



**BRENTWOOD  
BOROUGH COUNCIL**

## Draft Local Plan

**2013 - 2033**

February 2016

## COMMENT FORM

From 10 February to 23 March 2016 we are consulting on the Draft Local Plan for Brentwood Borough. You can view and comment on the Draft Local Plan online at [www.brentwood.gov.uk/localplan](http://www.brentwood.gov.uk/localplan)

Alternatively, please use this form to share your views on the contents of the Draft Plan.

All responses should be received by Wednesday 23 March 2016

Please return forms to Planning Policy Team, Brentwood Borough Council, Town Hall, Brentwood, Essex CM15 8AY, or alternatively attach completed forms and email them to [planning.policy@brentwood.gov.uk](mailto:planning.policy@brentwood.gov.uk)

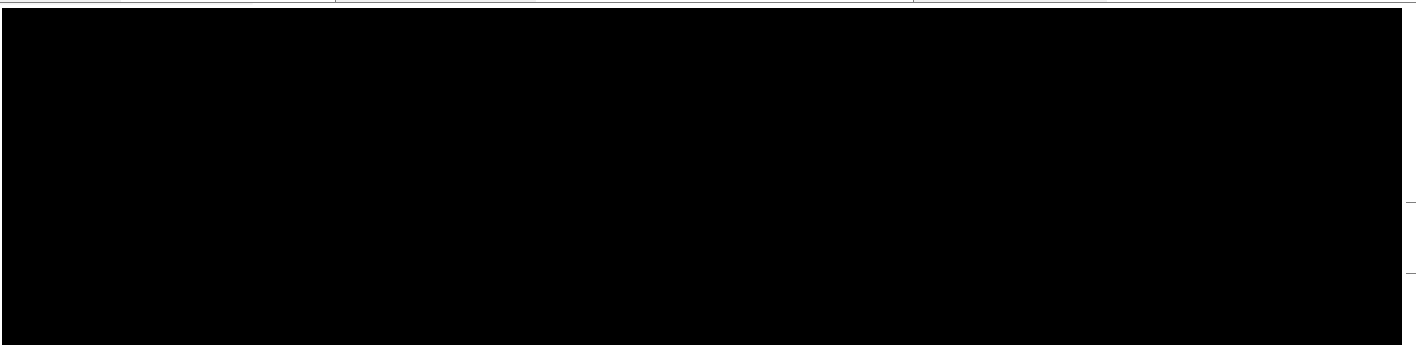
### Data Protection

All personal information that you provide will be used solely for the purpose of the Local Plan consultation. Please note whilst all addresses will be treated as confidential, comments will not be confidential. Each comment and the name of the person who made the comment will be featured on the Council's website.

By submitting this form you are agreeing to these conditions.

### PERSONAL DETAILS

Title:	Mr	First Name:	Roger	Last Name:	Blake
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## YOUR COMMENTS

Please indicate which section(s) of the Draft Local Plan you are commenting on (where applicable please clearly state the Policy reference or paragraph number):  
All - see statement below for individual paragraphs.

Please specify if you Support, Object or are providing a General Comment:  
(tick as appropriate)

Support

Object

General Comment

Comments (please use additional sheet if required):

**Brentwood Borough Council  
Planning Policy Team  
Town Hall  
Brentwood, Essex  
CM15 8AY**

**10<sup>th</sup> March 2016**

Dear Sirs,

**Brentwood Draft Local Plan (2013 -2033)  
Consultation Response from Doddinghurst Parish Council**

1. The Parish Council considers that the proposed document and its supporting material, the Site Allocation and Pattern Maps, are well-constructed and contain well thought through and comprehensive policies that the Parish Council supports overall.

The Parish Council would like to congratulate the Borough Planning team working on this project for their hard work in producing this Draft Document for consultation.

2. A number of detailed comments, observations and requests are made as follows:

Recommendations for improvement. (NB. Reference in this paper to the "LDP" means the Brentwood Draft Local Plan (2013 - 2033):

2.1 Whilst mapping of the Parish Council boundaries is in the Pattern book on Page 18 it isn't referenced anywhere in the LDP, but knowledge of the Parish Council boundaries would help better inform the reader and make some of the statements easier to understand. For example paragraph 9.58 on Page 142 is being interpreted by many as meaning the whole of the area of the Parishes listed (they are called settlements in the document) are urban when it is the established residential areas that are being referred to as an urban classification and excluded from the Green Belt. Clear understanding is not helped by the fact that the proposals map (Fig 9.2) isn't referenced in 9.58 and you have to read the glossary to understand what a proposal map is. Parish Councils are referred to on page 16 of the LDP para 2.40, so perhaps a reference to the mapping of the Parish Council areas could be included here?

2.2 Errors observed on Page 42 of the LDP. Hook End and Wyatts Green are not separate villages as implied in the "Cat 4 smaller villages" table but are wards of Blackmore Parish Council and are within the Blackmore Parish Council area. Stondon Massey and Navestock (which are separate parished areas) are missing altogether.

2.3 Page 93 of the LDP. The Willows, Place Farm Lane is within the boundary of Doddinghurst Parish Council and therefore the address should be Doddinghurst and not Kelvedon Hatch. This error is also repeated in the pattern book on page 30.

2.4 In comparison with historic housing growth in the Borough there are a very large number of dwellings (928) that are to be provided under the "windfall" allowance. We are concerned that, when the 255 non allocated housing and employment sites are studied this could lead to a planning blight in those area listed because all housing conveyance processes now ask for details of potential development in the area. The Parish Council therefore recommend that the non allocated site list is refined in the very near future, using the proposed LDP policies, to shortlist sites to meet the majority of "windfall" needs, rather than let a potential 10 year planning bun-fight start once the plan is adopted. At the moment people are being lulled into a false sense of security because the site allocation maps document omit potentially 100 or so sites where development will ultimately take place of 9 or more houses between now and 2033 to meet the proposed new housing targets.

2.5 LDP Policy 9.9 clause I. (NB has a stray "m" at the beginning). The Parish Council support the preservation of Bungalows but this particular clause relates only to the redevelopment of dwellings in the Green Belt. LDP Para 7.65 reflects on the fact that the population is aging but the need is not simply for specialist housing for the elderly. LDP Para 2.34 explains that there is a growth in numbers of the elderly in the Borough and para 9.76 expressly mentions giving older people the opportunity to downsize. This is no less so than in the villages, where there is a need for more bungalows for conventional retail purchase - not affordable or sheltered homes, to allow for the "churn" of people in the villages - for the elderly to "downsize" and families to "upsized" to the properties that now too large, or with gardens and stairs that are no longer an asset but a liability, for the aged. With the emphasis on affordable housing everywhere in the LDP the need for new bungalows has been somewhat squeezed out and there is no clear pathway in the policy document to facilitate this key provision - but with all the Green Belt safeguards that the Borough Council have rightly included. Can 9.76 perhaps reference approved Neighbourhood Plans as evidence of such requirement as well as the Council's Strategic Housing Market Assessment and local housing strategy?

2.6 LDP Policy 7.5 g (i). The Parish Council understands the drive for affordable housing but is nevertheless concerned about the possibility of unintended consequences of this policy clause which has the laudable intent of making new homes truly affordable in Brentwood, but, the Parish Council suspects that this approach could backfire badly in one of two ways, by either

- (i) Deterring development entirely, or
- (ii) By resulting in homes built to every minimum standard in the book in a race to the bottom in design with microscopic footprints and amenity space. In short, homes that are affordable but quite undesirable.

2.7 Green Belt and its development by stealth.

(i) The "Agricultural Business". One of the loopholes exploited by land speculators in the past and present (and we can point to several examples), is for an individual/ company to purchase a large green belt field, or either have (or purchase) an area of land behind their property, and then to set up a small scale rural business such as, e.g.: a stable; an egg farm; a mushroom farm etc. A typical approach will be where, sooner or later, an application will be lodged for some form of building annex where a person can live in order to tend "The Farm" and then in due course for this to be followed by an application for a full scale residential development. Once the residence is completed, the business soon seems to become unviable and ceases to trade, and the dwelling is sold for residential purposes.

(ii) As well as this approach we see the more clandestine method adopted in quiet backwaters where large screens or fences are put up to camouflage the field behind which small dwellings are constructed and then after 10 years a certificate of lawfulness is requested to make the development legal.

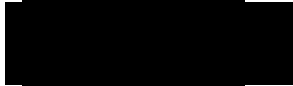
The question is, is there anything that can be done in the LDP to close these loopholes that are regularly exploited?

3. Consultation response approval.

The contents of this response to the Consultation detailed above has been agreed by the Parish Council have been as discussed at a meeting to review the LDP on the 7<sup>th</sup> January 2016.

Yours faithfully,

  
Deborah Dicker  
Chairman  
Doddinghurst Parish Council

  
Roger Blake  
Clerk & RFO  
Doddinghurst Parish Council

Thank you for taking the time to respond. Please return forms to Planning Policy Team, Brentwood Borough Council, Town Hall, Brentwood, Essex CM15 8AY, or alternatively attach completed forms and email to **[planning.policy@brentwood.gov.uk](mailto:planning.policy@brentwood.gov.uk)**