



**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:	Matthew	Last Name:	Driscoll
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Address:	For The JTS Partnership LLP on behalf of Mr Martin Morecroft				
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Post Code:		Telephone Number:	
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Email Address:	
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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):

Policies 5.1, 5.2, 7.1, 7.4, 9.10

Policy 5.1

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):

We generally support the Council's spatial strategy but it is concerned that proposed housing allocations will not deliver the vision or the quantum of dwellings required to meet objectively assessed need. The Partnership is particularly concerned that the allocations are inconsistent with the 'evidence base' that the Council has failed to undertake a comprehensive review of Green Belt boundaries. As such, the Council cannot demonstrate that the proposed strategy and housing allocations minimise the impact on the Green Belt.

We consider that, for the above reasons (and for other reasons highlighted later in this document) the Draft Local Plan is unsound.

The Council should follow a hierarchical approach to identifying land to meet residential need, along the following lines:

1. Existing urban areas
2. Existing developed sites in Green Belt
3. Review of Green Belt boundaries to ensure consistency with para 84 and 85 NPPG guidance. Boundaries to follow clear, recognisable, physical features and Green Belt not to include land which is unnecessary to keep open (such as land surrounded by development or which is part of a settlement).
4. Release of sites on the edge of existing settlements.
5. New settlements (Dutton Garden Suburb).

It is only by following a hierarchical approach, and analysing the impact on the Green Belt at each stage, that the Council can assure itself that the overall impact of the Green Belt will be minimised.

It is noted that on 1st March 2016, a document was published on the Council website produced by Crestwood Environmental Ltd., entitled, 'Assessment of Potential Housing, Employment and Mixed Use Sites in the Green Belt and their Relative Contribution to the Purposes of the Green Belt Designation'.

Whilst a number of sites are assessed, it is evident that the Council have not taken into account the results of this assessment when preparing their Draft Local Plan.

In particular, it is noted that the Council has allocated a number of sites, which have a 'moderate' impact to the Green Belt, rather than the smaller, but 'Low to Moderate' risk sites.

The Policy also states that limited development, including infilling where appropriate, will take place in villages within rural areas; however this is not evident within the Draft Local Plan allocations as published for consultation.

Policy 5.2

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 Objectively Assessed Housing Need figure of 7,240 new residential dwellings to be built over the Plan period is supported.

However there is a significant question mark over the deliverability of the Strategic Site at Dunton Hills and its ability to deliver within the Plan period (see response to Policy 7.1).

Whilst the Council has undertaken and published a working draft 'Assessment of Potential Housing, Employment and Mixed Use Sites in the Green Belt and their Relative Contribution to the Purposes of the Green Belt Designation' (after the publication of the Draft Local Plan), the results do not appear to have informed policy.

It is noted that the Council has chosen to allocate land which has a 'moderate' impact on the Green Belt, rather than the smaller, but 'Low to Moderate' risk sites (see response to Policy 7.4).

There is no justification within either the Assessment or the Draft Local Plan, as to the reason why those 'low-moderate' sites have not been allocated and whilst it is appreciated that some of those 50 sites within the 'Low' or 'Low to Moderate' criteria are not appropriate for housing development, being either in employment use, or having already been developed, the Council's failure to explain why the Evidence Base

does not influence the housing strategy makes the Plan, at present, unsound.

POLICY 9.10

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 policy effectively removes those frontages from Green Belt designation, in which case there should be no need for the policy and they should be removed from the Green Belt. The principle or basis behind this policy is not supported within the NPPF. The Green Belt boundary should be established on a strong defensible line. This should be a clearly defined and reasonably permanent physical feature in the landscape, such as a river, road or railway. Drawing the boundary across the middle of fields or gardens is totally unsatisfactory and even field boundaries may not be sufficiently permanent to form a reliable long-term boundary. At the very least, the Green Belt boundary should exclude existing residential development and this exclusion must extend to the whole of the residential curtilage. What is required is not a straight line but a clearly defined and readily defensible boundary.

This submission seeks to support an extension of the frontages set out within the Policy, particularly at Rayleigh Road. Whilst the northern side (nos. 554-664 Rayleigh Road) is considered a relevant frontage to meet the policy, it is requested that the ribbon development located on the southern side, including 741 Rayleigh Road should also be incorporated within frontages identified.

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**