

BY EMAIL

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

17 February 2015

Dear Sir or Madam,

BRENTWOOD LOCAL PLAN 2015-2030: STRATEGIC GROWTH OPTIONS AND DUNTON GARDEN SUBURB CONSULTATIONS (JANUARY 2015)

These representations have been prepared on behalf of Threadneedle Property Investments and sets out comments in response to Brentwood Borough Council's (BBC) Strategic Growth Options Consultation (SGOC, January 2015). Alongside the SGOC, BBC is also consulting on the 'Dunton Garden Suburb Consultation' (DGSC, January 2015). This is a joint consultation with Basildon Borough Council and is considered relevant to the SGOC.

Threadneedle Property Investments have a controlling land interest in a site at West Horndon Industrial Estate, Childerditch Lane and Station Road, West Horndon that are referred to in the SGOC as Sites 020 and 021 (hereafter referred to as 'the Sites'). Notwithstanding our Client's specific land interest, these representations have been prepared in objective terms and in the light of the prevailing planning policy framework – in particular the Government's guidance set out in the National Planning Policy Framework (NPPF) (March 2012) and National Planning Policy Guidance (PPG) (March 2014).

These representations follow earlier representations submitted with respect to the Council's Strategic Housing Land Availability Assessment (SHLAA, January 2010) & Employment Land Review (ELR, January 2010) and Preferred Options Local Plan (POLP, July 2013), where we have promoted part of the West Horndon Industrial Estate for residential-led mixed use purposes.

Purpose of the SGOC

The SGOC document (para 1.10) advises that, following consultation on the Preferred Options Local Plan (POLP, July 2013), several issues need to be reconsidered:

- **Objectively Assessed Housing Need** - the need to increase the proposed housing target in line with the requirements of National Policy;
- **Crossrail** - the need for additional evidence on the economic impacts arising from the arrival of Cross rail and other related impacts;

- **Dunton Garden Suburb** - Basildon Borough Council's proposals for a strategic allocation in Dunton up to BBC's boundary;
- **Sustainability** - Renewable Energy policies to be renewed; and
- **Planning for Gypsies and Travellers** - a new assessment for all Essex authorities has been produced.

BBC is therefore consulting on areas for potential growth and specific sites across the Borough to inform the emerging Local Plan. The document includes all "site options" put forward/promoted for development in previous stages of the emerging Local Plan.

Whilst the consultation is welcomed, it should be recognised that the majority of Evidence Base documents which will inform the emerging Local Plan (as listed at Para 1.13 of the SGOC) are still "forthcoming". Without the availability of such evidence, the extent to which respondents can take an informed view on where future growth should be located is limited. The same applies to BBC in progressing to the next stage of the Local Plan.

Proposed Housing Target

BBC's previous POLP (July 2013) proposed a housing target of 3,500 dwellings to be built in the Borough across the Plan period (2015-2030), with an annual delivery rate of 200 dwellings per annum (dpa) during 2015-2020, rising to 250dpa during 2020-2030.

The POLP also included an "alternative housing requirement" of between 331 to 362 homes per year, based on an assessment of OAN undertaken by Peter Brett Associates (PBA). This approach was rejected due to concerns about Green Belt release, congestion in Brentwood Town Centre, limited infrastructure capacity and impact on the rural character of the Borough.

In response to objections to the POLP (including from neighbouring authorities), recent Planning Inspectorate decisions on other Local Plan Examinations, and the NPPF requirement for plans to be "positively prepared" and supported by technical evidence, BBC has revisited its position.

The SGOC now suggests a housing requirement of approximately 360dpa, i.e. 5,500 dwellings over a 15 year plan period, in line with the "upper end" of the Objectively Assessed Need (OAN) as identified in the PBA report referred to above. The SGOC identifies that the capacity of brownfield sites in urban areas over 15 years is 2,500 dwellings, some 3,000 short of total OAN. As a result, BBC accepts that the use of the Green Belt to accommodate unmet housing need will need to be considered. The SGOC sets out possible spatial distribution options that are being considered by BBC as means for meeting the Borough's OAN.

Our client supports the uplift in the housing requirement for the Borough proposed by BBC.

Content of Representations

These representations seek to focus on promoting the merits the Sites subject to our client's interest. The SGOC lists thirteen questions that BBC is seeking responses to. Accordingly, these representations have been prepared using these questions as a structure. The questions are grouped into five broad subject areas, which comprise the following:

1. Managing Growth
2. Sustainable Communities
3. Economic Prosperity
4. Environmental Protection and Enhancement
5. Quality of Life & Community Infrastructure

These matters are dealt with in turn below.

Managing Growth

The 'Managing Growth' section of the SGOC confirms that 2,500 dwellings can be accommodated on brownfield land within the Plan period, and therefore, in order to meet the increasing housing target, BBC need to identify additional allocation sites within the Green Belt for residential development.

Para 2.12 confirms that the new Local Plan will need to set out a spatial strategy for where development of all kinds will be located, and for the purposes of the SOGC, the Borough has been split into three areas:

- (a) North of the Borough;
- (b) A12 Corridor;
- (c) A127 Corridor

West Horndon, and the Sites themselves, are located within the A127 corridor.

The SGOC poses two questions on growth options, which we address in turn below:

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

Paragraph 2.12 confirms that the three broad areas identified within the SGOC have been drawn up to focus on existing transport corridors. Para 2.13 confirms that each of the areas should not be considered in isolation, with each having different issues to consider, and with the potential to accommodate different approaches to development.

Our client supports the broad areas for growth that have been identified. It is recommended that BBC ensures the spatial strategy that has led to the identification of these broad areas is supported by a robust, wide ranging and up to date Local Plan Evidence Base that considers the effects on and means of improving existing infrastructure, assesses the sustainability of individual settlements, the capacity of the landscape to accommodate development and the availability of suitable sites for development.

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

Our client supports the high level "issues" identified in relation to each of the broad areas identified. An extensive amount of land is available for development in the West Horndon area in particular, West Horndon benefits from public transport links and access to the A127. Whilst the need for improvements to existing infrastructure is acknowledged, this can readily be achieved through the planning process and effective plan making.

Our client also notes that BBC's Landscape Character Assessment (LCA, September 2006) concludes that this area has a "moderate" sensitivity to change, compared to "high" sensitivity in the remainder of the Borough. Whilst the LCA requires updating, we do not anticipate substantial changes to the conclusions of this assessment. Specific areas for future growth in these locations will need to be carefully chosen with priority given to brownfield land in accordance with NPPF and NPPG objectives. We also note the Government's current consultation 'Building more homes on brownfield land – consultation proposal' (January 2015) that seeks views on proposals for measures to make it easier to build on brownfield land suitable for housing.

In order to continue to support the approach set out in the SCOG, it is recommended that BBC ensures its Local Plan Evidence Base is up to date and robust.

Sustainable Communities

Section 3 of the SGOC relates to the creation of “sustainable communities” and poses 4 questions, which are as follows:

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

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?

And

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)?

Our client supports the identification of new homes to be constructed on land to the west of West Horndon. Our client’s site, which is part of the West Horndon Industrial Estate and forms part of the land identified as part of the Strategic Allocation (Site Refs: 020 & 021), is a brownfield site that is located in close proximity from West Horndon train station and is therefore a highly sustainable and accessible location that would be ideal for residential development.

Paragraph 17 of the NPPF sets out the core land-use planning principles that should underpin both plan-making and decision-taking. Point 8 listed under paragraph 17 of the NPPF seeks to “encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided it is not of high environmental value”. In our opinion, site allocations 020 and 021 contained in the SCOG are supported by the objectives of the National Planning Policy Framework (NPPF) and will assist BBC in meeting its significant housing needs.

As set out above, BBC is consulting on the proposed “Dunton Garden Suburb” alongside the SGOC. This is a joint consultation with Basildon Borough Council to explore a potential opportunity for cross boundary development in the Dunton area. BBC states that by developing this potential option, there would be less pressure to develop elsewhere in Brentwood in order to meet housing need.

The site area of “Dunton Garden Suburb” is also located within part of Broad area “A127 Corridor” and West Horndon. The suggestion at Para 3.12 of the SGOC that the Dunton Garden Suburb is an alternative to strategic Greenfield / Green Belt development along the A127 corridor, rather than an addition to, is however not supported. Whilst it would be inappropriate to allocate both a new settlement and large strategic greenfield allocation within this area, there is a danger that the proposals for Dunton Garden Suburb will unduly erode the open gap between the settlements of West Horndon and Dunton. In addition, supporting a significant urban extension to Dunton may also be perceived as BBC allocating a substantial proportion the Borough’s future housing need in one area of the Borough.

Our client considers that the development of the proposed strategic allocations to the west of West Horndon avoid issues of settlement coalescence and would help to ensure the Borough’s urgent housing needs are met in the shorter term without needing to rely on fewer more substantial sites that may be more difficult to deliver.

This said, notwithstanding the outcome of this public consultation and whether BBC decides to pursue the allocation at Dunton Garden Suburb, the allocation of existing brownfield sites in the Green Belt for housing purposes should continue to be supported. The re-use of brownfield sites is a priority over and above the release of Greenfield land. What is more, BBC should allocate a range of site sizes and not rely on a single large allocation at Dunton Garden Suburb in order to ensure the Council meet its housing required in the shorter term and to ensure a proportionate disbursement of development to meet the Boroughs needs.

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

In the event insufficient brownfield land can be found to accommodate BBC's housing needs, our client has no objection to consideration being given to releasing sites on the edge of urban areas within the A12 Corridor.

Economic Prosperity

Section 4 of the SGOC relates to planning for future jobs growth in the Borough.

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?

Our client agrees that the most suitable approach is to allocate new employment sites close to the strategic highway network. Care will, however, need to be taken to ensure a suitable balance between the transport effects of employment and residential uses so to avoid the local highway network becoming over burdened.

Our client also wishes to take this opportunity to point out that the provision of retail and commercial leisure floorspace in West Horndon will not be delivered unless new homes are constructed in this location in order to create the necessary critical mass and demand to sustain its existence. This level of demand is likely to be generated through the construction of new homes in West Horndon, rather than in Dunton Garden Suburb.

We would, however, reiterate our comments made in response to BBC's previous consultation on the POLP that in view of the urgent need for housing in BBC any new mixed use development in West Horndon should refer to this Strategic Site Allocation as a "residential-led mixed use development".

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?

Our client has no comments in relation to this particular question.

Environmental Protection and Enhancement

Section 5 of the SGOC poses three questions relating to open space and landscape, and asks respondents to score the value of the landscape near where they live.

Para 5.8 advises:

As part of the landscape evidence currently being undertaken, it would be helpful to gain an insight into how many people view their local landscape where they live. Answering the following two questions will help inform the landscape evidence before it is published, which will then inform the decisions

Whilst we have no objection to the Council seeking to gain an understanding of local resident's perceptions of landscape "value", the outcomes of the survey should not be used to inform the landscape evidence currently being produced. This should be an Objective assessment undertaken by a qualified professional.

Quality of Life & Community Infrastructure

We would agree with the general Infrastructure considerations set out in Section 6 of the SGOC.

Site Allocations 020 & 021: West Horndon Industrial Estates

Our client supports the inclusion of Sites 020 and 021 as part of the West Horndon Strategic Allocation identified in the 'A127 Corridor Housing Site Options' contained in the SCOG.

The site allocation at West Horndon Industrial Estate are identified in BBC's SHLAA (October 2011) as a 'Potential Brownfield Sites'. The Site (refs: B188 & B189) is considered suitable for a medium density typology, however, we consider that a higher density typology should be considered in these locations due to their proximity to the station in the heart of West Horndon.

SHLAA sites are considered to be 'developable' and 'deliverable' if assessed as being 'available', 'suitable' and 'achievable'. As set out in the SHLAA, the identified industrial estate land to the west of West Horndon meets all these criteria:

- **Available: - the Sites are available now.** There are no insurmountable site constraints or legal / ownership issues which might prejudice development. The sites are in single ownership and the units are leased out. The leases are all due to expire and the owners are interested in mixed use residential-led development.
- **Suitable: - the Sites are ideally located for accommodating a highly sustainable development.** They comprise brownfield land within the West Horndon urban settlement boundary. These sites are readily accessible with good links to the A127 and close to West Horndon train station.
- **Achievable: - the Sites are deliverable in the next five years.** The Sites are not constrained by any landscape or environmental designations, although it is noted that the sites lie within a Landscape Improvement Area. The sites may require remediation prior to development as a result of its use as an industrial estate.

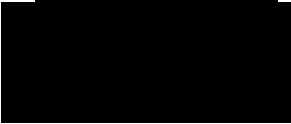
Our client is aware that BBC has suggested that approximately 250 dwellings could be constructed on Site 020 (the equivalent of 39 dwellings per hectare). However, on the basis that this site is located close to the settlement centre and its train station, our client considers that a greater density of development could be achieved in this location. We therefore respectfully request that Brentwood Council increases the approximate density for this site to a minimum of 320 dwellings (the equivalent of 50 dwellings per hectare).

To conclude, our client fully support BBC's recognition that the Local Plan needs to be revisited following consultation on the POLP, notably that the proposed housing requirement has increased in the light of OAN. Our client's site has great potential to meet Brentwood Council's housing needs and help deliver socio-economic infrastructure improvements for the residents of West Horndon. The redevelopment of our client's site for residential-led mixed use purposes would also result in a reduction in heavy vehicle traffic and noise impact through the settlement, which has been identified by local residents as a high priority during the Council's public consultation exercise.

We therefore support Council's aspiration to encourage new residential-led mixed use development in West Horndon, particularly the redevelopment of the West Horndon Industrial Estate (Sites 020 & 021).

We would be grateful if the above representations could be taken into account when considering the next stages of the Local Plan preparation process.

Yours faithfully,



JUSTIN KENWORTHY
Director

CC: Threadneedle Property Investments