



**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 DM23 (Housing Land Allocations – Major Sites)

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

Support

Object

Comments (please use additional sheet if required):

Please see attached submission made for an on behalf of Barwood Land and Estates Ltd.

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

Brentwood Local Development Plan: Preferred Options Consultation July 2013

Representation on Behalf of Barwood Land and Estates Ltd

The comments on this section of the Local Plan should be read together with all other responses submitted on behalf of Barwood Land and Estates Ltd (Barwood Land).

Policy DM23 is too limited in terms of the number of housing land allocations it identifies. The assumed density of each proposed site, and the forecast delivery from each, is not based on a detailed individual site assessment, casting doubt on the reliability of these assumptions.

The phasing section of the policy exacerbates these issues only allowing sites to come forward in advance of their assumed trajectory where other sites have failed to deliver as envisaged. This runs contrary to the Framework's aims of significantly boosting the supply of new housing now (paragraph 47).

The combined effect is, notwithstanding that the list of sites does not deliver the level of housing required to meet Brentwood's full objectively assessed housing needs, that there will be inadequate flexibility and contingency in the Local Plan should sites fail to come forward or be subject to significant delay. This is to the detriment of the Borough's housing delivery trajectory and concerning given the lack of delivery identified in the trajectory at various times in the plan period due to:

- the extent of the Green Belt coverage in the Borough;
- the lack of sufficient additional brownfield sites;
- the lack of supply of employment land leading to an inability to release such land for residential development
- the very limited opportunities for additional windfall sites to make up any shortfall; and
- should any major Green Belt release be required if West Horndon did not proceed or delivery was significantly delayed, this would necessitate the lengthy process of a further review of the Local Plan.

There is a failure to meet the objectively assessed housing needs of the Borough and there is a clear need for additional housing. There is no evidence or assessment in the draft Local Plan that warrants the capacity-constrained approach proposed which underpins the housing delivery trajectory or the acceptability of West Horndon as a major development allocation (either on its own merits or in comparison with other potential sites).

Honeypot Lane (site reference 022 in the Supporting Document: Draft Site Assessment, July 2013) meets the SHLAA site criteria and can contribute significantly to housing land supply. Policy DM23 should be modified accordingly to include this site.