



**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: Iain

Last Name: Hill

Address:

Ingleton Wood LLP

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):

03 – Vision

04 – Strategic Objectives

10 – Quality of Life & Community Infrastructure (10.7 in particular)

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 following comments are provided on behalf of the North East London NHS Foundation Trust (NELFT).

NELFT provides community health and mental health services in Essex and the north east London Boroughs of Barking and Dagenham, Havering, Redbridge and Waltham Forest. The area within their jurisdiction includes the Borough of Brentwood.

NELFT are generally supportive of the Council's Vision and Strategic Objectives, particularly Strategic Objective 11 (SO11), which seeks to enhance social inclusion, health and wellbeing. Our client also recognises the need for the forecast growth of 7,240 new residential dwellings (362 dwellings per annum) in policy 5.2 during the period up to 2033, and the need to provide sufficient social infrastructure including health care facilities to support this growth.

However, NELFT object to Section 10 of the draft Local Plan on the basis that it is not 'sound' in accordance with paragraph 182 of the National Planning Policy Framework (NPPF). More specifically, with regard to the provision of healthcare and associated facilities, it is considered that as drafted the plan does not deliver the most appropriate strategy and does not reflect an effective approach to cross boundary working on strategic issues.

Although the draft Plan outlines the need to create healthy, inclusive communities and notes specific requirements relating to open space and community facilities, there is no specific strategic policy regarding the provision of healthcare facilities.

Accordingly, as drafted the Local Plan does not identify an effective strategy to promote / require the delivery of adequate social infrastructure for the forecast growth within the Borough. It is requested that a specific policy seeking to promote and support, in principle, the provision of healthcare facilities is incorporated into the Local Plan. The policy should ensure that new and improved facilities are provided in light of assessment of the need for such facilities in the area and support the co-location of health and social care services where this would bring about improvements in access for the community. In addition, the policy should seek to secure the provision, enhancement and maintenance of health and social care facilities through planning obligations.

In addition, the Local Plan does not adopt a partnership approach to the provision of healthcare. As drafted the document *notes that the Clinical Commissioning Group is responsible for planning, designing, buying and the performance management of NHS services. Whilst the Clinical*

Commissioning Group have a statutory duty to improve the health of the local populations, the approach proposed does not have regard to the role of other health care providers and bodies within the locality and therefore does not consider the local implications of the forecast growth within the plan. In order to ensure the Local Plan is 'sound' a collaborative working arrangement should be established between the Borough Council, Essex County Council, the Clinical Commissioning Group, public health bodies and healthcare organisations to develop a comprehensive plan to the delivery of healthcare to meet local needs across the plan period.

NELFT would also request amendments are made to Section 10 of the draft Local Plan to reflect that, in certain circumstances, healthcare facilities can be redeveloped for alternative uses or amalgamated with other facilities if they are no longer required or fit for purpose. It is acknowledged that any such policy would need to incorporate criteria requiring any such proposal to provide evidence that the facility is not required and that its loss will not undermine the provision of services in the Borough. The disposal of facilities no longer required for alternative uses is key to overall strategy for the provision of new modern facilities that meet the ongoing requirements of community. This will ensure a joined up approach to delivering the necessary infrastructure in parallel to the forecast growth, ensuring that the plan is effective, justified and sound.

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**