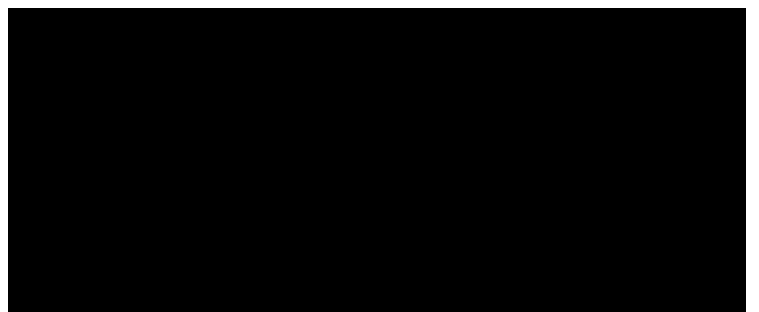


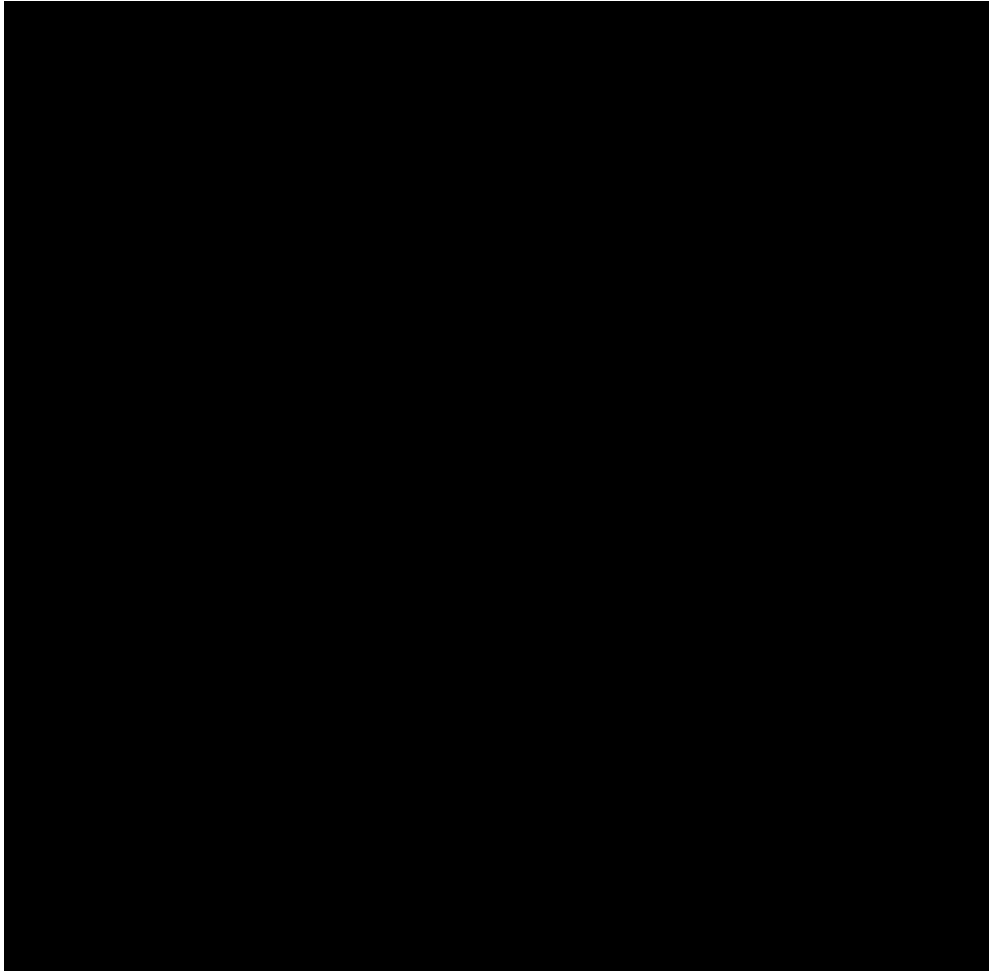
Brentwood Local Plan 2015 - 2030 Preferred Options for Consultation July 2013

RESPONSE BY BRENTWOOD SCHOOL

OCTOBER 2013



BRENTWOOD SCHOOL



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1.00 - INTRODUCTION

- 1.01 This response to the Local Plan Preferred Options for Consultation has been prepared on behalf of Brentwood School. The School's Charitable Object, as set out in its Trust Deed, is "the advancement of education in or near the District of Brentwood by providing day or day and boarding schooling".
- 1.02 The School was founded by Sir Anthony Browne in 1557 and has been a significant part of Brentwood's history (**Appendix A**). Sited in the centre of the town with extensive land holdings it is an important employer as well as being an educational establishment of some repute.
- 1.03 It is a dynamic institution, which throughout its history has continued to improve, alter, extend and provide new buildings to meet its growth and education requirements.

Employment

- 1.04 The School is a major employer providing direct employment for 411 full time and part time employees for a range of careers and skills. Roles include: Teachers, Teaching Assistants, Technicians, CCF, Bursary, IT, Communications, Administration, Sanatorium, Porter, Maintenance, Grounds, Gardeners, Catering, On top of the number of direct school employees there is further part time employment provided for indirect employees in excess of 100 covering such areas as exam invigilators, sports coaches, music/drama teachers, contract cleaners and archivist.

Community Use

- 1.05 Wherever possible, the School is pleased to make its facilities available for local people, organisations, clubs and charities and has developed strong links with local dramatic and musical societies, a variety of sports clubs and the Dioceses of Chelmsford and Brentwood.
- 1.06 The School has developed Brentwood Sports Centre, which together with Astroturf pitches and playing fields play a major role in the School's continuing effort to develop wider community links. Last year, the School provided the training venue for the athletes competing in the Modern Pentathlon event in the London 2012 Olympic Games. It was only one of three independent schools in the country selected as in-games venues and Brentwood School's involvement in this way is testament not only to the quality of the sporting facilities available at the School but

also to the School's commitment to serve the wider community. Set out in **Appendix B** is a list of local clubs/organisation who regularly use the School's buildings and facilities.

2.00 – SCHOOLS AND EDUCATIONAL ESTABLISHMENTS

2.01 In the document there is little or no consideration of educational facilities or schools, their needs or other related considerations.

2.02 The first reference we find to schools is in **Paragraph 3.76** (Page 72), which is in relation to the provision of infrastructure and community facilities in the context of Policy CP17 (Page 71) where it is set out that “*The Borough Council will require all new development to meet on and off-site infrastructure requirements necessary to support development proposals and mitigate their impacts*”

2.03 Whilst in **Paragraph 3.78** third bullet point social and community infrastructure is defined:

- *Social and Community – hospital, GP, dentist, children’s centres, schools, further education, emergency services, libraries, youth centres, leisure centres, community halls, local convenience store, theatre, public realm, public house.*

Thus the only context is where such elements will be delivered is through financial contributions, CIL and Section 106 obligations.

2.04 In reality all schools within the Borough will continue to move forward and develop under their own drive and within budgetary constraints.

Changes of Use or New Buildings for Institutional Purposes

2.05 It is noted that there is a positive and proactive Policy relating to institutional or community development Policy DM39, which is the key policy as far as the School is concerned. The Policy is, therefore, supported by the School, but the justification is very limited and no explanation is given of the evidence base or reference or contribution made by Brentwood School or other Schools to the community or employment generation. The School endorses the sentiments of any site being easily accessible and close to other facilities, which Brentwood School is, of course, being in the centre of the town.

2.06 Particular reference has been made to Paragraph 72 of the NPPF but not in its entirety the two bullets points to that paragraph. They should:

- *Give great weight to the need to create, expand or alter schools; and*
- *Work with schools promoters to identify and resolve key planning issues before applications are submitted.*

2.07 We have provided some facts and figures with respect to Brentwood School and reference should be made to this and other Schools. In other words the section should be expanded.

3.00 – BRENTWOOD COUNCIL’S VISION & BOROUGH CONTEXT

3.01 The Local Authority has given no consideration to community uses such as schools and educational facilities in Chapter 1 and their Introduction to the Local Plan.

Vision

3.02 The Local Authority in Paragraph 1.34 has set out their vision but again there is no reference to the quality of its schools and educational establishments.

3.03 It is then explained in Paragraph 1.35 that the strategic objective as set out intends to achieve their vision.

3.04 The listed Strategic Objectives SO1 to SO11 do not go far enough to highlight the important contribution made by its local schools and educational facilities to local employment and community development. The recommendation is that there is a need for a further Strategic Objective to: **“Promote and encourage the improvements, redevelopments and expansion of its recognised educational establishments”**.

4.0 – GREEN BELT

- 4.01 The next key Policy consideration is that relating to Green Belt. A large part of the School's site is defined as Green Belt. Under the Policies of the NPPF the Local Authority is required to review the Borough's long term needs and to establish Green Belt boundaries having regard to their permanence and that they should be capable of enduring beyond the plan period.
- 4.02 The School has suffered from refusal in its planning history from Green Belt Policy constraints. The most recent, for example, being that relating to the second Astroturf pitch served from Middleton Hall Lane. Planning permission was eventually granted but against a background of difficult planning negotiations.
- 4.03 It is the School's contention that their landholdings currently defined as falling within the Green Belt provide no real Green Belt function. The land east of Middleton Hall Lane is bounded by the Preparatory School to the north and development along Priest Lane to the south. There are other buildings along Priest Lane to the south. There are older buildings in the School's ownership including Mill Hill House and residential buildings at the junction of Middleton Hall Lane in Priest Lane with ribbon development extending along Priest Lane up to the running track. The Green Belt boundary in this location extends over part of the road surface of Priest Lane. The boundary is illegal and does not reflect the built form on the ground.
- 4.04 On the northern boundary the Preparatory School buildings and the Nuffield Hospital provide continuous development along Shenfield Road up to Middleton Hall Lane and the War Memorial.
- 4.05 There is no real gap that separates Brentwood and Shenfield. On the western side of Middleton Hall Lane there is School development with Brentwood Sports Centre main entrance gate, car parking and other buildings butting up to Middleton Hall Lane and totally enclosing the sports fields to the north.
- 4.06 To the north there is a small element of open land adjacent to the War Memorial before reaching Hough House but that area of land includes an access way, turning and car parking to serve the School. In summary, the land serves no real Green Belt purpose.
- 4.07 As has been supported in your introductory commentary the Council seeks to consider Shenfield and Brentwood as one main settlement to where major development should be directed. It really does not make sense to maintain the

School's land around Middleton Hall Lane as Green Belt where it is in the centre or close to the centre of the town. Other development management policies relating to urban open space can protect the Council's objectives of maintaining quality of life and community infrastructure such as under Policy DM31.

4.08 **Thus, there is a specific request to remove from the Green Belt the areas of land defined above.**

5.00 - EMPLOYMENT

5.01 As outlined in the Introduction the School makes a significant contribution to employment and Policy CP11: Strong and Competitive Economy is a proactive Policy and generally supportive to business development but the School would like to add to the criteria with:

- i. Recognising the contribution that educational establishments and emerging technology development can make to the local economic growth.*

Again, within the justification by reference to the evidence base and number of Schools and educational establishments the importance of this sector to employment opportunities in the Borough should be highlighted.

6.00 – SUSTAINABLE TRANSPORT

6.01 It is noted that sustainable transport is addressed under Policy CP13. The thrust of that policy is sensible and the School is pleased to see that the Council acknowledges the importance of working with partners to facilitate and promote sustainable transport.

6.02 The School highlights that it has a history in recent years to work with the Council to introduce traffic management measures and pedestrian safety improvements.

6.03 The School has spent considerable sums amounts introducing its own travel plan and monitoring. The first sentence to the third paragraph of that Policy reads:

“Sustainable travel will be encouraged through the requirement for travel plans from major developments, employers and institutions and residential travel packs.”

The words “**where appropriate**” should be introduced so that the sentence reads:

*“Sustainable travel will be encouraged through the requirement for travel plans **where appropriate** from major developments, employers and institutions and residential travel packs.”*

6.04 The School will support the Council in its endeavours to improve cycle ways and cycle links and in creating opportunities for Park and Ride or Park and Walk incentives.

7.00 – OTHER DEVELOPMENT MANAGEMENT POLICIES

7.01 The firm has submitted under separate cover comments in relation to other individual Development Management Policies that will be applicable to a wide range of developments in particular to Policy DM1 General Development Criteria, and Policy DM31 open space, community sport and recreational facilities recommending the following with respect to that latter Policy:

To include include a fourth exception criteria as set out below:

“That the contribution the open space makes in terms of its function, use, and to the character and amenity of the area, and the harm of its loss, is clearly outweighed by benefits arising from its redevelopment that meet other objectives of the plan.”

In addition, it is considered that the further text of the Policy (Paragraph 3) which refers to the presumption against any development that involves any loss of open space should also include the following words at the end of the paragraph as a further exception:

“... or that contribution made by the open space is clearly outweighed by benefits arising from its redevelopment that meet other planning objectives of the plan.”

7.02 Finally, with respect to Policy DM2 we recommend a minor amendment that the word **only** be deleted from the first sentence of that Policy as its inclusion is unnecessary and unduly onerous.

8.00 -

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8.02

