

Summary of representations received in response to the Addendum of Focussed Changes to the Pre-Submission Local Plan (October – November 219)

Consultation on the Addendum of Focussed Changes to the Pre-Submission Local Plan took place between October and November 2019. The table below provides a summary of the comments raised in response to this consultation.

1. Statutory consultee and other groups representations summary

Consultee	Support / Object	Summary
Basildon Borough Council	Object: Focussed Changes 1-5	<ul style="list-style-type: none"> • Objects to Focussed Changes 1 – 5, as they do not seem to have been informed by evidence or the Sustainability Appraisal as required by National Policy. • Maintain the view that there currently remains a lack of credible and robust technical evidence to justify that a new village in this Green Belt location is the best option for meeting Brentwood Borough’s housing needs, and continues to have doubts whether this allocation would be found sound at Examination in Public. • Apprehensive that the scale of development proposed, which amounts to over a third of the borough’s entire housing provision for the plan period, could be supported by infrastructure in the absence of a clear delivery plan. • Remains unclear, if the proposal were to be approved, how it will relate in terms of access and connectivity to the Basildon urban area given that the nearest Town Centre and acute healthcare facilities are all within Basildon Borough. • The amendments effectively redistributes 70 proposed dwellings from the ‘Central Brentwood Growth Corridor’, which has opportunities to embrace more sustainable modes of transport, to a Green Belt location with a less developed public transport infrastructure. • The reasons for the amendments do not seem to be supported by the evidence and appear to be based solely on the considerable number of objections received in response to the Pre-Submission Local Plan consultation in March 2019. • It is not considered that the central and southern growth corridors offer comparable choices in terms of the strategic importance or capacity of transport connections, and using the SA and other evidence, the Plan should select sites within the Central Brentwood Growth Corridor that provide opportunity for extensions to towns and villages that can encourage more sustainable travel choices and take advantage of the strategic infrastructure available. • Object to the housing trajectory, particularly on the reliance on DHGV to deliver at an accelerated rate of construction and early within the plan-period.

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		<ul style="list-style-type: none"> • Likely that early residents of Dunton will have to rely on nearby services including schools. Unlikely a primary school will be delivered early on site as indicated in the IDP. • DHGV is proposing new primary and secondary school provision. However, until such a time as the critical mass for new homes is established, it is more likely that Basildon Borough's facilities in Laindon will be picking up the demands of new users arising from the new settlement. • DHGV is within close proximity of the administrative boundaries with Basildon & Thurrock Boroughs, and Basildon Council still remains concerned by the lack of mitigation measures on potential infrastructure impacts and is disappointed that Brentwood Council have not taken the opportunity to address this through the Addendum of Focussed Changes. • It is noted that the need for new connections into Basildon Borough in terms of walking, cycling, public transport or road do not appear to be mentioned as being necessary to make it sustainable. • The transport mitigation measures included in the pre submission local plan are concentrated within Brentwood and ignore the fact that Laindon Station, has more platforms and has greater commutable capacity than West Horndon and could become an alternative choice for residents of the DHGV. • While using Basildon Infrastructure like the station, schools and the hospital, there will be added pressure on the A127, Basildon road network and public transport services. • It is questionable whether it can be adequately demonstrated by the Brentwood Local Plan that the allocations chosen, represent the most sustainable option without identifying and testing the viability of specific highway mitigation measures that will be necessary to make them deliverable and sustainable. • It should not be assumed that such growth can just be absorbed by the nearby infrastructure and services and Basildon Council expects policies in the Brentwood Local Plan to make it clear that S106/CIL or other funding receipts will be spent outside Brentwood Borough to sufficiently address where negative direct or residual impacts could otherwise occur.
Blackmore Parish Council and Blackmore Village Heritage Association	Object: Comments	<ul style="list-style-type: none"> • Remain strongly opposed to the proposed allocations in Blackmore (R25 & R26); • BBC can meet local housing needs without sites R25 and R26 at all;
	Object: Focussed Change 1 (Dunton Hills Garden Village Strategic Allocation)	<ul style="list-style-type: none"> • Acknowledge that the site is well located and is to be designed in such a way so to maintain characteristics of Green Belt openness. • There is no change to the approximate total yield which remains at 4,000. Therefore, all BBC have done is brought forward the number of housing to be delivered from DHGV. The density is now 31.1 dwellings per hectare (dph). • No consideration of increasing the densities of DHGV. An increase of 0.9 dph results in an additional 112 dwellings which would negate the need for development in less sustainable locations such as R25 and R26 in Blackmore.

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		<ul style="list-style-type: none"> NPPF encourages making effective use of land and achieving appropriate densities. The greatest need (40%) is for 1 and 2 bedroom units. Higher densities can be achieved with more smaller dwellings.
	<p>Object: Focussed Change 2 (Land off Crescent Drive, Shenfield)</p> <p>Focussed Change 3 (Land off Priests Lane, Shenfield)</p>	<ul style="list-style-type: none"> R18 and R19 (Crescent Drive and Priests Lane) are proposed to be reduced by 50 dwellings in total. R25 and R26 (Blackmore) following the proposed changes are 50 dwellings in total. If R18 and R19 are kept at the original proposed number of dwellings, sites R25 and R26 would not be needed. R18 and R19 are in more sustainable locations than Blackmore. Shenfield is in Settlement Category 1 whilst Blackmore is category 3. This should even be in category 4. Shenfield has better public transport services and shopping facilities. The two sites in Shenfield have also scored much more favourably than those in Shenfield as based on the Sustainability Appraisal.
	<p>Object: Focussed Change 4 (Land north of Woollard Way, Blackmore)</p> <p>Focussed Change 5 (Land north of Orchard Piece, Blackmore)</p>	<ul style="list-style-type: none"> Removing sites R25 and R26 does not prevent development in Blackmore but it is acknowledged that their removal would make development in Blackmore less likely and limited to “windfall” sites. As Blackmore sits within the Green Belt, the NPPF, and indeed emerging policy NE10, does permit new development in the Green Belt subject to set criteria being met. Indeed, there are sites in Blackmore that have recently been permitted notwithstanding the lack of a formal designation/allocation. Likewise, it is entirely probable that additional development will come forward/take place in Blackmore. With the above point in mind, the Parish Council and BVHA “point to” the site known as Red Rose Farm. That site is “previously developed land” within the NPPF definition; a fact confirmed by a Lawful Development Certificate. If the pending Red Rose Farm application is successful, as would appear likely as the Parish Council and BVHA understand that there is a recommendation for approval subject to completion of a s106 agreement, then a contribution to housing supply will be made in the village of Blackmore. Further, if the unallocated Red Rose Farm site is granted permission then it is entirely foreseeable that such would have an impact on the timing of delivery of any additional dwellings in Blackmore; including sites R25 and R26 if allocated. But the Red Rose Farm site very much illustrates the Parish Council and BVHA’s case that there are other sites which are far more preferable for development than the “virgin” Green Belt land that is sites R25 and R26. There have been recent planning permissions, but also applications awaiting determination, for residential development within Epping Forest District Council that are “on the doorstep” of Blackmore. Such developments “just on the border” of Epping Forest will undoubtedly rely upon Blackmore to meet their needs. Indeed, Blackmore is the nearest primary school to these Epping sites. Both the Parish Council and BVHA say that Blackmore cannot support these developments on the border of Epping Forest in addition to the proposed development at sites R25 and R26.

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		<ul style="list-style-type: none"> The Parish Council and BVHA further say that any applicable planning obligation/infrastructure payment from these Epping sites will not be invested into Blackmore; thus Blackmore takes the strain with none of the benefit. Moreover, the existence of the Epping Forest permissions/applications does not appear to have been taken into account by BBC in considering the sustainability of sites R25 and R26. The Parish Council and BVHA therefore say that the case for the inclusion of R25 and R26 is undermined in turn.
Environment Agency	Comment (General)	<ul style="list-style-type: none"> Resubmission of representations on Reg 19 Plan. Did not raise specific comments on addendum of focussed changes.
Essex County Council	Comment: Focussed Change 1 (Dunton Hills Garden Village Strategic Allocation)	<ul style="list-style-type: none"> BBC will need to be satisfied that the increase in dwelling numbers on this site is supported by the appropriate evidence base, including demonstrating that the reallocation of dwellings to this site is where the need is (paragraph 59 of the NPPF), and that all other reasonable options for reallocating the dwellings have been fully examined, including making as much use as possible of suitable brownfield sites and underutilised land, and optimising density (paragraph 137). As a result of the increase in dwelling numbers for this site allocation BBC should include, within the Plan evidence and supporting text for this Policy, details to demonstrate that the reallocation of dwellings to this site is where the need is (paragraph 59 of the NPPF), and that all other reasonable options for reallocating the dwellings have been fully examined, including making as much use as possible of suitable brownfield sites and underutilised land, and optimising density. BBC will need to be satisfied that the transport implications of the change in dwelling numbers on this site allocation are fully assessed through an updated transport evidence base for the Local Plan. BBC should also update its transport evidence base for the Local Plan to fully assess the transport implications of the change in dwellings numbers on this site allocation. The proposed change to this policy does not address ECC's representations to this policy made to the Pre-Submission Regulation 19 Local Plan consultation in March 2019. The policy needs to be further changed to address ECC's representations to this policy made to the Pre-Submission Regulation 19 Local Plan consultation in March 2019.
	Comment: Focussed Change 2 (Land off Crescent Drive, Shenfield) Focussed Change 3 (Land off Priests Lane, Shenfield)	<ul style="list-style-type: none"> BBC will need to be satisfied that the reduction in dwelling numbers on this site is supported by the appropriate evidence base, including demonstrating that the site allocation makes effective and efficient use of land (paragraphs 117, 118, 122 and 123 of the NPPF), and is economically viable (paragraph 67). As a result of the reduction in dwelling numbers for this site allocation BBC should include, within the Plan evidence and supporting text for this Policy, details to demonstrate that the site allocation makes effective and efficient use of land, and is economically viable.

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		<ul style="list-style-type: none"> • BBC will need to be satisfied that the transport implications of the change in dwelling numbers on this site allocation are fully assessed through an updated transport evidence base for the Local Plan. • BBC should also update its transport evidence base for the Local Plan to fully assess the transport implications of the change in dwellings numbers on this site allocation. • The proposed change to this policy does not address ECC's representations to this policy made to the Pre-Submission Regulation 19 Local Plan consultation in March 2019. • The policy needs to be further changed to address ECC's representations to this policy made to the Pre-Submission Regulation 19 Local Plan consultation in March 2019.
	<p>Comment: Focussed Change 4 (Land north of Woollard Way, Blackmore)</p> <p>Focussed Change 5 (Land north of Orchard Piece, Blackmore)</p>	<ul style="list-style-type: none"> • BBC will need to be satisfied that the reduction in dwelling numbers on this site is supported by the appropriate evidence base, including demonstrating that the site allocation makes effective and efficient use of land (paragraphs 117, 118, 122 and 123 of the NPPF), and is economically viable (paragraph 67). • As a result of the reduction in dwelling numbers for this site allocation BBC should include, within the Plan evidence and supporting text for this Policy, details to demonstrate that the site allocation makes effective and efficient use of land, and is economically viable. • BBC will need to be satisfied that the transport implications of the change in dwelling numbers on this site allocation are fully assessed through an updated transport evidence base for the Local Plan. • BBC should also update its transport evidence base for the Local Plan to fully assess the transport implications of the change in dwellings numbers on this site allocation. • The proposed change to this policy does not address ECC's representations to this policy made to the Pre-Submission Regulation 19 Local Plan consultation in March 2019. • The policy needs to be further changed to address ECC's representations to this policy made to the Pre-Submission Regulation 19 Local Plan consultation in March 2019. • The proposed reduction in the dwelling numbers on site R26 has overcome the Highway Authority's previous objection to vehicular access, as raised in ECC's response to the Regulation 19 consultation in March 2019 (Reference ECC104 BBC22492 and ECC105 BBC22494). ECC are satisfied that vehicular access can now be taken from Redrose Lane as originally proposed, and is not required to be taken from Orchard Piece or Fingrith Hall Road as previously requested.
Highways England	Comment (General)	<ul style="list-style-type: none"> • Highways England has been appointed by the Secretary of State for Transport as strategic highway company under the provisions of the Infrastructure Act 2015 and is the highway authority, traffic authority and street authority for the strategic road network (SRN). The SRN is a critical national asset and as such Highways England works to ensure that it operates and is managed in the public interest, both in respect of current activities and needs as well as in providing effective stewardship of its long-term operation and integrity.

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		<ul style="list-style-type: none"> • Highways England will be concerned with proposals that have the potential to impact on the safe and efficient operation of the Strategic Road Network (SRN), in this case the A12 and M25 Junctions 28 and 29. We have examined the consultation documents and given the scope of the Focussed Changes we have no comments at the present time. • In terms of the sustainability appraisal, it is worth stating that a growing concern to us is air quality and the impact of development traffic contributing to emissions from traffic on the SRN. We note that Paragraph 9.2.7 of the Sustainability Appraisal Report lists a number of wide ranging policies in pursuit of air quality objectives. We shall be paying particular attention to air quality matters in future and stress the need for appropriate monitoring. • We will continue to cooperate separately with Brentwood Officers in relation to the transport assessment of your Local Plan concerning the M25 and A12.
Historic England	<p>Comment: Focussed Change 1 (Dunton Hills Garden Village Strategic Allocation)</p>	<ul style="list-style-type: none"> • We acknowledge the proposed modification, but maintain our position as set out in our response to your regulation 18 consultation (dated 26th March 2018) and most recently in response to your Environmental Impact Assessment (EIA) Scoping Opinion Request for the site, that this allocation has the potential to harm the significance of a number of designated heritage assets within the setting of the site, and that a Heritage Impact Assessment (HIA) is required to justify its allocation, inform the potential capacity of the site, and any mitigation measures necessary to accompany the proposals. • The site contains three Grade II listed buildings in addition to these listed buildings within the site, it is surrounded by a range of other designated heritage assets including to the north-east of the site. • It is acknowledged that some of these surrounding heritage assets are severed from the site by the A127 and therefore the detailed consideration of setting will be a matter of material importance when considering the impact of development upon the significance of nearby assets. It is also not clear how the listed properties within the site are to be treated, or what evidence has been provided to support this allocation. • As well as these designated heritage assets, any consideration of development on this site would also need to include an assessment of impact on non-designated heritage assets, including buildings on the Local List that may be located within or in close proximity to the site. That assessment would need to include a consideration of the archaeological potential of the site and the County Archaeologist will be best place to advise on such matters. • Given the sensitive nature of the site and given the lack of supporting evidence on the historic environment, we reiterate our request that a Heritage Impact Assessment (HIA) is undertaken in accordance with our advice note. The HIA should determine the appropriateness or otherwise of the site for development, the extent of the development and therefore potential capacity of the site, the impacts upon the historic environment (considering each asset and its setting and its significance), impacts of development upon the asset and any potential mitigation measures necessary to

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		<p>accompany the proposals. Should the HIA conclude that development in the area could be acceptable and the site be allocated, the findings of the HIA should inform the Local Plan policy including development criteria and a strategy diagram which expresses the development criteria in diagrammatic form.</p> <ul style="list-style-type: none"> Historic England also recommends that further archaeological investigation is undertaken as well as landscape characterisation work to inform the evidence base. Essex County Council holds a series of Historic Landscape Characterisation Studies which will be a useful starting point and should form part of the evidence base to support this allocation. Characterisation work will be fundamental to understanding the capacity of development in the Dunton Hills Garden Suburb. Additional characterisation and archaeological investigations could be amalgamated into the HIA or can form separate documents.
	<p>Comment: Focussed Change 2 (Land off Crescent Drive, Shenfield)</p>	<ul style="list-style-type: none"> There are no designated heritage assets within or near to the site. Historic England has no comments to make on this focussed change.
	<p>Comment: Focussed Change 3 (Land off Priests Lane, Shenfield)</p>	<ul style="list-style-type: none"> There are no designated heritage assets within or near to the site. Historic England has no comments to make on this focussed change.
	<p>Comment: Focussed Change 4 (Land north of Woollard Way, Blackmore)</p>	<ul style="list-style-type: none"> We acknowledge the proposed modification, but maintain our position as set out in our response to your regulation 18 consultation (dated 26th March 2018) that two Grade II listed buildings - The Woodbines and Horselocks Cottage - are located to the immediate east of the site whilst the Grade II listed Wells Farmhouse is located to the north of the site. The Blackmore Conservation Area is to the south of the site, which contains a number of individual listed buildings. Any development of the site will need to be sensitive to this edge of settlement location and relate to the open landscape around it as well as to the historic settlement it adjoins. The surrounding land is of historic interest and also makes a positive contribution to the character and appearance of the conservation area. The cumulative impacts of the development of this site and that of site R26 must be taken into account in order to ensure the setting of these listed buildings and conservation area is not compromised. Development of this site will need to conserve and, where opportunities arise, enhance these heritage assets and their settings. The development should be of high quality design. These requirements should be included in any site specific policy and supporting text of the Plan.
	<p>Comment: Focussed Change 5</p>	<ul style="list-style-type: none"> As with R25, we acknowledge the proposed modification, but maintain our position as set out in our response to your regulation 18 consultation (dated 26th March 2018) that the development of this site

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	(Land north of Orchard Piece, Blackmore)	<p>has the potential to harm the significance of a number of designated heritage assets including the Grade II listed The Woodbines and Horselocks Cottage, and the Blackmore Conservation Area by eroding their setting. We recommend that Policy R26 includes a criterion to help secure a high quality development which respects the setting of the nearby listed buildings and conservation area. The policy should refer to the sites' sensitive edge of settlement location, and the need for high quality design which will relate to both the rural surroundings to the north and to the historic settlement adjoining the site to the south. Careful master planning will be required to ensure the scale and density of the development is appropriate for the location. The cumulative impacts of the development of this site and that of R25 must be taken into account in order to ensure the setting of these listed buildings and conservation area is not compromised. Development of this site will need to conserve and, where opportunities arise, enhance these heritage assets and their settings. The development should be of high quality design. These requirements should be included in any site specific policy and supporting text of the Plan.</p>
Ingatstone and Fryerning Parish Council	Comment (General)	<ul style="list-style-type: none"> • The last time we commented comprehensively on the LDP, on 3rd March 2016 (copy attached), we had not begun the evidence gathering for our Neighbourhood Plan, as our Neighbourhood Plan Advisory Committee was not convened until November 2017. The research on our own housing needs, relating to our existing 2,000 households and the requirements of our residents for the planning period the LDP covers, was only started in 2018. We sought to work closely with the Borough Council recognising that we are one of nine Parishes in the Borough that do not cover the entire geographical area – the balance being directly managed by the Brentwood Borough Council itself. • We had attempted to establish what the demand for housing is via Brentwood's own records but have not succeeded in obtaining a figure. Recently we have learnt that that your planning department policy team has been discussing local demand but they believe that the figure can only be based on the proposed development sites within the Regulation 19 Brentwood Local Plan Pre-Submission draft. Additionally this would include a figure for windfall sites expected in the area which would account for an additional 5%. • In summary – the proposed housing for our Parish is not based on local demand, but rather on what a proposed development site could accommodate. Therefore the figure for our Parish would be R22 as the site and 57 dwellings for the yield, plus 5% for the Parish as a whole. • Mountnessing Parish is adjacent to Ingatstone and Fryerning, and has been the subject of considerable new build housing in the last few years. In the current LDP a further development site is identified for 161 dwellings, amounting therefore to some 229 units that will be looking towards our Parish to meet much of its infrastructure needs, namely, pre-schools, schools, health services, parking, rail services etc. These figures are confirmed in Appendix 1 to your Addendum document.

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		<ul style="list-style-type: none"> The LDP does also identify a site for Employment close to both the sites identified above (R21 and R22). The Parish would wish to work with Brentwood Borough Council and Mountnessing Parish Council to enable this site to provide some of the infrastructure needs essential to both local communities.
London Borough of Havering	Object (General)	<ul style="list-style-type: none"> The focussed changes do not address nor resolve issues that Havering raised in its original Regulation 19 consultation in Spring 2019. The representations submitted previously still stand and should be reported to the Inspector when the Brentwood Local Plan is formally submitted.
Marine Management Organisation (MMO)	Comment (General)	<ul style="list-style-type: none"> General overview of the function of the MMO. No specific comments on content of consultation.
National Grid	Comment (General)	<ul style="list-style-type: none"> Response highlights where the sites set out within the addendum of focussed changes have National Grid transmission assets crossing them. These include Brentwood Enterprise Park, Dunton Hills and Nags Head Lane.
Natural England	Comment (General)	<ul style="list-style-type: none"> We note the changes listed in the documents and the rebalancing of housing numbers towards Dunton Hills Garden Village. We do not consider the modifications significantly change our position submitted to the Council as part of Reg 19 consultation.
Thames Chase Trust	Comment (General)	<ul style="list-style-type: none"> It is very welcome to see clear alignment between the Brentwood Borough Council Local Plan Addendum of Focussed Changes to the Pre-Submission Local Plan and the Thames Chase Plan, however, the Thames Chase Trust would like to see direct reference made to the Thames Chase Community Forest (TCCF) within the document, including any supporting documents. The Thames Chase Trust believes that there is more scope to include further references that would acknowledge the wider range of opportunities provided by the Community Forest, particularly in relation to emerging developments such Dunton Hills Garden Village (Policy R01).
Transport for London (TfL)	No comment	<ul style="list-style-type: none"> No comment

2. Land promoter representations summary

Promoter	Agent	Sites being promoted	Summary
Landowner	Alan Wipperman & co. property and town planning	Proposed housing allocation: R07 - Sow and Grow Nursery, Pilgrims Hatch	<ul style="list-style-type: none"> No objection but remain concerned on the over reliance on DHGV which carries increased risks in delivering homes over the plan period. There should be no more allocations in the south of the borough and no further reduction of sites elsewhere in the Borough. There has been no consideration of the potential increase in density at the Sow and Grow Nursery allocation as raised in Reg 19 reps.
Constable Homes Ltd	Bidwells	Proposed housing allocation: R25 - Land north of Woollard Way, Blackmore	<ul style="list-style-type: none"> Object: Focused Change 4 (Land north of Woollard Way, Blackmore) The approach to reducing the number of dwellings allocated in Blackmore, including the draft Policy R25 site, does not appear to be based on sound or proportionate evidence, and is simply a response to the quantum of representations submitted to the previous iteration of the Local Plan. It is a long-established planning principle that the number of representations received in respect of a particular topic is not in itself a material consideration. The evidence prepared by Constable Homes and Brentwood Borough Council, through previous rounds of Local Plan consultation, demonstrates that the previous amount of development earmarked for the site [around 40 new homes] is entirely appropriate. Bidwells, on behalf of Constable Homes, is currently taking a scheme proposal through the formal pre-application process, the latest design of which demonstrates to the Council (and future Local Plan Inspector) that there are no insurmountable or limiting planning issues, including those referenced in the consultation document above, to the delivery of a development of the site for approximately 40 new homes in a policy-compliant manner. Object to Focused Change 4 because it is unduly restrictive and would fail to optimise the beneficial use of the Policy R25 site, contrary to the National Planning Policy Framework.
BPM Investments Ltd	Strutt & Parker	Not a proposed site allocation: Land at Salmonds Grove, Ingrave	<ul style="list-style-type: none"> The modifications proposed by the AFC fail to ensure the Local Plan is capable of being found sound. The modifications place further reliance on one site (Dunton Hills Garden Community) to meet development needs, and further reduce the ability of the Local Plan to be able to respond to changing circumstances.

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			<ul style="list-style-type: none"> • There is no justification for the suggestion that the delivery rate of Dunton Hills Garden Village can be increased for the three years the housing trajectory suggests. • The Focussed Changes exacerbates problems that were present in the Pre-Submission Plan, namely five-year housing land supply, reliance on one site, over ambitious delivery rates. • It is now clear that the Local Plan will not be adopted in 2019. As such, the Local Plan's strategic policies are, as currently proposed, falling short of the required period from adoption. This is evidently contrary to the NPPF's requirement to cover a minimum of 15 years. • Site 67a (and 67b) are suitable, available, and achievable for residential development, either site can be delivered in the short term and an allocation would be justified, effective, consistent with national policy.
Tesco Stores Ltd	GL Hearn	Not a proposed site allocation: Sawyers Hall Farm, Brentwood	<ul style="list-style-type: none"> • Object to the subdivision of the site (Sawyers Hall Farm) into two separate parcels which resulted in the site being subject to two separate site appraisals. • The 'Consolidated Changes' have not been prepared in accordance with legal and procedural requirements • Object to Focused Change 1: Reallocation of 50 dwellings from the urban area to DHGV results in no net improvement to the levels of congestion or air quality within the urban area. To reallocate housing away from the Brentwood/Shenfield Urban Area where the demand for housing is greatest and direct 35% of the Boroughs housing on one allocation present a greater risk to the housing trajectory. Objections from Basildon and Thurrock are clear indicators of insufficient engagement with adjoining local authorities. • Significant risks posed by the current strategy in meeting the LHN over the period of the plan. Appendix 1 should remove completions for years 2016/17 and 2017/18 as the plan has not yet been adopted and is unlikely to be adopted until after 2021. The 926 net homes with extant permissions also should be removed from 'Allocation Total' unless BBC can provide evidence that the permissions for all 926 dwellings will still be extant at the point that the Local Plan is adopted. 410 dwellings of windfall allowances should also be removed in the absence of compelling evidence to suggest they are a reliable source

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			<p>of supply. Taking into account these suggested amendments, the Plan would fall short in meeting LHN.</p> <ul style="list-style-type: none"> To address this matter, Sawyers Hall Farm site (ref: 024a and 024b) should be allocated.
Childerditch Properties	Strutt & Parker	Proposed employment allocation: E12 – Childerditch Industrial Estate	<ul style="list-style-type: none"> Strongly support the proposed allocation at Childerditch Industrial Estate and support the principle of improving walking and cycling links within the site (E12) but question the extent to which these new cycle ways could be delivered along the A127 corridor, as this would require every land owner to be committed to this initiative. Part B Schedule of the IDP provides an indicative cost for delivering the cycle way improvements, which is noted as being £7,000,000 and states that the provisional funding sources will be from Section 106/CIL. Further clarification required on what proportion of these costs would be secured from developers and how much would be funded by BBC and/or ECC.
Countryside Properties	Strutt & Parker	Proposed housing allocations: R03 – Land at Chelmsford Road, Shenfield R16 & R17 – Land at Doddinghurst Road, Brentwood Not a proposed site allocation: Land at Bayleys Mead, Hutton	<ul style="list-style-type: none"> Concerned in relation to an over-reliance on large scale strategic development for the provision of housing over the Plan period. Should there be specific reasons why the 4 sites have a lower capacity than initially understood, alternative sites proposed for allocation, such as land at Chelmsford Road and Doddinghurst Road have sufficient capacity to accommodate an increase in unit numbers to protect overall housing delivery numbers for the Borough. R03: Policy wording relating to an inflexible provision of employment land (2ha) should be amended or removed as this is not justified or effective. R16 and R17: The previous iteration of the policy required vehicular access to be provided from “Doddinghurst Road for both site and/or Karen Close and Russell Close”. The current policy is worded to allow for vehicular access from Doddinghurst Road only. It is therefore requested that the policy retains flexibility for the use of the other accesses from Karen Close and Russell Close as a worst case scenario, particularly as these routes of access have been previously agreed with Essex County Council Highways.

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Crest Nicolson Eastern	Savills	Proposed housing allocation: R26 – Land north of Orchard Piece, Blackmore	<ul style="list-style-type: none"> • Object to Focussed Change 5, the reason for reducing the quantum of development from approximately 40 to 20 dwellings is purely political and is contrary to both technical evidence and the advice from statutory consultees (ECC and the EA) which concludes that a scheme of approximately 40 dwellings is entirely suitable. • Request that the wording of the site R26 allocation reinstate the capacity of the development to approximately 40 dwellings. • No growth of the sustainable settlement of Hutton has been proposed, despite its sustainability credentials and offering of small scale development sites such as land at Bayleys Mead.
Landowner	None	Proposed housing allocation: R19 – Land at Priests Lane, Shenfield	<ul style="list-style-type: none"> • Object to Focussed Change 3: The reason for the change to Policy R19 is purely due to representations from local residents and political pressure. The relevance of these concerns when considering site 178 in isolation have already been disputed. Based on the evidence on air quality, biodiversity, climate change mitigation, Community and well-being, economy and employment, heritage, flooding, housing, landscape, waste, water the R19 change is not justified. This latest reduction from 75 to 45 could adversely affect the scheme viability.
Ford Motor Company	Iceni	Proposed housing allocation: R05 Ford Headquarters and Council Depot, Warley	<ul style="list-style-type: none"> • Broadly supportive of the strategic housing allocation but recognises that the current pairing of the Headquarters and the Depot has potential to limit the delivery of the site in the short to medium term. • Question the below aspects of the draft allocation: <ul style="list-style-type: none"> ○ the inclusion of the Ford Warley site within years 9-17 of the Housing Trajectory. ○ Retention of 2.0 hectares of employment land – Land south of Eagle Way (i.e. main Ford Headquarters); ○ Delivery of residential care home providing 60 x bed spaces; and ○ 5% self-build and custom build across the entire allocation (including the Council Depot) • The housing trajectory should be updated to reflect Ford owned site's anticipated availability earlier within the Plan period, as demonstrated in previous representations.

Promoter	Agent	Sites being promoted	Summary
			<ul style="list-style-type: none"> BBC's proposed phased approach to the annual housing requirement, may not deliver sufficient quantum of housing within the early years of the Plan.
Hallam Land Management Ltd	Marrons Planning	Not a proposed site allocation: Land west of Ongar Road, Pilgrims Hatch	<ul style="list-style-type: none"> Object to Focussed Change 1 due to the absence of evidence to support the rate of delivery proposed. Object to Focussed Change 13: Whilst the change is a relatively small reduction in supply, it still further reduces supply and an objection is maintained on the grounds of soundness in that it is not consistent with national policy in failing to identify a five year supply of specific deliverable sites against the housing requirement. Request the Council consider through the Examination process additional allocation(s) within the Central Brentwood area in order to maintain its supply buffer and reduce the uncertainty and risks associated with the current Plan in relation to failing to meet housing need in areas where the need is derived.
McColl's Retail Group plc	Smith Jenkins Town Planning	Not a proposed site allocation: McColls House, Ashwells Road, Pilgrims Hatch	<ul style="list-style-type: none"> No comments on the focussed changes as these are very minor in scale. McColl's owned site is identified as an existing employment site in the Green Belt that is effectively reserved for B-class uses under emerging Policy PC03. In September 2019, Brentwood Borough Council gave this site Prior Approval for the change-of-use of our client's offices to create 55 dwellings. Therefore, it should be removed from this policy on the grounds that it is neither effective nor positively-prepared.
M Scott Properties Ltd	Strutt & Parker	Not a proposed site allocation: Land to the west of Crosby Close, Mountnessing	<ul style="list-style-type: none"> There is insufficient flexibility within the PSLP's target figure of 456 dpa which provides a buffer of just 0.9% of the new Local Housing Need (LHN) figure. The Focussed Changes reduce the Plan's ability to meet local needs, particularly those of an ageing population The Plan has failed to consider alternative, suitable sites, to balance the reduction in housing numbers in the sites subject to the Focussed Changes when identifying suitable solutions to correct this. We argued clearly within previous representations that the approach to assessing sites within the SA using the 'traffic light' scoring system

Promoter	Agent	Sites being promoted	Summary
			<p>was primitive, inconsistent and unjustified, which resulted in subjective and ill-informed conclusions. This is clearly shown in relation to the Site - land west of Crossby Close.</p> <ul style="list-style-type: none"> Concerns with the proposed approach to addressing the shortfall that Focussed Changes 2-5 necessitate by simply altering Dunton Hills Garden Village to deliver at a greater rate than previously calculated Cross-boundary and Statutory Consultee Objections were not addressed.
Redrow Homes Ltd	Pegasus Group	Proposed housing allocation: R21 - Land south of Ingatestone	<ul style="list-style-type: none"> Request that you the trajectory at Appendix 1 is updated to reflect the fact site R21 could deliver homes from year 2020/21 rather than 2021/22 as currently listed.
St Modwen Properties Plc and S&J Padfield & Partners	Strutt & Parker	Proposed employment allocations: E11 – Brentwood Enterprise Park E10 – Codham Hall Farm	<ul style="list-style-type: none"> The SA: The commentary on Economy and Employment also refers to the 'Enterprise Corridor' and the role of the Enterprise Park along the corridor. We note that paragraph 9.6.8 suggests that access will be directly to Junction 29 and the M25, while the draft plan indicates that access may be achieved via the B186. The SA has not been updated to reflect our previous comments. The Brentwood Enterprise Park site continues to be scored negatively against Local Wildlife Site, Ancient Wood and AQMA, GP, and school provision; these criteria should be considered differently when applied to an allocation for employment land than residential proposals. Additionally, through appropriate design and landscaping, any adverse impacts can be avoided. A neutral or 'depending on implementation' scoring for a number of these criteria would be much more appropriate. The same comment applies to Codham Hall Farm (101C), which has also scored negatively against Local Wildlife Sites. IDP: With regard to specific mitigation measures, T24 covers improvements at the B186/A127 junction. We are currently in discussion with ECC as to how the proposed access to Brentwood Enterprise Park can be delivered alongside these solutions. It should be noted that the measures set out at T24 will need to cater for the wider planned growth in the Borough, and not be seen as a measure wholly to ensure the delivery of the Brentwood Enterprise Park. Additional work is required by all parties with regard to the proposed segregated cycle network for the southern growth corridor if this is to

Promoter	Agent	Sites being promoted	Summary
			<p>be delivered without the need for third party land and the progression of development on key sites should therefore not be reliant on this from day one.</p> <ul style="list-style-type: none"> Transport & Movement chapter should also make reference to the potential role that Demand Responsive public transport can play. This element of the Transport work is being progressed by a number of parties who are engaging proactively in seeking to rationalise and progress solutions for delivering the identified sites along the Southern Growth Corridor (SGC), and this should be referenced in the IDP. Currently, the sections of the Transport and Movement document referring to buses are focused on provision of traditional fixed route bus services, which may only one be solution adopted at Brentwood Enterprise Park.
Stonebond Properties	Phase 2 Planning	Proposed housing allocation: R03 – Land north of Shenfield	<ul style="list-style-type: none"> Stonebond Properties have control of part of the allocation on the south eastern edge of R03, nearest to existing services and amenities in Shenfield. The scheme can come forward quickly to boost supply, without compromising the wider principles of the allocation. As such, we request the Housing Trajectory in Appendix 1 for site R03 is updated to reflect the fact that this site is capable of delivery in the first five years of the plan. As part of this approach, we would seek rewording of the policy to refer to Stonebond Properties site as a separate site allocation (Site R03B – Land at Alexander Lane, Shenfield).
Stonebond Properties	Strutt & Parker	Proposed housing allocations: R23 – Land at Blackmore Road R24 – Land at Stocks Lane	<ul style="list-style-type: none"> Whilst we have no comments on the proposed reduction to the number of homes for Blackmore or Shenfield, we do consider that the AFC is a missed opportunity to review the capability of other sites proposed for allocation in the Local Plan to accommodate the units to be lost at those sites rather than simply adding to the allocation at Dunton Hills Garden Village. The approach in which fewer homes will be delivered in the early years of the plan period and increasing delivery at the end of the plan period is contrary to the NPPF. Both of sites R23 and R24 can accommodate additional homes above the number they are identified.

Promoter	Agent	Sites being promoted	Summary
Landowner	None	Proposed housing allocation: R26 Land north of Orchard Piece, Blackmore	<ul style="list-style-type: none"> Object to Focussed Change 5: The site's original allocation of approximately 40 dwellings continues to be supported by technical evidence and statutory consultees. The reduced capacity to 20 houses is not in line with national policy for a plot of this size or Policy HP03 of the Pre-Submission Local Plan.
Transport for London (TfL) Commercial Development	None	Proposed housing allocation: R10 Brentwood Railway Station car park	<p>Object: Other (Reg 19 site allocation)</p> <ul style="list-style-type: none"> In written representations to the Reg 19 plan we supported the principle of the Strategic Housing Allocation R10: Brentwood Railway Station Car Park, however we did not agree with the approximate capacity of 100 homes which was too low. This was suggested to be increased to 405dpa in line with the Town Centre Design Guide. In addition, the boundary shown in the plan was incorrect. Strongly suggest that as per the above, an increased indicative site capacity is included within the Strategic Housing Allocation R10 to accurately represent the sites housing capacity and support the redevelopment of a highly accessible, optimal site.
Turn2Us	Strutt & Parker	Not a proposed site allocation: Land at Rayleigh Road, Hutton	<ul style="list-style-type: none"> The projected delivery rates for Dunton Hill Garden Village set out within the PSLP is already ambitious, the further increase proposed in Focussed Change 1 is not justified; is ineffective in ensuring delivery; and risks a shortfall in the timely provision of housing. The housing trajectory in Appendix 1 should not show completions at Dunton Hills Garden Village until 2027/28 at the earliest, unless robust evidence can be provided. Reduction of 75 to 45 dwellings in site R19.
The Ursuline Sisters Brentwood CIO	The JTS Partnership LLP	Proposed housing allocation: Land at Priests Lane, Shenfield	<ul style="list-style-type: none"> Object to the approach to achieve some reduction in housing numbers on identified sites and to lump the reduced number into the Dunton Hills Garden Village Strategic allocation as it will leave the Plan unsound. Object to Focussed Change 3: there is no justification or evidential support for the proposed decrease. Technical evidence confirmed the site's deliverability and sustainability to accommodate 130 dwellings. Focussed Change 1-5 would make the Plan significantly reliant on the DHGV allocation to meet the overall supply of housing, raising significant concerns about the robustness of delivery timetable and this

Promoter	Agent	Sites being promoted	Summary
			<p>position is only compounded by these focussed changes which remove deliverable unit numbers from the early/middle part of the Plan Period and add them on to the end.</p> <ul style="list-style-type: none"> There is great uncertainty about the ability to deliver the full DHGV allocation within the Plan Period. The site presents a significant number of challenges in masterplanning and bringing forward development. These rates of delivery in the housing trajectory is very high figures and is questionable in terms of the physical rate of delivery and their absorption rates (sales).
Wiggins Gee Homes Ltd	David Russell Associates	Not a proposed site allocation: Land at Crow Green Lane, Pilgrims Hatch	<ul style="list-style-type: none"> No justification is given for transferring the lost capacity from site R18, R19, R25, R26 to site R01. Dunton Hills Garden Village is surrounded by too many outstanding issues over the timing of housing delivery and the capacity of local and regional infrastructure to fully support this strategic proposal. The Pre-Submission Local Plan would be made more sound by transferring the 70 dwellings from allocations R18, R19, R25 and R26 to the certainty of the land at Crow Green Lane.

3. Resident representations summary

Focussed Change	Summary
1. (R01) Dunton Hills Garden Village	<ul style="list-style-type: none"> Allocation should be further increased and the delivery programme accelerated in order to remove policies R25 and R26 from the LDP.
2. (R18) Land at Crescent Drive, Shenfield	<ul style="list-style-type: none"> Site received less than 1% of total Reg 19 responses. Brownfield sites should be prioritised over greenfield sites and Green Belt should not be released at all unless all other alternatives have been used to fulfil the target housing allocations. The number of homes should be increased back to a minimum of 55 and R25 and R26 should be removed entirely.
3. (R19) Land at Priests Lane, Shenfield	<ul style="list-style-type: none"> Site received 11% of total Reg 19 responses. Defined as greenfield land within Brentwood urban area/settlement boundary. This is a site surrounded by existing housing, on a main road, and next to a railway line. This site is more suitable for residential development than more remote locations (e.g. Policies R25 and R26) and therefore should be built on before remote locations.

Focussed Change	Summary
4. (R25) Land North of Woollard Way, Blackmore	<ul style="list-style-type: none"> • R25 received 36% of total Reg 19 responses, R26 received 37% with a total of 73% for both sites. • Greenfield / Green Belt land in a remote village location with inadequate infrastructure not able to support level of development.
5. (R26) Land North of Orchard Piece, Blackmore	<ul style="list-style-type: none"> • Site should be removed completely from LDP, reduction of 10 houses does not resolve issues. • Site is developer led and still not properly assessed against local housing needs. • There are a number of large developments progressing nearby which will further degrade the infrastructure of Blackmore. These include 30 homes under construction on Fingrith Hall Lane plus an additional 5 on the same road, infill sites in Nine Ashes and 10 dwellings at Ashlings Farm. Inadequate consultation and strategic planning discussions with Epping Forest DC regarding these developments in the wider area. • There are a number of other sites going through the planning process including 12 houses at Redrose Farm, 5 starter units in Spriggs Lane, a further 9 houses on Spriggs Lane/ Chelmsford Road. • Redrose Farm is a brownfield redevelopment opportunity (opposite R26) for 12 homes and will deliver part of our own Village plan as opposed to digging up Green Belt. It should therefore replace R26 in its entirety. • Both R25 and R26 should be removed as the permitted and planned windfall development in the area will already overwhelm the limited resources and infrastructure of the Blackmore area. • There are better alternative sites both within the village/Parish and the wider Brentwood Borough area. Honeypot Lane (022) was previously removed from the Local Plan which is a better location due to it being on the edge of the Brentwood urban area, surrounded by existing housing, providing c200 houses. This should be reinstated as it would allow R18, R19, R25 and R26 to be removed whilst not adding the burden on R01. • R25 and R26 equate to 49% of the Green Belt release in larger villages. Brentwood and Shenfield urban area are identified as having the highest housing need, yet two sites (R18 and R19) have now had the number of dwellings reduced. Blackmore remains classified as a Category 3 settlement (larger village). Our population numbers are much lower than many other villages in this category which have sufficient infrastructure and resources that Blackmore lacks.

END

Supplementary

APPENDIX A ADDENDUM:

Summary of representations received in response to the Addendum of Focussed Changes to the Pre-Submission Local Plan (October – November 219)

The following summary of representations are in addition to those summarised in Appendix A.

1. Statutory consultee and other groups representations summary

Consultee	Support / Object	Summary
Anglian Water	Comment: Focussed Change 1 (Dunton Hills Garden Village Strategic Allocation)	As an infrastructure provider we closely monitor housing growth in our region to align our planned investment with additional demand for water recycling infrastructure. Therefore we have no comments to make relating to the focused change to Policy R01.
	Comment: Focussed Change 2, 3, 4 & 5	We note that it is proposed to decrease the amount of housing on this allocation site to address comments made as part of the previous consultation. As an infrastructure provider we closely monitor housing growth in our region to align our planned investment with additional demand for water recycling infrastructure. Therefore we have no comments to make relating to the focused change to Policy R18, R19, R25 & R26.
Chelmsford City Council (CCC)	Support: Focussed Changes 1, 4 & 5	<p>For relevance of Chelmsford, Policy R25 and R26, located in Blackmore have a reduction in the number of dwellings for these site allocations. From 40 to 30 homes for R25, and 30 to 20 homes for R26. The capacity of Policy R01 (Dunton Hills Garden Village Strategic Allocation) has increased from 2,700 to 2,770 to take account of the reduction in numbers from the sites identified. CCC continues to support BBC's proposed approach to housing and employment allocations which are unlikely to have any obvious adverse cross-boundary impacts on Chelmsford.</p> <p>BBC continues to meet its own housing need within its administrative boundaries and has not approached neighbouring authorities under the Duty to Co-operate to request other authorities help accommodate any unmet needs. This is supported by CCC.</p>
Priests Lane Neighbourhood Residents Association	Object: Focussed Change 3 (Land off Priests Lane, Shenfield)	We appreciate the reduction in house numbers from 75 to 45 addresses our concerns about inappropriate house density. However, it fails to address other concerns about the safety of a new access road and the suitability of Bishop Walk of an access considering the limited road infrastructure of Priests Lane and the already high traffic levels which will increase as a result of the various new housing developments in the area. It also does not reflect the Council addition of multiple access points. We think our existing objections are still valid and want them to be submitted along with the LDP, and continue to request a hearing.

Consultee	Support / Object	Summary
Rochford District Council	Comment (General)	<p>Rochford District Council would like to acknowledge the importance of Brentwood Borough Council continuing to engage positively on strategic issues, including as part of the Association of South Essex Local Authorities (ASELA) and in the preparation of the South Essex Joint Strategic Plan. Brentwood Borough Council is expected to continue to discharge its Duty to Co-operate with Rochford District Council and work positively to ensure that their mutual aspirations and vision for South Essex, set out in the Memorandum of Understanding dated July 2018, can be realised in the most effective, sustainable and equitable way.</p> <p>Rochford District Council raises no objection to the proposed amendments to Brentwood Borough Council's Pre-Submission Draft Local Plan, namely the revised capacities of various sites proposed for development. Brentwood Borough Council should, however, satisfy themselves and the Inspector that the policies subject to amendment, in the context of its wider spatial strategy, are both sound and deliverable. In particular, Brentwood Borough Council should satisfy itself that the rate of development suggested for 'Dunton Hills Garden Village' is deliverable and realistic in order to ensure no unmet needs will arise.</p>
West Horndon Parish Council	Object Focussed Change 1 (Dunton Hills Garden Village Strategic Allocation)	<p>The proposed additional homes added to Dunton Hills Garden Village ignores the fact that these homes will exacerbate an already ill-conceived and poorly planned new Garden Village, the size of which has grown and grown. The Council states that it is planning for a borough of villages however West Horndon Parish is being expected to provide a disproportionate amount of the necessary housing and industrial development. The conclusion being that the Garden Village is being used as an excuse to ensure that other parts of the borough do not have to experience the upheaval that will result from extended building works over time.</p> <p>The proposed Garden Village is not consistent with national sustainable development in terms of transport links, meeting climate change and combatting flooding. Sustainable movement in West Horndon Parish is already difficult and will be problematic with the Garden Village. No evidence has been provided to show appropriate assessment of the impacts on the A127 and A128, passenger numbers at West Horndon station are already at capacity and no understanding or allowance has been made to accommodate additional passengers. The proposal is non-sustainable.</p>

2. Land promoter representations summary

Promoter	Agent	Sites being promoted	Summary
CEG Land Promotions Ltd	Lichfields	Proposed housing allocation: R01 Dunton Hills Garden Village Strategic Allocation	CEG note the Council's proposal to increase the number of new homes to be provided for within the DHGV strategic housing allocation in the plan period to 2033. CEG considers this to be a relatively small increase in the number of new homes when compared to what was previously proposed to be provided by the end of the plan period and the total indicative capacity of the DHGV allocation overall.
Fairview New Homes Ltd	None	Proposed housing allocation: R18 Land off Crescent Drive, Shenfield	<p>The Council's failure to demonstrate that the strategic requirement of National Planning Policy Framework has been met. Therefore, the Local Plan is not legally compliant or sound.</p> <p>That no evidence or justification has been provided by the Council to justify the reduction in the number of units allocated of the site.</p> <p>The lack of evidence and justification behind the Council's decision to reallocate additional housing onto a large strategic Green Belt allocation where the delivery has already been highlighted as risk within the Sustainability Appraisal 2019.</p> <p>The continued failure of the Council to support the full capacity of a strategic site, despite discussion with Development Management and Statutory Consultees which demonstrate that the site could accommodate in excess of 55 units.</p>
Estates and Agency Strategic Land (EASL)	Iceni Projects Ltd	Object General	<p>Estates and Agency Strategic Land (EASL) is promoting land west of Thorndon Avenue, West Horndon which constitutes the most sustainable undeveloped site in Brentwood Borough given its proximity to West Horndon railway station and is supported by evidence, is available, suitable and deliverable at early stage of plan. EASL is also promoting land to the south of the station within Thurrock Borough.</p> <p>The proposed modifications further delay delivery of housing, where early delivery is needed, exacerbating soundness issues raise previously. The proposed stepped trajectory will not meet the Local Housing Need figure.</p>

			The increase from 350 to 454 is not justified and should be the uncapped figure of 469 as per PPG. Crossrail impacts have not been considered with 1000 more homes needed. With the SA warning of overreliance on the Garden Village.
Punch Partnerships	Cordage Group	Not a proposed site allocation: Land at Spital Lane, Brentwood	The proposed reduction in housing numbers in Shenfield and Blackmore reduces housing numbers in sustainable settlements where growth is needed, and puts them in a less sustainable location. In relocating the units to the proposed strategic allocation at Dunton Hills, the provision of these units will inevitably occur later in the plan period, when the focus should be on early provision to address the current housing land supply shortfall. The site at Spital Lane is an ideal candidate, having minimal impact on the openness of the Green Belt, being capable of accommodating six houses without any risk of flooding.
Landowners	Sworders	Not a proposed site allocation: Former sewage pumping station at Ingrave Hall, Ingrave	We support the reduction in housing numbers at the allocation sites in Shenfield and Blackmore, as this is justified by the evidence base. However, we object to the re-distribution of 70 dwellings to the Dunton Hills Garden Village (DHGV) allocation, because it would mean that fewer homes would be delivered in the early years of the plan. The reliance on DHGV to deliver such a large proportion of the Borough's housing need within the early years of the plan is too great, particularly when smaller sites are available, some of which are brownfield.

END