



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

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

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

| | | | | | |
|----------------|-----------------------------|-------------------|-----------------|------------|----------|
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YOUR COMMENTS (1 of 7)

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):

Paragraphs 41–42

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):

I oppose the 36% upward adjustment to the housing target made on the grounds of "affordability". The lack of affordable housing is due to prices being inflated by an unholy alliance of banks, estate agents, and government subsidy (cf. "Help to Buy" schemes). Even in London and the "Home Counties", there are many empty dwellings. Councils and government should concentrate on bringing more of these empty dwellings into use (the ability to impose a higher rate of Council Tax on such dwellings is one welcome development), instead of destroying the green belt. Within Essex, Brentwood will always command a premium, owing to its excellent transport links (both road and rail, as acknowledged in paragraph 26), no matter how much the supply of housing and employment land is increased. As a 25-year-old, I wish to make it clear that I object in the strongest terms to attempts at justifying destruction of the green belt in the name of "young people".

YOUR COMMENTS (2 of 7)

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):

Sites 010, 022, 023A, 023B, 027, 032, 034, 075B, 076, 077, 079A, 083, 085B, 087, 106, 128, 158, 194, 200, 235, 263, 276, 294

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):

I oppose any encroachment on the green belt. The National Planning Policy Framework makes clear that the "permanence" and "openness" of the green belt are vital facets of its integrity. Paragraphs 44 and 45 of the NPPF also make clear that Objectively Assessed Housing Need is not the only pertinent factor in determining housing targets, and the significant amount of green belt land in the borough would be sufficient justification to set housing targets at a lower level than that suggested by the Objectively Assessed Housing Need (Brentwood's green belt is, according to the

Comments (please use additional sheet if required):

I oppose any encroachment on the green belt. The National Planning Policy Framework makes clear that the "permanence" and "openness" of the green belt are vital facets of its integrity. Paragraphs 44 and 45 of the NPPF also make clear that Objectively Assessed Housing Need is not the only pertinent factor in determining housing targets, and the significant amount of green belt land in the borough would be sufficient justification to set housing targets at a lower level than that suggested by the Objectively Assessed Housing Need (Brentwood's green belt is, according to the council's own strategic growth options development plan, "the sixth highest in England by percentage of total area"). Moreover, it should be observed that developers are failing to implement planning permissions already obtained (cf. section on Historic Building Rates, as described by the Council in its responses to Sajid Javid). Until such permissions have been utilised, it is unacceptable to reward developers with more permissions.

In short, I call upon the Council to declare the green belt as an **absolute** constraint (cf. draft local plan in 2013), notwithstanding the alleged risk of being found "structurally unsound". It is my view that the Council is exaggerating such a risk: past comments by Eric Pickles, former MP for Brentwood & Ongar, who was the minister responsible for implementing major legislative changes in the so-called "localism agenda", have made clear that the green belt **is** a sound reason for reducing the housing targets.

YOUR COMMENTS (3 of 7)

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):

Paragraph 63

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 Brentwood Town Centre Design Plan (2017) has some promising ideas. However, it could be more ambitious in the density proposed. Given the high demand for housing and the excellent transport connections in the town centre, there should be a presumption in favour of taller buildings (preserving the green belt is far more important than preserving the so-called "skyline"), provided that they do not impinge upon the "right to light" of existing dwellings and gardens.

YOUR COMMENTS (4 of 7)

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):

Sites 002, 003, 039, 040, 041, 081, 102, 117A, 117B, 186

Please specify if you Support, Object or are providing a General Comment:

Comments (please use additional sheet if required):

In general, I support the development of these sites, provided that they are developed in a manner that does not necessitate significant felling of trees now or in the future. Woodland is of immense value aesthetically, recreationally, and environmentally. Brentwood benefits from having woodland within very easy reach, and it is vital that this remains the case, including in the urban parts not designated as “green belt”.

As stated in my comment on paragraph 63, I believe that the density proposed for these sites could be higher. Higher densities on these brownfield sites would then obviate any alleged need to develop other sites.

YOUR COMMENTS (5 of 7)

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):

Site 102

Please specify if you Support, Object or are providing a General Comment:
(tick as appropriate)

Support

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Object

☐

General Comment

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Comments (please use additional sheet if required):

I support an approach that prioritises the residential facet, maximising the number of dwellings, subject to respecting the “right to light” of adjacent properties. I believe that more than 300 residential dwellings could and should be built here. The need for more medium-sized commercial units (cf. Brentwood Town Centre Design Plan (2017)) can be realised through the repurposing/refurbishment of existing commercial buildings, including the Baytree Centre, which has **never** been at full occupation.

YOUR COMMENTS (6 of 7)

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):

Sites 044 and 178

Please specify if you Support, Object or are providing a General Comment:
(tick as appropriate)

Support

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Object

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General Comment

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Comments (please use additional sheet if required):

Although not green belt, these sites offer open space within the urban area, and are thus of immense value in their present state. Furthermore, existing infrastructure is not amenable to development — public transport in the vicinity is almost non-existent, and the roads would struggle to accommodate the extra traffic.

YOUR COMMENTS (7 of 7)

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):

Employment Sites 079C, 101A, 187, 200

Please specify if you Support, Object or are providing a General Comment:
(tick as appropriate)

Support

☐

Object

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General Comment

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Comments (please use additional sheet if required):

I oppose any encroachment on the green belt. The National Planning Policy Framework makes clear that the "permanence" and "openness" of the green belt are vital facets of its integrity. The Council could consider larger allocations in the town centre, especially in underutilised retail areas such as the Baytree Centre.

I call upon the Council to declare the green belt as an **absolute** constraint (cf. draft local plan in 2013), notwithstanding the alleged risk of being found "structurally unsound". It is my view that the Council is exaggerating such a risk: past comments by Eric Pickles, former MP for Brentwood & Ongar, who was the minister responsible for implementing major legislative changes in the so-called "localism agenda", have made clear that the green belt **is** a sound reason for reducing targets.

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