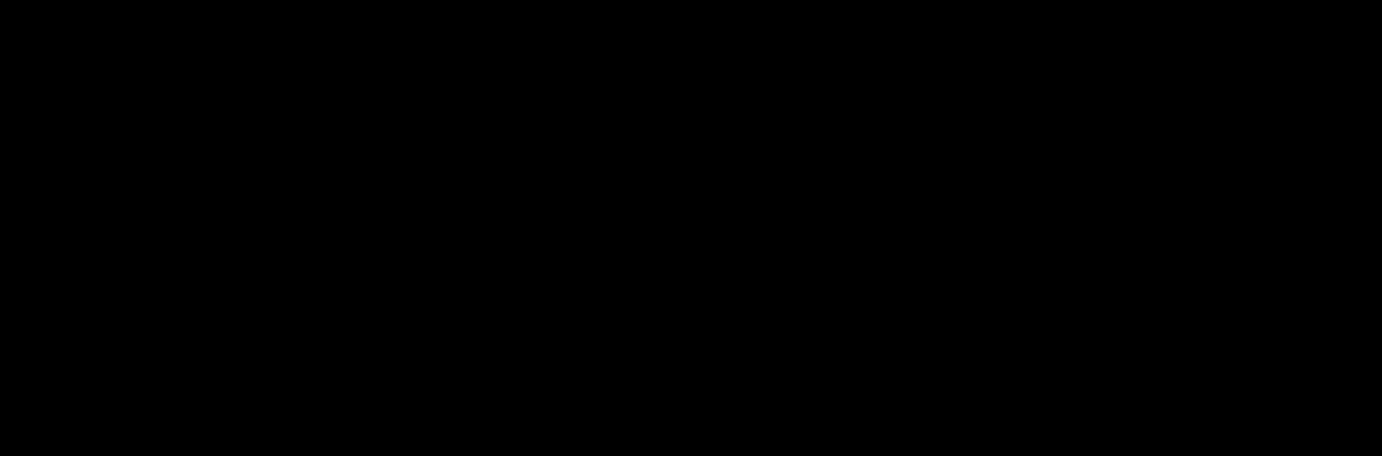


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## Brentwood Borough Local Plan Strategic Growth Options Consultation



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

I recognise them as defined by lines on the map.  
The more important distinction is between urban and unspoilt Green Belt.

**Q2:** Do you agree with the issues raised for each of these three areas?

I agree that brownfield land, whether or not it is in the Green Belt should be used before and instead of any Greenfield Green Belt land.

The north of the borough has the most historically sensitive landscape.

The A12 corridor is already the most developed but also has the most urban capacity for sustainable growth.

Any large scale development for the A127 corridor would only be sustainable if there is prior improvement to the capacity and access to c2c train services. Plans for large scale development here could not be considered sound without this.

**Q3:** Do you have any comments on the appropriateness of particular sites?

The most inappropriate sites seem to be the large areas to the east of Hutton, Ingrave and Warley.

**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?

This question asks us to pick least bad sites when none of them are consistent with specific policies in the NPPF. It would be wrong to do so. Why are we not asked 'Given the lower capacity for growth in the north of the Borough, which site put forward do we think is worst?'

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

Since this question is about releasing land; that means releasing it from its Green Belt protection. Particular attention must be given to the harm that would be done to the Green Belt purposes of the land. Where the land prevents urban sprawl, preserves the historic character of the area or stops encroachment into the open countryside it must be kept as permanently open Green Belt. The same is true where it significantly contributes to preventing the merger of settlements and directs development to urban areas; these harms will depend on the scale of growth, separation of the settlements and degree to which the Green Belt area has already become urban. Where Green Belt sites on the edge of urban areas have already become essentially urban and any derelict or damaged land is beyond improvement, their openness is lost and they have lost their purpose as Green Belt; they should sensibly be released. The value of sites on the edge of urban areas that have retained their essential openness can be considered to be even greater than that of more remote areas of Green Belt consequently these areas must not be released.

**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 Green Belt)?

It is preferable to develop brownfield sites if there is no option to recover the site. Sites next to villages must be saved if they have retained their openness. Land that prevents sprawl, preserves the historic character of the area and stops encroachment into open countryside must be kept as permanently open Green Belt. The same is true where it significantly contributes to preventing the merger of settlements. It directs development to urban areas. The harm done depend on the scale of growth, separation of the settlements and degree to which the Green Belt area has already become urban. Where Green Belt sites on the edge of villages have already become essentially built up and any derelict or damaged land is beyond improvement, their openness is lost and they have lost their purpose as Green Belt; they should then be released. The value of sites on the edge of villages that have retained their essential openness is even greater than that of more remote areas of Green Belt.

As stated at 1.10, some other local authorities' plans did not meet the full need for housing and were therefore found 'unsound' because they did not conform to the NPPF. Some other local authorities' plans, such as Reigate and Banstead, Hertsmere, Wealden and Watford, did not meet the full need for housing but were nonetheless found to be sound. The 'unsound' plans were not restrained by Green Belt as Brentwood is or were found unsound before the Planning Minister's letter clarified the matter on 3<sup>rd</sup> March 2014\* – see below.

The Brentwood Green Belt has been defined, it is meant to be permanent. Once defined, local planning authorities should plan positively to enhance the beneficial use of the Green Belt, such as looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land (Paragraph 81 NPPF). The Plan must be consistent with this if it is to be sound. The 89% of the Borough that is Green Belt helps protect the Borough's high quality environment, but also constrains development opportunities, making it difficult to meet local need; that is also its purpose. Green Belt boundaries should only be altered in very exceptional circumstances. These are only demonstrated where the Green Belt has already, irredeemably lost its purposes. The undeniable unmet need for housing is not a very exceptional circumstance – it has become a very ordinary one. Local Authorities should only meet this need in full if they are not too restrained by Green Belt as is clear from the Planning Minister's letter to the Planning Inspectorate of 3<sup>rd</sup> March 2014\* [Inspectors' Reports on Local Plans - Gov.uk](#). It does not trump Green Belt protection, as the

Prime Minister said in his letter of 19<sup>th</sup> March 2013 See also my additional comments after Q13 and [Hansard source](#) (Citation: HC Deb, 26 June 2013, c299)

**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?

Mixed use developments can provide the majority of the workforce and workplaces in the same location reducing the need to travel great distances to work. Locating new workplaces close to the strategic highway network and providing larger car park areas encourages car use which is responsible for most of our carbon footprint and pollution.

The future employment need will be less with the lower housing growth target that Brentwood must use because of the restraint on land availability due to being restricted to one ninth of the Borough's area that is not Green Belt.

A lower proportion of warehousing floor space would meet future employment needs at a lower cost in terms of the area of land required.

It may be advisable to require triple glazing and air conditioning quality controls for these new sites depending on the employment use and distance from the road.

**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, but with a smaller rise in population than the latest version of the Brentwood Plan, as is dictated by the Green Belt restraint, current vacant retail sites and an increasing use of internet shopping, I am not convinced of the need for retail development beyond the existing retail offer.

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

If nearby buildings were knocked down more open space would be provided. It is probably more sensible to restore derelict buildings than demolish them but it depends on their value, condition and other qualities such as whether it would be more appropriate to rebuild on site.

**Q10:** Please rate the level to which you value the landscape near where you live.

This question seems to be designed to rank areas against one another. There will be fewer responses in areas with smaller populations. Those areas scoring relatively lowly may be in greater need of improvement which is not necessarily the same as development.

**Q11:** To what extent do you think the following is present in the landscape near where you live: Houses; Commercial buildings; Nature Reserves; Farmland; Woodland; Wasteland; Infrastructure; Leisure Facilities; other?

Some of the things on this list are desirable – is there an intention to seek to provide them in areas that currently lack them, others may indicate the land is degraded - is there an intention to seek to improve them; but the council has already assessed landscape character and is doing more assessment, so is this question trying to gauge the level of local knowledge or ignorance?

**Q12:** Have we considered the main infrastructure issues? Are there other important issues to consider?

The first question on infrastructure must always be 'Is the need for new infrastructure justified and can it be reduced or mitigated by other – usually cheaper – measures?'

These issues are missing:-

- Libraries
- Parking control
- Recycling facilities
- Energy generation
- Broadband
- Traffic calming
- Allotments
- Public mechanical and artistic workshops

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

- Delivering high speed broadband.
- Reducing the need to drive by siting developments in areas that facilitate and encourage car-free living.
- Carbon capture and combined heat and power systems.
- Ensuring the needs for water and sewerage services are maintained safely through increasing times of flood and drought that are expected.
- Reducing the national need for new power generating capacity by encouraging the use of solar panels on southerly-facing roofs.
- Subsidizing and enabling improvements to household insulation.
- Improving and extending the network of cycle paths.
- Enhancing public rights of way, maintaining footpaths and bridleways and providing better signage and public information.
- Requiring the highest energy efficiency standards for new buildings.
- Traffic calming measures.
- Mixed-use developments for work and living.
- Increased covered accommodation for bicycles at three railway stations.
- New green bridges over the railway lines, motorway and the A roads.

### **Other Concerns**

Paragraph 182 of the NPPF says the Plan must be 'based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development' and be justified, effective and consistent with national policy. The statement made at 1.12 and repeated at 3.1 is incorrect; there is no need to meet all of the assessed need of 5,500 new homes in Brentwood Borough over the next 15 years – only a need to seek to do so, where reasonable and sustainable, consistent with the rest of the NPPF and justified.

The council is very constrained by the 89% of the borough that is Green Belt. This land is given very great protection from development and should remain permanently open. There are nonetheless brownfield sites within the Green Belt where the openness has already been compromised to such a degree that it will be impossible to restore its openness; in some cases it may also be undesirable to do so. These, very limited, sites should be assessed for their capacity to accommodate housing growth and may be appropriate for sensitive development. Beyond that, there is a duty to cooperate to see whether neighbouring local authorities can assist in meeting some of the borough's housing needs. That should be used as the mechanism to allow a lower housing target to be set. The borough must be able to demonstrate that it has proactively sought to satisfy its housing requirements by reaching agreements with cross-border areas. The Dunton Garden Suburb memorandum of understanding and the current consultations are a good start. The area covered by these arrangements is almost entirely unspoilt Green Belt, so it will be right to reject it for any large scale development. The exercise will have demonstrated the council has sought to reach a solution, in cooperation with Basildon who are similarly restrained by their Green Belt.

Significantly more than the 2,500 new houses expected as the urban brownfield capacity may be achieved. This is a potential outcome from the forthcoming assessment of the landscape capacity in surrounding urban areas.

It may be worthwhile to carry out a heights study to inform where it is appropriate to allow or encourage an increased capacity, at greater density, for residential and/or employment growth.

As long as the Brentwood Green Belt keeps its status and it is kept as permanently open land it will continue to direct growth to urban areas, that is after all one of its purposes. More one-off schemes, like the plans to convert Westbury Road Car Park to housing and the newly permitted changes of use to residential for offices and farm buildings, are more likely to come forward as long as the Green Belt is saved. This should allow the council to improve the plans at review stages and increase the windfall allowance included under paragraph 48 of the NPPF.

Brentwood has a far greater need for one and two bedroom accommodation than larger properties. This can be achieved at even greater housing densities than are proposed without compromising on the need for good design. This can help to fulfil more of the local housing needs without taking from the Green Belt. It would show that the Plan has been positively prepared.

The needs for social and affordable housing are far greater than the need for new market housing. The homelessness level must be brought down. The need for affordable housing must be addressed as part of the council's duties to improve social, economic and environmental conditions. The need for social and affordable housing and to preserve and enhance biodiversity and maintain the Green Belt should severely restrict market housing development so that the most severe needs are addressed properly and good Green Belt land is not lost to help meet a lower housing priority.