



**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:	Ivan	Last Name:	Armstrong
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Address:

Post Code:

Telephone Number:

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):

1. Essex Fire Service HQ Rayleigh Rd – see below
2. Housing Types- Strategic Housing Market Assessment

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

Support

☐

Object

☒

General Comment

☐

Co

1. **Essex Fire Service HQ Rayleigh Rd**

.I submit that the allocation of 50 units to this site cannot be justified for the following reasons:

- 1.1 Para 5.42 of the Plan states that you have applied densities in a realistic manner taking in surrounding development and general form of an area

The only basis on which the site could accommodate 50 dwellings would be for even more flats, possibly with more floors, than the present outline application for 44 dwellings. This would not take into account "surrounding development and general form of an area" as the site is surrounded by detached houses and is bordered on Rayleigh Rd mainly by large detached houses.

- 1.2 Appendix 2 - "Housing and Employment Delivery" shows that you have applied a density of 40 dwellings per hectare to this site and used the site area of 1.26 hectares to arrive at the estimate of 50 I would challenge the use of 40 per hectare as it would conflict directly with several of the policies in the Plan as follows:

a) Policy 7.3 states:

"Proposals for new residential development should take a design led approach to density which ensures schemes are sympathetic to local character and make efficient use of land.

Residential densities will be expected to be 30 dwellings per hectare net or higher unless the special character of the surrounding area suggests that such densities would be inappropriate; or where other site constraints make such densities unachievable."

It would be inappropriate to apply even 30 because the site has a very large number of trees which make anything higher "unachievable", particularly to meet the first para of 7.3 in terms of "sympathy to local character"

- b) This number of dwellings could not be accommodated within the terms of Policy 6.3 a) **"have no unacceptable effect on visual amenity, the character or appearance of the surrounding area;"** and e). **"cause no unacceptable effects on adjoining sites, by overlooking or visual intrusion; harm to or loss of outlook, privacy"**
- c) It would be in direct contradiction of point 6.16 under General Development Planning in particular overlooking neighbouring properties and being sympathetic to the character and form of neighbouring properties." **New development should be sympathetic to the character and form of neighbouring properties and surroundings**
- d) This is repeated again in Policy 6.4 d **"safeguard the amenities of occupiers or any nearby properties by ensuring that their character and appearance is sensitive to the context and surroundings."**

2. Housing Types

The Strategic Housing Market Assessment lacks the credibility to determine such an important aspect of housing policy, namely that 65% of future dwellings should be 1 or 2 bedroom flats, for the following reasons:

- a) It is based on responses from only 3% of all properties in Brentwood.
- b) It is based on an old survey in June 2013 where people were asked, among other things, whether they wanted to move and when.

No attempt has been made to get actual data to compare with intentions from people who said they aimed to move in the three years from mid 2013. 51% of them at least should have moved by now so we really need to know whether they did or did not and where they moved to.

- c) Much of the demand for flats comes from "Concealed Householders" i.e. those living with parents/family at present. Their main reasons for wanting to buy a flat in the borough were either that they wanted to live near family and friends, or that they have always lived in the area.

Whilst it would be nice to be able to satisfy these wishes for everybody, many people who now own their own houses accepted that they might have to move away from their home turf to possibly cheaper areas to gain their independence.

The survey makes it clear (Table 6-2) that local prices for one bed flats are out of reach of the incomes of over 80% of concealed households yet the strategy states that the main areas people want live are Brentwood and Shenfield, which are the most expensive areas. It seems illogical therefore to plan to build so many flats in these areas

One possible outcome is that there will be insufficient demand for all of

these flats and that developers will therefore not be interested in investing in such developments unless a more balanced approach to housing types is adopted.

Comments (please use additional sheet if required):

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