[redacted]

From: Matt Driscoll [redacted]
Sent: 17 February 2015 14:07
To: Planning Policy
Subject: RE: Growth Options Consultation - Fairview
Attachments: Site Location Plan, Fairview, Magpie Lane 001.jpg; Strategic Growth Options Comment - Fairview.docx

Dear Sirs,

On behalf of our client, Robert Mullholland & Co., please find attached a completed consultation questionnaire for the Strategic Growth Options Consultation.

If you have any queries, please do not hesitate to contact me.

Kind regards

Matt Driscoll MRTPI
Associate

T: [redacted]
M: [redacted]
E: [redacted]
W: [redacted]

THE JTS PARTNERSHIP LLP
[redacted]

150216 MJD/

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: Mr	First Name: Matthew	Last Name: Driscoll
Organisation (if applicable): The JTS Partnership LLP on behalf of Robert Mulholland & Co Ltd		
Job title (if applicable): [redacted]		
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

The Borough logically splits itself into three identified areas, which are of different character. The Borough contains two main infrastructure corridors, with more rural villages to the north and each area provides different development opportunities. The growth figure of 5,500 dwellings for the next 15 years is supported, however it is considered optimistic that 2,500 dwellings will come from the brownfield sites within the urban area.

? 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

As stated within Question 1, the growth figure of 5,500 dwellings for the next 15 years is supported, however it is considered optimistic that 2,500 dwellings will come from the brownfield sites within the urban area.

It is evident therefore, that some Green Belt land will have to be released in order to meet the objectively assessed target. As a result, it is recommended that a detailed review of Green Belt boundaries is undertaken. Over the years a number of anomalies have been created by inept drawing of the Green Belt boundaries. There are quite a few examples, for instance, of the Green Belt boundary cutting across the middle of a residential curtilage or wrapping around a single site. This makes no sense at all, and should be corrected.

The Green Belt boundary should be established on a strong defensible line. This should be a clearly defined and reasonably permanent physical feature in the landscape, such as a river, road or railway. Drawing the boundary across the middle of fields or gardens is totally unsatisfactory and even field boundaries may not be sufficiently permanent to form a reliable long-term boundary. At the very least, the Green Belt boundary should exclude existing residential development (except,

where acknowledged, the Green Belt 'washes over' the entire village) and this exclusion must extend to the whole of the residential curtilage. What is required is not a straight line but a clearly defined and readily defensible boundary.

The Council should follow a hierarchical approach to identifying land to meet residential need, along the following lines:

1. Existing urban areas
2. Existing developed sites in Green Belt
3. Review of Green Belt boundaries to ensure consistency with para 84 and 85 NPPG guidance. Boundaries to follow clear, recognisable, physical features and Green Belt not to include land which is unnecessary to keep open (such as land surrounded by development or which is part of a village).
4. Release of sites on the edge of existing settlements.
5. New settlements (Dutton Garden Suburb).

It is only by following a hierarchical approach, and analysing the impact of the Green Belt at each stage, that the Council can assure itself that the overall impact of the Green Belt will be minimised.

If this analysis justifies the release of the Dunton Garden Suburb then (for the reasons that we indicate in the following question) it is very unlikely that it will make any contribution to current 5 year housing supply or that will be built out in this Local Plan period. It is an allocation that will cover two Local Plan periods and the Council will therefore need to allocate additional land in this Local Plan.

We would like as part of this submission to confirm support for the allocation of a parcel of land at Fairview, Magpie Lane, Brentwood. (see attached Site Location Plan). The site would fall within criteria 2 of the above approach to identifying land. The site is a brownfield site and is harmful to character and visual amenity in its locality. It is predominantly used as a waste transfer station and generates excessive heavy goods vehicle traffic on the local rural road network. The allocation of the site for residential use possibly with a small element of appropriate employment space would improve local amenity and provide resources to relocate the business.

A preliminary assessment indicates that up to 25 dwellings of range of sizes and tenures could be accommodated on the site, helping meet local housing need and improving the character and appearance of the area.

? 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

The focus of this submission is centred on the A12 Corridor. However, proposals for development at West Horndon are supported, in principle. Questions continue to be raised regarding viability, sustainability and deliverability of these sites and whether

there is sufficient evidence to demonstrate that they could come forward within the plan period. Representations will be made separately to the Dunton Garden Suburb Consultation; however it is considered that this development fails in four of the five purposes of the Green Belt (Paragraph 80 of the NPPF). Such a suburb would: -

- Encourage the sprawl of large built-up areas (Basildon/Laindon);
- Potentially merge Laindon with East Horndon and West Horndon. Laindon itself is already merged with Basildon
- Further encroaches upon the countryside, creating a continuous stretch of development on the southern side of the A127, running from Nevendon to the A128.
- Failing to encourage the recycling of derelict and other urban land.

Questions are also raised over the deliverability of The Dunton Garden Suburb. Basildon Borough Council's Local Plan process has been set back, with the Council not expecting adoption until late 2018. Brentwood Borough Council will not be able to adopt their cross-boundary Development Plan Document until it is agreed and adopted by Basildon Borough Council. The proposals do not provide sufficient detail to demonstrate the deliverability of such a scheme and whether there is reasonable prospect of the full delivery of 2,500 dwellings within the 15 year period.

? Q5: Should the A12 corridor accommodate growth by releasing sites on the edge of urban areas? Yes ✓ No ☐

Comments

As part of the review of the existing Green Belt boundaries, development on sites on the edge of urban areas within the A12 corridor is supported.

? 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

It is appropriate to consider brownfield sites within villages, on the edge of villages and within smaller hamlets for development to meet housing need. Whilst less sustainable than town centre development such schemes can contribute to housing supply for local rural needs and affordable housing. Greenfield sites in sustainable locations are likely to need to be considered for development even after appropriate brownfield sites are developed.
It is questioned as to the extent of brownfield land available within villages. Given currently Green Belt restrictions, most of that land which was previously in brownfield use is likely to have been considered for development (under Paragraph 89 of the NPPF, an exception to inappropriate development is the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not

have a greater impact on the openness of the Green Belt). The brownfield land that is available within the Green Belt is generally found in more unsustainable locations outside of village boundaries. As a result, it is considered that, if in more suitable locations, Greenfield sites on the edge of villages should be considered.

? 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

No further comment.

? 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

No further comment.

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

Comments

No further comment.

? 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 / Attractivness	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
Infastructure (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

No further comment.

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

Comments

No comment.

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)