



GERALDEVE

Objection to the Brentwood Draft Local Development Plan 2019

On behalf of the BJ Read Associates

March 2019

PGWD/SP2

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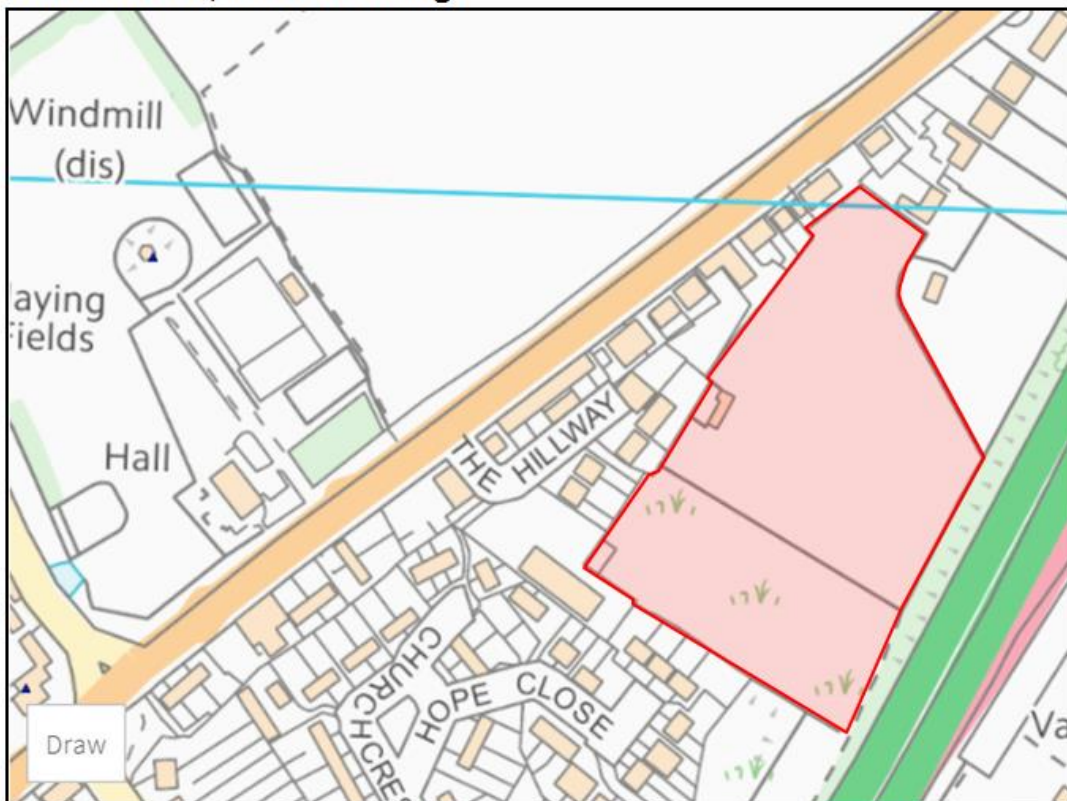
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1. Introduction/Background

1.1. We write to set out an objection to the Brentwood draft Local Development Plan 2019 (The Plan), on behalf of BJ Read Associates.

1.2. BJ Read Associates have land interests at Roman Road, Mountnessing.

Roman Road, Mountnessing



1.3. This representation is a formal objection to the Council's approach to the Local Plan process on the following basis:

- The approach to housing is fundamentally flawed and unsound; the Plan is not positively prepared; justified; effective; or consistent with national policy. This approach is in direct conflict with the National Planning Policy Framework (The Framework).
- Delivering a wide choice of high quality homes; the Plan fails to identify available

land in its draft site allocations. This is contrary to the Framework.

- The preferred strategy results in an unsustainable pattern of development. This is due to the fact that a number of the proposed strategic housing allocations are less sustainable and appropriate than un allocated alternatives; and
- Land at Roman Road Mountnessing would be a far more sustainable option for development. This is due to the clear locational/sustainability advantages of the site.

2. The Principles of Plan making

1.4. The Local Plan should be progressed in accordance with the National Planning Policy Framework (The Framework) and in particular;

“be prepared with the objective of contributing to the achievement of sustainable Development; and

be prepared positively, in a way that is aspirational but deliverable;”¹

1.5. The Framework states that, crucially Local Plans should be sound. They are “sound” if they are:

Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs¹⁹; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;

Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;

Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and

Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework.²

¹ NPPF paragraph 16

3. The Plan's approach

1.6. The draft Plan fails in its approach to housing for the following reasons:

1.7. **SP02: Fig 4.2** Too great an emphasis is placed on Dunton Hills Garden Village to provide for housing growth. An annual housing rate of 310 per year to 2023 reflects poor and unrealistic housing site choices. This strategy will have an adverse effect on affordability in the short term which will in turn increase land prices in the longer term.

1.8. **HP04 BE14 Specialist accommodation for older people.** The Draft Plan acknowledges the aging population but fails to plan for any increase in accommodation. In effect policy HP04 creates un-justified negative criteria against which to consider proposals. This approach is contrary to NPPF and NPPG guidance.

4. Roman Road Mountnessing as an alternative site

1.9. The Roamn Road, Mountnessing site is available for development, free from constrains and there is a clear commitment to provide affordable housing and or specialist housing for older people on this site. The delivery of this site is more certain than any other local site given that:

- it is in a single ownership;
- it has immediate and appropriate existing access to the main highway network (Roman Road);
- it is free from significant constraints or factors which would give just to additional, abnormal development costs;
- it is located within Mountnessing; and
- the land is not of any particular outstanding quality.

1.10. The allocation of Green Belt sites for housing confirms the principle that the release of Green Belt Land to meet the defined need for housing in the local plan is a “very special circumstance”. It follows that if this is to be acceptable the chosen sites for

² NPPF paragraph 35

release must be the most appropriate.

1.11. The Mountnessing Site is clearly the most sustainability location at which to meet, at least in part, the housing needs of Brentwood. The Site is not of high landscape value and any development would be distant from heritage assets in the area and public parks. The only point against the option is its location in the policy defined Green Belt.

5. Conclusions

1.12. The conclusion to the above analysis is that the draft Plan is unsound. The Mountnessing site has been incorrectly analysed by the Council and if were correctly so, would be a leading site to meet the housing needs of the Plan.