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Date: 12th March 2018

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

Submitted via email to: planning.policy@brentwood.gov.uk

Dear Sir/Madam,

Representations to the Brentwood Draft Local Plan – Preferred Site Allocations document (January 2018), made on behalf of Mr J Manning

On behalf of our client, Mr J Manning, we hereby submit the following representations to Brentwood Borough Council's Draft Local Plan . Preferred Site Allocations Document prepared in January 2018. We enclose the relevant forms with this letter.

Background

By way of background, RPS submitted representations to the draft Brentwood Local Plan Regulation 18 consultation in March 2016 (referred to as March 2016 Representations), which set out the policy context regarding travelling showpeople's plots and sites (also referred to as a showmen's yard). Our representations sought the allocation of land at the former Chequers Public House on Chequers Road for use as a showmen's yard/travelling showpeople's site. Those representations set out a number of objections to the draft Local Plan which then excluded provision for showpeople's provision and explained why the site should be appropriate for designation as a Travelling Showpeople's Site. Those representations remain relevant here (we will explain below) but are not specifically repeated for brevity reasons. It is requested that the Council apply those representations to this consultation, in conjunction with further representations below.

It is noted here that the only relevant change to those representations would relate to a planning permission which was granted for the demolition of the public house and its replacement with a single dwelling (Ref: 16/00344/FUL), which were under consideration at the time when those representations were made. The proposals for a showmen's yard on the property associated with that application were withdrawn before determination.

In more recent developments, our client has recently submitted an application for a Lawful Development Certificate (Section 191 application) for an existing use of the land for storage purposes (Class B8). This application is currently being considered by the Council under reference: 18/00323/S191. It relates to a significant portion of the land towards the rear of the former public house, which was assessed in our March 2016 Representations as being a suitable location for travelling showpeople's plots and yard.

Representations

Paragraphs 46-49

RPS **objects** to the references in Paragraphs 46-49 on the basis that it makes no reference to a provision of showpeople's plots in accordance with Government guidance (Planning



Policy for Travellers), for which RPS considers there is a need. Reference is made to the Brentwood Gypsies and Travellers Accommodation Assessment (GTAA) (October 2017), which identified that there were no travelling showpeople living or located within Brentwood at the present time and so there was no current or future need for additional plots. However, this does not necessarily reflect the situation regarding neighbouring authorities, where a shortfall in provision exists (in this case Thurrock District) and where these authorities may not be able to accommodate this need within their own administrative area due to a variety of factors. In this case Brentwood Council would have an obligation to assess whether it could assist Thurrock District in identifying suitable alternative provision for showmen's yards through the Duty to Co-operate (NPPF Paragraphs 178 and 179). Indeed, we have written extensively about this in our original March 2016 Representations, and this does not appear to be reflected in this current draft Local Plan document or in the background GTAA. It also does not reflect the fact that an application for a showmen's yard was submitted in 2016, which although no decision was taken, did provide substantial information regarding the need for plots in Brentwood and the suitability of the site for such purposes. We therefore object to this paragraph as it is unsound based on the evidence we have already put forward.

Paragraphs 73-74

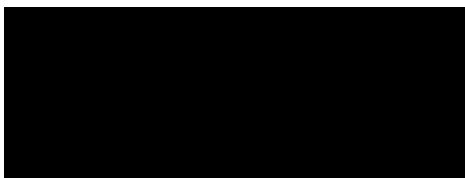
RPS **objects** to Paragraphs 73 and 74 and its table as it provides no plots for travelling showpeople. The Council should be allocating provision for travelling showpeople in Brentwood to accommodate the need arising in neighbouring Thurrock, which cannot be accommodated within Thurrock, given a suitable site exists (our client's site at Chequers Road). We assessed in detail why it is suitable site for a Showpeople's Yard in our March 2016 Representations, and a current application to confirm the site's existing use as Class B8 (storage) is currently being considered by the Council, which would confirm that site's suitability for one of three key elements of a showpeople's site (these being storage, maintenance and residential).

In conclusion, our objection regarding the draft Local Plan made in March 2016 remains the same, in that we consider that the Local Plan would be unsound without the provision of plots to accommodate need, which relates to a Duty to Co-operate with a neighbouring authority, particularly where a suitable site (at Chequers Road) is available.

We therefore request that the land at Chequers Road is allocated for such purpose to provide plots in accordance with the Government's guidance on the matter.

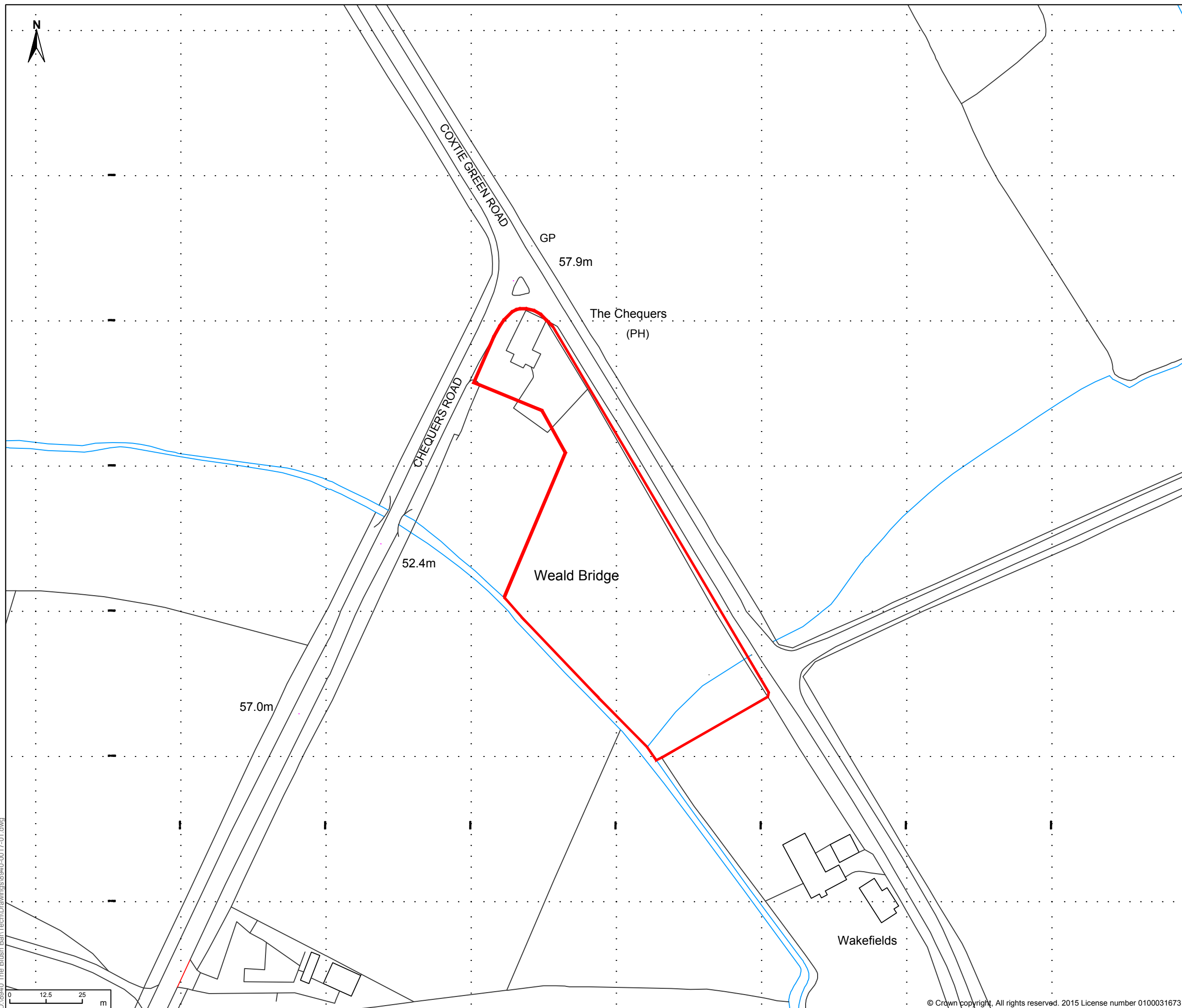
Please do not hesitate to contact me to discuss any matters raised in this letter.

Yours sincerely
For RPS



Nick Laister
Operational Director

Enc: Representations Forms
Site Location Plan



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 Notes
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Legend

 Site boundary

Rev	Description	Date	Initial	Checked



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Client **Mr Joseph Manning**

Project **The Blush Bar**

Title **Site Location Plan**

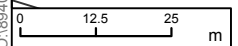
Status **FINAL** Drawn By **AJC** PM/Checked by **.**

Job Ref **OXF8940** Scale @ A3 **1:1,250** Date Created **March '16**

Figure Number **1** Rev **-**

rpsgroup.com/uk

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**BRENTWOOD
BOROUGH COUNCIL**

Brentwood Draft Local Plan Preferred Site Allocations

January 2018

COMMENT FORM

From 29 January to 12 March 2018 we are consulting on the next stage of the Brentwood Local Plan: Preferred Site Allocations. You can view and comment on the consultation document online at www.brentwood.gov.uk/localplan

Alternatively, please use this form to share your views on the contents of the document.

All responses should be received by Monday 12 March 2018

Please return forms to Planning Policy Team, Brentwood Borough Council, Town Hall, Brentwood, Essex CM15 8AY, or alternatively attach completed forms and email them to planning.policy@brentwood.gov.uk

Data Protection

All personal information that you provide will be used solely for the purpose of the Local Plan consultation. Please note whilst all addresses will be treated as confidential, comments will not be confidential. Each comment and the name of the person who made the comment will be featured on the Council's website.

By submitting this form, you are agreeing to these conditions.

PERSONAL DETAILS

Title:	Mr	First Name:	J	Last Name:	Manning
Address:	C/O Mr. Nayan Gandhi RPS, 20 Western Avenue, Milton Park, Abingdon, Oxfordshire				
Post Code:	OX14 4SH	Telephone Number:	01235 448791		
Email Address:	nayan.gandhi@rpsgroup.com				

YOUR COMMENTS

Please indicate which section(s) of the Preferred Site Allocations document that you are commenting on (where applicable please clearly state the section/heading or paragraph number):

Paragraphs 46-49

Please specify if you Support, Object or are providing a General Comment:
(tick as appropriate)

Support

Object

General Comment

Comments (please use additional sheet if required):

Please see cover letter

Thank you for taking the time to respond. Please return forms to Planning Policy Team, Brentwood Borough Council, Town Hall, Brentwood, Essex CM15 8AY, or alternatively attach completed forms and email to planning.policy@brentwood.gov.uk



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Title:	Mr	First Name:	J	Last Name:	Manning
Address:	C/O Mr. Nayan Gandhi RPS, 20 Western Avenue, Milton Park, Abingdon, Oxfordshire				
Post Code:	OX14 4SH	Telephone Number:	01235 448791		
Email Address:	nayan.gandhi@rpsgroup.com				

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