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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:

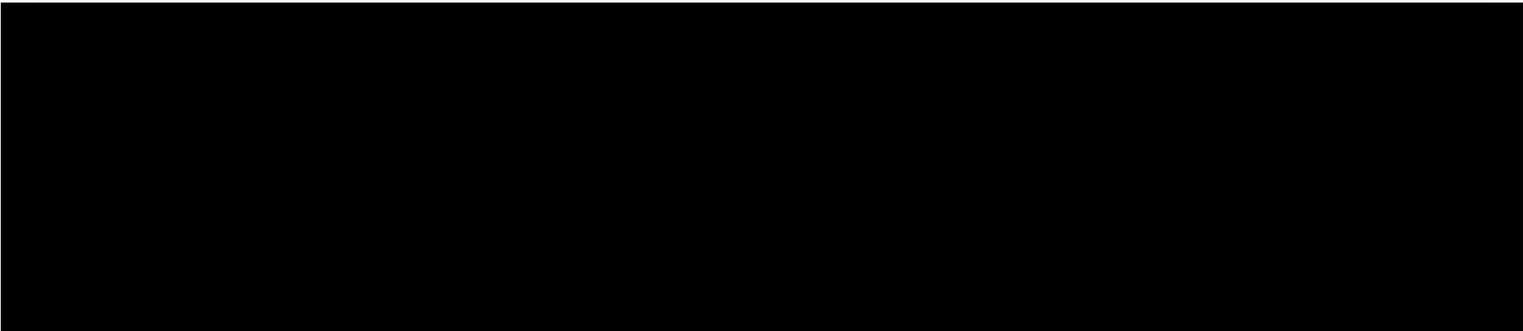
Planning Policy Team, Brentwood Borough Council Town Hall, Brentwood, Essex, CM15 8AY
or by email to planning.policy@brentwood.gov.uk

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: Michael	Last Name: Carpenter
Organisation (if applicable): CODE Development Planners Ltd on behalf of Commercial Estates		



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 three broad areas for considering approaches to growth have emerged from evidence gathered both as part of the current consultation process and the earlier evidence prepared to inform the 2013 Preferred Option consultation.

Plan makers should ensure that the current evidence gathering and consultation exercises are used to sensitivity test some of the earlier conclusions. For example, the strategic objective of “directing development growth to the existing urban areas of Brentwood, Shenfield and West Horndon” may need to be revisited if the new evidence suggests that an effective strategy to meet housing requirements in full would be to develop a suitable large scale greenfield site still within the preferred broad area but on land currently in greenfield use divorced from the three identified **urban** areas.

In analysing the scale of development requirements in the Borough and within the preferred broad areas it will be essential to ensure that the evidence base concerning the full objectively assessed housing and employment needs is up-to-date and robust. The requirements of the National Planning Policy Framework (NPPF) to achieve a ‘sound’ plan emphasise the need for a ‘positively prepared’ and ‘justified’ Plan with up-to-date and proportionate evidence.

We are entirely supportive of the statements in paragraph 2.11 and 3.3 of the SGOC:

“2.11 – However, in light of the changes since 2013, the level of growth required is now higher, specifically the need to meet full housing need.”

3.3 – The shortfall from previous years will also need to be taken into account in the future Plan period, which will increase the overall housing need figure. If the Plan period is extended to 20 years then the need will also increase proportionately over that period.”

In reviewing the evidence base it will also be important to review the previous belief that 2,500 homes can be accommodated on available brownfield land within the Borough.



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

Yes No

Comments

We broadly agree with the issues raised within each of these areas. The most substantial issues are likely to relate to greenbelt release and infrastructure constraint / potential for improvement. The Interim Sustainability Appraisal (SA) report prepared by URS and dated January 2015 represents a useful start to the assessment of reasonable alternatives. It is noted that Option 1 (Dunton) is identified as ranking high in the order of preference under a number of appraisal headings.

It is worth noting that where Option 1 might be seen as scoring less well there are likely to be appropriate mitigation solutions. This would be likely to apply for example in the cases of cultural heritage, flooding and soil / contamination.

The attached Appendix A represents an early and more detailed assessment of the potential delivery advantages of development at Dunton.

All of the Options assessed in the interim SA and any development in the three broad areas will require the release of greenbelt land.

The evidence base has always indicated that the strategic objective to “safeguard the greenbelt ...” cannot mean no encroachment into the greenbelt. There are clearly ‘exceptional circumstances’ to justify the alteration of the greenbelt. Under paragraph 83 of the NPPF a review should be undertaken through the preparation of the Local Plan taking into account the five purposes of the greenbelt (paragraph 80 of the NPPF) and the need to adopt a sound plan – ‘positively prepared’, ‘justified’, ‘effective’ and ‘consistent with national policy’.

In order to satisfy the need to produce a sound plan a comprehensive greenbelt review study should be undertaken so that the impacts of all reasonable alternatives can be properly assessed and noted.



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

Comments

Paragraph 3.12 of the SOCG rightly identifies a potential housing site option at Dunton. This option is considered in more detail within the interim SA. In our view, this option should more accurately be described as a mixed use development option. The economies of scale and location with existing access to the major junctions of the A127 afford it the opportunity to make a major and unique contribution to achieving the three dimensions of sustainable development noted in the NPPF – economic, social and environmental.

Appendix A represents an early and more detailed assessment of the potential delivery advantages of development at Dunton.

In our view there is also a sixth reasonable alternative option to investigate as part of the evidence base which could be designed to concentrate on the delivery of Brentwood Borough Council’s requirements only. A standalone settlement at Dunton which is not dependent on the delivery of other land to the east in the adjacent Borough Council area or on the development of land to the west of the A128. Assessment of such an option does not have to commit the Council at this stage to such a form of development but in order to make any subsequent plan ‘sound’ an objective assessment should be undertaken.

Such an alternative could potentially bring forward all the benefits and advantages discussed in Appendix A on land wholly within Brentwood Borough and in one ownership. This would ensure that, together with other land elsewhere in the Borough, the Brentwood Borough Local Plan delivered its full housing need in a sustainable location and form rather than relied upon the potential uncertainties associated with the delivery of land in a different local plan in a different local planning authority area. It could also be designed to maintain a meaningful and sustainable separation between any new development and the existing village of West Horndon.

We suggest that Brentwood Borough Council need to consider seriously the opportunities afforded by such a reasonable alternative in the provision of a Plan which is ‘positively prepared’, ‘effective’ and ‘consistent with national policy’.



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

In our view, the scale of housing and employment requirements in the Borough will require the delivery of a large scale development site able to provide a full range of onsite community facilities and essential offsite infrastructure improvements.

While there may be opportunities for some small scale development within or on the edge of West Horndon the scale of development required to meet full housing and employment need would 'swamp' the existing village with an existing infrastructure designed for a smaller scale village and less able to accommodate additional demand.

The alternative of a new large scale development either as a suburb associated with the western edge of Basildon or a standalone settlement would deliver the benefits and community explained in Appendix A without the dis-benefits of over developing the existing village of West Horndon.

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

Comments

The A12 corridor is likely to be considerably more constrained than the A127 corridor and less capable of mitigation. This is likely to apply most particularly to the ability of the existing road network to accommodate substantial growth.

Although there may be some limited opportunity to release small sites on the edge of urban areas very clear evidence of infrastructure capacity and delivery of necessary improvements will be required. It will also be necessary to test the value and importance of each site against the five purposes of the greenbelt judged against all reasonable alternatives.

The reference in paragraph 3.13 of the SOCG to the release of brownfield land and consideration of the impacts on infrastructure and services is highly relevant. It is not always the case that brownfield land within urban areas is suitable for release for housing purposes. New housing development within urban areas can have a substantial negative impact on infrastructure and services and can also lead to the loss of important existing uses such as employment. The creation of a genuinely sustainable pattern of development and a sense of community in accordance with the policies of the NPPF requires a mix of uses within easy travel distance of one another.

? 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

Although there may be some limited opportunity to provide for local need on greenfield sites located on the edge of villages the capacity or existence of local infrastructure and services are likely to limit the available opportunities.

Limited brownfield land release may also be a possibility but it will be essential to ensure any losses of existing uses does not render communities and development patterns less sustainable.

The existence of brownfield uses in the countryside and greenbelt locations often, as noted in paragraph 3.15 of the SOCG, for waste and scrap uses, perform an essential function. Policies should not, therefore, encourage their redevelopment. In any case, the focus of the NPPF is to achieve sustainable development in three dimensions – economic, social and environmental. The development of existing small brownfield sites unable to provide their own closely related services and travel options is unlikely to accord with the policies of the NPPF.



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

The general nature of modern employment uses requires easy and safe access to the strategic road network. This avoids the difficulties and dangers associated with commercial HGVs and large traffic volumes conflicting with the domestic scale usage of residential roads and community facilities.

There is clearly a continuing need to encourage suitable employment uses across a full range of employment sectors. Locations will need to be carefully selected.

As illustrated in Appendix A, there are substantial opportunities to deliver important and sustainable employment areas at Dunton with its easy access to both the A127 and A128 routes and the ability to site the various uses to avoid conflict.



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

N/A



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

Yes No

Comments

Opportunities for more open space provision within the Borough are often limited by the availability of land and funding.

With reference to the A127 corridor there is no doubt there remains a need for additional open space and public access to the countryside. Development of a large scale form of development as illustrated in Appendix A affords a genuine opportunity, not available in smaller allocations, to make a substantial improvement to the availability of open space and public access. This is one of the guiding principles of garden city development.

In addition to public access the development would enable the delivery of improvements and enhancements to biodiversity habitats. In order to be found ‘sound’ the Local Plan will need to demonstrate how it delivers the enhancements to public access and biodiversity in the greenbelt as required by paragraph 81 of the NPPF:

“Once greenbelts have been defined, local planning authorities should plan positively to enhance the beneficial use of the greenbelt, such as looking for opportunities to provide access; provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land.”

? 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

The headings in Section 6 of the SOCG identify the principal areas of infrastructure consideration.

As stated in paragraph 6.1:

“A key consideration when assessing new development sites will be their contribution to objectives and policies set out within the quality of life and community infrastructure section.”

As illustrated in Appendix A, the promoter at Dunton is entirely aligned with the objectives set out in the quality of life and community infrastructure section. Indeed these are an essential element of garden city principles.

The Infrastructure Delivery Plan (IDP) referred to in paragraph 6.3 will be an essential evidence base document of the Local Plan. Together with appropriate viability testing the Local Plan should test the deliverability of the chosen strategy.

As illustrated in Appendix A, the economies of scale offered by a large scale development will afford the greatest opportunities for the delivery of necessary infrastructure improvements in line with garden city principles.



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

Comments

The priorities for infrastructure spending will be led by the chosen pattern of development and individual site allocations.

The promoter of land at Dunton is currently undertaking initial infrastructure investigations which can be made available to the Council and fed into any further IDP evidence.

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)