



**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

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

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**

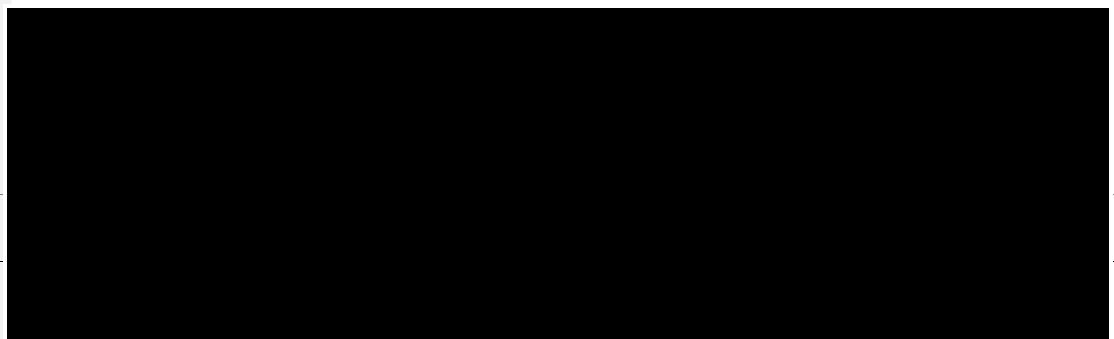
First Name: **James**

Last Name: **Govier**

Address:

Post Code:

Email Address:



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):

POLICY 5.1 SPATIAL STRATEGY

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

Support

Object

General Comment

General support is given to the Spatial Strategy which seeks to focus new development, and specifically housing in this instance, within the Borough's transport corridors and urban areas, and the sequential approach taken to the selection of sites which correctly prioritises brownfield land and all appropriate land within existing urban areas.

The development or redevelopment of land in existing urban areas should always be prioritised over development of brownfield or greenfield sites in the Green Belt

Support is given to the hierarchical approach taken in determining where sustainable growth will be best accommodated, and in particular the main focus being the Urban Area of Brentwood, including Shenfield, where new development will be best served by public transport, retail, employment areas, health and leisure facilities and schools. The Brentwood Urban Area offers the most scope to deliver development in accordance with sustainable development principles.

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):

POLICY H.2: HOUSING GROWTH

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

Support

Object

General Comment

The Objectively Assessed Housing Need figure of 7,240 new residential dwellings to be built over the Plan period, at a rate of 362 dwellings per year, is supported as a minimum. Whilst there is also support for the distribution of housing, the deliverability of the Strategic Site (2,500 houses) within the Plan Period is questioned - see also response to Policy 7.1.

Paragraph 5.46 of Chapter 5 deals with Housing Trajectory and sets out in the following bullet points how that trajectory is made up. Included within this is **Windfall Sites** which are identified within Policy 5.2 as contributing 14% of housing, amounting to 928 houses, or about 46 dwellings per year. The text (page 47) makes it clear that windfall makes an allowance for small scale development. Paragraph 5.43 identifies such sites as *“usually previously developed sites that have unexpectedly become available”*.

Given the dwindling supply of brownfield land within the urban area and the inherent unpredictability of the availability of windfall sites, it is not necessarily appropriate to continue to predict the availability at historic rates of provision. Against the backdrop of a relatively high proportion of housing supply overall, greater emphasis should be placed within the Local Plan on the importance of all windfall sites, regardless of their size, acknowledging the cumulative effect that even the smallest of sites providing 1 or 2 units, will have on housing supply and achieving the growth set out within Policy 5.2.

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):

POLICY 7.1: DUNTON HILLS GARDEN VILLAGE

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

Support

Object

General Comment

Policy 7.1 sets out details of the strategic Housing-led development at land to the west of Basildon, delivering 2,500 new homes, 5 hectares of employment land, local shops, community facilities, open space, schools and healthcare services. This is to be provided applying the garden village principles creating a new self-sustaining community.

We question whether such development can realistically be delivered within the plan period. When consulting on the Strategic Growth Options and Dunton Garden Suburb Consultation in 2015, this area of land was put forward in conjunction with Basildon District Council, promoting 4,000 – 6,000 new homes, new commercial and industrial land and a new railway station, across both Boroughs

Cooperation with Basildon DC now seems to have fallen away, with Basildon DC promoting, under Policy H10a & 10b of their Draft Local Plan part of that previously identified land to now provide mixed use of 1,000 new homes and 5.5 hectares of employment land within this plan period (up to 2033). In addition a further area originally included within the Dunton Garden Suburb Consultation 2015, is to be set aside to provide a further 1,350 dwellings, a residential care/nursing home and a primary and secondary school, to be delivered from 2034.

The approach taken by Basildon raises the question of whether the much greater area and housing numbers promoted by Brentwood Council under Policy 7.1 can be delivered within the plan period. The overall approach would represent piecemeal development of this 'garden village'. That part promoted by Brentwood Council would be largely isolated from the proposed West Basildon Urban Extension, and it is not clear whether there is any cooperation at all between the Boroughs in promoting these different parcels of land or whether there is any likelihood of a new train station being viable in this location. This throws considerable doubt on whether such new development is deliverable, and in a way that is self-sustaining and meets the principles of Garden Villages.

While the respondent is less concerned about the details of the Dunton Hills Garden Village proposals, its realistic deliverability undermines the Housing Growth under Policy 5.2, and thus places even greater emphasis and importance on delivering other identified sites within the urban area and any other suitable land currently not identified (windfall sites) in the urban areas, of whatever size, which can be delivered and make a contribution to housing supply.

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):

POLICY 7.2: HOUSING MIX, TYPES & TENURES

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

Support

Object

General Comment

While the objectives of Policy 7.2 are generally supported, the element requiring developments of more than 100 dwellings to provide a minimum of 5% self-build properties is not supported. While being a worthy aspiration and a growing part of the housing sector, one which promotes diversity, the deliverability of such housing is an additional level of complexity that will potentially constrain and slow down the deliverability of housing.

It is our opinion that, at this current time, such a provision should remain as an aspiration and not a policy requirement. Interest from self-build individuals or community groups is typically for smaller sites whereas the large house building companies, who will be the ones interested in the sites of +100 houses, are not currently set up to effectively deliverer land for self-build.

Recommended Change:

Accordingly it is proposed that the wording to Policy 7.2 is changed at the 4th paragraph, to state: *“Developments of 100 dwellings or more will be **encouraged** to provide a minimum of 5% self-build properties...”*

Support is given to the final paragraph of Policy 7.2 which states that the final housing mix, type and tenure will be subject to negotiation, with account taken of, *inter alia*, nature, constraints and character of sites. This is then reiterated at the end of paragraph 7.17 of the general text.

It is our opinion, that, in respect of **constraints**, it should be made clear that this includes the ability to provide a site with appropriate infrastructure. For example, where a high density scheme cannot be supported by the existing or an improved local highway network, this is a constraint that will be taken into consideration and a different mix and type of properties would be considered, where it addresses the highway issue.

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):

POLICY 7.3: RESIDENTIAL DENSITY

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

Support

Object

General Comment

This policy is supported in general. However, as with the response to 7.2 above, the consideration of site **constraints** which might affect achieved densities should include the ability of the proposal, at density levels specified by policy, to be adequately served by existing or improved infrastructure.

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):

POLICY 7.4: HOUSING LAND ALLOCATIONS

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

Support

Object

General Comment

Policy 7.3 and the housing allocations as set out in Figure 7.2 of the Draft Local Plan are supported in general.

With specific reference to **Site Ref: 044 – Land at Priests Lane** (which has been put together with separately owned land, Site Ref: 178) the Table at Appendix 2 of the Local Plan firstly identifies these combined sites as being able to deliver approximately 130 dwellings. This is at a density stated in the Table to be 96dph. However as both sites making up this allocation total 5.35 hectares in area, density to achieve 130 dwellings would equate to approximately 24.3 dph.

Recommended Correction:

The stated density relating to Site Ref: 044 & 178 – Land at Priests Lane, Brentwood, at the table contained within **Appendix 2** to the Draft Local Plan, should be corrected to read 24 dph.

The phasing estimate for both parcels of land making up the Priests Lane allocation is stated to be 5-10 years. One cannot speak for the 0.9 hectares under Ref: 178, however, that part comprising the larger area of 4.45 hectares (Site Ref: 044) is under the full control of the Ursuline Sisters, Brentwood, is unused and unoccupied with no barriers to it being made available immediately. It would, thus, be deliverable within the 0-5 years phasing estimate.

Recommended Change:

The **Phasing Estimate** within the table at **Appendix 2** to the Draft Local Plan should be amended to show delivery within the 0-5 years time period, at least for that part of the allocation within the Ursuline Sisters ownership (Site Ref: 044).

The description of the Land at Priests Lane (Site Refs: 044 and 187) at Table 7.2 Housing Land Allocations makes reference in brackets to the following – *to include provision of open space and/or Sports facilities for public use.*

Although the site is currently open land, it is privately owned, unused for over a decade, totally inaccessible and makes no contribution to either public open space or sports provision. The only contribution it makes as open land is to provide the limited number of properties that bound _____

with an open outlook, it is otherwise out of sight from the surrounding area. Therefore the requirement to make the provision of open space or sports facility for public use (assumed to serve more than just the future occupants of the site) is not one that is justified on the basis of the loss of any existing open space or sports facility used by the public.

Furthermore, in the absence of an up to date Open Space Audit, it has not been shown that this area is deficient in, or in need of any additional public open space or sports facility to meet an identified need.

The requirement to make such a provision, over and above what level of open space would usually be required to serve a development of such size, is unjustified and will potentially constrain the effective use of the land in delivering housing in this highly sustainable location.

Recommended Change:

The wording within Figure 7.2, in relation to Site Ref 044 and 178 – Land at Priests Lane, Brentwood, which states “*to include provision of open space and/or Sports facilities for public use*” should be deleted or at the very least changed to read “***potential for the provision of open space and/or Sports facilities for public use***”

Policy 7.4 sets out criteria justifying the early release of sites, in advance of its stated phasing. In assessing the delivery of housing within the Borough over the plan period, and in determining and reviewing the ongoing 5 year housing supply, regard will be had to all housing that has already been delivered or is in the pipeline. Therefore, where, for example, supply exceeds the average of 362 houses per year for one or more years, this would not have any harmful impact on a revised 5 year housing supply, as it would take into consideration the over-supply already achieved. While it is important to consider phasing to gain an understanding of when sites might realistically become available, allowing for a robust conclusion to be reached on deliverability of identified allocations, the phasing of such allocations should not be constrained by an arbitrary 5 year phasing timetable. The delivery of new housing is often driven by economics and the general health of the economy, and where new development is being sought it should not be denied by the indicative phasing applied within Appendix 2 of the Local Plan.

It is considered that the only relevant matter restricting the phasing of development is that set out at (c) of Policy 7.4, which requires infrastructure requirements of the development can be fully met and satisfactorily addressed.

Recommended Change:

Delete (a) and (b) of Policy 7.4.

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):

POLICY 7.5: AFFORDABLE HOUSING

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

Support

Object

General Comment

Policy 7.5 Affordable Housing has had no regard to the provision of 'Starter Homes', as has been set out within the Housing and Planning Bill 2015. Under the Bill, Local Planning Authorities are under a duty to promote the supply of starter homes. It is acknowledged that it is currently unclear whether such a provision is to be made alongside or as part of overall affordable housing provision. However, the Local Planning Authority should acknowledge the Housing and Planning Bill 2015 and give consideration to its likely impacts, and how such requirements are to be dealt with by policy.

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):

POLICY 9.3: LANDSCAPE PROTECTION AND WOODLAND MANAGEMENT

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

Support

Object

General Comment

Policy 9.3 seeks to protect land where development would have a harmful impact on important landscape heritage and ecological features, including trees and hedgerows. It sets out at (a) to (e) information that will be required to accompany development proposals.

While these require consideration of existing ecological factors (a), proposed landscaping (b) protection of trees (c), landscaping maintenance (d) and method statement for dealing with excavated materials (e), it does not make any requirement for a landscaping assessment to be carried out, which would define the landscape features of the specific site and what contribution it makes to the wider landscape area, and thus whether it has any, or contributes to local significance.

While reference is made at paragraph 9.24 to a Landscape Assessment commissioned by the Council (due mid-2016) and the existing Mid Essex Landscape Character Assessment, such documents will consider broad landscape patterns and characteristics. When dealing with smaller individual sites, the contribution they make in landscape terms, both locally and to the wider area, are often very specific. Such sites should be considered on an individual basis and a Landscape Character Assessment provided with any submission, which considers the specific landscape characteristics of the site, the wider context of the broader landscape assessment, and assesses the potential impact from development. Such an additional requirement under Policy 9.3 will enable a more informed decision to be made that reflects the landscape value of individual sites within the wider landscape character, allowing for a judgement to be made on any impact that will arise from development and balancing this against other planning objectives/material considerations.

Recommended change:

An additional criteria should be added to Policy 9.3 requiring that applications are also accompanied by a detailed landscape assessment which includes information sufficient to assess the potential impact of the proposal on the immediate and wider landscape character.

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):

POLICY 10.9 OPEN SPACE, COMMUNITY, SPORT & RECREATIONAL FACILITIES

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

Support

Object

General Comment

Reference is made to the Proposals Map which sets out land allocated as Protected Open Space or Local Green Space. The detailed proposals map has not been provided with this consultation. Therefore a judgement as to whether the requirements of Policy 10.9 are fair and justified cannot be made without having knowledge of what land has been allocated as Protected Open Space or Local Green Space, and the basis for doing so.

In the absence of the Proposals Map, and any further supporting background studies which set out the basis for the allocation of land under this policy, support cannot be given to this policy – See also JTS comment made on this Policy on behalf of The Brentwood School.