



**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):

Strategic Objectives: SO1 (location of growth), SO7 (Green Belt), SO8 (housing)

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).

The purpose of spatial planning is to bring together economic, social and environmental matters, so that spatial planning becomes a key factor in achieving sustainable development. This is reflected in the National Planning Policy Framework's (the Framework) presumption in favour of sustainable development detailed in paragraphs 6, 7, 8, 14 and 15.

There is obviously therefore a degree of inter-relationship between all 11 of the Strategic Objectives set out in the Brentwood Local Plan 2015-2030: Preferred Options Consultation Document. However, there is a far stronger intrinsic relationship between three of the Strategic Objectives in particular, namely SO1, SO7 and SO8.

Strategic Objectives SO7 and SO8 reflect national policy set out in the Framework. However the application and delivery of the Strategic Objectives when taken together through the proposed Local Plan policies is of concern.

The starting point as required by the Framework at paragraph 47 is that Brentwood Borough should ensure that the Local Plan meets the full, objectively assessed needs for both market and affordable housing in its housing market area.

Given the extensive Green Belt designation surrounding Brentwood, housing growth has historically been provided by increasingly scarce opportunities from the redevelopment of larger Brownfield sites such as former hospitals and gas works, with the remainder comprising contributions from a sizeable number of small infill developments within defined settlement boundaries. For the future, these development opportunities are either limited (i.e. an increasing shortage in available Brownfield sites or under-used employment land), or have site specific problems such as being too small to make a significant contribution to sustainability objectives, particularly where their development would result in an over-intensive land use pattern.

Brentwood Borough will also need to demonstrate that it has fulfilled the requirements of the Duty to Co-Operate and worked constructively with other local authorities that are capable of, and agreeable to, meeting the housing needs that it cannot accommodate. As part of the process the Borough should identify sufficient new sites with contingencies to meet its own housing requirements.

The Framework is clear at paragraph 83 that Green Belt boundaries should only be altered through the preparation or review of the Local Plan. The broad extent of the Metropolitan Green Belt should be retained, but the Local Plan needs to positively address national policies to boost housing delivery, economic growth and sustainable development. This should include a clear process of consideration and careful assessment of the use of Green Belt land that could contribute to these national priorities. The Framework intends that the preparation of the Local Plan is the appropriate time to do this.

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The Local Plan should consider development in sustainable locations where:

- there is close proximity between jobs, homes and open spaces, capable of being accessed by public transport, on foot or on cycle;
- sites are readily deliverable;
- development would not damage the distinctive character of Brentwood, or the overriding contribution of the Green Belt to Brentwood's quality of life, biodiversity and environment, which are highly valued by the local community, and which give it its character and distinctiveness;
- it is environmentally responsible and appropriate to the special qualities of Brentwood and the particular expectations of the population and workforce;
- re-alignment of the Green Belt boundary using physical features that are readily recognisable would continue to form a logical long-term and defensible boundary for the urban extent of the Borough.

Honeypot Lane (site reference 022 in the Supporting Document: Draft Site Assessment, July 2013), as promoted through the Strategic Housing Land Availability Assessment (SHLAA), is a clear example of a site that fulfils all of these criteria.