

Gregory Gray Associates

CHARTERED TOWN PLANNING CONSULTANTS

Victoria House, 18-22, Albert Street, Fleet, Hampshire, GU51 3RJ.

Planning Policy,
Brentwood Borough Council,
Town Hall,
Brentwood,
Essex,
CM15 8AY.

14th March 2016

Dear Sir/Madam,

BRENTWOOD BOROUGH DRAFT LOCAL PLAN CONSULTATION

Gregory Gray Associates is instructed to write on behalf of our client, Wyevale Garden Centres, in response to the above consultation.

Our client has an interest in Ongar Garden Centre, a 3.87ha site located within the Green Belt, to the south of the village of Chipping Ongar. Our earlier correspondence dated 6th February 2015 in response to the Council's Strategic Growth Options Consultation requested that the Council consider the allocation of Ongar Garden Centre as a suitable site for residential, retail, employment or leisure purposes within the emerging Local Plan. The highly developed nature of the existing site would allow it to be redeveloped to contribute towards meeting the Borough's identified needs in a manner compliant with national Green Belt policy and without detriment to the existing character of the area.

Our client supports the sequential land use approach adopted within the Draft Local Plan, however considers that further clarity should be given to the status of brownfield sites which are not located on the edge of existing settlements. The Council's preferred approach seeks to achieve the right balance between conserving the Borough's character and the delivery of development which meets the needs of all those who live, work or visit the area. It adopts a sequential approach to site selection which recognises that there will be a need to identify undeveloped Green Belt sites in the form of urban extensions to existing settlements. Whilst it is accepted that such extensions may provide immediate access to established local facilities this element of their 'sustainability' needs to be balanced with the environmental impact caused by the development of currently open sites.

Sites such as that belonging to my client by contrast, may have a lower degree of accessibility to existing facilities but can offer a major benefit in terms of their environmental impact since their previously developed nature can mean that their development for an alternative use has a nil or even reduced impact upon the character or amenities of an area when compared with the existing situation.

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It is a fundamental tenet of sustainable development that natural resources, such as land, should be used prudently and that the natural environment should be protected. Therefore my client considers that the emerging Brentwood Local Plan should prioritise the use of all previously developed land in preference to greenfield alternatives in accordance with the principles of sustainable development and the core planning principles set out at para. 17 of the NPPF which include encouraging *“the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value”*.

Whilst it is accepted that Ongar Garden Centre does not immediately adjoin a settlement boundary such that a future resident or occupier of the site would be likely to utilise private means of transport, the site is located within easy reach of an established centre and its redevelopment would contribute towards meeting identified employment or housing needs with no material impact to the character of the area and whilst reducing the impact of traffic on the character and amenities of the locality.

For these reasons it is considered to be sequentially preferable to a greenfield Green Belt site on the edge of a settlement and it is requested that the proposed sequential hierarchy (Policy 5.1) be amended to reflect this and the housing or employment allocations set out in Policy 7.4 (Housing Land Allocations) and Policy 8.4 (Employment Land Allocations) be amended to include Ongar Garden Centre as a proposed development site.

Our client recognizes that Policy 8.8 New Retail and Commercial Leisure Development reflects the *‘town centre first’* approach advocated within the NPPF, however requests that regard is also had to para. 23 of the Framework which states (inter alia) that LPAs should *“set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres”*.

This is applicable to specialist uses, such as garden centres, where the high bulk, low value of the goods sold, together with a need for access by private vehicle, renders a town centre location generally inappropriate and unviable. As such, the retail policies of the emerging Local Plan should recognize the need for such retailers to be located in out of centre locations and the inappropriateness of applying the sequential test in their regard.

Our client has no objection to Policy 9.8 Green Belt which reiterates the purposes of the Green Belt as set out in the NPPF and states that development proposals within the Green Belt will be assessed in accordance with national policy and guidance.

However strong objection is raised to Policy 9.9 on the grounds that it is not consistent with national policy. The proposed policy states that *“Within the defined Green Belt, changes of use of land, the construction of new buildings, the extension or re-use or replacement of existing buildings is considered inappropriate and will not be permitted”*. However, para.89 of the NPPF sets out exceptions to the definition of *‘inappropriateness’* in Green Belt terms which specifically includes the extension and alteration of a building provided that it does not result in disproportionate additions over and above the size of the original dwelling; a replacement building provided the new building is in the same use and not materially greater than the one it replaces; or the limited infilling or redevelopment of a previously developed site where it would not have a greater impact upon the openness of the Green Belt and the purpose of including land within it than the existing development.

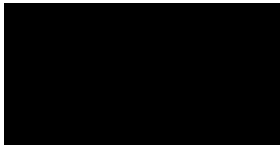
It is recognised that draft Policy 9.11 provides for the latter eventuality in part, i.e. the redevelopment of brownfield sites within the Green Belt, however no provision is made for the expansion of existing businesses through the limited extension, alteration or replacement of an existing building or limited infilling within a previously developed site.

When applied to existing lawful commercial sites within the Green Belt, such as that belonging to my client, Policy 9.9 is overly restrictive. Para. 28 of the NPPF provides support for the sustainable growth and expansion of all types of existing business in rural areas through conversion of existing buildings and well-designed new buildings. This support for economic growth in rural areas applies equally to land designated as Green Belt as that in the open countryside and can be achieved in a manner consistent with Green Belt policy either through the re-use of an existing building (para.90) or through one of the specified exceptions to the definition of *'inappropriate'* development as set out in para. 89 and referred to above.

Accordingly, it is requested that Policy 9.9 be fully revised so as to be consistent with national Green Belt policy. Failure to do so would render the emerging Local Plan 'unsound' for the purposes of the forthcoming Examination.

I would be grateful if you could take the above comments into consideration in the development of the Draft Local Plan. Should you have any queries, please do not hesitate to contact me.

Yours faithfully

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Jo Male
cc. Client