

[REDACTED]

From: Wakako Hirose [REDACTED]
Sent: 17 February 2015 14:23
To: Planning Policy
Cc: Chloe Ballantine
Subject: Brentwood Borough Local Plan Strategic Growth Options Consultation
Attachments: Consultation Questionnaire Asphaltic Developments.pdf; Site Location Plan.pdf; Brentwood Growth Option Rep Covering Letter 170215.pdf

Dear Sir/Madam

Please find attached representations to the current consultation on the Local Plan, lodged on behalf of our client, Asphaltic Developments Ltd.

I would be grateful for your acknowledgement of receipt of our submission and request that my details are included in your circulation list for future updates on the Local Plan and consultation.

Kind regards,

Wakako

Wakako Hirose

BA (Hons) DipTP MRTPI
Associate - Town Planning

[REDACTED]
[REDACTED]



[REDACTED]
[REDACTED]
[REDACTED]



[REDACTED]

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WH/159/30/3

17 February 2014

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

Email: planning.policy@brentwood.gov.uk

BY EMAIL

Dear Sirs

**RE: BRENTWOOD BOROUGH LOCAL PLAN 2015 - 2031 - STRATEGIC GROWTH
OPTIONS CONSULTATION - REPRESENTATIONS ON BEHALF OF ASPHALTIC
DEVELOPMENTS LIMITED**

We act on behalf of Asphaltic Developments Ltd and write in respect of the above consultation, to which we are instructed to submit representations.

As you are aware, our client has an interest in the Brentwood Leisure Park, in Warley, Brentwood, which is detailed on the enclosed site location plan (drawing ref: 159/30/3_SLP01). We previously submitted representations on the Preferred Options Local Plan consultation document in October 2013, to promote Brentwood Leisure Park's opportunity for housing development to be considered in the emerging Local Plan for the Borough.

Brentford Leisure Park is identified as one of the A12 corridor housing site options (site ref: 141) in the current consultation document. We consider that the Leisure Park site is a suitable and appropriate site for residential development in order to meet the Council's objectively assessed housing needs, which have increased to 5,500 homes in the plan period. As such, we request that the site's suitability and potential for housing development is recognised in the Local Plan through an allocation, as set out in the enclosed Consultation Questionnaire.

We request that our response to the "Consultation Questionnaire" is taken into account as part of the consultation exercise.

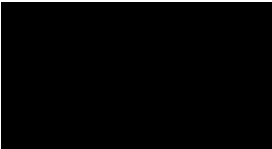
We respectfully request that the Council considers the representations in full and that those considerations will be reflected in the next stage of the document's preparation. We request that we are kept informed and updated of the forthcoming stages of the preparation of the Brentwood Borough Local Plan.

[Redacted signature block]



We will be pleased to provide further information or explanation on these representations should it assist. In the meantime, we look forward to receiving written confirmation that these representations have been received and duly made as part of this consultation exercise, marked for the attention of Wakako Hirose at this office.

Yours faithfully



Rapleys LLP



Enc.

Internal use only	
Comment No.	
Ack. date	



Brentwood Borough Local Plan

Strategic Growth Options Consultation

January 2015

Consultation questionnaire

This consultation questionnaire relates to the Brentwood Local Plan Strategic Growth Options Consultation and is provided for you to make comments. Please take the opportunity to read the consultation document before filling in this form and returning to:

Planning Policy Team, Brentwood Borough Council Town Hall, Brentwood, Essex, CM15 8AY
or by email to planning.policy@brentwood.gov.uk

Comments need to be received by 5pm on Tuesday 17 February 2015

If you need any help completing this form please contact the Planning Policy Team using the contact details given above or by telephoning 01277 312620.

Personal Details

Title: Miss	First Name: Wakako	Last Name: Hirose
Organisation (if applicable): Rapleys LLP on behalf of Asphaltic Developments Limited		
Job title (if applicable): Associate		
Address: [REDACTED]		
Post Code: [REDACTED]	Telephone Number: [REDACTED]	
Email Address: [REDACTED]		

Questions

The Council is seeking responses on key issues. Focused questions appear in bold boxes throughout the Strategic Growth Options document. These questions are summarised in this consultation questionnaire. More information can be found at www.brentwood.gov.uk/localplan.

Please use an additional sheet if necessary. Please note that all responses will be published online.



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

Yes No

Comments

With regard to the growth options, we agree that brownfield land should be utilised efficiently as part of future growth options for the Borough, and that there are brownfield development opportunities adjoining/surrounding the urban areas within the Green Belt.

We consider that in order to meet the Borough's objectively assessed housing needs, available brownfield land within the Green Belt should be utilised, which in turn would minimise the pressure on development of greenfield and undeveloped Green Belt sites. We therefore agree that brownfield development opportunities within the Green Belt should be actively promoted and utilised as part of the Borough's growth.

The Sustainability Appraisal ('SA') of the Brentwood Borough Local Plan (Interim SA Report January 2015) considers 5 options for growth, which include strategic sites on greenfield and agricultural land, as well as urban extensions (option 5). It states that it is appropriate to appraise Option 5, which would involve dispersing growth between a number of smaller sites, within or on the edge of existing urban areas, and more work would need to be undertaken to determine precisely which sites are best performing and should be developed, if it did transpire that the Council's preferred approach is Option 5. We consider that non-strategic brownfield sites which are connected to, or close to urban areas, thereby providing sustainable urban extensions, should be considered as one of the preferred options for the delivery of the Council's housing requirement. This is necessary to ensure a flexible and responsive supply of land, and to prioritise the re-use of previously developed land in line with national policy.



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

Yes No

Comments

? Q3: Do you have any comments on the appropriateness of particular sites? Yes No

Comments

Site Reference: 141: Brentwood Leisure Park

Brentwood Leisure Park is brownfield land within the Metropolitan Green Belt, in Warley, south of Brentwood. The site extends to 7.825ha in total (with that area of the site excluding the wooded area) extending to approximately 5.6ha. That part of the site, comprising the existing leisure park, including dry ski-slope, driving range, outdoor karting centre, a restaurant, a vacant indoor leisure centre and car park, represents brownfield land.

As advised in our previous representations, the Leisure Park site could come forward for redevelopment in the short to medium term, should the existing uses become vacant or unviable in terms of their ongoing operation. The site represents an available location for redevelopment and is a suitable (previously developed) site for residential use, at such a time when the existing uses become vacant or unviable.

The site offers a number of benefits, which lends it suitably for future residential development. These are as follows:

- The site can sustainably accommodate residential development, supporting the borough's objectively assessed housing needs;
- The site is considered suitable for removal from the boundary of the Metropolitan Green Belt, on the basis that its characteristics do not fulfil the purposes of including land within the Green Belt;
- The site is well placed in relation to the existing built form, and constitutes previously developed land, and is therefore a suitable location for growth as an extension of the urban area; and
- The site currently contains dry-ski slope, driving range, and go-kart track, which do not contribute to the characteristics of Green Belts, and housing redevelopment has the potential to facilitate the provision of appropriate landscaping, which would contribute to the landscape value and the characteristics of the Green Belt in the surrounding area.

The SA undertook a sustainability appraisal of Option 5, as a whole, rather than individual sites. In order to inform the allocation of sites for housing development, sustainability of each sites considered under Option 5 would need to be assessed individually. Brentwood Leisure Park is a sustainable site, when assessed against sustainability criteria, and does not have many of the constraints as identified in the SA Site Specific Baseline Issues for Option 5, as follows:

- There is no Air Quality Monitoring Area in the surrounding area and road network.
- The nearest station is less than 1.5 miles away (c. 1.2 miles). Additionally, the

nearest bus stop, which provides bus serves to Brentwood Railway Station and the town centres, is within easy walking distance of the site (0.3 mile). Therefore, the site is accessible in terms of public transport provision.

- The site is accessible in terms of local facilities – the nearest local centre, including Post Office, and General Practice are approximately 1.1 miles and 0.9 mile from the site.
- The site is not within or adjoins Flood Zones 2 or 3.
- The site is previously developed land.

Accordingly, the site is considered to be more sustainable as a housing site than other sites under Option 5 or other strategic sites on greenfield and agricultural land.

As the site is very close to the existing urban area, it is considered suitable for removal from the boundary of the Metropolitan Green Belt, on the basis that its characteristics do not fulfil the purposes of including land within the Green Belt, as set out in the National Planning Policy Framework (NPPF). Accordingly, the removal of the site from the Green Belt boundaries would not alter the position in terms of:

- i) Checking unrestricted sprawl;
- ii) Preventing neighbouring towns from merging;
- iii) Assisting in safeguarding the countryside from encroachment;
- iv) Preserving the setting and special character of historic town in the locality, and
- v) Assisting urban regeneration.

We therefore consider that Brentwood Leisure Park is an appropriate, suitable and sustainable site for housing development to deliver the Council's housing requirements, without undermining the fundamental aim of the Green Belt policy for the borough through preventing urban sprawl and encroachment to the openness of the Green Belt.



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?

Comments



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

Yes No

Comments

Yes. As commented under Question 1, we consider that the A12 corridor area, which has the majority of the existing towns and urban areas, should be the focus for growth to meet the Council's housing needs. This should be realised through the release of sustainable sites on edge of urban areas, including appropriate brownfield sites within Green Belt, such as Brentwood Leisure Park (as detailed in our comments under Question 3). It is considered that sustainable urban extensions are in line with national policy, through prioritising the utilisation of previously developed and are necessary to ensure a flexible and sufficient supply of land.



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 the Green Belt)?

Comments



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?

Yes No

Comments



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?

Yes No

Comments

? Q9: Are there opportunities for more open space provision in the area where you live? Yes No

Comments

? Q10: Please rate the level to which you value the landscape near where you live (on a scale of 1 to 5), as compared to other areas within Brentwood Borough, for the following aspects:

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
Historic Interest	1	2	3	4	5
Tranquility	1	2	3	4	5
Other – please specify:	1	2	3	4	5

? Q11: To what extent do you think the following are present in the landscape near where you live (on a scale of 1 to 4):

Aspect:	Absent	Occasional	Frequent	Predominant
Houses	1	2	3	4
Commercial / Industrial buildings	1	2	3	4
Nature Reserves / Wildlife	1	2	3	4
Farmland	1	2	3	4
Woodland	1	2	3	4
Degraded / Derelict / Waste land	1	2	3	4
Infrastructure (Road / Rail / Pylons etc.)	1	2	3	4
Leisure / Recreation Facilities	1	2	3	4
Other – please specify:	1	2	3	4



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

Yes No

Comments



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

Comments

Thank you for taking the time to complete this questionnaire

Please ensure that you return comments to the Council by 5pm on Tuesday 17 February 2015
(see page 1 for details)