



BRENTWOOD LOCAL PLAN 2015-2030 PREFERRED OPTIONS CONSULTATION (JULY 2013)

REPRESENTATIONS SUBMITTED ON BEHALF OF COUNTRYSIDE PROPERTIES (UK) LTD IN RELATION TO LAND AT DODDINGHURST ROAD

Colliers International, on behalf of our client Countryside Properties (UK) Ltd, are instructed to comment on the Brentwood Local Plan 2015-2030 Preferred Options document. We wish to make representations on the following sections:

Chapter 1: Strategic Objectives

The eleven strategic objectives are included in the Local Plan to realise the overarching vision for the Borough. Whilst we agree in general with the strategic objectives set out in the plan, we wish to specifically support the following:

- SO2 - Manage development growth to that capable of being accommodated by existing or proposed infrastructure, services and facilities.
- SO8 - Plan for housing that meets the needs of the Borough's population and contributes to creating inclusive, balanced, sustainable communities.

However, whilst we acknowledge the need to safeguard the Green Belt and areas of landscape value, as set out at a national level within the NPPF, this should not be at the detriment to the ability to deliver the objectively assessed needs of the Borough and provide the most sustainable growth option for the plan period. The Borough's Metropolitan Green Belt is currently drawn tightly around the existing settlements. We believe that in order to achieve the strategic vision by 2030, growth should be focused to the town of Brentwood and a review of the Green Belt boundary should be undertaken in order to release enough land to accommodate the identified objectively assessed needs.

Therefore, we strongly object to strategic objective:

- SO7 - Safeguard the Green Belt and protect and enhance valuable landscapes and the natural and historic environment.

Chapter 2: Spatial Strategy

Policy S1 'Spatial Strategy'

We object to the proposed approach taken to establishing the spatial strategy for the Borough, in particular to not focus the majority of growth in and around the town of Brentwood and position to maintain the current Green Belt boundaries.

We believe that the development of the West Horndon Opportunity Area offers the potential for sustainable development over a strategic long term vision. In order to meet the required growth levels and deliver the strategic objectives of the Plan, Brentwood should be the focus of the majority of



housing delivery for the plan period and a review of the Green Belt for the release of land should be undertaken in general conformity with Alternative Option 1.

Brentwood is considered the most sustainable location for growth given its excellent transport links, existing social infrastructure, access to jobs and services and should be the focus of growth for this plan period. This approach requires the allocation of greenfield sites in the form of small scale urban extensions. We also have a number of concerns regarding the delivery of a number of identified brownfield sites within the development boundary which should be factored into any Green Belt release. Even with the current housing target for the plan period, to which we object below, there is a clear need to provide a contingency due to the possibility that the housing target could be further reduced by issues of individual site deliverability.

The Plan acknowledges that the Preferred strategy is to accommodate only a proportion of the Borough identified needs, advising that capacity constraints means that it is not possible to fully accommodate the scale of growth required to meet its objectively assessed needs. The capacity constraints identified relate to the harm to the landscape, Green Belt, settlement identity and character and town centre traffic congestion. This approach is not compliant with the NPPF, whereby the Green Belt policy (para 80) is not seen as an outright prohibition on development in the Green Belt. The NPPF allows LPAs to review their Green Belt boundaries where it would meet the objectives of the Plan which includes meeting housing need. Indeed releasing greenfield land on the edge of settlement boundaries, within sustainable locations, would be in compliance with the principles and aims set out in the NPPF.

The development of our clients' land off Doddinghurst Road (either side of the A12) as a housing allocation is considered essential to the achievement of the strategy vision through the delivery of strategic objectives SO1, SO2, SO8 and SO10.

The site is located within a highly sustainable location to accommodate a small scale urban expansion and is within a single ownership with no known constraints to its deliverability. The opportunity would be developable within the first 5 years of the plan period and should be defined as a strategic housing use allocation in the Local Plan for approximately 230-250 dwellings.

Policy S2 'Amount and Distribution of Residential Development 2015-2030'

Policy S2 refers to the amount and distribution of residential development between the plan period (2015-2030). We object to the Preferred Option which seeks a provision of 3,500 net dwellings at an annual rate of 200 units up to 2020 and 250 units per annum thereafter to 2030.

The approach is based on a justification that the figure represents a provision that is above the former RSS figure, however, below the objectively assessed need (Alternative Option 1) as any more growth would have a significant detrimental impact on the Green Belt, landscape, settlement identity and character.

The opening words of paragraph 47 of the NPPF outlines the need to boost significantly the supply of housing is a key national objective. It requires LPAs to ensure that its Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area (paragraph 47). Alternative Option 1 sets out the objectively assessed needs for the Borough which is to deliver



4,960 to 5,600 dwellings within the plan period. Therefore, the proposed option equates to only 60% of its housing need, leaving 40% unmet.

Brentwood Borough Council indicate in the justification section of the Plan that to meet this unmet need it is looking to neighbouring authorities to meet this unmet need, through the mechanisms set out in the NPPF and its Duty to Cooperate. The inability to identify within the Plan which adjoining LPAs have agreed to accept the outstanding figure shows a fundamental gap in the evidence base.

We have approached Basildon, Epping Forrest, Chelmsford, Uttlesford, Maldon, Rochford, South-on-sea and Castlepoint whom advise that whilst they have liaised with Brentwood under the Duty to Cooperate they have not engaged in detailed discussions regarding accommodating unmet housing numbers. Many of these LPAs are not in a position to facilitate any additional growth as they have fully adopted Local Development Frameworks, such as Chelmsford City Council, whereby any additional growth levels would need to be incorporated during a strategic review of its development plan.

The preliminary views from the Inspectors of both the Litchfield District Council Local Plan and Gravesham Local Plan Core Strategy Examination in Publics raise serious concerns about their soundness regarding the proposed total new housing provision as they do not make adequate provision for the objective assessment of housing need contained in their evidence base. We believe that the same conclusions are applicable to the Proposed Option in this case. Therefore, in order to be found sound, the Plan must seek to meet the full identified housing need and so must adopt the Alternative Option 1 and provide for between 4,960 to 5,600 dwellings.

We have further concerns relating to the preparation of the Local Plan and evidence base to direct key decisions, which should be prepared in advance in order to inform the Plan and its strategy, in particular the proposed housing provision. For instance, in June 2013 which was only two months prior to the current consultation period, Brentwood Borough Council stated proposed housing provision at a rate of up to 362 dwellings per annum as set out in the Brentwood Local Development Plan Newsletter (Issue 1, June 2013). Whereas, in July 2013 the figure had been fixed at a reduced rate of 233 dwellings per annum as set out in the Brentwood Local Development Plan Newsletter, (Issue 2: July 2013). However, there is no indication that Brentwood Borough Council has the evidence base for implementing a different strategy at such a late stage in the preparation process.

Chapter 3: Core Policies

Policy CP10 'Green Belt'

We recognise the need for retention of the Metropolitan Green Belt, as outlined in the NPPF. We object, however, to the strategy objective to making only minor amendments to the Green Belt. In order to meet the future needs of the Borough to 2030 there is an identified need to review and amend the Green Belt boundaries in order to accommodate growth in a plan led way.

The only feasible Alternative Approach, not currently identified as an approach within the Plan, is to release land where it is no longer serving Green Belt purposes as defined at paragraph 80 of the NPPF. This approach should be implemented through a review of the Green Belt boundaries, which when undertaken to deliver the objectives of the Plan is considered a warranted exceptional

circumstance to do so. The NPPF makes it clear that when reviewing Green Belt boundaries LPAs should take account of the need to promote sustainable patterns of development (para 84) and take into account the criteria set out in paragraph 85.

Our clients land at Doddinghurst Road (either side of A12) is located adjacent to the settlement boundary of Brentwood. The physical presence of key infrastructure roads, namely the A12 running through the site and Doddinghurst Road abutting the eastern edge, mean that the land is no longer providing a Green Belt function (as set out in para 80 of the NPPF) and would allow for a clear defensible Green Belt boundary along Doddinghurst Road. The Landscape Character Assessment (2006) includes the site within 'F8 Doddinghurst Wooded Farmland' which identifies the presence of the A12 disrupts the landscapes key characteristic of tranquillity becoming less rural in nature in this location. Our clients land meets the criteria set out in paragraph 85 and would allow the Plan's strategic objectives to be realised.

Chapter 4: Development Management Policies

Policy DM23 'Housing Land Allocations – Major Sites'

Our client objects to the exclusion of their site as a major housing allocation in the Plan. As set out previously in this representation, there is a clear need to allocate sustainable greenfield sites adjacent the settlement boundary of Brentwood in order to meet the Borough's full objectively assessed needs for market and affordable housing.

It is our view that land at Doddinghurst Road (either side of A12) is capable of fulfilling the role of a small scale urban expansion to Brentwood. The site comprises approximately 7.2 ha (full site plan shown in Appendix A) of greenfield land adjacent to the settlement boundary of Brentwood (as shown in Figure 1) and offers the ability to deliver 230-250 dwellings together with associated amenity and open space. It is bounded by residential development to the north, south, west and south east with commercial leisure to the north east; therefore would allow for a clear long term defensible Green Belt boundary.



Figure 1: Location Plan of land at Doddinghurst Road (either side of A12), Brentwood



The site offers the most viable major development opportunity in Brentwood and particular benefits include:

- Good access to public transport; approximately 1.4m from a train station and 3 no. bus services (routes 73, 73A, 261 and 657) along Doddinghurst Road to the east of the site.
- Access can be provided from a number of options including from Doddinghurst Road as well as secondary accesses from housing estate to the south, off Russell Close and Karen Close.
- Retained access points at Viking Way can be utilised - discussions have been undertaken with the Highways Authority who are keen to explore the East-West Permeability this would provide from Ongar Road to Doddinghurst Road.
- Close to established services and community facilities: 0.5m to nearest shopping parade (Ongar Road); 0.6m to nearer GP; 0.6m to nearest employment site; 1m to Brentwood Town Centre; and close to a number of Primary Schools and a Secondary School.
- Would not result in an intrusion into the countryside and would present an expectable release from the Green Belt, whilst providing a long term defensible boundary.
- Would not result in the loss of specific landscape, habitat or biodiversity designations. Allowing for the ability to create a green linkage from the urban area to the wider countryside and provide a landscape buffer between the development and the A12.
- Outside of a flood zone and not liable for flooding.

Strategic Housing Availability Assessment (SHLAA)

Land at Doddinghurst Road (either side of A12) was included and assessed in the SHLAA (October 2011) as suitable, available and achievable, determining that the site is deliverable in years 5-10. The SHLAA assessment notes that the site is located adjacent the existing settlement boundary, within close proximity to a number of services and facilities and would present a good infill development capable of accommodating 216 dwellings. The site is within a single ownership with no identified abnormal build costs and the detailed design of the scheme could accommodate any screening/buffer in relation to the A12 which crosses the site.

Draft Site Assessment

Land at Doddinghurst Road (either side of A12) is also included within the supporting document Draft Site Assessment (July 2013). The site is presented as capable of accommodating 288 dwellings and is assessed positively against all key indicators including sustainability, transport and environmental factors.

Our clients' site was discounted from inclusion as it does not meet the Draft Plan Spatial Strategy, namely that it lies within the Green Belt. However, it is our view that a review of the Green Belt and inclusion of our clients' site as a housing allocation is considered essential to the achievement of the strategy vision through the delivery of strategic objectives SO1, SO2, SO8 and SO10.

Housing Allocation

Land at Doddinghurst Road (either side of A12) is the most suitable and sustainable location for Green Belt release to accommodate major housing development, located within the key settlement of Brentwood. Extensive work has been undertaken by our client and a preliminary masterplan prepared

(Figure 2) which establishes that the site is deliverable within the beginning of the plan period. The site should be defined as a housing allocation in the Local Plan for 230-250 dwellings. The failure of the Plan to reflect the Site Assessment and SHLAA assessments with an allocation of the site will reduce the provision of housing in the borough in the short, medium and long term.



Figure 2: Indicative layout of site at Doddinghurst Road (either side of A12), Brentwood

Conclusion

We strongly believe that at this stage the approach taken by Brentwood Borough Council to preparing the Local Plan and put forward in this Proposed Options draft document is not justified, effective or consistent with the NPPF.

Concerns are raised relating to the preparation of the Local Plan and evidence base to direct key decisions taken. The fact that a number of documents have not been published in advance of the previous consultation stages or at this more advanced Proposed Options stage shows clear gaps in the evidence base; it is queried whether they are being retrospectively prepared to accord with the 'revised' strategy

In order to meet the strategic objectives in the plan period (2015-2030), growth can sustainably be directed to the town of Brentwood with due regard given to the longer term strategic vision needed to realise West Horndon Opportunity Area 'new settlement'. A review of the Green Belt boundary with the aim to release greenfield sites that abut the town of Brentwood should be undertaken, in order to accommodate the full objectively assessed needs for housing. Our clients land at Doddinghurst Road (either side of A12), capable of accommodating 230-250 dwellings, provides the opportunity to deliver market and affordable housing in the short term.