

Brentwood Borough Draft Local Plan Consultation

**Representations on Behalf of Countryside Properties Ltd
in Relation to Land at Bayleys Mead, Hutton**

Our Ref: C13031

March 2016





Phase 2

PLANNING &
DEVELOPMENT
LIMITED

250 Avenue West, Skyline 120
Great Notley, Braintree
Essex, CM77 7AA

01376 329059

office@phase2planning.co.uk
www.phase2planning.co.uk

Contents

	Page
Summary	4
Representations to the Draft Local Plan by Policy	5

Appendices

Appendix 1	Plans of Land at Bayleys Mead, Hutton
------------	---------------------------------------

Summary

The following response to the current draft Local Plan 2013-2033 consultation follows our representations in October 2013 to the then Preferred Options consultation and the Local Plan Strategic Growth Options consultation in 2015. These representations have been made on behalf of our clients, Countryside Properties Ltd who have an interest in land at Bayleys Mead as identified on the plan attached as appendix 1. It is proposed that this site could provide high residential development.

In summary our representations cover the following key points:

- Over-reliance on less sustainable sites elsewhere in the district;
- Concerns over delivery, both within the Plan period and in terms of five year housing land supply; and
- Plan should include the site at Bayleys Mead, Hutton for residential development.

Our response to the Strategic Growth Options consultation last year summarised the Company's position as follows.

Countryside Properties feels there to be a number of issues surrounding the overarching approach to growth which need to be addressed. Countryside wishes to continue to engage with the Council as the plan develops.

Land to the east of Bayleys Mead, Hutton has been promoted for development by Countryside and has been recognised within the Council's Strategic Housing Land Availability Assessment as being suitable, available and achievable for development. Furthermore, the Council's evidence recognises that the site would "...to be a natural extension to the existing residential area of Hutton and it is considered that development would have a minimal impact on the countryside". Furthermore, the site is "within close proximity to a public transport route and services and facilities" and "the cost of connection to infrastructure and services and any developer contribution is likely to be in line with what would normally be expected for a site of this size". (Strategic Housing Land Availability Assessment October 2011, sites G032 and 55).

Countryside has undertaken considerable evaluation work on the site and can demonstrate that the site continues to be a suitable location for development with no constraints to bringing forward the development. It can also be shown that the site performs poorly against the five purposes of the Green Belt as set out in the National Planning Policy Framework. Countryside therefore consider that land at Bayleys Mead provide for a small scale development that can be delivered in the early part of the plan period.

The following response will be set out within this context, and following the headings within the consultation document.

Representations to the Draft Local Plan by Policy

Policy 5.1 Spatial Strategy

The Council's strategy focuses development on the transport corridors. The policy states that the main focus of development will be in and around Brentwood and Shenfield including Hutton, supported by one strategic allocations in the A127 corridor. It is submitted, however that the Plan overly relies on its Dunton allocation in the A127 corridor, which is not the most sustainable locations for growth, given that transport links, access to jobs and services and town centre facilities are more limited. Brentwood, Hutton and Shenfield are sequentially preferable locations, with better access to services and facilities than the proposed Dunton Hills Garden Village. It is therefore considered that the Council should recognise this in the policy and examine whether there are any additional sites in the Brentwood/Shenfield/Hutton area that could be brought forward.

Our client's land at Bayleys Mead is an appropriate site for residential development. With regard to the criteria listed under policy 5.1, our client's site has the following merits:

- a) The site has good access to public transport, services and facilities, with Brentwood Urban Area including Hutton classified as a main town (settlement category 1). It is close to the centre of Brentwood, with bus route 498 providing direct and frequent access to the town centre, which contains a good range of services and facilities. The site is recognised within the Council's Interim Sustainability Appraisal (SA) as falling within 110m from a bus stop.
- b) The site will not have a significant impact on the listed criteria:
 - o **Green Belt** – although the site falls within the Green Belt, its development is considered to be appropriate. The site has been assessed against the Green Belt functions contained in the NPPF and it is concluded that the site performs poorly against these. In summary, the release of this land would not result in unacceptable sprawl as the development would be confined to a small parcel of land which is well contained. The release would not lead to the merging of neighbouring towns given the size of the release and the distance to Billericay.

Although the development would involve development in the countryside the scale of the release is such that the encroachment is minimal. Finally, the site does not form part of the setting of a historic town and is part of an overall strategy that includes urban regeneration, by encouraging the recycling of derelict and other urban land.

The Council's Assessment of Potential Housing, Employment and Mixed Use Sites in the Green Belt – Working Draft Document (GB Assessment) 2016 recognises that development would extend beyond existing settlement limits marginally, but would not lead to coalescence, but we disagree that the site is only partly contained and with the conclusion that the overall contribution of the site to Green Belt purposes is moderate.

Development of this site in isolation would only result in a small Green Belt release which would not compromise the identified purposes of Green Belt as a whole. The Borough

has around 13,500 hectares of Green Belt and this site of 1.57 hectares represents less than 0.02% of the Green Belt.

- **Visual Amenity** –the site is identified within the Council’s SHLAA as appearing “to be a natural extension to the existing residential area of Hutton and it is considered that development would have a minimal impact on the countryside.” Furthermore, as stated above the site is well contained from the west with very few views in to and out of the site which demonstrates that the impact of the proposed development would be minimal.

Trees within the site have been evaluated and this concluded that the tree resource consists of a mix of mature woodland trees predominately oaks and hornbeams to the eastern side of the site, with a row of mature hornbeams to the northern side of the northern most ditch, together with an overgrown hedgerow to the southern side of the southern-most ditch. These provide excellent screening and containment of the site from views from the surrounding countryside.

Development of this site would therefore have a negligible impact on the rural character of the Borough.

- **Heritage** – there are no heritage assets on the representation site.
 - **Transport** – this site is recognised in the Council’s SHLAA as being “within close proximity to a public transport route and services and facilities”. The SHLAA also identifies that “the cost of connection to infrastructure and services and any developer contribution is likely to be in line with what would normally be expected for a site of this size”. This has also been explored and in terms of site access; surface water drainage; foul drainage provision; and potential for contaminated land, no insuperable constraints have been found.
 - **Environmental Quality** – this site is recognised as having a relatively low landscape quality in the Council’s GB Assessment.
 - **Wildlife** – An ecological appraisal has been prepared by Green Environmental Consultants which concludes that the site is abandoned farmland that has been colonised by scrub and trees. The study concludes that the potential of the site to contain ecology is poor. Further surveys will be undertaken as a matter of course but the presence of anything likely to withhold development is considered unlikely.
 - **Flood Risk** – the site lies within Flood Zone 1 and is not therefore at risk from flooding.
 - **Air and Water Pollution** – the site is not located in close proximity to an Air Quality Management Area.
-

-
- c) Our clients are committed to the delivery of this site and can confirm that this site is deliverable within the early part of the plan period.

The development of this site would represent a logical extension to Brentwood and Hutton, and in light of the above, it is considered that although allocation of our client's site would necessitate Green Belt release, the site is well located for development and the impacts would be limited.

Policy 5.2 Housing Growth

Provision of new dwellings in accordance with Objectively Assessed Housing Needs (OAHN) is supported. However, concern is raised in relation to the reliance on Dunton Hills Garden Village to provide 2,500 dwellings within Plan period, equating to 35% of housing for the Borough. The Plan has heavy reliance on this one site which has no existing services and facilities and in our experience, delivery of such settlements, which not only provide new housing and employment, but supporting infrastructure, services and facilities are slow to deliver. It is also relevant to note that although a development of this type will bring forward some facilities and services, these are likely to be limited in nature and scale due to the limited size of the future population. It is submitted that this site should either be excluded from the Plan or reliance on the delivery of this site should be reduced and other sites should be allocated adjoining the urban areas of Brentwood/Shenfield.

Reliance on this large site, which will have significant infrastructure requirements, impacts on the delivery a five year supply of housing, which is a requirement of the NPPF under paragraph 47. The Council's housing trajectory at figure 5.11 clearly shows that the Council does not have a five year supply of housing and that undersupply in years one to three will not be off-set by supplying over the minimum requirement in years 4 and 5. The Council clearly needs to allocate additional sites at this stage to ensure that the five year requirement can be met.

Housing completions have been low in recent years, with only 105 dwellings completed in 2013 and 159 in 2014. Not only will the Council need to make a step-change in terms of delivering housing, it is submitted that the Council should take account of previous under-delivery in identifying sufficient sites to meet housing requirements and also a 20% buffer in accordance with the NPPF.

The SHMA (2013) identifies Brentwood as largely a single housing market area, whilst recognising that to some extent it shares its housing market area with Basildon and Chelmsford. It is considered that the significant housing allocation at Dunton Hill Garden Village will contribute to the Basildon's housing market area to a greater extent than the Brentwood housing market area due to the location of this site relative to the main urban areas. Sites on the edge of Brentwood and Shenfield can make a greater contribution towards meeting local need for housing within the Brentwood housing market area.

In order reduce reliance on the allocation at Dunton Hills Garden Village, for the reasons outlined above, and to ensure that the Council has a five year supply of housing, it is suggested that appropriate, additional sites on the periphery of the principal urban area of Brentwood, Hutton and Shenfield should be allocated. In accordance with our representations to Policy 5.1 our clients land at Bayleys Mead should be allocated accordingly.

Policy 6.6: Strategic Sites

For the reasons set out in our representations to Policy 7.1, reliance on the housing-led strategic site of Dunton Hills Garden Village in the Plan period should be reduced.

Policy 7.1: Dunton Hills Garden Village

As set out in our representation to Policy 5.2, concern is raised in relation to the reliance on Dunton Hills Garden Village to provide 2,500 dwellings within Plan period, equating to 35% of housing for the Borough. The Plan has heavy reliance on this one site which has no existing services and facilities and in our experience, delivery of such settlements, which not only provide new housing and employment, but supporting infrastructure, services and facilities are slow to deliver. It is also relevant to note that although a development of this type will bring forward some facilities and services, these are likely to be limited in nature and scale due to the limited size of the planned population. A new settlement of 2,500 houses will never provide the level of services and facilities as larger settlement such as the principal urban areas of Brentwood/Shenfield/Hutton and are therefore less sustainable locations for new development. It is submitted that this site should either be excluded from the Plan or reliance on the delivery of this site within the Plan period should be reduced and other sites should be allocated adjoining the urban areas of Brentwood/Shenfield/Hutton.

The Sustainability Appraisal identifies the potential for significant negative effects arising from the draft Plan “given the uncertainty that remains regarding Dunton Hills Garden Village. One of the most effects is in terms of landscape:

“With regards to Dunton Hills Garden Village, there are clearly landscape sensitivities, with consultees (notably Thurrock Council) suggesting the potential for impacts to valued landscapes, and loss of Green Belt that serves a clear purpose (particularly in the sense of preventing coalescence and/or sprawl). It is anticipated that there will be good potential to avoid/mitigate effects; however, there is some uncertainty and a need for further work to examine options. It is noted that, whilst there is the potential to make use of some clearly defined physical features (A127, A128, railway line), it may be a challenge to ensure a defensible long term boundary separating the Garden Village from west Basildon (where there is a planned urban extension).

With regards to the A12 urban extensions, there are perhaps fewer concerns.” (Paragraphs 18.1.13 to 18.1.14).

Flooding is also identified as a notable issue:

“... would need to address flood risk issues, given the stream that runs through the site (which notably leads to an area to the south of the site, adjacent to the railway, as being ‘more’ susceptible to flooding, according to SWMP modelling). ... Also, it is noted that a large portion of the area ... is identified by the SWMP as having limited potential to deliver ‘infiltration’ measures as part of sustainable drainage strategy.” (Paragraph 16.1.2).

Policy 7.4: Housing Land Allocations

The inclusion of Dunton Hills Garden Village for 2,500 dwellings within the Plan period is questioned for the reasons set out in our representations to Policy 7.1.

It is submitted that the representation site at Bayleys Mead can make a modest contribution towards housing supply. The illustrative layout shows in the region of ... dwellings. The exact quantum of residential development could be tailored to meet the Council's requirements.

The representation site has multiple benefits, as identified in our response to Policy 5.1.

Figure 8.3: Employment Land Allocations

This should be amended to include reference to our representation site at Bayleys Mead.

Figure 9.2 Green Belt in Brentwood Borough

This should be amended to include reference to our representation site at Bayleys Mead.

Policy 9.12 Site Allocations in the Green Belt

This should be amended to include reference to our representation site at Bayleys Mead, which is deliverable early in the plan period, unconstrained, adjoins Brentwood urban area and can provide a high quality residential development.

Conclusions & Changes to the Plan

In light of the above, it is considered that the Plan is contrary to the NPPF in terms of the early delivery of housing sites and its emphasis on sustainable growth options.

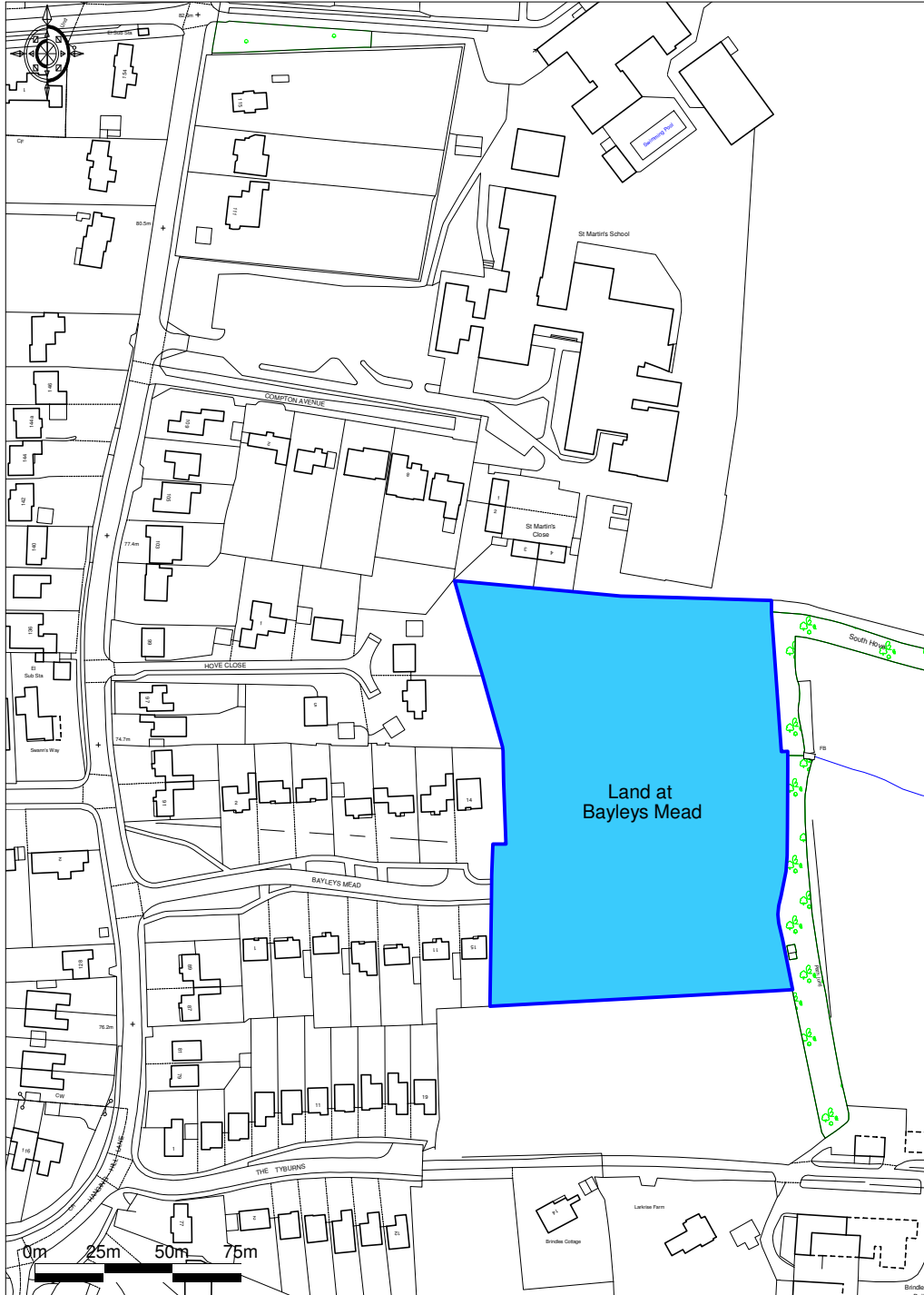
The following points are also made:

- Brentwood, including Shenfield, Hutton etc is where most jobs and services are located within the Borough, and therefore should be locations where growth is located.
- The Council have a significant deficiency in its five year housing land supply at present, and it is important to balance strategic allocations with smaller sites with few constraints that can be delivered quickly, such as the Bayleys Mead site;
- The current strategy of the Plan will not meet projected affordable housing needs in the Borough.

As a consequence of the above, we would request that it include the allocation of land at Bayleys Mead in accordance with our comments above, as shown on the plan attached with **appendix 1**.

Appendix 1
Plans of Bayleys Mead site

Title Land at Bayleys Mead, Hutton
Scale 1:2500
October 2013



Ordnance Survey © Crown Copyright 2013. All rights reserved.
Licence number 100022432. Plotted Scale - 1:2500





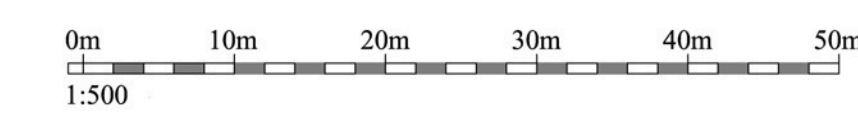
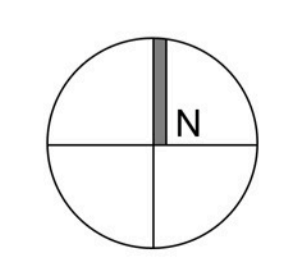
Schedule of Accommodation

Private

Plot	Beds	Floor Area (sq.ft)
1	4	2024
2	4	2024
3	5	2017
4	5	2017
5	5	2017
6	4	2024
7	4	2024
8	5	3017
9	5	2017
10	3	1150
11	3	1150
12	5	2017
13	3	1150
14	3	1150
15	3	1150
16	3	1150
17	3	1150
18	3	1150
19	3	1150
20	3	1150
Total		32698 sq.ft

Affordable

Plot	Beds	Floor Area (sq.ft)
21	2	750
22	2	750
23	2	750
24	2	750
25	3	900
26	3	900
27	3	900
28	3	900
29	3	900
30	3	900
Total		8400 sq.ft



Revision A - 26/02/13 - Layout Amendments - JN

 62 BURGATE, CANTERBURY, KENT, CT1 2BH T: 01227 762060 F: 01227 762149 13 NORTH STREET, ASHFORD, KENT, TN24 8LF T: 01233 624354 F: 01233 610018 1 KINSBOURNE COURT, LUTON ROAD, HARPENDEN, HERTFORDSHIRE, AL5 3BL T: 01582 765102 E: 01582 462149	Client / Project Countryside Properties Proposed Residential Development, Land at Bayleys Mead, Brentwood, Essex	Drawing Description Sketch Scheme Site Layout plan Scale 1:500 @ A1 Date February 2013 Drawing No. 21595A / 01 Drawn PO



Phase 2

PLANNING &
DEVELOPMENT
LIMITED