



**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 S1 (Spatial Strategy)

**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](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**

## **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 S1 has an inherent flaw. The Plan's spatial strategy is focused on achieving a level of development that does not meet Brentwood's full objectively assessed housing need.

The spatial strategy chosen does not reflect the evidence of housing need and demand identified in the Plan's evidence base. It appears to be the result of a decision to use a capacity constrained approach as the reason for not being able to deliver the full objectively assessed housing need.

There is little recognition of the inter-relationships between meeting housing need, justified Green Belt constraint and the hierarchy of development within the Borough. The spatial strategy appears to have been drafted after the decision was made on the levels of development that the Local Plan would accommodate. This is compounded by the lack of clear evidence that explains how the Borough has fulfilled the Duty to Co-Operate and how unmet housing need will be accommodated.

Formulation of a Local Plan is the proper stage at which to consider Green Belt boundaries, in accordance with the Framework (paragraph 83) and how sites contribute to the purposes and functions of the Green Belt; a step that appears to have been largely bypassed. The possible exception is the proposed Strategic Allocation at West Horndon, accounting for some 43% of the Borough's 'chosen' housing requirement. However this proposed allocation does not appear to be supported by a comprehensive comparative analysis showing how it performs against other spatial growth options.

The option of centralising growth in and around the town of Brentwood is discounted on the basis that "having more than one strategic location for development will provide flexibility to meet development needs over the long term". However, the allocation at West Horndon appears unrelated to the existing settlement hierarchy and available infrastructure identified in the Borough.

The town of Brentwood must retain its status as the highest order settlement in the Borough and focus for future growth because:

- it is the settlement with the largest existing population in the Borough;
- it contains the main employment areas (Brentwood Town Centre, Brentwood Station and Warley Business Park);
- it contains the main retail areas (focused on the High Street);
- it has excellent rail accessibility and connectivity; and
- it is the focus of the main identified public transport routes and services within the Borough.