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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: Miss	First Name: Sophie	Last Name: Pain
Organisation (if applicable): Pegasus Group		
Job title (if applicable): Senior Planner		

## 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](http://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

Yes, the Borough needs to consider growth in each of the identified broad areas in order to meet its objectively assessed need. Specifically, the promotion of growth within the A12 corridor will enable improvements to be made to the surrounding transport network, possibly even to the A127, given the position of Herongate to the north.



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

Yes  No

### Comments

We consider that the main issues of each area have been raised in the document and that opportunities for improvements have been identified within the A12 corridor and that through development, the opportunity for improvements to be made to the A127 to alleviate its congestion problems and support further growth within this area could be possible.



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

### Comments

It is considered that our client's site (land between Heron Close and Billericay Road) is sustainable as it abuts the existing development boundary of Herongate. Policy CP13 of the 2013 Preferred Options, document proposes a Green Travel route passing through the village. The objective of this route is to link Brentwood town centre with strategic allocations at West Horndon to the south, thereby providing a sustainable public transport route. Development on the eastern edge of Herongate would be well placed to take advantage of the proposed Green Travel route.

Our client's site is a sustainable site that does not have any complex ownership requirements to obstruct its delivery. It is a Greenfield site that is not known to have any constraints such as remediation requirements that could impede its development. As such, given the sites sustainable location and its ability to be delivered within a 5 year period, it would assist with the delivery of homes for the Borough as identified within the objective assessed needs study.

There is a concern that the Garden Suburb at Dunton is proposed as an alternative to development at other strategic sites in the Borough, as suggested in the Strategic Growth Options document. We do not consider that this would be an appropriate strategy for Brentwood and instead would be supportive of Dunton as a means of providing some of the development needed by both Councils, as referred to in the Dunton Garden Suburb Consultation. This would allow for both strategic site allocations and the Garden Suburb to be brought forward as a robust strategy for housing delivery. We request that this ambiguous matter is clarified in future versions of the strategy.

It would be concerning if Dunton Garden Suburb were solely relied upon to deliver the identified shortfall of 3,000 dwellings. This is because while the illustrative masterplan within the Garden Suburb consultation demonstrates some parcels of housing would fall within the administrative boundary of Brentwood, thereby assisting with the housing needs as identified within the OAN study, further information indicates that if approved, any development is likely to take a minimum of 8 years before anything could happen on site and a further 10-15 years before the development is completed. Therefore, if Dunton Garden Suburb is solely relied upon to deliver an additional 3,000 dwellings, a time delay of at least 8 years within a 15 year plan period would be detrimental to the Borough meeting its OAN.

The allocation of sites such as land between Heron Court and Billericay Road will provide Brentwood with a range of sites that enable a flexible approach to housing delivery and ensures that land comes forward within the plan period. To rely upon Brownfield sites and Dunton Garden Suburb to deliver the required housing could mean that the housing may not be delivered within the 5 year period due to unknown variables associated with developing previously developed land. For this reason, we consider that the identification of additional sites within Herongate, should be thoroughly considered as it is deliverable within the shorter term and will assist with meeting the Boroughs objectively assessed need.



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

We consider that Brentwood should consider all options available to them in order to deliver housing within their administrative boundary, including appropriate greenfield sites that abut the development edge of settlements.



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

#### Comments

The Strategic Growth Options document identifies proposed sites within the A12 Corridor that are either Brownfield sites within urban areas or to require the release of sites within the Green Belt that adjoin urban areas. The nature of Brownfield sites can mean that their deliverability is unpredictable due to existing operational uses, complex land ownerships, possible loss of employment uses and likely remediation works that would be required.

While our client's site has not been identified as an allocation, it is positioned adjacent to the urban edge of Herongate, which was identified as part of the 2013 Preferred Options, Draft Assessment as a Larger Village. Whilst Martin Grant Homes recognise the proposition that most new development will be focused upon Brentwood and Shenfield, the scale of the future housing requirements arising in the period to 2030 will inevitably require the considered release of land from the Green Belt in Larger Villages. It is considered that our client's site would provide an appropriate scale and balance of development in this vicinity which would meet the longer term needs of the Borough as identified in the objectively assessed needs study. It is considered that a limited release of land on the eastern side of the settlement between Heron Court and Billericay Road would not be in conflict with the Green Belt purposes identified at paragraph 80 of the NPPF.

? 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

Brentwood's Interim Five Year Housing Supply 2013-2018 (2014) identifies that during 2001 – 2012 the total number of housing completions in the Borough was 2533, 433 more than the RSS target. While the Borough under-delivered for three of those years, overall Brentwood have used their previous cumulative delivery rates to substantiate a 5% buffer when calculating their 5 year land supply. Despite this, the Borough is unable to demonstrate a 5 year supply, only 4.29 years.

Further to this, given the Borough's reluctance to release any appropriate land from the Green Belt, the five year housing land supply relies upon allocated sites on brownfield land. While the report highlights that the Borough does not consider that there are any constraints on these allocated sites that would jeopardise their delivery by 2018, realistically the nature of brownfield sites means that their deliverability can be uncertain.

Given that it is approaching two years into the five year period and few of these sites have delivered any housing, along with the fact that Brentwood are unable to demonstrate a 5 year housing land supply, we are of the view that it is imperative for a range of sites to be considered including appropriate Greenfield sites on the edge of urban areas such as the identified land at Herongate in order to bring forward an appropriate supply of housing and provide a more flexible approach to delivery.

The Objectively Assessed Need for the Borough has concluded that 360 homes are required per year during 2015-2030. The capacity of all Brownfield sites within urban areas in the Borough could provide for a maximum of 2,500 new homes, some 3,000 short of the total number needed during the 15 year plan period. For this reason, all options available to Brentwood should be considered and that in order to provide for the forecasted local need a strategy that incorporates both Brownfield sites and those Greenfield sites on the edge of settlement boundaries would provide for a flexible and robust strategy for the delivery of 5,500 houses within the administrative boundary of Brentwood.



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 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 comment.



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

Yes  No

**Comments**

No 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 / 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

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? 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**

No 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)