



**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: First Name: Last Name:

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):

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):

REPRESENTATIONS ON BEHALF OF BRENTWOOD SCHOOL AND BRENTWOOD PREPARATORY SCHOOL

Introduction – General Comment

1. The draft Local Plan has been published for a 6 week consultation period from 10 February to 23 March 16. The Schools have been a key contributor to the Local Plan process and has involved the Head of Planning and Head of Forward Planning as well as two members of the Planning Committee at an early stage. The key elements of discussion have been the growth plans of the Schools and the particular feasibility for expansion of the Preparatory School. Discussions have highlighted the need or otherwise for Green Belt designation within the Urban area as affecting the Schools and restricting development opportunities.
2. The focus has been on the major contribution that the Schools make to community infrastructure as well as the benefits to employment and the sharing of facilities. This representation should be viewed in the context of our submission made on 17 February 15 and consultation response of 2013.

Draft Local Plan

3. The draft Local Plan, in **Chapter 2**, places the context for the Local Development Plan and under the heading Education and Schools, paragraphs 2.47 to 2.49 sets out that the general context is one of ensuring adequate education provision is available to existing and future local residents. As a principle

it is one the Schools would strongly **support**.

4. While paragraph 2.49 highlights that Primary Schools in the Borough are generally at capacity, particularly within the Brentwood Urban Area. As an endorsement of the Borough's conclusions that Primary Schools are generally at capacity, Brentwood School has identified its need to expand pupil numbers at the primary level and is confident of strong demand.

Support and General Comments

5. **Chapter 3** – Vision. It is set out that Brentwood Borough will continue to be a thriving and unique destination growing its prosperous local economy and fostering development. In their vision it is also set out that:

“Brentwood will grow sustainably with new development directed to locations best served by local services and facilities to help further improve existing and new residents’ quality of life”.

The Schools are **supportive** of that vision.

6. **Chapter 4** address strategic objectives and sets out five economic prosperity objectives, **Policy SO4 to SO8**. Not directly focussed on School developments, nevertheless of relevance to the employment benefits deriving from School expansion and redevelopment, is **Policy SO4**:

“foster a prosperous, vibrant and diverse local economy by attracting new commercial investment in order to maintain high and stable levels of economic and employment growth”.

Again the Schools are **supportive** of that strategic objective in the context of its own growth aspirations.

7. **Chapter 5**. The Schools **support** the sequential land use approach which is in accordance with the NPPF requirements for sustainable development. In particular for the urban areas to prioritise Brownfield sites within existing urban areas and to consider all appropriate land within existing urban areas (paragraph 5.16 and figure 5.4).

8. It is noted that the general text under Hierarchy of Place (paragraph 5.26) sets out that Brentwood Town Centre is the Borough's main focus for shopping, **community** and leisure activities and the Schools' aspirations are to add to those contributions.

9. **Chapter 6** Managing Growth refers back to strategic objectives 1 and 2 resulting in **Policy 6.1** Sustainable Development. The policy follows the thrust of the National Planning Policy Framework (NPPF) and is **supported**. Our clients aim to equally work proactively with the Local Planning Authority.

Support and Object

10. Under the heading General Development Planning, **policy 6.3** sets out general development criteria which are **supported** where there is minor adjustment – see general JTS Partnership representations.

Object

11. Criteria h, is unnecessary and the Council places too great a weight on it. It should either be removed or additional words added:

“h) result in no net loss of residential units unless other material public and planning benefits outweigh such loss”

12. The Local Authority’s over emphasis of the need for the retention of residential at all costs. There may be many opportunities for greater community benefits to come forward where there is inconsequential loss of one or two units or where other plan objectives can be met.

13. It is noted that the Borough has highlighted Gateways into Brentwood and the positive approach adopted **is supported** but under the subheading of Highway Junctions. There is too great an emphasis on landscaping being prioritised, landscaping should mainly be referred to amongst other urban context features including quality of buildings. Not treated as a priority in an urban context.

Suggested alternative wording:

“Within the urban area the emphasis will be to create buildings of high quality with landscaping where appropriate. Outside the urban areas and depending on character, landscaping will be encouraged to enhance the local area”

14. **Chapter 9** addresses Green Belt, in paragraphs 9.46 through to 9.90 it is highlighted that 89% of the Borough is within the Green Belt. It is explained earlier in the Plan that this percentage is ranked sixth highest in England. On that basis it is expected that the Council should be able to review with greater flexibility its Green Belt boundaries, particularly where within the urban areas. **Policy 9.8** sets out that the Metropolitan Green Belt boundaries within Brentwood will be maintained, paragraph 9.51 making clear that in order for Brentwood Borough to grow economically and to provide adequate housing land must be made available for such growth. There is a failure to consider wider strategic objectives of the Authority in failing to review Green Belt boundaries and to address the long term needs of the Borough.

15. The Local Authority has been working towards a Green Belt boundary review and that work has not yet been published in its final form. It is titled “*working draft*” and a number of assessments can be criticised. The results in any event do not appear to have informed policy – see general JTS objection to Policy 5.2. It is an area of ongoing discussion and should not be ignored by the LPA.

16. Taking for example another Local Authority, London Borough of Bromley, where the Firm has been

promoting School redevelopment in the context of the need for education provision to correspond with population growth is critical. Alongside much of London the Planning Authority have recognised the need to provide greater flexibility with their existing School sites to remove Metropolitan Open Land and Green Belt designations replacing where appropriate with Urban Open Space or adjusting the Green Belt boundary completely (reference will be made to that education review in further submissions to the LPA) to ensure that education needs are met for the Plan period.

17. **Chapter 10** provides the text and policies in relation to the key strategic objectives 11-13 (page 152). Page 153 under the heading Sustainable Transport and **Policy 10.1** sets out that future developments will be located in accessible locations to help reduce the need to travel. As a policy it also requires that major generators of travel demand should be located in Brentwood Town Centre. The Schools fall under that category and as a policy it is **supported**.
18. Key elements dealing with infrastructure and community facilities are on Pages 166 and 167.

Objection

19. **Policy 10.9** addresses open space, community, sport and recreational facilities and is restrictive in terms of school development where the policy has a presumption against any development that involves loss of open space, community, sport, recreation or play facilities, etc, except on two basis;
 1. *There is an excess of provision,*
 2. *Where alternative facilities of equal or better quality*
20. The Schools would like to see a third exception:
 3. *Where the needs of other community infrastructure is more pressing*

Objection

21. Finally in Chapter 10 there is reference to Institutional buildings (page 181).
22. As a section for such an important area of development it is considered it should be strengthened with some additional text and paragraphs following:

“Established Schools and other educational facilities make a major contribution to community use and provide essential support to increased housing growth.”

“This plan recognises that such education providers will continue to improve facilities and such Institutional users will be encouraged to made efficient use of their assets and landholdings. Where feasible such providers will be encouraged to share their assets with the wider community to improve health and social wellbeing.”
23. After Paragraph 10.86 there should be additional words:

“It is recognised that such uses provide an important contribution to community facilities as well

as benefitting the local economy. There will be a general presumption in favour of such developments where located in the right place.”

24. The arguments and reasoning behind strengthening the text of the Plan in this area is that in accordance with NPPF and its thrust towards sustainable development there is a strong need to make the most efficient use of land and to take every opportunity to bring forward developments that have significant public benefit. There should not be any obstacle to promoting such developments unless it can be shown that there is real demonstrable harm.

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