



Secretary of State  
Department for Communities and Local Government  
House of Commons  
Westminster  
London  
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To the Incoming Secretary of State, Department for Communities and Local Government,

**RE: Brentwood Borough Council – Local Development Plan**

Brentwood Borough Council is currently moving forward with its Local Development Plan. As part of which, our objectively assessed housing need (OAN) has identified a requirement for at least 5,500 additional new homes in the Borough over the next 15 years – 360 per annum. Our best estimates show that around 2,500 of these could be provided on brownfield sites, leaving around 3000 for which no other land but the precious green belt (or already over-congested town centres), is possible. But the fact that 89% of this borough is green belt is an essential part of its character and we are fiercely defensive of it. Since it neighbours the Greater London area, Brentwood's green belt still clearly functions as the 1947 Town and Country Planning Act envisaged it: a green lung preventing further urban sprawl stretching (as it would now), beyond the M25 into neighbouring counties: it should therefore be protected at all costs, and we want to do so.

If the wider UK picture is considered, plenty of brownfield land appears to be available for development - but this is only true on a national level, not within local boundaries; like most resources, it is unevenly distributed. A Council for the Protection of Rural England (CPRE) report in November 2014 found that there were sufficient brownfield sites to accommodate more than a million new homes, even if those that were of recreational or wildlife value, or could be developed for purposes such as employment, were discounted. Moreover, more than 400,000 homes on brownfield sites already have planning permission, and this is not necessarily a finite resource: again according to the CPRE, the supply of potential new brownfield sites outstripped its development between 2010 and 2012.

As you can appreciate, any decision to even consider developing in the green belt is a difficult one for local communities and their representatives. Brentwood treats its responsibilities under the local plan process seriously and is attempting to deliver what is being asked of it, but what is being asked is a plan that will acknowledge our need to provide more housing in the area, almost irrespective of the simultaneous demands laid upon us to respect and protect the green belt.

How can an authority in our position abide by the five stated purposes of including land within the green belt, and preventing inappropriate development, according to the NPPF (checking the unrestricted sprawl of large built-up areas; preventing neighbouring towns from merging into one another; assisting in safeguarding the countryside from encroachment; preserving the setting and

special character of historic towns; and assisting in urban regeneration by encouraging the recycling of derelict and other urban land), under such circumstances?

Where any new development is proposed, there needs to be benefits for local people with the provision of additional social and physical infrastructure. However, despite measures such as the Community Infrastructure Levy, the delivery of much of this is not in our gift, and becomes less and less so the more significant the infrastructural improvements required.

The provision of new schools, health care facilities, roads, public transport, community and sports facilities, and cultural uses is either down to other partners, or beyond the current budget of authorities such as ours. Despite such services being essential for sustainable and beneficial growth, the council can only raise the issue of need, not guarantee their delivery.

Ironically, despite itself being an infrastructure project, the impending multi-billion pound Crossrail service is an example of this, thanks to the complete lack of funding for necessary, integrated, public realm improvements in and around Shenfield and Brentwood stations. If local people cannot enjoy any positives from such a development, there is little chance of reassurance that squeezing 3000 new homes onto the green belt, or further overburdening town centres, can be beneficial rather than damaging.

Therefore, if the growth agenda is accepted as the correct one to follow, what will be needed is an unshakeable commitment from you and Central Government to provide essential social and physical infrastructure to meet increased demand. Without committed funding, and thus possible solutions to problems that have already been worsening for decades, how can any local authority promote growth in housing numbers to anywhere near levels dictated by the OAN process? In the absence of such funding any responsible authority would struggle to support significant development to meet perceived need for new homes, employment, etc. in its area as part of Local Plan preparation process, and would naturally highlight the lack of infrastructure provision as the key factor in any such decision.

Questions surrounding devolution have recently had a high profile, but whatever the future of the UK, genuinely devolved Localism is a workable model. In this even non-unitary authorities such as Brentwood, working either in isolation or (more likely) in partnership with neighbours, could both identify the challenges facing themselves and be provided with the power to require the infrastructural changes which would be needed to render the future we envisage viable.

Alternatively, well thought out strategic planning on a national level is workable. In this the overall national picture can be assessed and Central Government can take steps to counter damaging forces within the country - such as those leading to unwelcome bleeds in economic activity and population which both drain deprived areas yet drier, and swamp other areas with inward transfers. Equally a blend of these two approaches might be possible - after all, local and national perspectives on desired change do not have to be at odds.

Unfortunately, however, local authorities have not recently enjoyed options which resemble these closely enough. All too often we seem to find ourselves left with the task of finding solutions to problems which are impossible because contradictory demands are simultaneously being made (as well as being asked to do so with less resources than ever before).

In Brentwood's case we both wish to protect our green belt, and are tasked with doing so by successive pieces of legislation, but simultaneously are required to accept OAN figures as a central part of the plan-making process that cannot be met without significant (and of course irreversible) green belt encroachment. To do either is possible - to do both cannot be, but even the choice between them is denied us.

All of this is not just unacceptable in a passing way to local people and those of us who represent them, but will have permanent unacceptable consequences: the no man's land of confused strategic planning processes will result in a No Man's Land Britain in which the urban and rural become irrevocably hybridised. We wish to express our deep antagonism to this prospect, and request intelligent policies which will enable Local and Central government, working hand in hand, to prevent it.

We would therefore welcome the opportunity to discuss this with you at your earliest convenience.

Yours faithfully

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Leader of the Council

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