



**BRENTWOOD
BOROUGH COUNCIL**

Local Plan 2015-2030

Preferred Options

July 2013

COMMENT FORM

(For official use only)

Comment
No.

Ack. date

You can comment on the Local Plan 2015-2030 Preferred Options online at www.brentwood.gov.uk/localplan. Alternatively, please use this form to share your views on the contents of the Local Plan.

PERSONAL DETAILS

YOUR COMMENTS

Please indicate which section(s) of the Local Plan you are commenting on (please clearly state the Policy reference or paragraph number):

Policy CP2

Please specify if you Support or Object (tick as appropriate):

Support

Object

Comments (please use additional sheet if required):

If the Local Plan 2015-2030 were to be prepared on the basis of addressing objectively assessed housing needs, it would not be possible to accommodate all the future housing requirements within existing settlements. Whilst Martin Grant Homes acknowledge that Policy CP2 refers to the “majority of new development” being provided within existing settlements, Policy CP2 will need to be rephrased in order to encompass a review of existing green belt boundaries required to facilitate the accommodation of future development arising in the period 2015-2030.

Indent c. of Policy CP2 refers to areas where development “*should not take place*” including undeveloped green belt land. However, as noted above, the accommodation of objectively assessed housing needs will necessitate the development of land beyond existing settlement boundaries. In such circumstances, it is inappropriate for indent c. to maintain that presently undeveloped green belt constitutes an area where development should not take place. A thorough review of existing green belt boundaries should be undertaken as part of the process of preparing the Local Plan in order to ensure that appropriate/sustainable undeveloped green belt land is made available to accommodate necessary development arising in the period 2015-2030. Martin Grant Homes agree with the observation at indent g. concerning the need to ensure a flexible, responsive supply of land. That supply should be assessed on the basis of addressing objectively assessed housing needs arising in the period 2015-2030.

We have noted that the Council maintains that there is no alternative approach to that described at Policy CP2. Martin Grant Homes would remind the Council that the achievement of sustainable development includes the accommodation of objectively assessed housing needs. In such circumstances, we do not consider that the preferred approach described in Policy CP2 is essential

“in order to deliver sustainable development.” Indeed, the focus placed by the Council upon the retention of the existing green belt boundaries will act against the achievement of sustainable development in the period 2015-2030. Paragraph 8 of the NPPF states that the achievement of sustainable development will be secured by seeking economic, social and environmental gains jointly and simultaneously through the planning system. That system is expected to play an active role in guiding development to sustainable solutions. Furthermore, paragraph 17 of the NPPF requires that every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth. Plans should take account of market signals, such as land prices and housing affordability, and set out a clear strategy for allocating sufficient land to address those future requirements. Policy CP2 does not provide the appropriate positive impetus to address future development requirements.

Martin Grant Homes acknowledge the comment at paragraph 3.2 of the Preferred Options that the level of development described in the Preferred Options for Consultation aims to strike a balance between responding to the need for development and recognising the constraints which exist. Unfortunately, a careful consideration of the appropriate balancing exercise has not been carried through and it is noted that paragraph 3.2 of the Preferred Options refers to the response of residents who place *“a high value on protecting the Green Belt.”* That consideration effectively predetermines the amount of land that the Council believes is available to accommodate new housing in the period to 2030. This response does not enable the Local Plan fully to evaluate and address objectively assessed housing needs arising in the period to 2030.

Please return to Planning Policy Team, Brentwood Borough Council, Town Hall, Brentwood, Essex CM15 8AY, or alternatively attach completed form and email **planning.policy@brentwood.gov.uk**

Please note that all responses will be published online. More information can be found at **www.brentwood.gov.uk/localplan**

All responses should be received by Wednesday 2nd October 2013