

Planning Policy Team
Brentwood Borough Council
Town Hall
BRENTWOOD
Essex
CM15 8AY

Date: 21st March 2016
Our Reference: SAR/AP/PP/BrBC
Your Reference:

By e-mail to : planning.policy@brentwood.gov.uk

Dear Sirs,

BRENTWOOD DRAFT LOCAL PLAN CONSULTATION

Thank you for the opportunity to comment on this consultation. At its meeting on 16th March 2016, the Council's Cabinet considered a report on the consultation and resolved to respond in accordance with the report. I should therefore be grateful if you would accept this letter as the response of Castle Point Borough Council to the consultation on Brentwood's Draft Local Plan, and I am pleased to set out below the text of the Cabinet report.

In general terms the preparation of the Draft Local Plan is to be welcomed. The strategy to be pursued appears to support sustainable development and growth, by ensuring that it is closely related to existing infrastructure and facilities. Furthermore the recognition in the Plan of the strategic role of Brentwood town centre and the significant influence of Crossrail is welcomed.

However, there are some concerns with aspects of the Plan and its evidence base. First the Plan is based on evidence suggesting that it is an independent Strategic Housing Market Area, but the relationship of the periphery of the borough to both Thurrock and Basildon does not suggest that this may be a robust assumption.

A significant proportion of the new housing sites are planned for locations outside the current urban areas of the borough. It is a laudable aim of the Plan to protect the character of the suburban areas and villages; however, by directing new developments outside of these areas it is likely to give rise to issues concerned with sustainability. Travel and transport become significant issues, and there are no proposals within the plan for significant improvements in transport capacity to support dispersed growth, which in turn could have implications for the accessibility of neighbouring areas.

In terms of objectively assessed housing need, whilst a plan that will meet its needs is supported, there are concerns regarding the appropriateness of the locations of the strategic housing sites selected, for the reasons set out above.

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As noted above, the Plan does not indicate what transport improvements will be undertaken to accommodate the growth planned within its borough. Further work would be needed to identify what impacts the proposed developments will have on the existing transport networks, and how to mitigate these impacts.

For example the proposed development at Dunton Hills Garden Village involves:

- *2,500 new homes;*
- *at least 5 ha of employment land;*
- *local shops;*
- *community facilities;*
- *schools; and*
- *healthcare services*

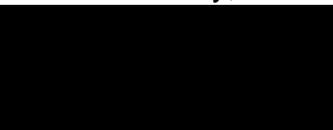
The Plan acknowledges that this development would have an impact on the A127 Corridor, but it does not indicate what mitigation measures would be put in place.

The Plan's provision for Gypsy and Traveller pitches is supported; however the Plan states that, due to possible changes to the definition of Gypsy and Travellers, this could change. It would be more prudent to deal with this uncertainty through a process of monitoring and review of the effectiveness of the Plan.

Finally, the Plan's policy regarding renewable energy infrastructure is also supported, as is its commitment to reduce CO₂ emissions by 20%.

I trust this consultation response is of assistance to you in determining how to proceed with regard to the preparation of Brentwood's Draft Local Plan. If you have any queries with regard to the matters raised, please do not hesitate to contact me.

Yours sincerely,



Steve Rogers

Head of Regeneration & Neighbourhoods

