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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:

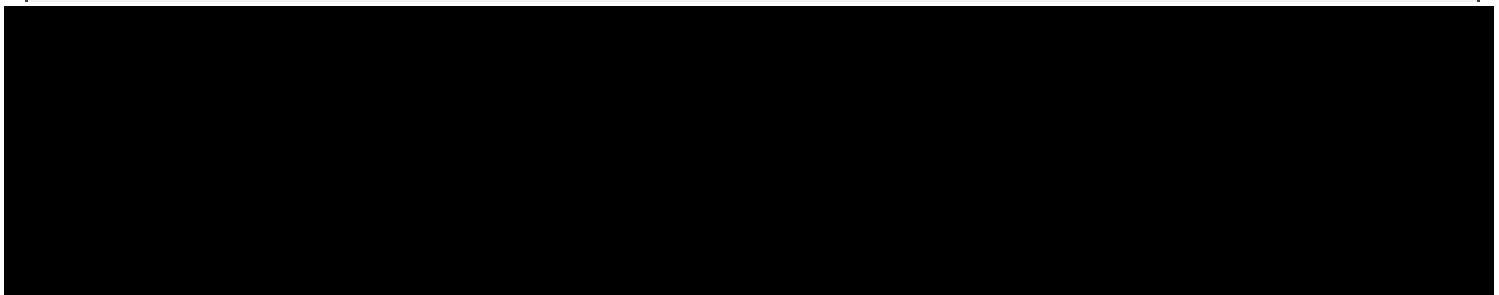
Planning Policy Team, Brentwood Borough Council Town Hall, Brentwood, Essex, CM15 8AY
or by email to planning.policy@brentwood.gov.uk

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: Mike	Last Name: Taylor
Organisation (if applicable): Chilmark Consulting Ltd.		
For and on behalf of Barwood Land and Estates Ltd.		



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 comments for Barwood Land and Estates Ltd. (Barwood Land) made herein in response to each of the Consultation questions must be read in conjunction with Barwood Land's previous submissions and representations to the Brentwood Borough Local Plan preparation process.

Barwood Land submitted representations concerning the spatial planning options for future development and growth in the Borough to the *Brentwood Local Development Plan Preferred Options 2015 – 2030 Consultation* (July 2013).

Those representations set out Barwood Land's concerns with respect to the alternative options for locating growth, the level of proposed housing delivery (particularly the need to ensure that the Plan meets the full, objectively assessed housing needs of the Borough) and the deficiencies in adopting a spatial pattern of growth that did not recognise the inherent sustainable development benefits of focusing growth in and adjacent to the highest order settlements, particularly Brentwood.

Section 2 (Managing Growth) of this *Strategic Growth Options Consultation*, 2015 document now proposes that the Borough be split into three separate areas: North of the Borough; A12 Corridor; and the A127 Corridor.

The 2013 Preferred Spatial Strategy, previously consulted upon, identified options for growth based on various levels of centralisation or dispersal. Those options were framed against an understanding of the roles and functions and the hierarchy of settlements in the Borough and critically reflected the sustainability merits of focusing growth towards the higher order settlements such as Brentwood first and foremost.

The approach proposed in the *Strategic Growth Options Consultation* is a somewhat artificial sub-division of the Borough apparently based upon road corridors according to paragraph 2.12 rather than a wider spatial understanding of the role and function or hierarchy of settlements.

The division into three areas rather under-values the importance of Brentwood as the highest order settlement in the Borough. It does not fully recognise the important inter-relationships in meeting the full objectively assessed housing need with sustainable development (including the justified release of land from the Green Belt in sustainable locations) consistent with the existing hierarchy of settlements in the Borough.

While it is acknowledged that paragraph 2.13 indicates that the three broad areas "*cannot be seen in isolation*" the division does not reflect functional housing or employment markets in the Borough and could form the basis for an artificial sub-

division of housing or employment growth requirements that may not deliver the most sustainable form of development to meet the Borough's growth needs.

Barwood Land recognises that it is for the Borough Council to make its own decisions about how and where to apportion future housing and employment growth.

While there are some limitations to the broad areas approach, provided the underlying purpose of spatial planning (that brings together economic, social and environmental matters in an integrated way to achieve sustainable development) is consistently applied, the broad areas offer a reasonable mechanism through which to assess the plan's growth options. This is reflected in the National Planning Policy Framework's (NPPF) presumption in favour of sustainable development detailed in paragraphs 6, 7, 8, 14 and 15 and forming the core planning principles set out in paragraph 17.



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

Yes No

Comments

The issues raised for each of the broad areas appear to reflect a somewhat partial and limited view of the critical matters facing the various urban and rural settlements in the Borough.

There is little that explains or describes in detail the importance or weight to be attached to the issues identified and the Borough Council should give greater consideration to the inter-linkages between issues that affect the whole Borough.

The sub-section concerning Growth Options (page 12 and paragraphs 2.12 and 2.13) correctly identifies that future housing growth, in meeting the full objectively assessed housing needs of the Borough, would require the use of Green Belt land as there is insufficient capacity in the stock of previously developed sites.

Indeed, Brentwood Borough will need to demonstrate that it has fulfilled the requirements of the Duty to Co-Operate and worked constructively with other authorities in the Housing Market Area to understand and help accommodate unmet housing needs that may arise. As part of the process the Borough should identify sufficient new sites with contingencies to meet its own housing requirements. This must be clearly established as an issue relevant to the whole Borough and particularly to the A12 Corridor that contains the highest order settlements and centres of Brentwood and Shenfield.

Turning specifically to the A12 Corridor, the following issues are considered to be critical by Barwood Land:

- Paragraph 2.17 identifies that there are development opportunities surrounding the urban areas within the Green Belt. This is an important and

accurate point, as such sites are able to contribute to meeting the Borough's objectively assessed housing needs in a sustainable manner reflective of the established spatial pattern and hierarchy of settlements.

- The transport context for the A12 Corridor issues set out in paragraph 2.17 includes reference to Brentwood's access via the A12 to the M25, but would benefit from a more substantive reference to the committed Crossrail development currently under construction which will significantly enhance the connection of Brentwood to employment, services and facilities in London and to the west. Paragraph 2.3 indicates this point but the A12 Corridor analysis itself does not fully recognise or expand upon the significant economic and housing growth demand implications arising from Crossrail for Brentwood.



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

Comments

Figure 8 at page 16 provides a helpful overview map of housing and mixed-use site options that have been put forward for consideration. The text at paragraph 3.9 identified that the sites shown in Figure 8 include those considered within the Strategic Housing Land Availability Assessment (SHLAA) and also in the 2013 Preferred Options Consultation.

There are two sites that Barwood Land comment upon now as set out in the sub-sections below.

A12 Corridor - Honeypot Lane – Site 022

Land at Honeypot Lane (site 022) is identified in the A12 Corridor Housing Site options (page 18, Figure 10) and also referenced in the list of potential sites in Appendix 1 (page 36).

Barwood Land supports the identification and allocation of Land at Honeypot Lane. Brentwood is an appropriate location for a sustainable urban extension such as that which could be provided on land at Honeypot Lane.

Land at Honeypot Lane extends to some 10.9 hectares and is situated to the west/south-west of Brentwood adjacent to the existing built-edge of residential properties on Honeypot Lane and on Hill Road and South Weald Road to the south. To the west, the site is bounded by the A12 (with Weald Park beyond) and Weald Road to the north. Honeypot Lane provides an important link between the A1023 London Road to the south and Weald Road to the north.

The site is enveloped on three sides by the existing built-form of Brentwood. It is also contained within the existing landscape and topographical structure of the western part of Brentwood, the A12 and Weald Lane. The site is situated below the hill crestlines of Brentwood and South Weald (to the west of the A12).

The site is not currently actively used, comprising pasture land and is largely clear of significant vegetation other than at its boundary edges.

Indeed, Honeypot Lane meets in full the SHLAA site criteria concerning suitability, availability and achievability for residential development as the *Draft Site Assessment, July 2013* previously concluded. The site can contribute significantly to the housing land supply in a sustainable location in Brentwood early in the plan period as it offers:

- close proximity between jobs, homes and open spaces,
- the potential capability to be accessed by public transport, on foot and by bicycle;
- a site that is readily deliverable now and can therefore contribute to the five year housing land supply of the Borough;
- a development opportunity that would not damage the distinctive character of Brentwood, or the overriding contribution of the Green Belt to Brentwood's quality of life, biodiversity and environment, which give it its character and distinctiveness;
- the opportunity to refine and re-align the Green Belt boundary using physical features that are readily recognisable and that would continue to form a logical, long-term and defensible boundary for the urban extent of the Borough.

A127 Corridor – West Horndon and Cross-boundary Development at Dunton

Figure 9 at page 17 shows the proposed combination of individual sites that would together form a larger extension to West Horndon (known as the 'West Horndon Strategic Allocation') offering some 1,500 dwellings. The land identified is contained in Sites 020, 021, 037, 038 and 126 and was previously indicated within the *Preferred Options Consultation* document, July 2013.

It is understood from review of the current Strategic Growth Options at paragraph 3.12 and Figure 9 that the latest proposals are to promote either the 'West Horndon Strategic Allocation' or the 'Dunton Garden Suburb Strategic Allocation' (Site 200, an area of land to the east of West Horndon stretching across the administrative boundary with Basildon Borough).

Paragraph 3.12 of the *Strategic Growth Options Consultation* notes that there is potential for larger growth opportunities in the A127 Corridor as part of strategic mixed-use allocations.

The 'West Horndon Strategic Allocation' and the 'Dunton Garden Suburb' alternative must relate fully to the existing pattern of settlements, the hierarchy of centres and the available infrastructure identified in the Borough in order to be sustainable.

In order to make the West Horndon allocation, or the Dunton Garden Suburb sustainable and viable (in accordance with all aspects of the NPPF definition of sustainable development) there would be a need for significant new social, community, transport, environmental and green infrastructure to be delivered which are costly requirements and will take some significant time to be provided and become fully established to the benefit of the future residents, with consequent

implications for the timing of delivery of housing.

Fundamentally the West Horndon allocation or the Dunton Garden Suburb proposals represent long-term, phased development schemes that are likely to make a significant contribution to housing and economic growth only in the latter part of the plan period.

In the meantime, there are other locations in the Borough, particularly sites in Brentwood such as Land at Honeypot Lane, through which new residential and economic growth can be secured early in the plan period, making best use of existing, available infrastructure. Such locations are well placed to maximise the benefits of new committed infrastructure arising from the Crossrail rail development that will be completed and operational by 2018, within the early part of the plan period.

? 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

Barwood Land's consideration of the proposed 'West Horndon Strategic Allocation' or the alternative 'Dunton Garden Suburb' allocation are set out in response to Question 3 above and not repeated herein.

The capacity for growth, while a relevant factor, should not be determinative of the location for growth alone. The Borough Council might wish to consider a more multi-dimensional assessment in order to form a complete analysis of potential locations for growth necessary to ensure that a sustainable form of development results in the Borough.

Available land capacity is, on its own unrelated to the existing spatial pattern of development, residential population, provision of services, employment and facilities. On this basis there are better-suited sites in locations within and adjacent to the existing higher order centres such as Brentwood that can provide an appropriate mix and choice of sites for future growth.



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

Yes No

Comments

The release of sites in the A12 Corridor area to accommodate growth is supported by Barwood Land.

The release of sites is necessary to ensure that the Borough is able to meet its objectively assessed housing needs in full, and to do so in areas of the Borough that offer the most sustainable development locations for growth.

The release of sites will inevitably require the review and release of Green Belt land. The NPPF is clear at paragraph 83 that Green Belt boundaries should only be altered through the preparation or review of the Local Plan. The plan-preparation process currently underway is therefore the appropriate point at which to review edge of urban area sites within the Green Belt and the *Strategic Growth Option Consultation* reasoned justification text at paragraph 3.13 (b) is therefore supported.

The Brentwood Local Plan needs to positively address national policies to boost housing delivery, economic growth and sustainable development. This should include a clear process of consideration and careful assessment of the use and release of Green Belt land that could contribute to these national priorities.

The town of Brentwood must retain its status as the highest order settlement in the Borough and be the focus for future growth through the release of sites because:

- it is the settlement with the largest existing population in the Borough;
- it contains the main employment areas (Brentwood Town Centre, Brentwood Station and Warley Business Park);
- it contains the main retail areas (focused on the High Street);
- it has excellent rail accessibility and connectivity (that will be further enhanced with the Crossrail rail line development); and
- it is the focus of the main identified public transport routes and services within the Borough.

Given the extensive Green Belt designation covering much of the Borough, new dwellings have historically been provided by increasingly scarce opportunities from the redevelopment of larger brownfield sites, with the remainder comprising contributions from a sizeable number of small infill developments within defined settlement boundaries. For the future, these development opportunities are either limited (i.e. an increasing shortage in available brownfield sites or under-used employment land), or have site specific challenges such as being too small to make a significant contribution to sustainability objectives, particularly where their development would result in an over-intensive land use pattern.

In accordance with Barwood Land's response to Question 3, the Local Plan should consider development in sustainable locations in Brentwood where:

- there is close proximity between jobs, homes and open spaces, capable of

- being accessed by public transport, on foot or by bicycle;
- sites are readily deliverable;
- development would not damage the distinctive character of Brentwood, or the overriding contribution of the Green Belt to Brentwood's quality of life, biodiversity and environment, which are highly valued by the local community, and which give it its character and distinctiveness;
- the Green Belt boundary can be reviewed and re-aligned using physical features that are readily recognisable would continue to form a logical long-term and defensible boundary for the urban extent of the Borough.

Honeypot Lane (site reference 022 in Appendix 1), as assessed through the Strategic Housing Land Availability Assessment (SHLAA), is a clear example of a site that fulfils all of the criteria for release from Green Belt and has the ability to make a significant, positive contribution to sustainable development and growth of Brentwood early in the plan period.

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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

Dispersed development at the edges of villages and small settlements (irrespective of whether they utilise greenfield or previously developed sites) does not always offer an optimal approach to ensuring the creation of sustainable communities.

There is of course merit to making provision for new development in existing villages to specifically support rural housing needs and ensure the future for existing services and facilities; however such provision should be limited in order to respect the character and scale of those smaller settlements and to avoid unsustainable patterns of movement.

As a counterpoint, it is the larger, higher order settlements such as Brentwood, that offer the greatest opportunities to meet local housing, economic and service needs in a wholly sustainable manner.

The focus for future growth should therefore be towards the higher order settlements and to identified sites, such as Honeypot Lane, Brentwood (site 022) that are capable of delivering sustainable development in all its dimensions early in the plan period.



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

Section 4 of the Strategic Growth Options Consultation sets out the proposed approach for employment site options. Paragraphs 4.4 – 4.9 identify that the Local Plan will need to consider the most appropriate locations for employment land, while paragraph 4.2 indicates a need for up to 23 hectares of additional employment land (depending upon the future housing growth scenario ultimately adopted).

Paragraph 4.9 highlights the importance of retaining existing employment land in suitable locations such as industrial estates and office locations. This is supported by Barwood Land insofar as the assessment of such sites' future role and function must be appraised in accordance with the requirements of the NPPF at paragraphs 20 and 21 and the guidance in Section 3 of the NPPG at paragraph 003 concerning the re-appraisal of previously allocated employment land to assess whether circumstances have changed which would alter their suitability for economic development.

Future employment needs require a balanced approach to the consideration of employment site locations and options. This analysis is complex and nuanced and should consider a wider set of criteria than identifying locations close to the strategic highway network.

The NPPG is clear on this matter at Section 3 in paragraph 016. This paragraph considers that there is a range of relevant site assessment criteria (including site size; location; current land uses and character; physical constraints; potential environmental constraints; development progress; and the suitability of fit of proposed sites for particular employment uses). Paragraph 019 then advises that sites and broad locations for employment land should be guided by: the Development Plan and national policy; and critically market/industry requirements in the functional economic market area.

Barwood Land consider that the location of new employment sites should accord with the NPPF and NPPG and must therefore be consistent with the principles of securing sustainable development in all its aspects. In practice this means that employment site opportunities should be in proximity to the areas of established and future working population and at locations that are accessible by a range of means of transport, including public transport. It does not automatically follow that the most sustainable approach to meeting employment need in Brentwood Borough would be to allocate sites closest to the strategic highway network.

Indeed, such an approach would underplay the economic potential of Crossrail that will significantly enhance the accessibility of Brentwood town and Shenfield to

centres of employment outside the Borough in a wider functional economic market area and also enhance the opportunities for business to attract a skilled labour force from within the Borough and from elsewhere.

Furthermore there will be a range of employment needs arising (in terms of the location, size and nature of employment sites/floorspace) from different economic sectors and occupiers that in turn have diverse requirements for B Use Class floorspace. Access to the strategic highway network may, or may not, be a priority for different sectors and occupiers. Paragraphs 4.5 – 4.6 of the Strategic Growth Options identify the diversity of employment site requirements but need to more fully substantiate the conclusion drawn that locations close to the strategic highway network are most appropriate because “they meet modern business needs”.

Finally, the approach of allocating new employment sites predominantly on strategic highway networks should be properly considered against the requirements of the NPPF at paragraph 37 aiming to create a balance of land uses in order to minimise journey lengths for employment; and paragraph 38 with respect to encouraging the promotion of a mix of uses, including work on-site for larger scale residential developments.



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

Barwood Land has no comment to make in relation to this question.



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

Yes No

Comments

Barwood Land has no comment to make in relation to this question.



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:

Barwood Land has no comment to make in relation to this question.

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):

Barwood Land has no comment to make in relation to this question.

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

Barwood Land considers that the range of potential headline infrastructure considerations set out in paragraphs 6.4 – 6.11 appears appropriate for analytical purposes.

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

Comments

As noted in response to Question 12, the range of potential headline infrastructure considerations set out in paragraphs 6.4 – 6.11 appears appropriate for analytical purposes.

However Barwood Land consider that it should be the role of the proposed *Infrastructure Delivery Plan* in combination with the work to be undertaken in assessing a Community Infrastructure Levy (CIL) for the Borough and in light of the identified housing, employment and other land allocations in the Borough that determines the priorities for infrastructure spending.

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)