



**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:	Mrs	First Name:	Christine	Last Name:	Blythe
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Address:

[REDACTED ADDRESS]

Post Code:

Telephone Number:

[REDACTED TELEPHONE NUMBER]

Email Address:

[REDACTED 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):  
ALL SECTIONS – See details below

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

Support	<input type="checkbox"/>
Object	<input checked="" type="checkbox"/>
General Comment	<input type="checkbox"/>

Comments (please use additional sheet if required):

1. I strongly object to the current Spatial Strategy in the draft Local Plan. It fails to take into account the needs of existing villages in the north of the Borough.

The draft Local Plan disproportionately favours the centre and south of the Borough, along existing transport corridors that are already congested, while failing to take into account the needs of existing villages in the north of the Borough, like Blackmore. The Strategic Growth Options consultation document (2015) recognizes that villages must grow to provide for local need, the current draft Spatial Strategy fails to take this into account. Where is the evidence to support this U-turn in planning policy?

2. Has the Council provided a Settlement Hierarchy paper to assess the needs at local villages?

For example what is the justification in allowing development at Mountessing, rather than larger villages further north in the Borough, like Blackmore? If the Council is basing the plan on transport corridors alone, it has failed to objectively assess the needs across the entire Borough.

3. SO's 1 & 2 (pg 25) prejudice development growth to existing or proposed infrastructure to the centre and south of the Borough. The Council has a duty of care to ensure the entire Borough's needs are met to 2033 and the draft plan only meets the needs of part of the Borough.

4. SO3 is not being met in the north of the Borough in the respect of creating "inclusive, balanced, sustainable communities" (p25) to the year 2033.

An objectively assessed local plan would recognize the need to ensure that existing villages, like Blackmore, need some development to retain their working population which will ensure that services such as local shops, leisure amenities, primary schools, GP practices and public transport services are sustained.

5. The proposed plan fails to spread economic prosperity across the Borough and in particular in the north of the Borough.

SO4, SO5, SO6, SO7 promoting Economic Prosperity in the Borough (pg 25) focus on Brentwood and new development in the south of the Borough. There is no evidence that this plan seeks to implement SO8 (Promote and support a prosperous rural economy) in the north of the Borough because no GB development is planned, despite there being no brownfield opportunities.

6. How do you define “inappropriate” (SO9 Safeguard the Green Belt from inappropriate development and enhance its beneficial use, pg 26)? A 10% increase in existing villages for the next 20 years (is “inappropriate”) but the creation of a new garden village of 2,500 houses (is “appropriate”)?

7. How do you define “character”?

Para. 5.21 of the draft plan indicate’s that development in the rural north and rural south will be limited to retain local “character”. Throughout the plan there are references to safeguarding the GB land and then the need to release some GB land for development as 96% of the Borough falls in GB allocation. Surely the loss of village services as a result of inadequate housing and subsequent decline in the working age community will result in a detrimental “character”?

8. Assessment of GB Site

An assessment of 60 GB sites was produced after this plan was written. And yet the draft plan proposes to create a new garden village at Dunton Hills on GB land that is rated “medium value”, for 2,500 new homes (35%) of housing needs in the Borough to 2033, compared to SHLAA site G070A, Land South of Redrose Lane, Blackmore, being promoted by Crest Nicholson for circa 40 houses within the village with clearly defensible boundaries is also rated “medium” but not part of the proposed allocation plan. A Local Housing Requirements Study for Blackmore by Barton Wilmore in August 2013 projected household growth in the village required circa 80 dwellings in the next 20 years.

9. Villages in the north of the Borough will atrophy over the period of the plan.

As the plan covers the to period 2033, Blackmore and some of the other larger villages in the north of the Borough will atrophy in this timespan. How when both sites are rated GB “medium value” can it be justified to “create” rather than “sustain” a village? Furthermore as the Council has noted “new housing growth will deliver a boost to the local economy” para. 5.39 Why then is there no consideration of the larger villages, like Blackmore in the north of the Borough?

10. I strongly object to the creation of a new garden village at Dunton Hills.

The proposed new village is not equitable, deliverable or sustainable, requires the release of a significant area of GB land, adds more pressure to the already congested A127, is disproportionate in terms of total housing capacity for the Borough from one single source and will not be deliverable within a reasonable timeframe. I strongly disagree that para 5.41 “A proportionate approach has been taken...”. It is clear contrary to para 5.42 the Council has NOT “applied densities to potential development sites in a realistic manner...”.

11. **Brownfield Redevelopment Opportunities in the rural north and rural south of the Borough**

These “Brownfield redevelopment opportunities” (para 5.33) do not exist in the GB villages to the north of the Borough. The case has been made in this draft plan that larger villages in the rural north of the Borough have limited services/amenities and therefore development should not take place here. A limited amount of development needs to take place here to ensure the future vitality and viability of villages like Blackmore. This does not mean changing the “character” of the north of the Borough but rather managing growth in a discrete and viable way.

12. **I strongly disagree with the statement para 5.41 “the Council has reluctantly considered appropriate and sustainable locations within Green Belt”. (See point 8 above)**

With regard to **S010 (Protect & enhance valuable landscape & the natural and historic environment), Figure 9.1 Environment and Biodiversity (p126) indicates that the proposed development sites to the south of the Borough are in areas of a high concentration of both local wildlife sites and sites of special scientific interest,** compared to those in the north of the Borough which have a much lower concentration of these sites.

What justification can there be to allow the development of 2,500 houses in one area in GB, while not allowing a 10% growth of existing villages in the next 20 years. Para 9.53 “Development will be restricted to those limited types of development which may be allowed in exceptional circumstances within the Green Belt” but barring Brownfield opportunities such development has been excluded in the rural villages of the north of the Borough.

13. **With regard to SO11, S012, S13 re the Quality of Life & Community Infrastructure, rural villages to the north of the Borough have been largely overlooked.**

For example S012 Improving public transport, cycle and walking facilities and encourage sustainable transport choices should be implemented throughout the Borough. Villages such as Blackmore need to maintain a demand for a bus service for it to be economically viable for services to run which means the village needs to maintain an active, balanced community. The existing road network needs to be maintained to 2033 to enable rural villages to reach existing and new services/amenities available in the Brentwood area.

The bias of the current plan is again evidenced by the lack of a proposed Green Travel Route linking villages to the north of the Borough to Brentwood and/or train links. Figure 10.1 Proposes a Green Travel Route to support the proposed development in the south, while ignoring linkages and benefits for those villages in the north of the Borough.

Ensuring a viable bus service, maintaining current road networks and implementing a Green Travel Route to the north of Brentwood would be in line with S011 & S012.

S013 benefits the centre and south of the Borough alone if the plan allows for no development to take place in the rural north. **It seems that the population of the Borough is intended to be concentrated in a confined geographic area. It must be possible to protect and enjoy the GB in the Borough while at the same time permitting a more equitable dispersal of the population in the area available.**

14. Primary school places in the Borough

I note that Brentwood has capacity for secondary school places but limited capacity for primary school places. Building new villages and new schools takes a significant amount of time. Keeping primary schools open in rural villages is key to ensuring an “inclusive, balanced, sustainable” pg 25 S03 community. Primary school capacity currently exists within the village of Blackmore and perhaps within other villages. Do we need to create a new village or focus on maintaining the ones that currently exist?

15. Housing Trajectory

Para 5.46 states that “The Council has strived to be realistic about the likelihood of sites coming forward .... A clear commitment is shown in this Plan to bring forward land as quickly as possible to meet housing needs swiftly in line with national policy and guidance.”

May I ask why, when in the Council’s SHLAA (2010) and Draft Site Assessment (July 2013) site (ref 70A, site 076 in this plan) is identified as a suitable site for development of new housing being within defensible boundaries of the village and available to be delivered within 1-5 years, the Council’s new spatial policy eliminates this site?

Crest Nicholson, second time National Builder of the Year, have a vision statement that identifies the benefits and opportunities to Blackmore for the development of site 076. I believe it can be proven that it falls within national policy and guidance. This site is achievable and could assist with the five year housing supply. This complies with site selection para 7.29 “The fourth tier allows for limited greenfield sites in the GB which comprise urban extensions within reach of services and infrastructure and with defensible boundaries”.

16. Travel by non-car modes

It is not reasonable to have a policy para. 7.62 that requires: “the ability to travel by non-car modes” in a Borough with an extensive rural community. This again demonstrates extreme bias and a lack of consideration for assuring the future viability of the Borough’s rural villages in the north. Furthermore if development is to be limited to areas where non-car modes exist, then the local plan will be spatially inequitable... as this draft is.

Thank you for re-considering these points and re-examining the draft plan.

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)**