



**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:	Miss	First Name:	Breana	Last Name:	Coyle
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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):

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):

The Local Planning Authority have chosen a strategy that directs development growth to the Borough's Transport Corridors and urban areas in locations well served by existing and proposed local services and facilities (SO1). In that context has set out SO3 for housing to meet the needs of the Borough's population, while safeguarding the Green Belt from 'inappropriate' development (SO9).

The difficulties of achieving enough housing in the Plan period without the release of Green Belt sites is recognised by the need to achieve two key strategic sites with the allocation at Dunton Hills Garden Village as well as at West Horndon (paragraph 5.20).

Having regard to Objectively Assessed Needs (OAN) the Council has set out in figure 7.2 Housing Land Allocations which apart from strategic sites lists a number of sites which are releases of Greenfield Green Belt. The Local Authority in setting out their OAN figure of 7,240 require an average delivery rate of 362 dwellings per annum, see policy 5.2 Housing Growth. As is explained paragraph 5.37 the draft plan spells out that these figures are significantly greater than the Local Authority have been able to deliver in recent years.

It is considered that it will be sensible for small sites within the larger villages to contribute to overall housing provision and that there are opportunities for Greenfield urban extensions within the Green Belt to assist in overall housing delivery without demonstrable harm to the Green Belt or the character of the villages.

The general text under the Section "Hierarchy of Place" in relation to the larger villages is too restrictive, we would recommend that paragraph 5.31 be amended to read:

"Larger villages in the Borough are served by a local shopping parade and a Primary School. They generally have "some" limited community and health facilities as well as making some provision for local jobs. All such villages identified have bus services and are readily accessible to the primary road network and larger centres".

It is noted in Paragraph 5.33 that the Local Authority proposes no amendment to the Green Belt

boundaries surrounding larger villages. However, it is quite clear that there are a few small sites which if promoted for development would not have any impact on the character of the Borough or its important larger villages and which could make an essential contribution to the longer term needs of the Borough.

These representations submitted on behalf of Thorndon Park Golf Club (TPGC) relate primarily to the villages of Herongate and Ingrave which abut our client's landholdings (see submission of February 2015). We have identified a small site opportunity which can contribute to wider community objectives.

We would also suggest inserting the following words:

"Where a small scale development is considered appropriate as logical rounding off without harm to the character of the village, any such site will be considered for development where it is brought forward early in the Plan Period".

We are also highly critical of the Local Authority's approach not to review the Green Belt boundaries of the key village settlements in accordance with the requirements of the NPPF and paragraphs 83-85 to meet the longer term needs of the Borough. This matter is addressed in greater details by other representations submitted by the JTS Partnership.

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**