

# Consultation Response

**Brentwood Borough Council  
Draft Local Plan**

**On behalf of Mr. C. Lonergan**

**March 2016**





## INTRODUCTION

1. This representation for the Brentwood Draft Local Plan (DLP) 2016 is submitted by Strutt & Parker of behalf of Mr. C. Lonergan, owner of Salmonds Farm, Ingrave.
2. The site has been considered by the Council through its Strategic Housing Land Availability Assessment (SHLAA) 2011 and is referenced in the Site Specific Sustainability Appraisal (SA) as sites Nos.067a and 067b. To assist officers, a location plan is submitted with this representation.
3. The site is on land currently allocated as Green Belt in the Brentwood Replacement Local Plan (2005), but is situated immediately adjacent to the settlement boundary of Ingrave and Herongate. It is recognised that the settlement boundaries contained within the Brentwood Replacement Local Plan 2005 were predicated on the need to accommodate significantly less development than currently required, and this site is located in a sustainable position on the eastern edge of Ingrave, in an area of residential character.
4. The specifics of the site, and its sustainability for allocation for residential development, is addressed within this submission.
5. We have a number of concerns in respect of the proposed approach in the DLP, and fear that if the Council are to proceed in the current direction it will result in a plan that is unsound. Our concerns are detailed within this submission.
6. It is considered that land at Salmonds Farm, Ingrave, should be removed from the Green Belt and allocated for residential development in order to assist with the soundness of the Plan and to ensure it is deliverable.

## GENERAL PRINCIPLES OF THE NPPF RELEVANT TO THESE COMMENTS

7. Local Planning Authorities (LPAs) are expected to prepare local plans with the objective of contributing to the achievement of sustainable development in accordance with Paragraph 151 of the NPPF. This requires that plans should be consistent with the principles and policies set out in the Framework.

8. Paragraph 152 states that significant adverse impacts in economic, social or environmental dimensions of sustainable development should be avoided and alternative options should be pursued. One of the methods for assessing alternative options is through the Sustainability appraisal (SA). The Council has prepared a SA for the plan and a site specific SA for each of the sites. These are considered later in this submission.
9. Paragraph 157 of the NPPF sets out the expectations on LPAs when preparing their Local Plans. Crucially, Local Plans should (amongst other matters):
  - a. Be based on cooperation with neighbouring authorities, public, voluntary and private sector organisations;
10. Paragraph 159 requires LPAs to identify the scale and mix of housing the local population is likely to need over the plan which, among other matters, meets household and population projections, taking account of migration and demographic change; caters for housing demand and the scale of housing supply necessary to meet this demand.
11. Paragraph 173 of the NPPF concerns ensuring viability and deliverability of the Plan. It expects LPAs to give careful attention to viability and costs in plan-making. It states clearly that Plans should be deliverable.
12. Paragraph 177 states that ‘it is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. To facilitate this, it is important that local planning authorities understand district-wide development costs at the time Local Plans are drawn up. For this reason, infrastructure and development policies should be planned at the same time, in the Local Plan.’

## **WINDFALL DEVELOPMENT**

13. There is concern that the Council are placing an unjustified reliance and expectation on the supply of windfall development to meet the Councils objectively assessed need (OAN) for housing.
14. The DLP proposes to deliver 7,240 dwellings between 2013 – 2033 at a rate of 362dpa. The policy is reliant on 35% of housing from the untested strategic site of Dunton Garden Village (covered later in this representations) and 14% from Windfall allowance. Appendix 3 confirms the reliance on Windfall units of 50-108 dwellings each year between 2022 – 2033 (958 in total).

15. The Council's 2014 SHMA by DCA considered housing need across Brentwood, Braintree, Chelmsford, Colchester and Maldon Council areas. It concludes that Brentwood can be considered its own housing market area. Within this collective of Council areas, Brentwood is considered to share a market area with Basildon and Chelmsford (Paragraph.3.10.3). It concludes that between 288 – 384dpa are required with 35% affordable housing (DCA 2014).
16. Paragraph 48 of the NPPF concerns Windfall development and how this relates to calculating the 5year supply. Paragraph 24 of the guidance (ID:3-24-20140306) states that LPAs can identify broad locations in years 6-15 which could include windfall on the same criteria as Paragraph 48. Council's may include windfall where it is expected to provide a reliable source of supply. Allowance should be realistic having regard to the SHMAA, delivery rates and trends. This relates to the five year supply and should not be confused with plan making where the Council should aim to meet the full objectively assessed need as set out in Paragraph 159 of the NPPF.
17. Paragraph 5.43 of the DLP states that windfall will continue to contribute towards housing supply over the next 15 years. By definition, there is considerable uncertainty as to how much of a contribution windfall will be able to make towards housing delivery. It is far from certain that it will be able to make the level of contribution which the DLP assumes. It is considered that a properly prepared plan should not aim to provide around a seventh of its total housing requirement from windfall sites. It should instead be prepared to meet its full objectively assessed need from known sites. Windfall should provide a boost to housing supply and should not be relied upon for delivery when there are suitable, available and achievable sites identified in the SHLAA that would be able to meet the identified demand. Such sites include the land at Salmonds Farm, Ingrave, which is found to be suitable, available and achievable.
18. Paragraph 5.44 of the DLP confirms that the Council is '*keen not to rely on windfall*'. However, the approach adopted within the DLP appears to do just that, with windfall providing no less than 14% of supply between 2022-2033. The expectation of a high level of windfall is not based on evidence and it is not reasonable to predict a high supply of unallocated development to be delivered in later years when it is predictable that such sites are likely to diminish in availability over time. It is considered the Councils reliance on windfall is inappropriate and would not accord with Paragraph 182 of the NPPF. Such reliance would not be justified, effective or consistent with national planning policy.

## HOUSING DELIVERY

19. Paragraphs 2.26 – 2.30 of the DLP state the population and housing characteristics of Brentwood. This includes that there are very high house prices in the Borough. Section 3 sets out the vision for the plan, that it will respond to local community needs. Section 4 sets out the Strategic Objectives and Objective 3 (SO3) is to plan for housing that meets the needs of the Boroughs population and contributes to creating inclusive, balanced and sustainable communities.
20. It is recognised that the Council is deficient in providing a five year supply of housing land. It is therefore important to balance the strategic allocations with smaller sites, as these will generally have fewer constraints and can be delivered quickly to assist with meeting the persistent undersupply of housing in Brentwood. Such sites includes land at Salmonds Farm, which can be delivered within the first five years of the plan.
21. Paragraph 159 states that LPAs should identify the scale and mix of housing the local population is likely to need over the plan period which, among other matters, meets household and population projections, taking account of migration and demographic change; caters for housing demand and the scale of housing supply necessary to meet this demand.
22. The proposed plan does not account for migration from London, as identified in the PBA OAN report. This is contrary to the NPPF Paragraph.159.
23. Paragraph 5.17 of the DLP states that key considerations are: land availability; need; scale; settlement pattern; hierarchy and; capacity. Paragraph 5.31 sets out that Settlement Category 3 relate to Larger Villages, which include Ingrave. No amendments are proposed to the Green Belt in these villages *'in order to retain the character of the Borough'* in line with the Spatial Strategy.
24. Paragraph 5.33 relates to the Council bringing forward brownfield sites in the Green Belt. This is considered to be an arbitrary response to provide new dwellings in locations that may, or may not be beneficial to the principles of the Green Belt, without giving due regard to the appropriateness of those locations for residential development. Equally, it is not reasonable or logical to presume that the character of a Larger Village will be harmed by development or proportionate growth on its boundary. In fact, a village such as Ingrave is likely to be more sustainable as a result of a proportionate increase in land available for housing to assist with meeting the needs of those who wish to live in Ingrave and Herongate but may otherwise be unable to remain due to a limited supply of new dwellings as a result of these Local Plan policies.

25. The approach being taken by the Council to not release land that is otherwise suitable, in order to protect the Green Belt, is considered to be counterproductive to a successful future for villages such as Ingrave and Herongate. This is particularly pertinent when considering that over 80% of Brentwood is designated as Green Belt land.
26. Policy 5.2 - Housing Growth - states that the DLP will provide 7,240 dwellings between 2013 – 2033 at a rate of 362dpa. The starting point for Brentwood is to meet their lower OAN. The delivery is reliant on 35% of housing from the untested strategic site of Dunton Garden Village and 14% from Windfall allowance as set out in Appendix 3.
27. Interrogating these proposals further, as the Council will be aware, Basildon Borough Council are also proposing to meet their lower OAN and may have unmet need over the plan period. The Plan should have a clear understanding of how housing need will be met within the SHMA area to ensure the plan is positively prepared in accordance with Paragraph. 182 of the NPPF.
28. 5.41 states that the Council has ‘reluctantly’ considered appropriate and sustainable locations within the Green Belt. This does not provide confidence that the Council have positively prepared the plan or more specifically that it has properly considered the ability of Green Belt sites to provide housing to meet identified need, including sites such as land at Salmonds Farm in Ingrave to assist with meeting delivery of homes over the early period of the plan.
29. Paragraph 5.41 concerns defensible boundaries that avoid ‘urban sprawl’. It is considered that sites such as Salmonds Farm, while in the Green Belt, do not result in sprawl as a result of allocation. We would also refer the council back to Paragraph 7.6 of this consultation which states that development in the Green Belt can contribute towards restricting urban sprawl. We would support the Council in this latter position in that the allocation of development on sites with clear boundaries and that relate to the existing settlement are able to provide predictable and defined development without resulting in sprawl into the countryside, which would be more likely to arise from development imposed on the borough as a result of failure of the plan to properly meet its housing needs. A proposed layout is supplied with this representation to assist the council in recognising the defensible boundary this site can provide. It is considered that the scheme in no way represents sprawl and is a well-planned development with clear relationship to Ingrave and Herongate. If the aim of the Council in applying Policy 5.2 is to avoid sprawl, then the Council has the ability to prepare policies that ensure any allocation is contained within sensible boundaries. The allocation

of our clients' site at Salmonds Farm would meet the aim of Policy 5.2 while also assisting with providing a deliverable site in a larger village to meet housing need.

30. The Council's 2014 SHMA by DCA considered housing need across Brentwood, Braintree, Chelmsford, Colchester and Maldon Council areas. It concludes that Brentwood can be considered its own housing market area. Within the collective of Council areas considered, it can also be considered to share a market area with Basildon and Chelmsford (Paragraph.3.10.3). It concludes that 35% affordable housing is required and that the housing requirement is between 288 – 384dpa (DCA 2014).
31. Paragraph 6.14 considers General Development Planning and sets out the councils approach to secure sustainable development. It states that this means directing development to locations that are “supported by effective transport, leisure, community and other services, while ...protecting the Green Belt.”
32. We would comment that there is nothing about securing *sustainable development* that concerns protecting the Green Belt and that its inclusion in the approach to securing sustainable development is not necessary and may limit the Council's ability to deliver sustainable sites that otherwise provide suitable locations for residential or other development. The Green Belt is a policy restriction with very clear aims as set out in Paragraph 80 of the NPPF and derives from urban planning theory that substantially pre-dates the conception of sustainable development.
33. As an example, sites such as Salmonds Farm are able to provide suitable, sustainable sites supported by the infrastructure and requirements referred to in Policies 6.1, 6.2 and 6.3 of the DLP, which by design would make it a sustainable site. Sites should not be considered *unsustainable* simply on the basis of the current Green Belt designation of land.
34. Fortunately, Policy 6.3 makes no reference to Green Belt and therefore it is recommended that the supporting text is altered to reflect that Green Belt should not be a consideration in whether development will be sustainable or otherwise. Green Belt policies are set out elsewhere in the Plan and should remain a separate matter.
35. It is therefore our considered view that the plan would be unsound unless additional sites are allocated within the plan, particularly medium scale sites in suitable locations around larger villages,

which are able to support those villages, create new defensible boundaries and help to meet the Councils OAN, which is likely to be higher than the OAN stated in the DLP.

## **DUTY TO COOPERATE**

36. Section 2.22 of the DLP concerns the Duty to Cooperate and that it will 'work with its neighbours on cross-boundary issues'. Crucially, Paragraph.178-181 confirms the Council's duty to cooperate on cross boundary issues when preparing the Local Plan, particularly on issues that relate to cross-boundary issues. The Government expects joint working on areas of common interest to be diligently undertaken for the mutual benefit of neighbouring authorities. Paragraph 179 specifically advises that authorities consider producing joint planning policies on strategic matters and informal strategies such as joint infrastructure and investment plans.
37. The Dunton Garden Village is a strategic element of the Plan that is proposed on the boundary with Basildon Borough Council. A Memorandum of Understanding was prepared in November 2014 by Brentwood and Basildon Council's to set out a consultation and an approach to how the area could deliver between 4,000 and 6,000 dwellings. A Statement of Consultation was published in December 2015. This Statement confirms that 84% of respondents had concerns about the proposal. There were three main issues, being environmental harm and erosion of the Green Belt; Infrastructure provision; deliverability of the project. The consultations states that 'many comments suggest both Council's consider spreading growth needed in other areas rather than concentrating the majority of development in one area (Paragraph.5.5). Concern was also expressed that the impacts of development affect existing residents in Basildon more than Brentwood residents (Paragraph.5.8).
38. The Dunton Garden Village proposal is evidently a strategic issue of cross-boundary significance and preparation of policies in the Plan should follow the advice set out in the NPPF. The lack of consistency between Basildon Borough Council's Local Plan and the Brentwood Local Plan is inconsistent with the advice which clearly expects authorities to work together to provide joint planning policies. Without consistency with Basildon Borough Council for the allocation, the proposal represents an unsupported development in the Green Belt that would compromise the principles of land being within the Green Belt and fail to connect with the existing infrastructure in Brentwood Borough, relying on services in Basildon Borough.



39. In addition, the consultation found that 84% of respondents had concerns with the proposal. The Council has not, therefore, demonstrated support for the Dunton Garden Village proposal and has progressed with a strategic development of cross-boundary importance without the support of the public or the neighbouring authority. It is therefore considered that the policy has not been positively prepared and is not justified by the evidence base.
40. The Dunton Garden Suburb proposal is necessarily a long term strategy. The delay in preparing a strategic allocation and securing the supporting infrastructure can be significant. It is therefore important that the Council aim to meet the housing need of the Borough through a more dispersed allocation of sites, particularly early in the plan.
41. Accordingly, the Council should consider alternative sites that are able to provide housing that supports the larger villages and delivers a secure quantum of housing in more sustainable locations, such as land at Salmonds Grove, Ingrave. This site would provide flexibility in the delivery of homes in a sustainable location. Evidence prepared for the Local Plan supports the inclusion of our clients land to meet the needs of the local area. We provide an indicative layout plan to assist officers in understanding the capacity of the site and its ability to provide an attractive housing scheme for Ingrave and Herongate.

### **DUNTON GARDEN SUBURB – GENERAL COMMENTS**

42. Site 200 of the Site Allocations Maps is the entire Land to the East of A128, South of A127 and allocated for 2,500 dwellings between 2019-2033. Within Policy 6.6 - *Strategic Sites* the only housing-led development is Dunton Garden Village, which amounts to 35% of the Council's housing allocations (Paragraph.7.1). Strategic Objective S03 seeks to plan for housing that meets the needs of the Borough's population and contributes to creating inclusive, balanced, sustainable communities.
43. Policy 7.1 – *Dunton Garden Village* is not currently considered to be a deliverable proposal. The Policy refers to creating a self-sustaining village. This is not a rational statement, as the village, if delivered, would look to both Basildon and Brentwood, particularly West Horndon and Laindon, for access to many services and facilities including rail transport, jobs and Regional retail services. The Dunton Garden Suburb Consultation by LUC published November 2014 explicitly states at 1.11 that the potential principles of Dunton Garden Suburb include *integration with the existing community, including investment towards Laindon Town Centre Regeneration*. Paragraph 2.2 of the

Consultation states that “*It is notable that the potential development location is very well connected to the M25 so that demand for employment land is likely to be high*” (Paragraph.2.4), again implying the site is not intended to be self-sustaining, even when delivery was combined with the neighbouring authority to deliver between 4,000-6,000 dwellings.

44. West Horndon represents a more sustainable location for development than Dunton Garden Village. The neighbouring authority do not confirm that they support the delivery of this development, which is of cross-boundary significance and a strategic allocation within the Brentwood Plan. The allocation of Dunton Garden Suburb will place untested travel pressure on the highway network, Laindon and West Horndon rail stations. Paragraph 7.8 indicates the high reliance on the A127 corridor, ingraining high levels of private car use. The Basildon Local Plan Consultation 2016, Policy H10 – West Basildon Urban Extension, confirms under Option 3 that insufficient evidence has been prepared to demonstrate that the Dunton Garden Village is appropriate or deliverable in the plan period. It is therefore highly questionable whether the 2,500 dwellings proposed for the site will be delivered and if so, in what timeframe. Appendix 2 of the Consultation suggests Dunton can be delivered in years 5-15. There is a therefore a need to look again at other sustainable sites in the Borough that would provide a more secure delivery, such as land at Salmonds Farm, Ingrave.
45. The 2014 PBA OAN Study confirms at paras. 6.17-18 that it does not consider migration from London in identifying the OAN but supports an OAN of 360dpa. The Council should consider whether this is consistent with the NPPF. Further, the Council is relying on a small number of allocations to deliver the plan, with only 22 sites listed in Figure 7.2. A lack of delivery of any of these sites will result in the plan not meeting the identified need which, as set out above, is likely to be lower than the actual need. The release of further sites, especially those in Green Belt locations, will provide flexibility to the plan and meet the objectives and requirements of the plan process. Policy 7.4 – *Housing Land Allocations* should therefore include land at Salmonds Farm, Ingrave.

## **CHAPTER 9 AND SO9 - SAFEGUARDING GREEN BELT.**

46. Paragraph. 9.3 correctly recognises that the Green Belt is not an environmental designation. As such, it should not be considered under the environmental protection chapter. The purposes of the Green Belt are clearly set out in the NPPF Paragraph.80, as expressed earlier in this representation.
47. Paragraph 9.46 confirms that 89% of the Borough is Green Belt and that it has the 6<sup>th</sup> highest amount in England. As such is it difficult to understand the Council's approach to protecting the Green Belt over the aims of meeting the housing and other requirements of the population, particularly through a reliance on windfall, few allocations and a new Garden Village which is questionable in its delivery.
48. It is also slightly circular for the Council to seek to protect the Green Belt while allocating a site on its boundary, which will conflict with the purposes of the Green Belt to a much more significant degree than any other allocation in the Borough.
49. The allocation of sites, such as our clients' site at Salmonds Farm, would not erode the purposes of including land within the Green Belt as set out in Policy 9.8.
50. We would agree with paragraph 9.51 that delivery of land in the Green Belt is required in order to Grow the borough. The Council must provide adequate land for housing and employment, and that failure would undermine the prosperity of the Borough.
51. Paragraph 5.46 of the DLP states that the Council seek to maximise housing provision. This appears to be inconsistent with the Council's approach as contained in the DLP Policies to meeting housing need, as set out above. Paragraph. 5.46 of the DLP states a clear commitment to bringing forward land as quickly as possible to meet housing needs. It is apparent from the council's reliance on the release of a strategic site in Dunton Garden Village for 2,500 dwellings in years 5-15 (2018-2028 (LP Consultation Appendix 2) and the reliance of permitted development conversions, which equal 156 dwellings in 2017 and 288 in 2018, that the Council is not planning to bring forward land as quickly as possible, when there are suitable, available and deliverable sites submitted to the SHLAA that are not being allocated for early release.

## THE SPATIAL STRATEGY

52. Policy 5.1 of the DLP sets out Brentwood Council's Spatial Strategy. It states that limited development will take place in villages within rural areas at a level commensurate with services and facilities available and which maintain local amenity and distinctiveness. It goes on to define this as:

- a. Accessible to Public Transport, services and facilities;
- b. Have no significant impact on the Green Belt;
- c. Likely to come forward over plan period.

53. It is considered that Policy 5.1 could be suitable to deliver appropriate development within larger villages only if additional sites were allocated for housing in these locations within the local plan. The current proposals, which limit development in otherwise suitable locations due to the current Green Belt boundaries, are considered to be too restrictive and inflexible to help meet the housing needs of the Borough and restrict the ability of larger villages to grow to meet their population requirements.

54. Land such as land at Salmonds Farm, Ingrave, should be allocated as a suitable site for development, which is able to fulfil the policy expectations set out in Policy 5.1. In combination with the reliance on Windfall sites and the Dunton Garden Village, it is perverse that the Council has not allocated larger villages for a greater quantum of development where sites have been assessed as being suitable, available and achievable.

## SUSTAINABILITY APPRAISAL

55. Salmonds Farm, Ingrave was considered in the Brentwood Local Plan draft Site SA as sites 067A and 067B (pp.44-48). Combined, these provide almost 3ha of land in Herongate and Ingrave. The assessment concludes that the site has potential to meet housing need, being suitable, available and achievable for around 44 dwellings.

56. The assessment considered that landscape topography would need to be considered in the design of any development and that the western part of the site should be restricted to reduce impact on the countryside. Delivery of the site was considered to be likely from a medium sized developer in years 1-5, early in the plan period. None of the consultation comments raised matters that could not be addressed through a detailed development proposal

57. Given the suitability of the site for development and the immediate delivery of the scheme to assist with meeting housing need, it would seem perverse not to allocate the site for residential development for early delivery.
58. Section 5.4 sets out the previous consultations and the conclusion that Options 1 & 2 of the 2014 Consultation were supported as the most sustainable. The Statement of Community Engagement prepared for the Consultation confirms that: *“There were numerous objections to the Council not meeting its full need and it was put forward that protecting the Green Belt should not outweigh this.”* (p.15). It also confirms that in relation to Green Belt and Open Space, responses were mixed (p.16). However, the number of responses to the Green Belt policy, and the number of objections, was relatively low at 58 objections to the proposed policy and the need for a Green Belt review (amongst other comments).
59. The Sustainability Appraisal (SA) plays an important role in the plan-making process. It should be used to identify and consider all reasonable alternatives at an early stage in the plan making process, and should inform the local planning authority in choosing its preferred approach.
60. It is imperative that the SA considers all reasonable alternatives. We would draw the Council’s attention to judgments in respect of *Heard v Broadland District Council*, *South Norfolk District Council*, *Norwich City Council* (2012) and *Save Historic Newmarket Ltd v. Forest Heath District Council* (2011). The judgments in these cases confirm the need for the public to be presented with an accurate picture of the reasonable alternatives at an early stage, for these alternatives to be subject to appraisal, and for reasons for their rejection / selection to be explained within the Environmental Report.
61. We have concerns with the current approach to SA in respect of both how the proposed total housing figure has been considered and specific individual sites have been assessed.
62. In respect of the total housing target for inclusion in the Local Plan, we note the Interim SA published alongside the DLP assumes the Local Plan will plan for the delivery of 7,240 new homes over the plan period (2013 - 2033). As set out within this representation, the provision of a greater number of new homes is clearly a reasonable alternative that merits consideration. However, there appears to be no assessment of the sustainability of a higher level of growth.

## **DELIVERABILITY**

63. Paragraph 173 of the NPPF concerns ensuring viability and deliverability of the Plan. It expects LPAs to give careful attention to viability and costs in plan-making. It states clearly that Plans should be deliverable.
64. With regards to the entire Plan, it is not evident from the evidence base that the Dunton Garden Village proposals are deliverable. This is especially pertinent given the commentary by Basildon District Council that the evidence base is not complete to demonstrate the suitability of the site to deliver a new village of 2,500 dwellings and the impact, and therefore the mitigation, that may be required in order for this to be successfully integrated with the landscape and the neighbouring borough from which it would be likely to access services and facilities.
65. Paragraph 177 states that:
- a. It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion. To facilitate this, it is important that local planning authorities understand district-wide development costs at the time Local Plans are drawn up. For this reason, infrastructure and development policies should be planned at the same time, in the Local Plan.
66. The proposals in the Plan are not supported by clear evidence that there is a reasonable prospect of infrastructure being delivered. It is not clear that the district-wide costs are understood for the plan. It is therefore prudent for the Council to allocate homes in the Larger Villages, where new strategic infrastructure is not required to support the schemes, providing greater certainty of delivery of homes throughout the plan period.

## **CONCLUSION**

67. The above matters form our objection and comments to the Local Plan consultation. Our client considers that to overcome the concerns raised, it would be necessary to allocate additional land for housing throughout the borough and on sites that do not rely on significant infrastructure or windfall development to achieve the Local Plan objectives. Land at Salmonds Grove, Ingrave would be ideally located and has been identified as suitable, available and achievable in the Council's SA. It would be capable of delivering a modest development of at least 50 dwellings to support the villages

of Ingrave and Herongate in a sustainable location, providing a defensible green belt boundary with no impact on the wider landscape objectives.

I trust these comments will be fully considered by Officers when determining the next stage of the Local Plan and the spatial strategy for the Borough. It is considered that there are significant failings in how the council are seeking to deliver housing sites and that these must be addressed prior to the preparation of a submission Local Plan. It is our recommendation that the allocation of medium scale sites, such as our clients site at Salmonds Farm, Ingrave, would assist the Council in delivering a Sound Local Plan.

Should you have any questions or require further information in relation to these comments, please contact me directly via the details heading this submission.

Yours sincerely,

