



**BRENTWOOD  
BOROUGH COUNCIL**

# Brentwood Draft Local Plan Preferred Site Allocations

January 2018

## COMMENT FORM

From 29 January to 12 March 2018 we are consulting on the next stage of the Brentwood Local Plan: Preferred Site Allocations. You can view and comment on the consultation document online at [www.brentwood.gov.uk/localplan](http://www.brentwood.gov.uk/localplan)

Alternatively, please use this form to share your views on the contents of the document.

All responses should be received by Monday 12 March 2018

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](mailto: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:					
Email Address:					

## YOUR COMMENTS

Please indicate which section(s) of the Preferred Site Allocations document that you are commenting on (where applicable please clearly state the section/heading or paragraph number):  
Part 1, Paragraph 31, page 14

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 Council has gone to considerable lengths to justify the locations for new development. In particular Redrow supports the Spatial Strategy which has a clear rationale and which reflects well the spatial patterns and dynamics of the Borough. However Redrow have concerns about how the release of land from the Green Belt is justified.

The Council has not expressly demonstrated exceptional circumstances to justify significant areas of land being taken out of the Green Belt. Steps have been taken, but not described in the Local Plan in terms that reflect the provisions of the National Planning Policy Framework (NPPF). The Draft Revised NPPF, published on 5<sup>th</sup> March, does not relax the constraints surrounding the release of land in the Green Belt. As paragraph 136 of the revision illustrates, the exceptional circumstances that might justify the release of Green Belt land have been spelt out:

“Before concluding that exceptional circumstances exist to justify changes to Green Belt boundaries, the strategic plan-making authority should have examined fully all other reasonable options for meeting its identified need for development. This will be assessed through the examination of the plan, which will take into account the preceding paragraph, and whether the strategy;

a) makes as much use as possible of suitable brownfield sites and underutilised land;

b) optimises the density of development, including whether policies promote a significant uplift in minimum density standards in town and city centres, and other locations well served by public transport; and

c) has been informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development, as demonstrated through the statement of common ground. The following text is proposed to follow paragraph 31:

The context for this Draft Plan is that the Green Belt, including the inner boundary around Brentwood, was established in 1957 and extended to cover the whole of Brentwood Borough Council (BBC) in 1976. No significant changes have been made in the intervening time, and in particular no changes were made in the 2006 Brentwood Replacement Local Plan. 89% of the Borough is now covered by the Green Belt and 10% is built on. The Green Belt in this area has demonstrated its permanence.

In just part of that period, 2001/02 to 2016/17, 3412 dwellings have been built in the Borough, of which 3235 or 94.8% have been built on previously developed land. The recent record shows that significant housing growth has been accommodated in the Borough without any significant

incursions into the Green Belt, this in spite of the fact that the Green Belt covers nearly 90% of the Borough.

Against this constrained background the Council has followed good practice to check whether exceptional circumstances have been demonstrated to justify significant changes to the Green Belt boundary:

- a. The entire Green Belt within Brentwood has been divided into parcels and each has been assessed according to its contribution to the first four purposes of Green Belts. An assessment has also been made of the overall contribution that each parcel makes to the purposes of the Green Belt. Whilst “inappropriate development is, by definition, harmful to the Green Belt” (NPPF, para 87) there are degrees of harm, and the Council’s assessment enables land to be classified according to the degree of harm that might ensue if the land were to be developed.
- b. Having overseen housing completions of 213 p.a. in the period 2001/02-2016/17 or 132 dwellings p.a. in the more recent period 2012/13-2016/17, the Council is now addressing an OAN of 380 dwellings p.a. (7600 in the plan period), an increase of 178% over the higher longer rate of completions.
- c. In order to meet this rate of housing need in a sustainable manner and whilst respecting the Green Belt, the Council has undertaken a sequential approach to the identification of sites for development. This is shown diagrammatically in Figure 4 “Developing the Spatial Strategy” of the consultation document whilst Figure 8 “Housing Growth” shows the numbers and proportions of housing sites that are derived from the successive stages of the sequential approach. The key stages in the Council’s approach are: to use brownfield sites first, then consider growth in settlements in terms of their relative sustainability linked to services and facilities and finally the release of Green Belt land is only considered after all sustainably located, suitable, available and deliverable brownfield sites have been identified as allocations. This approach is applied in the context of the preferred spatial strategy.

In summary the Council has examined and exhausted alternatives to the use of Green Belt land. It has identified Green Belt sites, the loss of which to development would entail only moderate harm to the purposes of the Green Belt. And it has shown how the draft Local Plan can deliver the housing that is urgently needed in the Borough. The Council are satisfied that they have demonstrated the exceptional circumstances needed to justify alterations to Green Belt boundaries.

*The Council is advised to add into the above argument the steps that they have been taken, and the results achieved, from optimising the density of development on non-Green Belt land and from exercise of the duty to cooperate.*

It is further suggested that the word “brownfield” (in penultimate line of para 31) should be followed by the words “and greenfield” in order to be consistent with Green Belt policy and to reflect the approach adopted by the Council.

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