
Brentwood Local Plan

Planning Representations

Prepared by Savills (UK) Ltd on behalf of Crest Nicholson Eastern in respect of Land South of Redrose Lane, Blackmore



Contents

1. Representations	1
Appendices	8

Appendices

Appendix 1: Land South of Redrose Lane Vision Statement

1. Representations

Introduction

- 1.1 These planning representations have been prepared by Savills (UK) Ltd on behalf of Crest Nicholson Eastern for Brentwood Borough Council's Strategic Growth Options Consultation. The representations specifically relate to SHLAA site G070A, Land South of Redrose Lane, Blackmore, which is being promoted by Crest Nicholson.
- 1.2 A Vision Statement is enclosed at Appendix 1 which identifies the benefits and opportunities for the site.
- 1.3 This report sets out the key areas that Crest Nicholson wish to make representations upon.

Spatial Strategy

- 1.4 The draft Local Plan at paragraph 5.15 and figure 5.3 states that the Spatial Strategy has to strike a balance across the Borough of meeting development needs whilst respecting the Borough's character.
- 1.5 It acknowledges that limited infilling will be permitted in villages, commensurate to the size and extent of services within such villages. However, paragraph 5.21 states that growth in the rural north of the Borough will be limited with no Green Belt release in order to retain "*local character*".
- 1.6 It is therefore considered that the draft Spatial Strategy fails to consider the local needs of the more rural areas within the Borough and is contrary to the views of the Council in the Strategic Growth Options consultation document (2015) in which it stated that "*it is important to consider allowing villages to grow in order to provide for local need*". There remains a need to do this for a number of reasons; to address local issues of affordability, to retain the working age population within villages, to ensure the viability and vitality of local shops and to ensure the sustainability of local services, including schools.
- 1.7 As such, it is considered that the Council has failed to consider local, settlement-specific needs of more rural areas and we consider there that there should be some development land allocated in villages through Green Belt release, including Blackmore.
- 1.8 Paragraph 5.21 states that "*Growth in the Rural North and Rural South areas of the Borough will be limited to retain local character. Brownfield opportunities will be encouraged where appropriate schemes help meet local needs, and in line with other policies in this Plan help ensure our villages remain thriving communities*".



- 1.9 There are very limited brownfield sites to develop within the Rural Areas. As such there will be little or no growth within the Villages which again will only worsen local issues of affordability and put additional pressure on viability and vitality of local shops and services.
- 1.10 It is mentioned in paragraph 5.5 that *“Consultation responses suggested a preference for options 1 & 2. This was supported by technical evidence as the most sustainable strategy for future growth”*. We have not been able to find any technical evidence to support this statement within the evidence base and we request that the Council provides a robust justification to why option 1 and 2 was preferred.
- 1.11 Paragraph 5.41 states that *“a proportionate approach has been taken”*. We strongly disagree with this statement as no Green Belt release at large villages is clearly not a proportionate approach and is a U turn on the previous strategy as well as being contradictory to the Local Plan's strategic aims to meet local needs and ensure that village facilities continue to “thrive”.
- 1.12 Para 5.17 states that *“the preferred approach seeks to achieve the right balance between conserving the Boroughs character and deliver development which meet the needs of all those who live, work and visit. Key considerations are land availability, development needs, scale of growth proposed, the existing settlement pattern and hierarchy and capacity of places to accommodate growth in a sustainable manner. The Council has carefully considered evidence on all these matters from a variety of sources before reaching a view on the proposed spatial approach”*.
- 1.13 We disagree that the Council has carefully considered evidence on all matters. The Council has not provided a settlement hierarchy paper to determine suitable villages for development or an urban capacity study to determine potential number of units at those villages. As such we question the validity of the Council's Spatial Strategy.
- 1.14 Paragraph 5.33 states that *“No amendment is proposed to the Green Belt around larger villages in order to retain the character of the Borough”*. However, there is no definition of character. The loss of village services as a result of inadequate housing and subsequent decline in the working age population will result in a detrimental “character”. Rural character is retained by allowing new housing to sustain village services and enabling community activity and interaction.
- 1.15 Overall we consider that the Spatial Strategy has not been considered in thorough and logical way.

Hierarchy of Place

- 1.16 The draft Local Plan sets out the settlement hierarchy within the Borough. Paragraph 5.24 states that the hierarchy is based on the characteristics of each settlement taking into account services and facilities available.

- 1.17 Blackmore is classified as a larger village, as a settlement which is served by a local shopping parade and primary school but doesn't have employment opportunities or community and health facilities.
- 1.18 Whilst it is considered that the designation is appropriate, there should be recognition that some of the villages are more sustainable than others and therefore, warrant some development.
- 1.19 It is considered that the villages of Ingrave and Herongate as well as Mountnessing are the least sustainable of the larger villages. Both Ingrave and Herongate have very limited services, with one local shop between the two settlements and one local public house. Moreover, the villages are predominantly linear in nature and as such there is limited scope for development without disrupting the existing pattern of development and creating urban sprawl.
- 1.20 In addition, Mountnessing, has very limited services. Again, the village is linear in nature so further development would disrupt the pattern of development. Moreover, Planning and Licensing Committee resolved to grant outline planning permission for the redevelopment of Thoby Priory on 21st July 2015 (LPA Ref. 15/00527/OUT) and it is considered that this number of houses is sufficient to sustain the village over the plan period.
- 1.21 It is therefore considered that only limited development would be appropriate in three out of the six larger villages identified as remaining over the plan period (West Horndon will be re-classified following development). In terms of services and facilities, Blackmore, has significantly more services than the other villages identified within the same settlement hierarchy group; a local shop, tea room, two public houses, a primary school, antiques shop, two churches, village hall and a sports and social club.
- 1.22 However, as a result of the lack of development over recent years, the services within the village are under threat, which is evidenced by the closure of The Bull Public House. Adopted Local Plan Policy LT11 seeks to resist the loss of Public Houses and the preamble to that policy states; *"The provision of such facilities within smaller rural settlements help to create sustainable communities, reduce the need for journeys by car, promote social inclusion and enhance social interaction leading to safer, friendlier and more cohesive communities. Every effort shall therefore be made to retain such uses"*.
- 1.23 In dismissing an appeal for residential development in the beer garden of the public house, the Inspector commented that *"I have had regard to the availability of other public houses within Blackmore village. Although there are alternatives within walking distance of the appeal site, each public house has a different character, and neither of the other two pubs have as large a beer garden. In addition, from the considerable number of representations seeking to retain the existing community use, it is evident that that public house use of the Bull Inn is highly valued, and the beer garden in particular is a key feature which draws customers from a much wider catchment than the village itself. Accordingly the proposal would be likely to have an adverse impact on the attractiveness of the pub to customers from Blackmore and beyond."* (App Ref APP/H1515/A/14/2216001).



- 1.24 It is therefore clear that not only is the public house a valued community facility, it is also recognised in planning policy as contributing to the social cohesion and sustainability of the village. However, without the residential development to sustain such services, they will close and the quality and sustainability of the village will come under pressure.
- 1.25 In addition, “Commissioning School Places in Essex 2015/20” (2016) confirms that Blackmore Primary School currently has capacity to accommodate an additional 11 pupils. The provision of family housing on Land at Redrose lane, Blackmore would be beneficial in terms of ensuring that sufficient numbers enrol to meet this capacity. This would have a positive impact on the existing school and wider community with more children given access to extend learning opportunities. It will also ensure that the village has a wider age diversity which will enable the retention of a working age population in future years and secure the long term viability of shops and services.
- 1.26 As such, it is considered that some development is needed within the village and rather than identifying the villages as inappropriate for Green Belt development (paragraph 5.33), development land should be identified in Blackmore.
- 1.27 Whilst the Spatial Strategy Policy 5.1 identifies that limited development in villages will be acceptable to sustain services, Policy 9.10 sets out the areas in which limited infill only will be acceptable. These are restricted to short frontages of ribbon development and does not include any areas within Blackmore. It is therefore considered that by following only this approach, the Council will put at risk the future sustainability of services within Blackmore.

Housing

- 1.28 The draft Local Plan identifies that provision will be made for 7,240 new homes over the planning period (2013-2033). The Objectively Assessed Housing Needs for Brentwood Report (2015) prepared by PBA, states that the OAN based on 2011 population projections is 360dpa. The 2012 population projections have since been published and although PBA state that these were likely to be similar to those published in 2011, it is noted that the Council has not updated this figure or published an assessment of the OAN following the publication of the 2012 household projections. It is therefore considered that the Council should set out the OAN based on the 2012 projections and without doing so, it cannot be considered appropriate for the Council to rely on the current figure, as it is not the most up to date needs figure.
- 1.29 In line with the draft Spatial Strategy set out in Policy 5.1, the Council proposes to allocate residential led development at Dunton Hills Garden Village to provide “a significant proportion of the Borough’s housing need” (para 7.3). Dunton Hills will provide 2,500 new homes, equating to 29% of the Borough’s housing need.



1.30 There are concerns in respect of nearly a third of the housing supply coming from one source and it is highly questionable whether such a large scale concept can be relied upon to address the significant housing shortfall that currently exists. In order to deliver the required number of houses in the first five years of the plan, the Council should allocate smaller, more suitable and deliverable sites.

1.31 We object to the scale of the garden suburb and consider that an urban extension to the west of Basildon Town (PADC 5 in Basildon's Core Strategy Revised Preferred Options) represents a more suitable and deliverable approach. The scale of the Garden Suburb currently proposed would unduly restrict the remainder of Brentwood and Basildon's towns and villages to meet local, settlement-specific housing and socio-economic needs.

Land South of Redrose Lane, Blackmore

1.32 This document specifically supports the site at Land South of Redrose Lane, Blackmore (076) which we consider should be released from the Green Belt, in order to meet the existing and future housing and socio-economic requirements within Blackmore, which would be appropriate in line with the response to the Spatial Strategy and Hierarchy of Place outlined above.

1.33 A Local Housing Requirements Study for Blackmore, prepared by Barton Wilmore concludes that projected household growth at Blackmore will generate a need for between circa 81- 98 dwellings over the next 20 years (or approximately 60-75 though the proposed Plan Period 2015-2030). It is considered that the Land south of Redrose Lane is the only sustainable housing option within Blackmore to meet this need in the short-to medium term.

1.34 The Vision Statement enclosed with this letter demonstrates how the Site could be sensitively developed to provide a sustainable, high quality scheme in the region of 40 residential units. The site is suitable for a number of reasons:

- The site is well screened, with defensible boundaries on four sides, ensuring that visual impact from the proposals will be minimal, and considerably less than other promoted sites;
- The site does not result in any symptoms of coalescence and is located within an area of established residential character, that presents itself as a logical extension to the existing settlement boundary;
- The site does not perform the function of preserving the setting and special character of a historic town or any assets of historic value;
- No environmental or ecological constraints have been identified on the site that would prevent its development for residential use; and
- The proposals would result in a number of significant socio-economic community benefits.

- 1.35 Access to the site is achievable from Red Rose Lane which has been agreed in principle with Highway Officers. Pedestrian access is possible from the north-west corner of the site via a new footpath link connecting to a short section of new footway on the south side of Red Rose Lane. The new footway extends south to the existing footway that currently terminates opposite Orchard Piece, from which point existing footways facilitate walk trips to the village centre.
- 1.36 Within BBC's SHLAA (2011) and "Draft Site Assessment" (July 2013) which supports the Local Plan, "Land South of Redrose Lane, Blackmore (ref G070A)" is identified as appropriate for housing development for 89 units. It should be noted that a design-led approach has resulted in a lower-density scheme of approximately 40 residential units. The Vision Statement enclosed identifies the benefits and opportunities for the site.
- 1.37 BBC states in their SHLAA that the site is:
- Suitable:*** *The site is located adjacent to the settlement boundary and contained by Redrose Lane, Fingrith Hall Lane and Chelmsford Road. The site comprises land used for grazing. The site is bounded on one side by residential properties. Development in this location would help to support the viability and vitality of existing services and potentially provide new services*
- Available:*** *The site is available for residential development; and*
- Achievable:*** *Residential development on this site would be achievable due to its location within an attractive area. Due to its size this site would be brought forward by a medium sized developer.*
- 1.38 A total of seven sites (not including the subject site) are considered in the SHLAA. Two of the sites are on brownfield land and can only achieve approximately one dwelling (B140 and B141). The remaining five sites are located on greenfield land. Three of these sites are discounted due to the unacceptable intrusion into the countryside G041, G044 south and G044 west). One other site can only achieve one dwelling (G146).
- 1.39 The remaining Green Belt site G070 lies to the west of the subject site. This site has many similarities due to its close proximity to the subject site. However it is more open in nature, does not have clear defensible boundaries on all sides and development would have a greater impact on existing residential properties. The site also lies to the north west of Blackmore which represents an important green gateway into the village, characterised by open space either side of Nine Ashes Road (including Blackmore Millennium Park). The north eastern part of Blackmore is distinctly different in character due to its more enclosed nature and the existing residential development along Chelmsford Road.
- 1.40 As such it is considered that the subject site is the only suitable site around Blackmore. It should also be noted that the Sustainability Appraisal confirms that Blackmore is the most sustainable site at Blackmore.



- 1.41 Land South of Redrose Lane (076) is being promoted by Crest Nicholson who are National Housebuilder of the Year for the 2nd year in a row and are fully committed to delivering a high quality, low density, well-landscaped scheme.



Appendices

Appendix 1: Land South of Redrose Lane Vision Statement

Land at Redrose Lane, Blackmore

Vision Statement



March 2016



Architects + Interior Designers Limited

ARDENT | CONSULTING
ENGINEERS



Overview

This document is submitted as part of the supporting case for the residential development of Land at Redrose Lane, on behalf of our client Crest Nicholson.

Crest Nicholson is a leading housebuilder across the South of England and is the current National Housebuilder of the Year (two years running). Crest has a 50 year heritage of high quality, community focused development and is based locally in Brentwood. For the Last three years Crest has been ranked in the top two developers under the independent sustainability audits sponsored by the Homes and Communities Agency.

Crest has assembled a team of leading advisors including Savills, LAP and Ardent Consulting Engineers, who will assist with developing proposals for the site. The aim is to make the very best of the unique opportunity to deliver a high quality and sustainable new residential development within Blackmore, which would contribute towards meeting the settlement and the Borough's housing and socio- economic needs.

1.0	Introduction
2.0	Site and Surroundings
3.0	Borough-wide Planning Context
4.0	Settlement Specific Planning Context
5.0	Growth Options around Blackmore
6.0	Opportunities and Constraints Plan
7.0	Concept Plan Development
8.0	Access and Design Principles
9.0	Indicative Layout
10.0	Indicative Illustration
11.0	Socio Economic Benefits
12.0	Conclusions

winner of
housebuilder
awards
2014


THE SUNDAY TIMES

BHA
British Homes Awards 14


WhatHouse?
AWARDS
2014

Site & Surrounds

The 1.6 hectare site is located adjacent to the settlement boundary of Blackmore which is classified as a Larger Village by Brentwood Borough Council (BBC). The site lies to the south of Redrose Lane, and adjoins the settlement boundary to the south which is characterised by two storey terraced and detached housing. The site's eastern boundary is characterised by established trees and the western boundary by Fingrith Hall Lane. To the north, across Redrose Lane lies Redrose Farm, which contains a two storey house and a collection of agricultural buildings and structures.

The existing access from the single track Redrose Lane (via a gated field access) is at the site's northern boundary.

In terms of public transport, local bus services operate from the centre of the village. Served destinations include Chelmsford City Centre, Ongar and Brentwood Railway Station.



Site within urban context

Borough-wide Planning Context

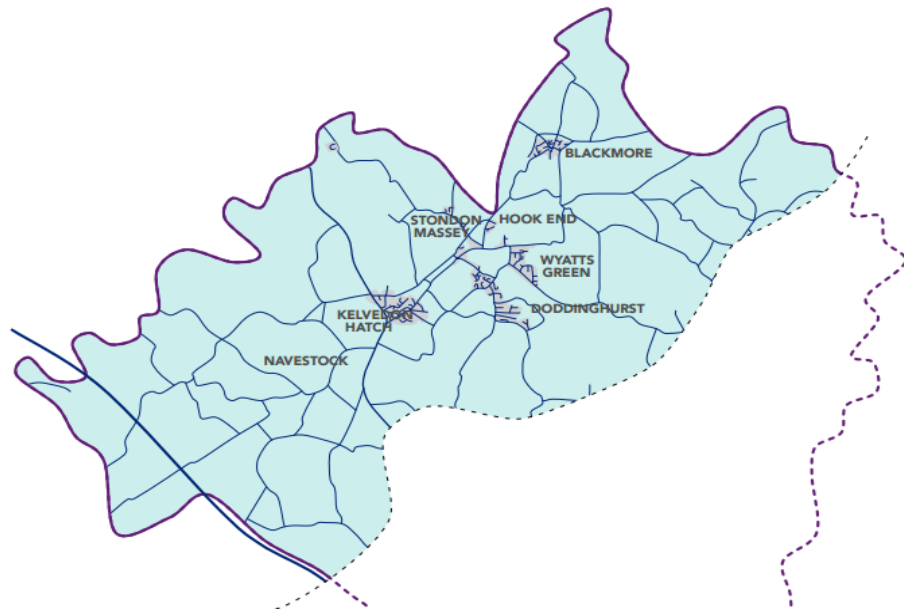
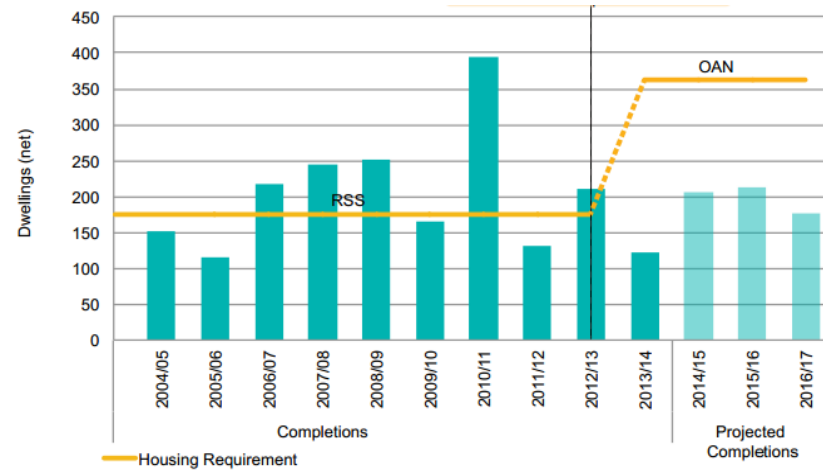
BBC is currently consulting on its Draft Local Plan. The consultation period closes on 23rd March 2016.

Within the Draft Local Plan, BBC acknowledges that to meet local need fully, there will be limited release of Green Belt to deliver extensions with clear defensible physical boundaries.

BBC's housing trajectory (opposite) demonstrates a significant housing supply shortfall over the next five years.

As acknowledged by BBC (2015) in the Strategic Growth Options document (2015), "it is important to consider allowing villages to grow in order to provide for local need".

The Draft Local Plan states that development should take pace in villages at a level commensurate with services and facilities available and which maintains local amenity and boosts the local economy.



Settlement Specific Planning Context

A settlement specific Housing Needs Assessment has been prepared by Barton Wilmore which sets out the future local housing requirements within Blackmore. The document projects that household growth within Blackmore will generate a need for between 60 and 75 dwellings over the plan period (4 to 5 new dwellings per annum). This is considered the minimum level of growth necessary, being based on demographic change.

The proposed development site would provide in the region of 40 new homes which will meet the future needs of Blackmore for the next 10 years. Meeting settlement specific need is also critical in terms of addressing localised affordability issues and retaining the viability and vitality of local shops and services.

Commissioning school places in Essex 2015/20 (2016) confirms that Blackmore Primary School currently has capacity to accommodate an additional 11 pupils. The provision of family housing on Land at Redrose Lane would be beneficial in terms of ensuring sufficient numbers on roll to meet this capacity. This would have a positive impact on the existing school and wider community with more children given access to extend learning opportunities. It will also ensure that the village has a wider age diversity which will enable the retention of a working age population in future years and secure the long term viability of shops and services.

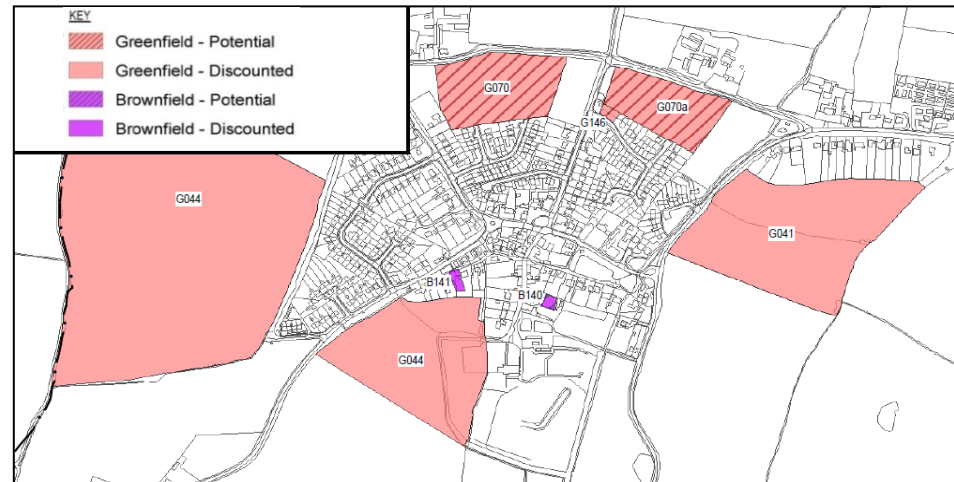


Growth options around Blackmore

The SHLAA identifies potential sites for future development within the Borough. The Brentwood SHLAA was published in October 2011 and is also contained as part of the draft Site Assessment published in 2013 which makes reference to the subject site. The site reference is G070A. BBC state in the Assessment that the site is:

- **Suitable:** The site comprises land used for grazing. The site is bounded on one side by residential properties. Development in this location would help to support the viability and vitality of existing services and potentially provide new services;
- **Available:** The site is available for residential development, and;
- **Achievable:** Residential development on this site would be achievable due to its location within an attractive area. Due to its size this site would be brought forward by a medium sized developer".

A total of 7 sites (not including the subject site) are considered in the SHLAA. Two of the sites are on brownfield land and can only achieve approximately 1 dwelling (B140 and B141). The remaining 5 sites are located on greenfield land. Three of these sites are discounted due to unacceptable intrusion into the countryside G041, G044 south and G044 west).



Green Belt site G070 lies to the west of the subject site. It is much larger and more open in nature, and would have a greater impact in landscape terms. The site also lies to the north west of Blackmore which represents an important green gateway into the village, characterised by open space either side of Nine Ashes Road (including Blackmore Millenium Park). The north eastern part of Blackmore is distinctly different in character due to its more enclosed nature and the existing residential development along Chelmsford Road.

As such it is considered that the subject site is the most appropriate site at Blackmore due to its enclosed nature (with defined boundaries on all sides) that would represent a natural extension to existing residential development.

It has the potential to deliver approximately 40 homes which would assist to meet the projected housing needs of Blackmore over the next ten years.



The proposals seek to complement the site's existing features and constraints.

Key Design Features

- Achieve high quality new homes;
- Develop a scheme that delivers an area of public open space as a key feature of the scheme;
- A design that respects neighbouring properties;
- Design a layout which reflects the existing street pattern;
- Provide a new road junction from Redrose Lane comprising a shared surface;
- Comprehensive Landscaping Strategy to create an attractive location for residents to live;
- Respect services and utilities crossing the site both over and underground
- We are aware of previous drainage issues on Redrose Lane. Ardent have been appointed to advise on the drainage strategy for the site. As part of the proposed development it is likely that the proposed floor levels will be raised slightly in the north east corner of the site to ensure that the proposed development will not be affected by drainage issues.









APPROXIMATELY 40 DWELLINGS, LAND TO THE SOUTH OF REDROSE LANE, BLACKMORE

The NPPF sets out three dimensions to sustainable development, these being economic, social and environmental.

In its economic role, the planning system is required "to contribute to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation and by identifying and coordinating development requirements, including the provision of infrastructure" [para 7, NPPF].

The NPPF confirms that pursuing sustainable development involves seeking positive improvements to people's quality of life, including:

- Making it easier for jobs to be created in cities, towns and villages; and
- Improving the conditions in which people live, work, travel and take leisure; and widening the choice of high quality homes.

BARTON WILLMORE

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ECONOMIC PROFILE

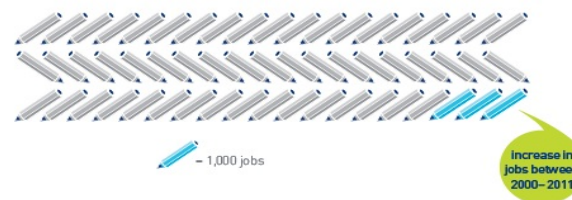
Household Growth

HOUSEHOLD GROWTH IN THE LOCAL AUTHORITY BETWEEN 2011-2021
Source: CLG 2011 Interim Household Projections



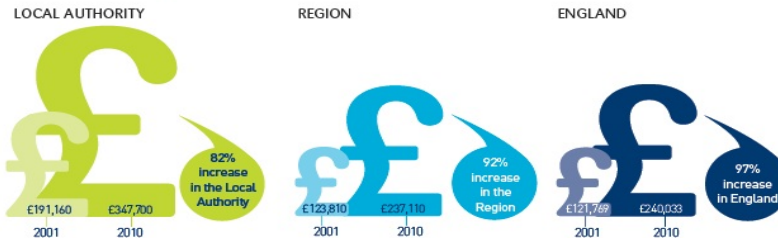
Employment Profile

JOB GROWTH IN THE LOCAL AUTHORITY BETWEEN 2000-2011
Source: NOMIS



Average House Price Index

HOUSE PRICE BETWEEN 2001-2010 COMPARISON
Source: CLG/Land Registry



ECONOMIC IMPACT OF PROPOSED SCHEME

Paragraph 152 confirms that Local Planning Authorities should seek opportunities to achieve each of the economic, social, and environmental dimensions of sustainable development, and net gains across all three. The following summary highlights the substantial net positive impact that the proposed scheme will have on the local economy, which is entirely consistent with NPPF policy.

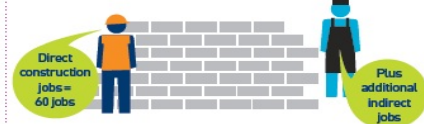
ADDITIONAL COMMERCIAL EXPENDITURE



ADDITIONAL NEW HOMES BONUS



JOBS CREATED DURING CONSTRUCTION



ADDITIONAL LABOUR FORCE AND ECONOMIC OUTPUT ON COMPLETION



The infographic above provides a summary of the socio economic benefits of the scheme. Prepared by Barton Willmore.

The land at Redrose Lane should be considered for sustainable residential development for a number of key reasons, as outlined in this document, including the following:

- There is an identified shortfall of housing at both borough and settlement specific level;
- It has been identified that in order to meet the settlement specific needs of Blackmore, at least 4-5 units should be completed each year;
- The site could sustainably deliver around 40 much needed new homes meeting Blackmore's housing need for the next ten years;
- The site is considered to be the most sustainable location within Blackmore compared to other competitor sites;
- The site has good links to existing transport networks and infrastructure (as acknowledged by BBC);
- The site is well screened, with defensible boundaries on four sides, ensuring that visual impact from the proposals will be minimal, and considerably less than other promoted sites;
- The site is located within an area of established residential character and represents a logical extension to the existing settlement boundary;
- No environmental or ecological constraints have been identified on the site that would prevent its development for residential use; and
- The proposals would result in a number of significant socio-economic community benefits.

