



**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](http://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 CP10

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

Support

Object

**Comments** (please use additional sheet if required):

Policy CP10 states that the general extent of the green belt will be retained “*subject to minor allocations made in this Plan affecting Green Belt.*” However, Martin Grant Homes consider that the Local Plan provides an appropriate opportunity to review objectively longstanding green belt boundaries in order to establish whether land can be removed from the green belt to accommodate necessary development without impacting upon the purposes of including land within a green belt described at paragraph 80 of the NPPF. There is nothing in the evidence base to suggest that this important evaluation/assessment has been undertaken/considered.

Policy CP10 indicates that the primary concern of the Council is to retain broadly the existing green belt boundaries without seeking to evaluate an acceptable balance between green belt and the accommodation of development requirements arising in the period to 2030. The Council is reminded of the comment at paragraph 83 of the NPPF that local planning authorities should, when preparing their local plan, consider existing green belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. The evidence base does not suggest that this consideration has been evaluated by the Council. Accordingly, Martin Grant Homes consider that Policy CP10 is unsound as there is no evidence to suggest that the Council has sought to undertake an appropriate balancing exercise with regard to the accommodation of new housing arising in the period to 2030 in an area where green belt policies apply.

We agree with the comment at paragraph 3.36 of the Preferred Options that “*the new Local Plan provides an opportunity to refresh Green Belt boundaries.*” However, we do not consider that the advice in the NPPF means that such a review should be restricted to “*minor alterations.*” The green

belt was defined many years ago and the opportunity should be taken through the preparation of the Local Plan 2015-2030 to refresh those existing green belt boundaries within the context provided by paragraph 80 of the NPPF. The Council is reminded that paragraph 85 of the NPPF states that local planning authorities, when defining green belt boundaries, should not include land which it is unnecessary to keep permanently open. An analysis of existing green belt boundaries should be undertaken in order to establish whether there are tracts of land which it is unnecessary to keep permanently open. In such circumstances, the land concerned should be removed from the green belt to accommodate necessary development arising in the period to 2030.

As with the issue of the objectively assessed housing needs arising in the Borough, the potentially relevant evidence regarding green belt has not been published in parallel with the Preferred Options. Page 47 of the Preferred Options for Consultation notes that the 'Landscape Sensitivity Testing and Green Belt Assessment' report is forthcoming. It is unhelpful/inappropriate that the Preferred Options has been published without that element of the evidence base being available to guide the policies described in the Preferred Options.

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](mailto: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](http://www.brentwood.gov.uk/localplan)**

**All responses should be received by Wednesday 2nd October 2013**