

1. Objection Overview

Billericay Action Group wishes to express its objection to all three 'Growth Options' presented as part of this consultation.

All of these options pre-suppose that the Council will build on Green Belt, something which the second section of this document shows is unnecessary under the NPPF and associated Guidance.

Building on Green Belt is a choice, not an obligation.

The Greater Essex Demographic Forecasts (Phase 6) show Brentwood's Natural Growth requirements to be just 88 per annum. This could easily be met by Brownfield sites.

So the needs of Brentwood residents can easily be met without the Council making the choice to develop Green Belt.

There is a strong argument to suggest that the OAN itself is unnecessarily high, but in any case, Billericay Action Group urges that Brentwood Council submits a sub-OAN Housing Target to the National Planning Inspectorate.

Examples of Local Authorities that have had sub-OAN Housing Targets approved by the NPI include Norwich, Eastbourne, Wealden and Purbeck.

2. Green Belt protection

The NPPF describes how, once established, Green Belt boundaries should only be altered in 'exceptional circumstances', through the preparation or review of the Local Plan (Para 83 NPPF).

It goes on to say that (our emphasis):

"As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances." (Para 87 NPPF)

Planning Practice Guidance further clarifies this:

"The Framework is clear local planning authorities should, through their Local Plans, meet objectively assessed needs **unless** any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in the Framework taken as a whole, or specific policies in the Framework indicate development should be restricted. Such policies include those relating to... land designated as **Green Belt.**" (Para 044 NPPG)

"...assessing need is just the first stage in developing a Local Plan. Once need has been assessed, the local planning authority should prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period, and in so doing take account of any **constraints such as Green Belt**, which indicate that development should be restricted and which may **restrain the ability of an authority to meet its need.**" (Para 045 NPPG)

"Unmet housing need...is unlikely to outweigh the harm to the Green Belt and other harm to constitute the "very special circumstances" justifying inappropriate development on a site within the Green Belt." (Para 034 NPPG)

An OAN can take no account of Green Belt, however it is also clear that Green Belt is a constraint on meeting an OAN and that a sub-OAN Housing Target should be standard practice where GB does act as a constraint.

Unfortunately the current Plan not only presents an unnecessarily high OAN, it also intends to meet it in full; the Green Belt has not been treated as a constraint.

Brentwood has not explained which 'exceptional circumstances' apply to justify building 3000 houses on Green Belt. If it is a need to meet the OAN, then NPPG (quoted above) makes it clear that this does not qualify as such a justification.

The Green Belt has five purposes (Para 80 NPPF):

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Green Belt achieves these aims by keeping the land 'permanently open' (Para 79 NPPF), and it is hoped that this document makes clear that there is no requirement in the NPPF or elsewhere, for LA's to remove land from the Green Belt.

To summarise: De-designating Green Belt is a choice, not an obligation.