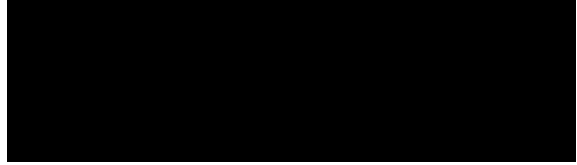




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Date: 13<sup>th</sup> March 2015

Planning Policy Team  
Brentwood Borough Council  
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Dear Planning Policy

**London Borough of Havering response to Brentwood Borough Council consultation on Strategic Growth Options**

Havering welcomes the opportunity to comment on the above Local Plan document. Our comments are set out below and, as referred to in our previous correspondence, these supersede the comments submitted on the 17<sup>th</sup> February 2015.

Potential development sites (A12 Corridor)

The document identifies a number of sites in the A12 Corridor Housing Site Options section which are adjacent to the Havering borough boundary - specifically sites 175B and 175C (Land at M25, Junction 28, Brook Street) - which are identified as potential mixed-use development sites and site 32 (Land east of Nags Head Lane) which is identified as a potential housing site.

It is acknowledged that all sites in the document are potential development sites only at this stage, and that no detail on the type, scale and form of development is provided. However, Havering has specific concerns about sites 175B and 175C being taken forward into the Draft Brentwood Local Development Plan, regardless of the form of development (housing or mixed use). Both sites are in the Green Belt and development on this land would have significant impact on the character and openness of Green Belt. Development of these sites and site 32 (also Green Belt land) would result in a form of ribbon development along the A12 from Brentwood / Brook Street to the Havering boundary. Site 175C falls

within the M25 and is adjacent to the Ingrebourne Valley Metropolitan Site of Importance for Nature Conservation (SINC) and any development would have a significant impact on the openness and character of eastern entrance into Havering from the A12. This would be contrary to the long established purpose of Green Belts (as set out in paragraph 80 of the National Planning Policy Framework) to prevent neighbouring towns merging into one another and to safeguard the countryside from encroachment.

In addition, development of these sites would have significant transport implications, with a considerable potential adverse impact on Havering's section of the A12 and the A127 and the rest of 'our' road network, particularly the Gallows Corner junction but also through displacement elsewhere into the Havering highways network, especially when there are difficulties elsewhere on the strategic road network.

The A12 and the A127 are the responsibility of Transport for London (TfL) within Havering. Both roads are essential elements of the highway infrastructure of Havering and are fundamental to traffic being able to get into and out of the borough safely and conveniently. Havering's residents and businesses as well as those further afield are highly dependent on these key routes for day to day living and business prosperity. Both highways are already heavily trafficked and there is considerable concern that additional traffic using these routes linked to development in Brentwood will adversely affect traffic flows and have a detrimental environmental impact through additional noise, pollution and vibration. Gallows Corner is already a significant 'hotspot' in traffic terms and the Council has recently highlighted to Transport for London the importance of major improvements and for increased resilience for this part of the highway network.

#### Potential development sites (A127 Corridor)

The document identifies site 101A (Land at Cobham Hall, including M25 work site at A127/M25 Junction 29) as a potential new employment site - Brentwood Enterprise Park. This is in line with its identification in the 2013 Preferred Options report. As this is adjacent to the Havering borough boundary, the Council will want to see further detail on proposals for this site should it be taken forward into the Draft Brentwood Local Development Plan later in 2015.

Development of this site would have significant transport implications, with a considerable potential adverse impact on Havering's section of the A127, which is already at or close to capacity in the peak periods in both directions.

#### Gypsy and traveller sites

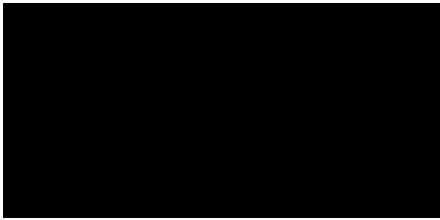
Appendix 1 of the documents lists 19 existing gypsy and traveller sites in Brentwood, a number of which are in the Navestock area, close to the Havering borough boundary. However, only 10 of the 19 sites are identified on the maps on pages 16 to 19. Further clarification on where all 19 existing sites are located is

necessary. Information on pitch numbers on each existing site should also be included.

The document notes that the Council will need to consider national policy and the conclusions of the 2014 Essex Gypsy and Traveller Assessment when preparing the Draft Brentwood Local Development Plan. This version of the plan should include current and future pitch numbers and details of new or extended existing sites for comment.

I hope that these comments are helpful. Please contact me if you have any questions regarding this.

Regards



Peter Hall

Development Planning Team Leader