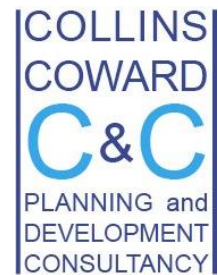


DD: [REDACTED]
T: [REDACTED]
M: [REDACTED]
F: [REDACTED]
E: [REDACTED]



Our Ref: CC/1647

14 March 2016

Planning Policy Team
Brentwood Borough Council
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Brentwood
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By Email: planning.policy@brentwood.gov.uk

Dear Sirs

BRENTWOOD LOCAL PLAN – CONSULTATION

1. Green Belt Study

We refer to Draft Local Plan published for public consultation purposes. This is supported by an evidence base including the working draft of the “*Assessment of Potential Housing, Employment and Mixed Use Sites in the Green Belt and their relative contribution to the Purposes of the Green Belt Designation*” published on 1 March 2016.

We act for Mr Brown the owner of site ref 249 Blackmore. The assessment contained within the working draft contains a number of inaccuracies and the assessment is incorrect. This is not wholly surprising given the number of sites to be assessed but also contains errors in the understanding of Green Belt policy as set out in the National Planning Policy Framework (“NPPF”).

We note the draft site allocations include five sites which are termed “Greenfield” Green Belt sites for release. There are no releases proposed in the north of the Borough. All of the proposed sites for release, save for Site 23, perform worse in Green Belt terms than our client’s site 249. It would seem on the face of it that the Council is simply focusing development in the south of the Borough and not taking a balanced view of housing provision across the Borough.

It is important to interrogate the Council’s Green Belt assessment. This study is not wholly reflective or representative of the NPPF. Paragraph 84 requires Council’s when reviewing Green Belt boundaries to take account of sustainable patterns of development. The Council should consider channelling development to large villages such as Blackmore. Paragraph 85 of the NPPF sets out the basis for defining boundaries. The Council’s Green Belt study does not take account of paragraphs 84 or 85 and is therefore fundamentally flawed. Nor does it consider permitted development rights and locations where development would not be inappropriate (paragraphs 89 and 90). On this basis the Green Belt work is simply no more than a landscape assessment.

Turning to the survey sheet for site 249 there are a number of errors. Firstly, on the boundary type the whole site is contained within tall evergreen trees not hedges. There are no views into or out of the site. There is no clear separation of the site from Blackmore village as it is surrounded by residential development on the north, east and west sides. There is a private access from the site into the village of Blackmore which can be opened up if the site is allocated for housing making all facilities within walking distance. The site is highly sustainable. The site has medium tranquillity as it lies next to the main Ingatestone Road.

The present land use is actually classified as under the referencing system as E/F being arable land and pasture depending upon crop rotation. It is also used to store farm machinery. Under development type the site would be “infilling” not an “urban extension”. The southern edge of the site forms the urban boundary to the site and village. It is visually contained within the village and the surrounding land uses reflect the physical attributes of the site. On balance it is clear the site has a low/moderate function in relation to the Green Belt purposes. Accordingly, we request the site assessment be corrected and allocated for residential development.

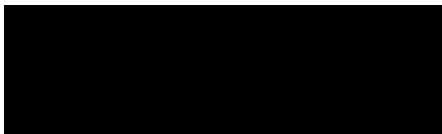
2. Draft Local Plan

The Draft Local Plan at Policy 9.8 seeks to introduce a further purpose of the Green Belt which is not present in National Policy in the NPPF, namely 9.8(a) which should be deleted. Likewise, draft Policies 9.9 and 9.11 go beyond the NPPF and should be deleted.

Conclusion

We trust these representations are of assistance. We look forward to working with the Council in the preparation of its Local Plan.

Yours faithfully



Collins & Coward Ltd