



Reference: P013198-L01

30 September 2013

Planning Policy Team
Brentwood Borough Council
Town Hall
Brentwood
Essex
CM15 8AY

By Email

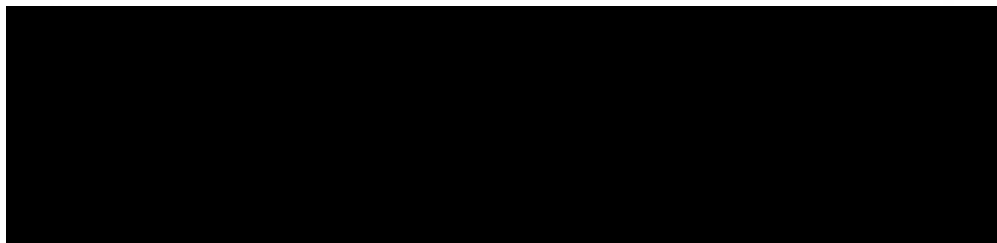
Dear Sir or Madam

'Brentwood Local Plan: Preferred Options for Consultation' 2013

Please find enclosed our representations in respect of the Brentwood Local Plan: Preferred Options' 2013. The representations are submitted on behalf of Laindon Holdings Limited.

I trust the enclosed documentation is in order. Please do not hesitate to contact me should you require any further information.

Yours faithfully



**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 SO7 'Strategic Objectives'

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

Support

Object

Comments (please use additional sheet if required)

Please refer to separate sheet.

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

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**'Brentwood Local Plan: Preferred Options for Consultation' 2013
Representations on behalf of Laindon Holdings Limited**

**Objective S07 'Strategic Objectives'
Objection**

Strategic Objective S07 seeks to safeguard the Green Belt and protect and enhance valuable landscapes. We consider that this objective should be amended to reflect the Council's preferred options Policy S1, which recognises that it is appropriate to allow the reuse of suitable developed sites in the Green Belt. This recognition should similarly be incorporated within the strategic objectives.

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PERSONAL DETAILS

[Redacted area]

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 S1 'Spatial Strategy'

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

Support

Object

Comments (please use additional sheet if required)

Please refer to separate sheet.

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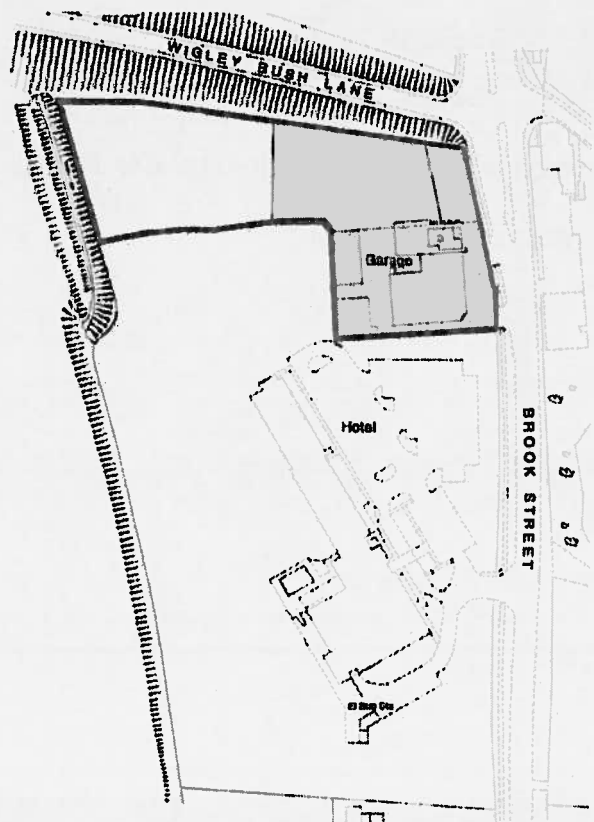
Policy S1 'Spatial Strategy' Objection

Policy S1 sets out the Council's preferred spatial strategy for the Borough. It sets out an aim to protect the Green Belt, but recognises that it is appropriate to allow the reuse of suitable developed sites in the Green Belt. In this context, the policy suggests "minor changes to accommodate proposed development on existing developed sites in the Green Belt".

We support the reuse of suitable sites in the Green Belt. This is consistent with the presumption in favour of sustainable development.

However, we consider that the policy should identify appropriate sites for redevelopment. Specifically, it is suggested that land at Brook Street and Wigley Bush Lane, Brentwood (as shown on the plan below) is an appropriate site for redevelopment. The site currently accommodates a car showroom and car park. Together with the adjacent developments, it forms part of a ribbon of established commercial development along Brook Street.

The site is in an accessible location on the edge of Brentwood. It offers scope to accommodate sustainable development and its continued inclusion within the Green Belt is no longer appropriate. We consider that the site should be identified for development, consistent with the approach set out in the Council's preferred options.



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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 CP1 'Sustainable Development'

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

Support

Object

Comments (please use additional sheet if required)

Please refer to separate sheet.

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**Policy CP1 'Sustainable Development'
Support**

Policy CP1 'Sustainable Development' sets out the presumption in favour of sustainable development. We support this presumption and its explicit inclusion within the Local Plan.

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PERSONAL DETAILS

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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 'Green Belt'

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

Support

Object

Comments (please use additional sheet if required)

Please refer to separate sheet.

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Policy CP10 'Green Belt' Object

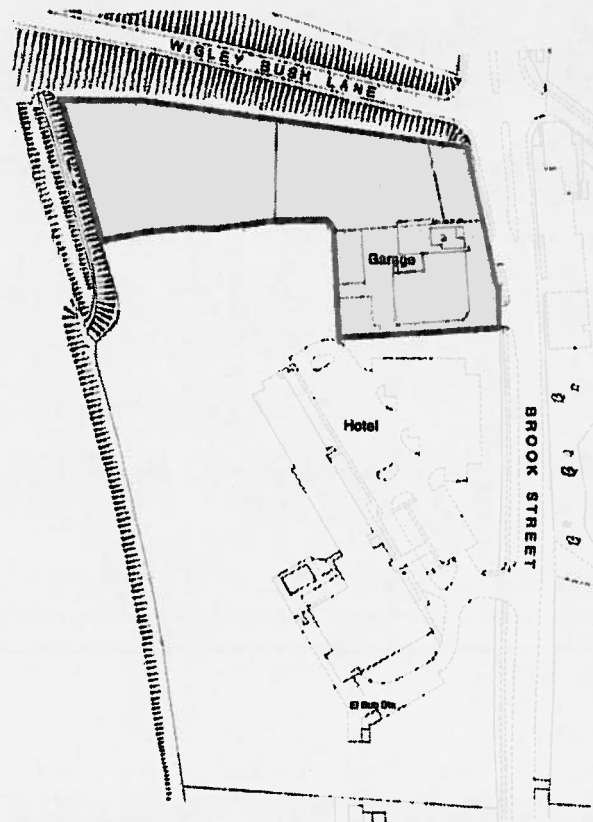
Policy CP10 'Green Belt' states that the general extent of the Green Belt will be retained, subject to minor allocations.

We consider that in accordance with Policy S1 (which acknowledges that it is appropriate to reuse suitable developed sites in the Green Belt), the extent of the Green Belt should be amended. Previously developed sites that are appropriate for redevelopment should be removed from the Green Belt.

We consider land at Brook Street and Wigley Bush Lane, Brentwood (as shown on the attached plan) is an appropriate site for redevelopment and should be excluded. The site currently accommodates a car showroom and car park. Together with the adjacent developments, it forms part of a ribbon of established commercial development along Brook Street.

The site is substantially developed and occupies an accessible location on the edge of Brentwood. It offers scope to accommodate sustainable development and its continued inclusion within the Green Belt is no longer appropriate.

The National Planning Policy Framework requires that local authorities should not include land which it is unnecessary to keep permanently open (NPPF Paragraph 85). Accordingly, the site should be identified for development, consistent with the approach set out in the Council's preferred options.



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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 CP17 'Provision of Infrastructure and Community Facilities'

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

Support

Object

Comments (please use additional sheet if required)

Please refer to separate sheet.

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**Policy CP17 'Provision of Infrastructure and Community Facilities'
Object**

The policy identifies the requirement for new development to provide for off-site infrastructure necessary to mitigate their impacts. The policy indicates the potential introduction of Community Infrastructure Levy.

We consider that the approach must be sufficiently flexible to respond to the viability of proposals.

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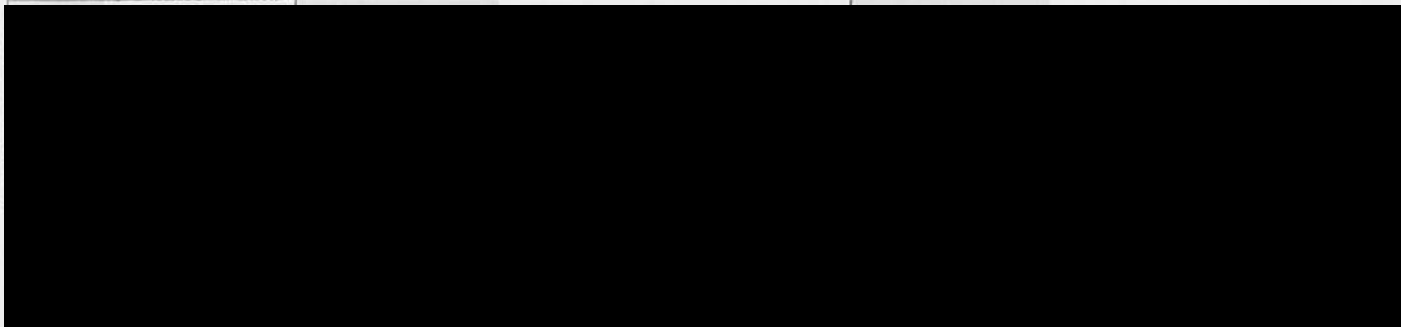
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YOUR COMMENTS

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

Policy DM9 'New Retail and Commercial Leisure Development'

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

Support

Object

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**Policy DM9 'New Retail and Commercial Leisure Development'
Object**

The policy seeks to reflect the requirements of the sequential approach and the assessment of impact required under the National Planning Policy Framework. However, the criteria within the policy are overly complex and are inconsistent with the Framework.

In particular, the Policy requires that proposals have "no impact on the vitality and viability" of existing centres. This is inconsistent with the Framework and the presumption in favour of sustainable development.

The presumption in favour of sustainable development demands that planning permission be granted, unless there are adverse impacts that would 'significantly and demonstrably' outweigh the benefits (NPPF Paragraph 14). In relation to 'main town centre uses', the Framework states that applications should only be refused where there is "significant adverse impact" (Paragraph 27).

In this context, the suggested requirement that there be "no impact" is entirely unreasonable and is contrary to the presumption in favour of sustainable development.

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Policy DM11 'New Development in the Green Belt'

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

Support

Object

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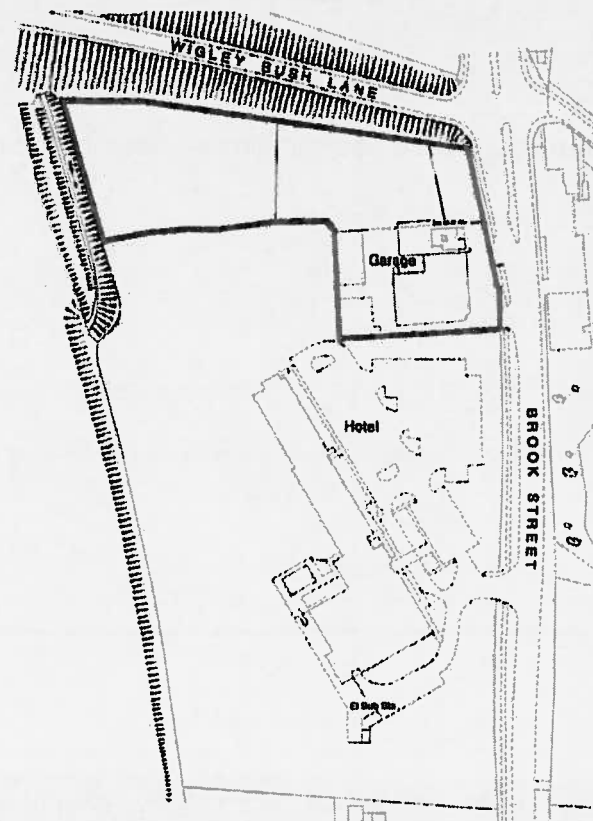
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**Policy DM11 'New Development in the Green Belt'
Object**

The policy sets out detailed criteria for the assessment of applications for development in the Green Belt. It is considered that these criteria are unnecessary. The key issue in the assessment of proposals for development concerns the impact of development on the openness of the Green Belt and the purposes of including land within it. The suggested criteria in Policy DM11 go beyond this and are inappropriate.

In accordance with Policy S1, Policy DM11 should similarly recognise that there is suitable previously developed land within the Green Belt that is able to accommodate development without harm. In our view, this land (including land at Brook Street and Wigley Bush Lane, Brentwood) should be excluded from the Green Belt. Nevertheless, Policy DM11 should acknowledge that a more flexible approach would be appropriate in relation to sites within the Green Belt that already contain a significant amount of development. A more flexible approach would allow the efficient use of previously developed land.



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Policy DM12 Established Areas of Development'

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

Support

Object

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Policy DM12 'Established Areas of Development' Object

Policy DM12 considers 'established areas of development' with reference to 'frontage ribbon development' within the Green Belt. The policy identifies specific locations.

Whilst it is appropriate to recognise that areas of established ribbon development may provide greater opportunity for development, the policy only contemplates residential development. It should also be recognised that there are similarly areas of commercial ribbon development.

Land at Brook Street, Brentwood is an area of commercial ribbon development. It occupies a sustainable location on the edge of Brentwood and is no longer appropriate for inclusion within the Green Belt. If the site is nevertheless retained within the Green Belt, the Local Plan should similarly recognise that there are areas of commercial ribbon development where a more flexible approach to development in the Green Belt is needed.

