



**BRENTWOOD
BOROUGH COUNCIL**

**Local Plan 2015-2030
Preferred Options
July 2013
COMMENT FORM**

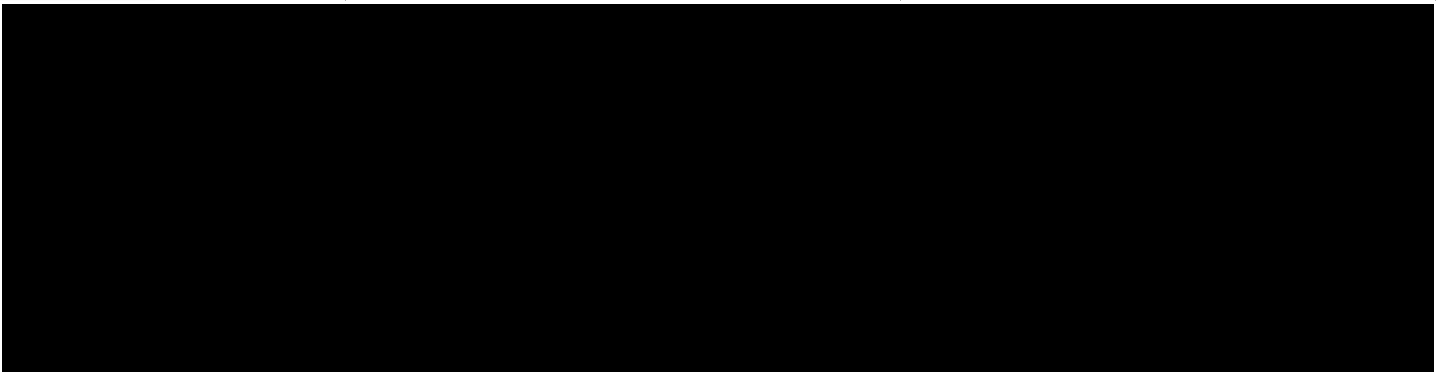
(For official use only)

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): Please see responses below

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

Support

Object

Comments (please use additional sheet if required):

Policy CP2: Managing Growth

This policy states that *“The Council expects the majority of new development to be provided within existing settlements through the development, conversion, or re-use of previously developed land and buildings.”*

We consider that development on the edge of settlements (i.e. the rural areas) provides a sustainable form of development in accordance with national policy. Furthermore, additional development can increase the sustainability of settlements by way of an increase in the local population. Such development can reinforce the sense of place by introducing new residents into settlements. An increase in local populations would lead to an increase in the use of local services such as village shops, post offices etc.

The NPPF acknowledges that development in the rural areas will differ in its sustainability when judged against development in the urban areas, but this need not mean that planning permission cannot be granted. With the Government’s pressure on the need to accelerate development, it becomes increasingly more likely that development on the edge of settlements will be required.

We consider that the policy should be amended to reflect the need and benefits of providing development in rural areas, and in particular adjacent to rural settlements.

Policy DM16: Re-use and Residential Conversions of Rural Buildings

The policy confirms that planning permission will be granted for the re-use, conversion or adaption of rural buildings for employment, tourism, leisure or community or residential use, provided it meets a number of criteria. With regards to residential, part (f) requires: the location to be suitable for residential; a marketing exercise over 12 months demonstrating a lack of need; the residential element to be a subordinate part of a scheme for business re-use; and the building considered to be within a small group of buildings.

This policy is inconsistent with the National Planning Policy Framework (paragraph 55). Paragraph 55 of the NPPF confirms that new isolated homes in the countryside are acceptable if they would re-use redundant or disused buildings and lead to an enhancement of the immediate setting. There is no such requirement for marketing exercises to be completed and the building need not form part of a group of buildings. This is evident by the reference to “new isolated homes” which sets the context for paragraph 55. With regards to the suitability of a site for residential, the NPPF only refers to the need to enhance the immediate setting.

This policy should be amended to be consistent with paragraph 55 of the NPPF.

Policy DM24: Affordable Housing

The policy sets out a requirement to provide 35% affordable housing for schemes of 15 units or more. Schemes for 12-14 units will need to provide four on-site units, schemes for 10-11 units will need to provide three on-site units, schemes for 8-9 units will need to provide two on-site units and finally schemes of 5-7 units will need to provide one on-site unit. Schemes for 1-4 dwellings can either provide a contribution or units on-site. There is reference to viability which will require an open book assessment and the amount will be negotiated accordingly.

However, the policy does not provide clarification on the level of contribution which would be required from schemes of 1-4 dwellings. The policy would seem to suggest that a unit could be provided on-site by such sized schemes. However, this would seem to contradict the distinction that the policy places between schemes of 5-7 units and those of 1-4 units. Furthermore, in terms of a financial contribution, it is not clear how this is to be calculated or determined. Without such information, this policy cannot be supported and is considered to be unsound.

The policy should be amended to provide further clarification on the affordable housing contributions which are sought from schemes of 1-4 dwellings.

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