

[REDACTED]

From: Breena Coyle [REDACTED]
Sent: 17 February 2015 15:05
To: Planning Policy
Subject: Brentwood Local Plan Strategic Growth Options Consultation
Attachments: 150217 Questionnaire on Behalf of Brentwood School.pdf

Dear Sirs

Please find attached the completed Consultation Questionnaire form submitted on behalf of our clients, The Governors of Brentwood School.

Please do not hesitate to contact me should you require any further information or clarification on the above.

Regards

Breena Coyle
Planner

T: [REDACTED]
W: [REDACTED]
[THE JTS PARTNERSHIP LLP](#)
[REDACTED]
[REDACTED]

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Comment No.	
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Brentwood Borough Local Plan

Strategic Growth Options Consultation

January 2015

Consultation questionnaire

This consultation questionnaire relates to the Brentwood Local Plan Strategic Growth Options Consultation and is provided for you to make comments. Please take the opportunity to read the consultation document before filling in this form and returning to:

Planning Policy Team, Brentwood Borough Council Town Hall, Brentwood, Essex, CM15 8AY
or by email to **planning.policy@brentwood.gov.uk**

Comments need to be received by 5pm on Tuesday 17 February 2015

If you need any help completing this form please contact the Planning Policy Team using the contact details given above or by telephoning 01277 312620.

Personal Details

Title:	First Name: Breena	Coyle
Organisation (if applicable): The JTS Partnership		
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Questions

The Council is seeking responses on key issues. Focused questions appear in bold boxes throughout the Strategic Growth Options document. These questions are summarised in this consultation questionnaire. More information can be found at **www.brentwood.gov.uk/localplan**.

Please use an additional sheet if necessary. Please note that all responses will be published online.



Q1: Do you agree with the broad areas, for the purpose of considering approaches to growth?

Yes No

Comments

The Borough logically splits itself into three identified areas, which are also of different character. It is sensible to look at the main infrastructure corridors as individual areas. In particular to identify the central A12 Corridor as this includes the main settlements of Brentwood and Shenfield and it is logical in sustainability terms.



Q2: Do you agree with the issues raised within each of these areas?

Yes No
and

Comments - Yes and No

There is the implied suggestion in **Paragraph 2.17** that development opportunities will only be considered alongside opportunities surrounding the urban area within the Green Belt. As the main centres are the most sensible and sustainable to focus development the LPA should look at all sites including greenfield within the urban area.



Q3: Do you have any comments on the appropriateness of particular sites? Yes No

Comments

There are a number of urban edge sites in sustainable locations which will be logical rounding off or infill within the Green Belt, which will make good housing sites contributing to the small local communities.



Q4: Given the greater capacity for growth along the A127 corridor, which of the sites put forward do you think is the best location for growth?

Comments

The focus of this submission is centred on the A12 Corridor and Section 6 Quality of Life and Community Infrastructure. This firm makes representations on other employment issues in separate representations.



Q5: Should the A12 corridor accommodate growth by releasing sites on the edge of urban areas?

Yes No

Comments

See comments under Q3 above. Having looked within the urban areas at all potential sites it is sensible and in accordance with the NPPF to consider releasing sites on the edge of urban areas within this corridor. It is evidenced from the housing needs data that the LPA will need to consider the long term need of the Borough and release sustainable edge of urban area sites.



Q6: In order to provide for local need is it preferable for Greenfield sites on the edge of villages to be released, or to develop brownfield sites (both within the Green Belt)?

Comments

These comments have been directed to the main urban area.



Q7: To enable future employment need to be met do you agree that the most sustainable approach is to allocate new sites close to the strategic highway network?

Yes No

Comments

Employment comments have been made in separate representations but we would consider that the most sustainable approach is to allocate new sites close to the strategic highway network and provide a wide choice of sites. However, within the Urban Areas and particularly Brentwood Town Centre there is a need to promote the best opportunities for Community Infrastructure such as educational use which also makes a direct contribution to employment.



Q8: In order to ensure that the Town Centre remains economically sustainable, do you agree that a "Town Centre First" approach should be taken to retail development?

Yes No

Comments

No further comment.



Q9: Are there opportunities for more open space provision in the area where you live?

Yes No

Comments

There are opportunities to take a more pragmatic approach to open space to ensure deliverability of some space for public use where none currently exists.



Q10: Please rate the level to which you value the landscape near where you live (on a scale of 1 to 5), as compared to other areas within Brentwood Borough, for the following aspects:

Aspect:	Very Low	Low	Average	High	Very High
Scenic Beauty / Attractiveness	1	2	3	4	5
Outdoor Recreation / Leisure Use	1	2	3	4	5
Wildlife Interest	1	2	3	4	5
Historic Interest	1	2	3	4	5
Tranquility	1	2	3	4	5
Other – please specify:	1	2	3	4	5



Q11: To what extent do you think the following are present in the landscape near where you live (on a scale of 1 to 4):

Aspect:	Absent	Occasional	Frequent	Predominant
Houses	1	2	3	4
Commercial / Industrial buildings	1	2	3	4
Nature Reserves / Wildlife	1	2	3	4
Farmland	1	2	3	4
Woodland	1	2	3	4
Degraded / Derelict / Waste land	1	2	3	4
Infrastructure (Road / Rail / Pylons etc.)	1	2	3	4
Leisure / Recreation Facilities	1	2	3	4
Other – please specify:	1	2	3	4



Q12: Have we considered the main infrastructure issues? Are there other important issues to consider? Yes No

Comments

Yes, we have considered the main infrastructure issues but this is an important area as we have highlighted in particular under the 2013 Draft Local Plan Preferred Options. On that Draft Plan we put forward detailed commentary in relation to Brentwood School. We link back to those representations which highlighted the many community and employment benefits and opportunities brought to the town.

Since that time there has been further discussion with the Borough Council outlining some of the aspirations of the School and in particular its need for continued growth. What in particular has been highlighted is the School's aspirations to expand the Preparatory School i.e. to provide for greater primary education places.

It is noted in **Paragraph 6.4** that the Local Authority have highlighted:

In the light of the requirement to meet full housing need, Essex County Council have identified a significant deficit of primary school places in Brentwood Borough by 2017/18 and the remaining schools in the area will be close to capacity or slightly over capacity by 2017/18. In response to new development, new primary school(s) will be needed along with the remodelling and expansion of education and childcare facilities to meet local need.

Brentwood School in providing a first class learning facility is keen to expand and from its own statistics shows that a significant proportion of Preparatory School pupils will want to continue with the all-round education benefits to be provided by the main Brentwood School at secondary level. This requirement is on top of the additional places that have been identified to meet the projected housing needs of the Borough.

Given the importance of the School to the local economy it is highlighted that any new plan should fully reflect these arguments and provide flexibility for the School's growth both in its policies and through amendments to the Development Plan Proposals Map. It is sensible and logical to consider the School's land ownerships to meet future development needs and to reappraise whether this town centre land fulfils a Green Belt function.

It is further highlighted that some of the School's land ownership provides potentially for greater opportunity to meet housing needs in particular for Teacher accommodation in a Borough where expensive housing restricts the flexibility of recruitment where Teachers have to struggle with high housing costs.

Also reference is made to **Paragraph 6.8** where the Local Authority has distinguished between education and community facilities. It is highlighted that schools and educational facilities are able to contribute to recreation, leisure, sport and cultural activities across the spectrum.

Recent discussions with the Borough Council have identified the major contribution that Brentwood School provides for local community groups and activities, sharing its wide range of facilities to the benefit of the community as a whole. Every opportunity should be taken in the Local Plan to provide for that greater community use.

Green Infrastructure

It is noted that new development will be expected to contribute and link through to the Borough's green infrastructure. However, there must be a balanced approach, which critically reflects the aspirations and needs of those providers and who have a greater role to play in the long term infrastructure contributions to the Borough i.e. elements of green space must not just be protected because it has a very historic designation as such. There is a presumption flowing from the NPPF and the requirements to achieve sustainable development and in particular the need to reflect the requirements of **Paragraph 83** under Protecting the Green Belt Land, which for ease of reference is repeated below:

Local Planning Authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once, established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.

There is, therefore, a requirement to address these key urban sites so affected by historic policy constraints to meet the aspirations of the Borough to provide full community infrastructure.

We look forward to continuing on-going dialogue with the Borough Council.



Q13: What do you think the priorities for infrastructure spending should be?

Comments

No Comment.

Thank you for taking the time to complete this questionnaire

Please ensure that you return comments to the Council by 5pm on Tuesday 17 February 2015
(see page 1 for details)