
Brentwood Borough Council Local Plan Representations

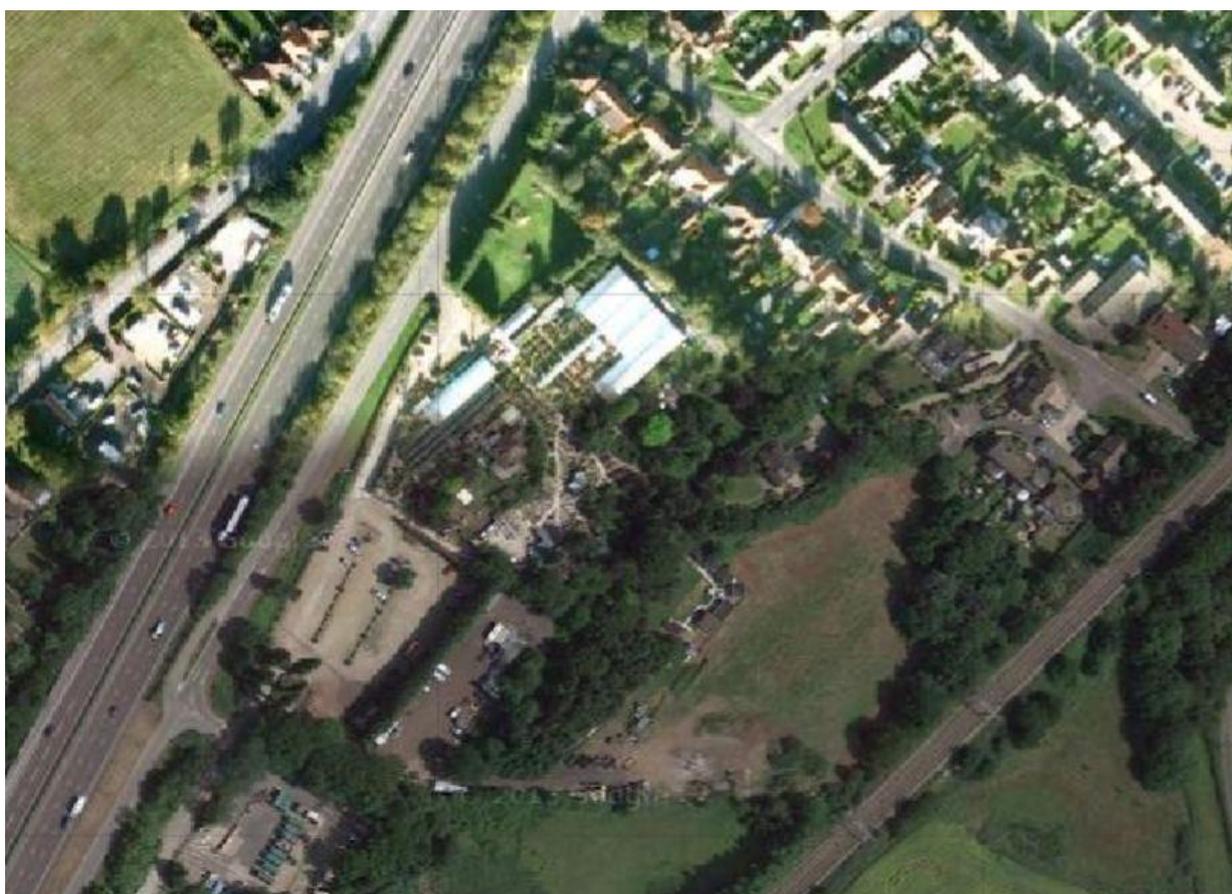
On behalf of Bellway Homes Essex

1. Introduction

- 1.1 These representations have been prepared by Savills UK on behalf of Bellway Homes (Essex) in response to Brentwood Borough Council's Draft Local Plan consultation. These representations specifically relate to Ingatestone Garden Centre, Roman Road, Ingatestone which is identified for redevelopment for residential purposes in the Draft Local Plan (site 128).
- 1.2 A Design Statement has been prepared which identifies the benefits and opportunities for the site by Robert Hudson Architects. Bellway welcome the draft allocation for the site which has been considered to be suitable and deliverable for residential development.
- 1.3 Bellway Homes (Essex Division) are one of largest and best known house builders in the United Kingdom. They have a long track record of high quality developments throughout the region, and specifically within the Borough with specific developments at Warley Training Centre and Mascalls Park in Brentwood.
- 1.4 Bellway are committed to innovation in both construction and design and are keen to ensure that the schemes they develop create sustainable, attractive and desirable places for people to live. They have employed a full consultant team to review the site and specific constraints associated with the redevelopment of the site. Initial technical work demonstrates that the site is fully deliverable and there are no technical issues associated with the redevelopment of the site for residential as set out on the accompanying site layout.
- 1.5 The consultation document does not identify a set of questions to respond to, however, for ease of reference this letter sets out the key areas that Bellway wish to make representations to.

2. Site and Surrounding Area

- 2.1 The site is situated on Roman Road, where it joins the A12. The site is bounded by residential development to the east and a domestic recycling centre to the west. It is designated Green Belt and a Special Landscape Area but comprises, in the majority, previously developed land, with various buildings, including a cafeteria and polytunnels associated with the Garden Centre covering most of the site.



- 2.2 The site is identified as being within the Mountnessing Parish but is separated from Mountnessing by the A12 and is closer to Ingatestone and the facilities there. It is a 15 minute walk to the station with regular services into London and also to the High Street which has a range of retail and leisure facilities.

3. Emerging Development Proposals

3.1 The emerging proposals have been developed to demonstrate the capacity of the site for residential development in line with the surrounding residential densities and the typology of Ingatestone. This demonstrates that the site can accommodate around 80 residential units, however, it is considered that there may be capacity for more residential development on site.



3.2 The scheme has been designed to provide a broad mix of units, including one and two bed flats as well as two, three, four and five bedroom houses which will assist in providing a balanced community. The parking has been designed to meet EPOA standards.

3.3 The scheme has been designed to retain a parkland feel with extensive grassed areas and open spaces as well as a water feature through the middle of the site.

4. Key Policy Considerations

- 4.1 At the national level, the National Planning Policy Framework (NPPF) (2012) provides an overarching framework for the production of local policy documents and decision making. At the heart of this document is a presumption in favour of sustainable development. In this regard paragraph 7 states that there are three dimensions to sustainable development; economic, social and environmental. For plan making this means, that local planning authorities should positively seek opportunities to meet development needs, and that local plan should meet objectively assessed need with sufficient flexibility (paragraph 14).
- 4.2 Paragraph 47 of the National planning Policy Framework (NPPF), requires Local Planning Authorities (LPAs) to significantly boost the supply of housing. In accordance with the NPPF, LPAs should use their evidence base to ensure that their Local Plans meet 'full objectively assessed needs for market and affordable housing'.
- 4.3 In the event that Local Planning Authorities cannot do this, paragraph 49 states that policies in relation to housing should not be considered up to date.
- 4.4 In relation to the Green Belt, paragraph 89 allow for the development of previously developed land provided it does not have a greater impact on the openness of the green belt and the purpose of including land within it.
- 4.5 The Council has identified the site as being suitable for residential development in the Preferred Options Consultation document and is included in the Five Year Land Supply Assessment (2014) for 130 residential units; it is therefore considered deliverable.

Spatial Strategy

- 4.6 The draft Local Plan at paragraph 5.15 and figure 5.3 states that the Spatial Strategy seeks to strike a balance across the Borough of meeting development needs whilst respecting the Borough's character. Policy 5.1 sets out the Spatial Strategy for the Borough and states that new development will be focused on land within the Borough's Transport Corridors, specifically Brentwood and Shenfield will be the main focus for development, supported by growth along the A12 and A127, wherein strategic allocations will be made. Bellway broadly supports this strategy.
- 4.7 In respect of Ingatestone, the transport corridor led approach supports the allocation of land for housing here as there are two junctions on the A12 and also a train station with trains to London Liverpool Street and East Anglia. This is reflected in figure 5.8 of the draft Local Plan and this overall approach is supported by the client.

Hierarchy of Place

- 4.8 Ingatestone is recognised in the draft Local Plan as being the Borough's largest village with a larger catchment than the immediate area. This is supported and it is considered that Ingatestone comprises a sustainable location which has the ability to support new housing.
- 4.9 It is noted, that whilst the Ingatestone Garden Centre site is situated within the Mountnessing Parish boundary, it is separated from Mountnessing by the A12, which serves as a significant barrier and the site is therefore more closely linked to Ingatestone and the facilities and amenities there. Moreover, for the purposes of the Local Plan allocations, the Council has considered it to be Ingatestone and no additional sites have been identified in Mountnessing aside from those that have been granted planning permission (Mountnessing Roundabout and Thoby Priory).
- 4.10 At paragraph 5.29 of the Local Plan, the Council recognises that Ingatestone has good facilities, however, the number of residential site allocations has been limited due to infrastructure constraints and the 'lack of suitable sites'. It is considered that there is scope for more development at the Ingatestone Garden Centre site which could assist in establishing development of a scale that reflects the sustainability and facilities of the settlement.

Housing

- 4.11 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 (OAN) 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. This should be addressed in the next version of the Local Plan.
- 4.12 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.
- 4.13 Whilst this site has merit in providing development of a capacity sufficient to form a new settlement and therefore provide services and facilities for new residents, there are concerns in respect of nearly a third of the housing supply coming from one source, particularly in respect of delivery.

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- 4.14 The draft Local Plan also seeks to allocate a significant amount of land for housing at West Horndon Industrial Estates (500) and Officer's Meadow, Shenfield (600) and whilst Bellway has no in principle objection to these draft allocations, the housing trajectory anticipates that completions happen in 2018 for Officer's Meadow and 2019 for West Horndon.
- 4.15 Taking into account the fact that neither site has planning permission and that the Local Plan isn't anticipated to be adopted until 2017, and that West Horndon is, in the majority, occupied by industrial uses and there may be contamination issues, it is considered that the projected levels of delivery for these two sites is very optimistic. It is therefore considered that in order to deliver the required number of houses in the first five years of the plan, the Council should allocate higher density development on those sites that are considered appropriate which can be delivered more easily and therefore quicker.

5. Ingatestone Garden Centre (Site 128)

5.1 The site has been identified by the Council as being achievable, suitable and deliverable and the Preferred Options consultation (2013) included an allocation of 130 residential units on the site. The site remains as a proposed allocation in the draft Local Plan, however, figure 7.2 of the Local Plan identifies the site for delivery of 60 residential units.

5.2 Whilst Bellway welcome the allocation of the site for residential development, we disagree that the reduced capacity of the site to 60 is appropriate or represents the best use of this previously developed site. As demonstrated in the attached Design Statement, it is considered that the site can deliver at least 80 units but there is scope for more.

Quantum

5.3 There is no explanation in the draft Local Plan or evidence base as to why the site capacity has been reduced and it is considered that the professional team can address any technical issues in relation to the site and deliver additional housing in a balanced layout. The indicative scheme demonstrates that the site has capacity for at least 80 residential units, and likely more, without having an adverse impact on amenity, which accords with draft Policy 7.3 which states that 'development should take a design led approach' to ensure development is sympathetic to local character and makes efficient use of land.

5.4 Officers have indicated that the reduction in site capacity is as a result of the need to ensure separation between Mountnessing and Ingatestone through the provision of a green buffer on the site. However, the Council's Assessment of Potential Housing, Employment and Mixed Use Sites in the Green Belt (2016 draft) identifies the site as making a low to moderate contribution to the five purposes of including land within the green belt and the 'moderate' contribution is partly as a result of the assessment concluding that the two settlements (Ingatestone and Mountnessing) would no longer be separate and there is a risk of coalescence.

5.5 However, by virtue of the A12, which provides a strong physical barrier, the settlements cannot coalesce and therefore this should not be a 'moderate' classification. This is recognised in the comments section of the Assessment. The layout can be designed to incorporate a buffer if required, however, this will not result in a loss of a significant number of units and therefore could still deliver 90 residential units.

5.6 In addition, the assessment states that the site has a countryside function, but by virtue of its role as a garden centre with associated buildings and much of the site being previously developed land, it is considered that it has no countryside function. Overall, it is considered that the site makes a 'low' contribution.

5.7 It is considered that the allocation should therefore be increased to between 90 and 100 residential units.

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- 5.8 Moreover, emerging Policy 7.3 states that densities should be at least 30 dwellings per hectare (our emphasis) or higher except where the surrounding areas suggests this would be inappropriate.
- 5.9 The proposed allocation of 60 residential units on site 128 would result in a density of 18.5 dwellings per hectare which, not only, does not reflect the surrounding densities which are around 20 dwellings per hectare, is also not making efficient use of land in with national policy and draft Policy 7.3. In respect of residential densities, it is considered that an allocation of around 90 residential units, would be more appropriate.

Delivery

- 5.10 The Council recognises the contribution this site will make to the five year land supply of housing and it already identified for delivery in the first five years of the plan period.
- 5.11 Bellway support this approach and are willing to deliver the site within this period. In addition, the landowner is willing for the site to be delivered and the Garden Centre has already ceased trading to facilitate the early delivery of the site. It is therefore considered that the site will make a valuable contribution to the delivery of housing in the first part of the plan period.
- 5.12 Notwithstanding the foregoing, the NPPF (paragraph 173) states that sites that are identified for development should be of a scale that are deliverable and viable to ensure that the required level of housing can be delivered. In this regard, a site allocation of 60 residential units will undermine the overall delivery of the site and the social infrastructure necessary to facilitate this development.
- 5.13 It is noted that the Council has not prepared an infrastructure delivery plan and we request that one is prepared that reflects the requirements of the Borough in light of the proposed allocations. In any events, to ensure the site is delivered and contributes to housing in the way envisaged, the Council should increase the level of housing identified for the site.

Technical Issues

Flood Risk

- 5.14 The site lies entirely within Flood Zone 1 and therefore is deemed to have a low risk of flooding
- 5.15 There is a small watercourse that conveys through the site that is a tributary of the Ingatestone Hall Brook. The watercourse on site is partially culverted and it is the intention to naturalise the watercourse as part of the development in line with Environment Agency aspirations. Any works to the watercourse will ensure that flood risk is not exacerbated in line with NPPF requirements

- 5.16 There has been no record of historical on site flooding from any source following review Brentwood Borough Council Strategic Flood Risk Assessment and Surface Water Management Plan.

Drainage

Surface Water

- 5.17 The site currently drains to the onsite watercourse. It is the intention to maintain the existing drainage regime in line with best practice whilst applying reduced greenfield rates to provide betterment over and above the existing situation. This approach should assist in alleviating current levels of flood risk downstream in Ingatestone
- 5.18 It is proposed to incorporate SuDS techniques throughout the site in order to control and treat surface waters prior to discharge off site in line with both national and local planning policy requirements. The SuDS devices will likely include swales, ponds and permeable paving.

Foul Water

- 5.19 The foul drainage associated with the proposed development will convey to the nearby Anglian Water public foul sewer in Roman Road where capacity is currently available in the sewer network to serve the development.

Highways

- 5.20 It is proposed to retain and enhance the existing site access from Roman Road, with this being suitable in both capacity and safety terms to serve the proposed residential development.
- 5.21 The vehicle trip generation of the proposed residential development is forecast to be less or equal to the number of vehicle trips that the extant Garden Centre could attract throughout the week. The proposed development would generate a higher number of trips in the weekday morning and evening network peak hours by comparison; however the increase would have an immaterial impact on the operation of the local highway network.
- 5.22 There are bus stops located on the B1002 Roman Road within a 450m (5 – 6 minute) walk from the site, accessible via existing footways and subway under the A12. These are served by routes to Brentwood, Mountnessing, Ingatestone village centre and Chelmsford. Ingatestone Railway Station is located within a 15 minute walk from the site, for commuter services to London. The village centre, with its shops and amenities,

is within a 1.8km (23 minute) walk. The site is therefore well suited to residential development with public transport and local facilities close by.

- 5.23 The development layout would conform to Essex Design Guide standards, and car and cycle parking would be provided to the adopted Essex minimum standards, which are at least 2 car parking spaces per 2-bed or larger unit plus 1 space per 4 units for visitors, and 1 cycle parking space per unit.

Noise

- 5.24 The main site perceived noise sources are the A12 trunk road to the north west, the Great Eastern Mainline railway line to the south east and the recycling centre to the south.
- 5.25 From initial assessment work, it is considered that desirable noise levels can be achieved across the development site with the incorporation of suitable mitigation measures including; building form, orientation of buildings, uprated façade glazing, passive and mechanical venting and the integration of uprated fencing and boundary treatments.

Air Quality

- 5.26 The site is located adjacent to an Air Quality Management Area, declared due to nitrogen dioxide pollutants from road traffic emissions associated with the A12 trunk road. Local monitoring shows no exceedance of the relevant objectives.
- 5.27 The site is also located to the north of a household waste recycling centre which is not considered to have a negative impact on air quality due to regular collections from the site.
- 5.28 If through further analysis mitigation measures are required from the above sources such measures will likely include, filtered façade ventilation, or a suitable buffer distance.

Trees

- 5.29 The professional team has carried out an initial arboricultural assessment of the trees on site which has identified trees of different categories. The latest layout has been designed in response to the arboricultural survey and has retained as many of the mature trees as possible.

6. Key Benefits

6.1 The allocation of this site for between 90 and 100 residential units will provide a number of significant benefits, which include:

Social

- The redevelopment of the site for residential units making efficient use of previously developed land;
- Development providing a mix of residential units helping to meet identified need;
- Delivery of affordable housing;

Economic

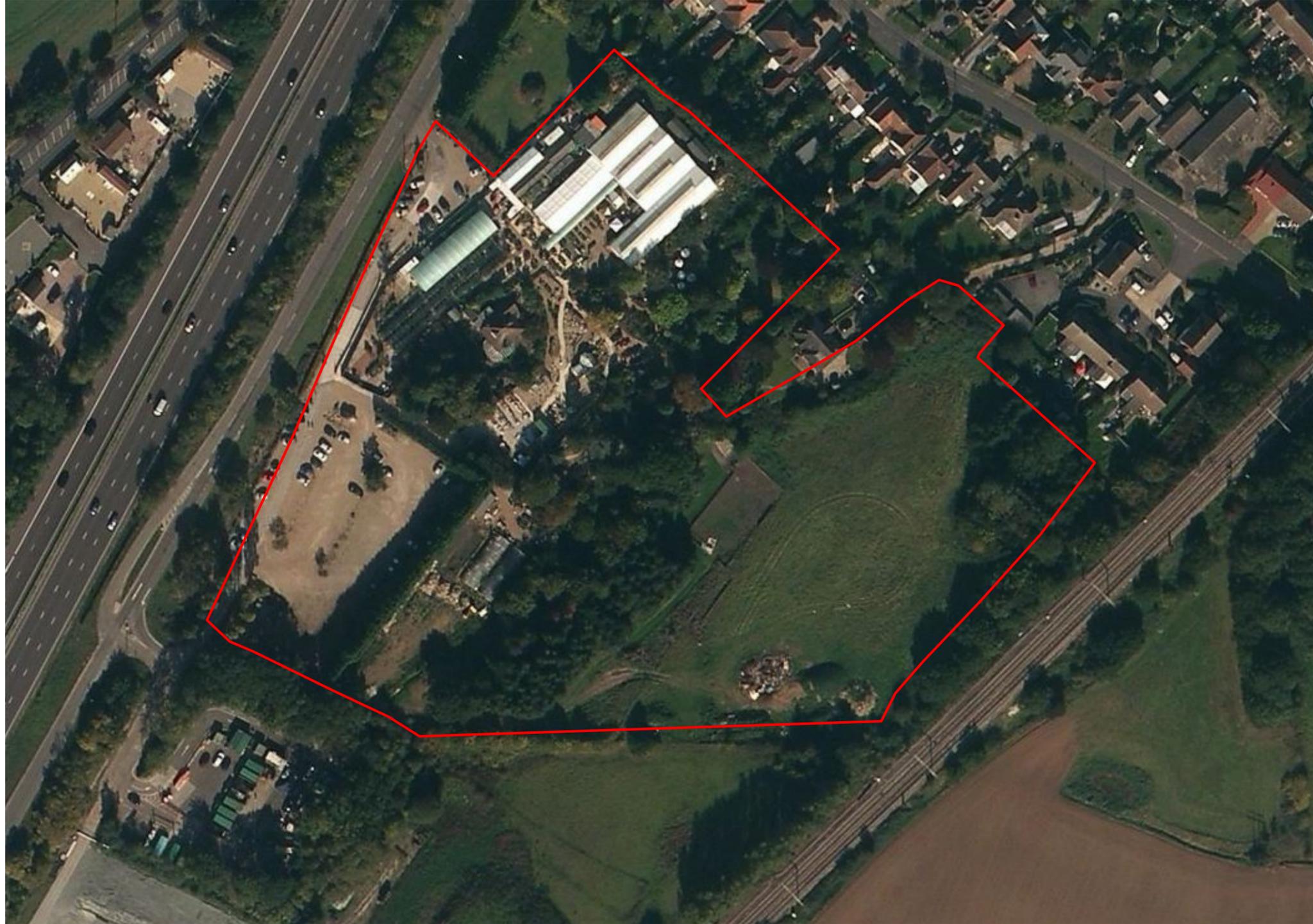
- The redevelopment of the site will contribute to economic growth during construction and over the life of the development;
- The construction of housing creates a range of employment opportunities within the local and wider economy and has been acknowledged by the Government as a key driver for boosting housing delivery as required by the NPPF;
- The allocation will also contribute to the economic role of sustainable development by delivering land to improve choice and competition in the residential market place;
- In addition, new workers and residents will spend within the local economy which will assist in sustaining the local services and infrastructure in the wider area.

Environmental

- The site allocation will deliver housing on previously developed land, through which undeveloped land can be better protected;
- The delivery of housing will not have an adverse impact on ecology and any future application would be supported by biodiversity enhancements;
- Any future application would meet the national energy and sustainability requirements.

6.2 In conclusion, Bellway support the principle of the site being allocated for residential development, however consider that there is a missed opportunity if the site is only allocated for 60 units and that between 90 and 100 residential units could be delivered with a landscape buffer if required.

6.3 Moreover, the A12 provides a significant physical separation between Mountnessing and Ingatstone and therefore the development of this site will not lead to any coalescence between the settlements.



INGATESTONE GARDEN CENTRE

SUPPORTING DOCUMENT Rev C

ROBERT HUTSON ■ ARCHITECTS THE MILL THE TYE EAST HANNINGFIELD ESSEX CM38AE

21 Mar 2016 ©



Location Map (Google Maps 2016)

Introduction

This supporting document has been assembled as part of the written representations on the Brentwood Draft Local Plan (Brentwood Borough Council 2016a) and covers site reference 128, Ingatestone Garden Centre, Roman Road, Ingatestone (Brentwood Borough Council, 2016c).

Site Location

The local plan describes this 3.25Ha site as being brownfield land in the Metropolitan Green Belt, 15 minutes walk south-west from Ingatestone Station. Ingatestone is located on the A12 corridor and London Liverpool street can be reached within one hour by rail (Brentwood Borough Council, 2016a; 2016b). The site is allocated for housing in the merging local plan and we have been asked to propose a suitable scheme for our client, Bellway Homes, based on the opportunities and constraints identified by the consultant team.



Bellway Homes was founded in 1946 and has developed from a local family run business in the North East of England into one of Britain's most successful home building groups. From its origins nearly 70 years ago as a small business in Newcastle upon Tyne, Bellway has become one of the UK's largest house building companies, with annual revenue of £1.765 billion. It has its headquarters in Newcastle but now operates from 15 divisions throughout the UK and has built and sold over 135,000 homes since its incorporation.

The proposal is made by the Bellway Homes Essex Division. Based in Chelmsford, the Essex Division is one of the largest of the 15 divisions and contributes in the region of 800 units per annum. Bellway see the Ingatestone Garden Centre as a key development and are keen to continue the company's strong reputation in the area.

Bellway has an excellent track record at delivering a wide range of high quality residential schemes by using extensive stakeholder engagement to create environments that people aspire to live in.



Masterplan for Channels, Little Waltham, Chelmsford (Bellway)



Alston Grange, Chelmsford (Bellway)



Housing at Newhall (Bellway)

Consultant Team

Architecture

R O B E R T H U T S O N ■ A R C H I T E C T S

Planning



Bellway have assembled an experienced consultant team to look at this site which has very particular constraints and opportunities. This team is working collaboratively to consult and advise on all issues relating to the design of a new community on this site.

The road and railway ensure the site is well connected so that once the acoustic issues are addressed, the full potential of the site in terms of landscape, existing water features and retained trees can be realised.

Transport, Drainage and Acoustics.



Ecology



Arboriculture



Ground Conditions and Remediation.



Bellway and Robert Hutson Architects

Bellway has had a long association with Robert Hutson Architects, having delivered housing schemes across Essex at sites such as Channels, near the village of Little Waltham, Chelmsford, Ekco Park in Southend and Mascalls, a former Hospital Site set in parkland in Warley, Brentwood. Common threads running through these schemes is a concentration on public open space and on stakeholder consultation, fostering strong local relationships to bring forward the most appropriate designs.

At Mascalls, a previously developed site in the Green Belt, the scheme is set amongst existing trees and defines large areas of public open space so that it was shown to be an acceptable redevelopment in a thorough qualitative and quantitative analysis including a visual impact assessment. The homes created use a mix of materials found locally such as slate roofs, white rendered walls and timber cladding to produce a contemporary design with a strong grounding in the local vernacular.

Bellway Schemes



Channels, Little Waltham, Chelmsford.



Siteplan- Mascalls Park, Warley, Brentwood.

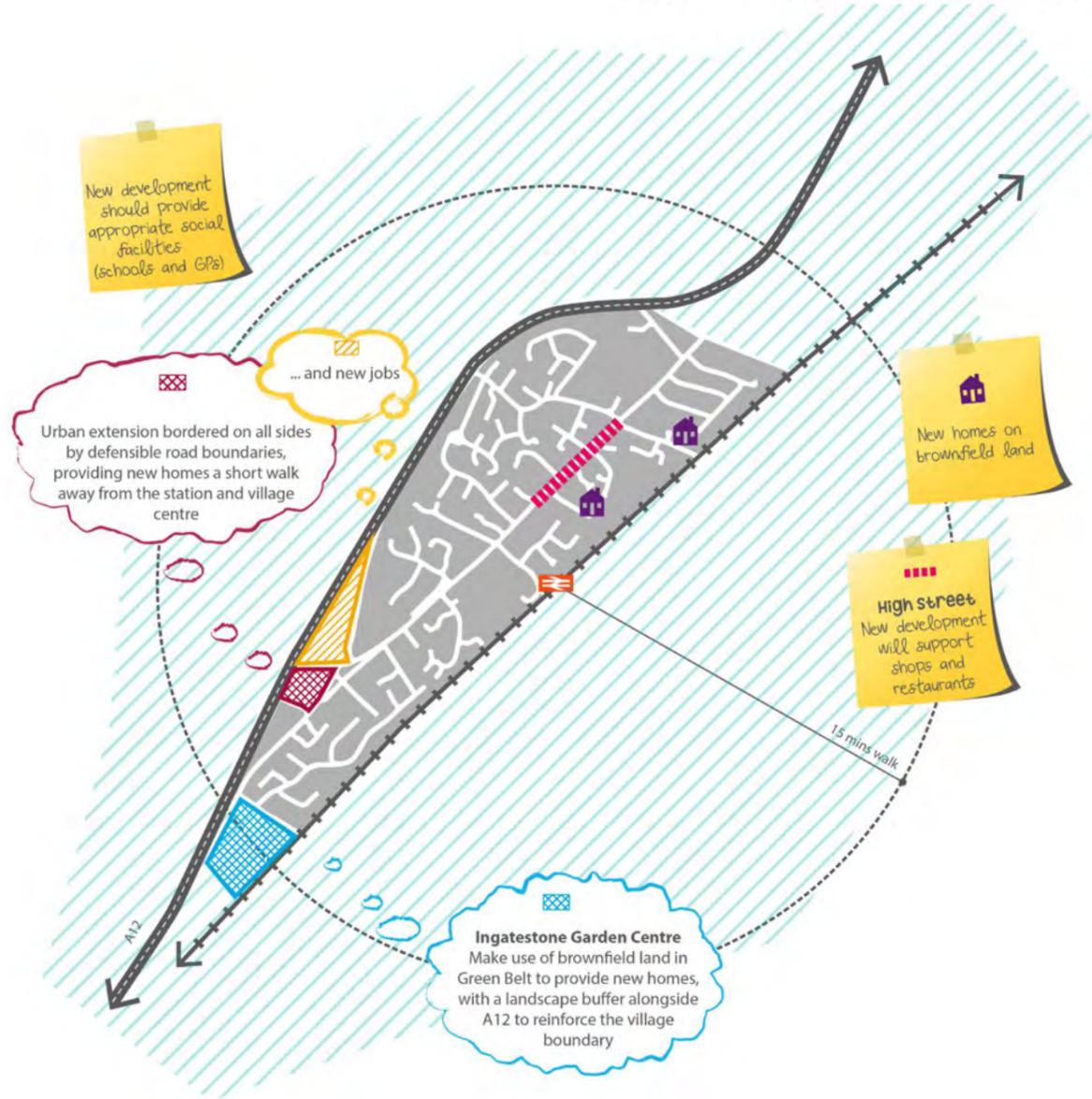


Views of Mascalls (Robert Hutson Architects)



Local Settlement and Facilities

Supporting Document | Pattern Book



A12 Corridor: Ingatestone

A12 Corridor: Ingatestone (Brentwood Borough Council 2016b, p40)

Ingatestone Garden Centre is described in the local plan as being 3.25 Ha site, a short 15 minute walk to the South-West of Ingatestone Station. Ingatestone forms part of the A12 corridor and is well served by trains to London Liverpool Street which can be reached in under an hour. (Brentwood Borough Council, 2016a; 2016b)

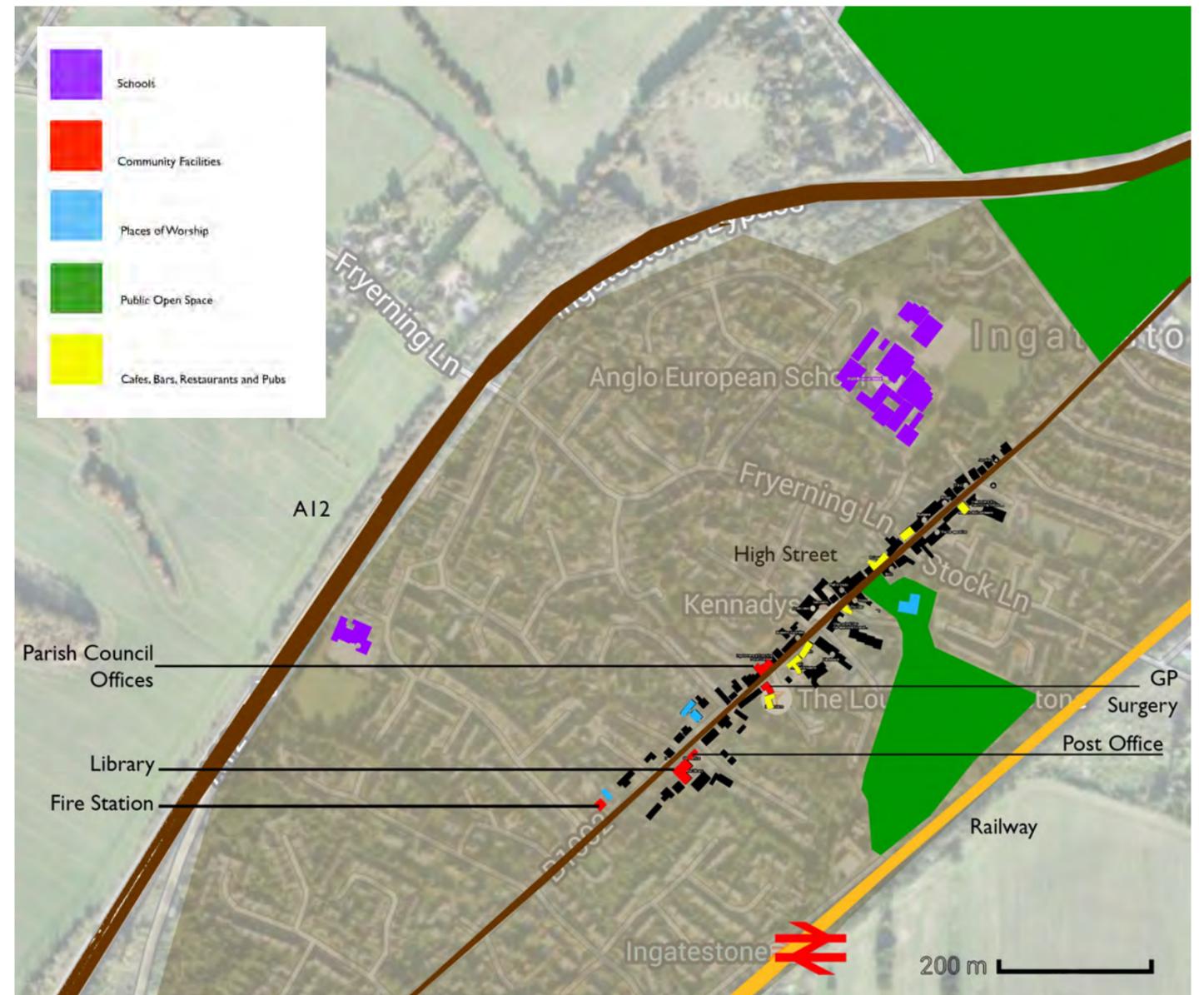


Diagram Showing Ingatestone Local Facilities and Services.

Ingatestone High Street is also a short walk away from the station. There are a number of community facilities nearby including a doctors surgery, fire station, library, several churches and two schools. The high street contains local shops, pubs, bars, cafes and restaurants. There is access to large areas of public open space and sports facilities.

Site Photographs and Views

The garden centre has developed to the west of the site and is visible from the road. To the north-east of the site is the housing along Burnthouse Lane which is predominantly semi-detached housing, two-storeys in height, with pitched roofs and either brickwork or rendered walls. This development is constrained by the road and the railway.



Site Red Line Plan



View A - View of Entrance to Burnthouse Lane from Roman Road.



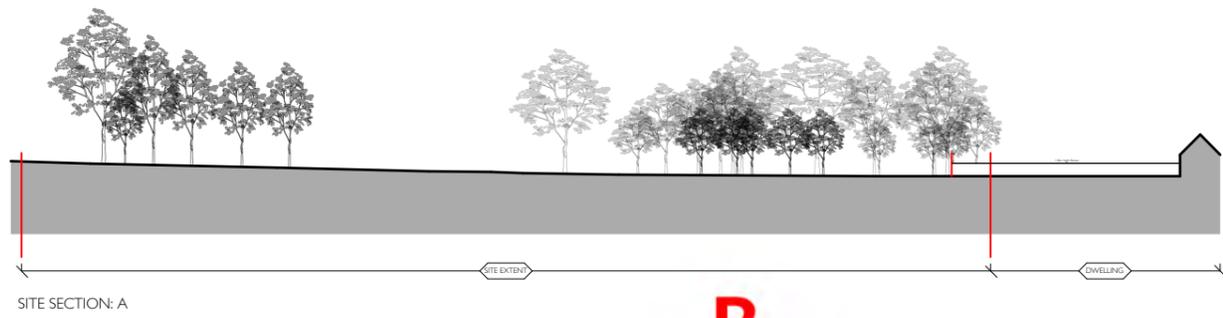
View B - View along Burnthouse Lane looking towards the railway.



View C - View of entrance to Garden Centre site



View D - View of Garden Centre from Roman Road looking North-East.

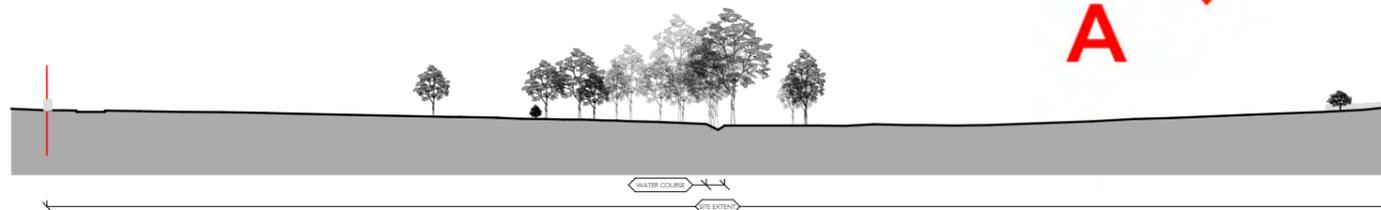
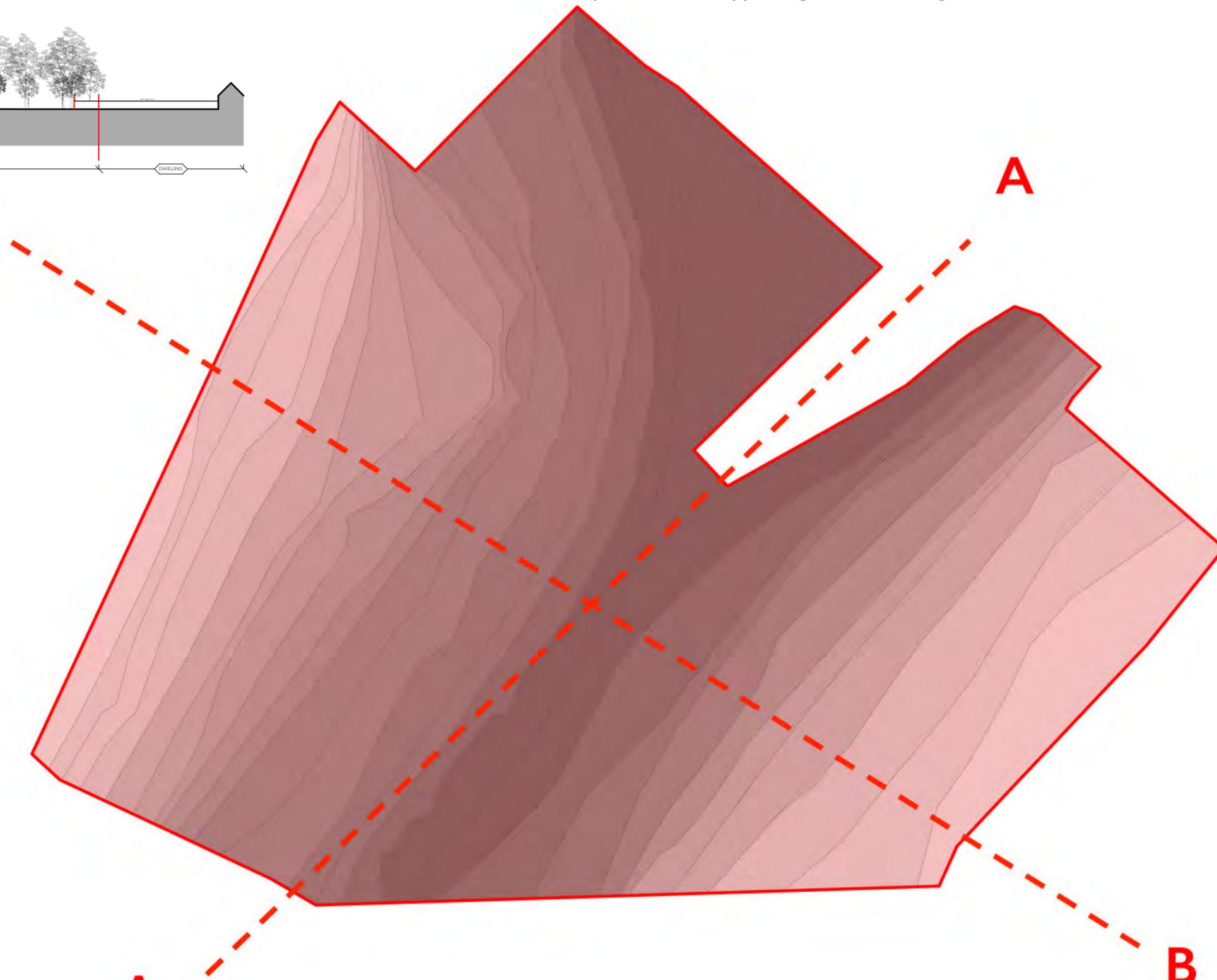


SITE SECTION: A

Site Levels Analysis

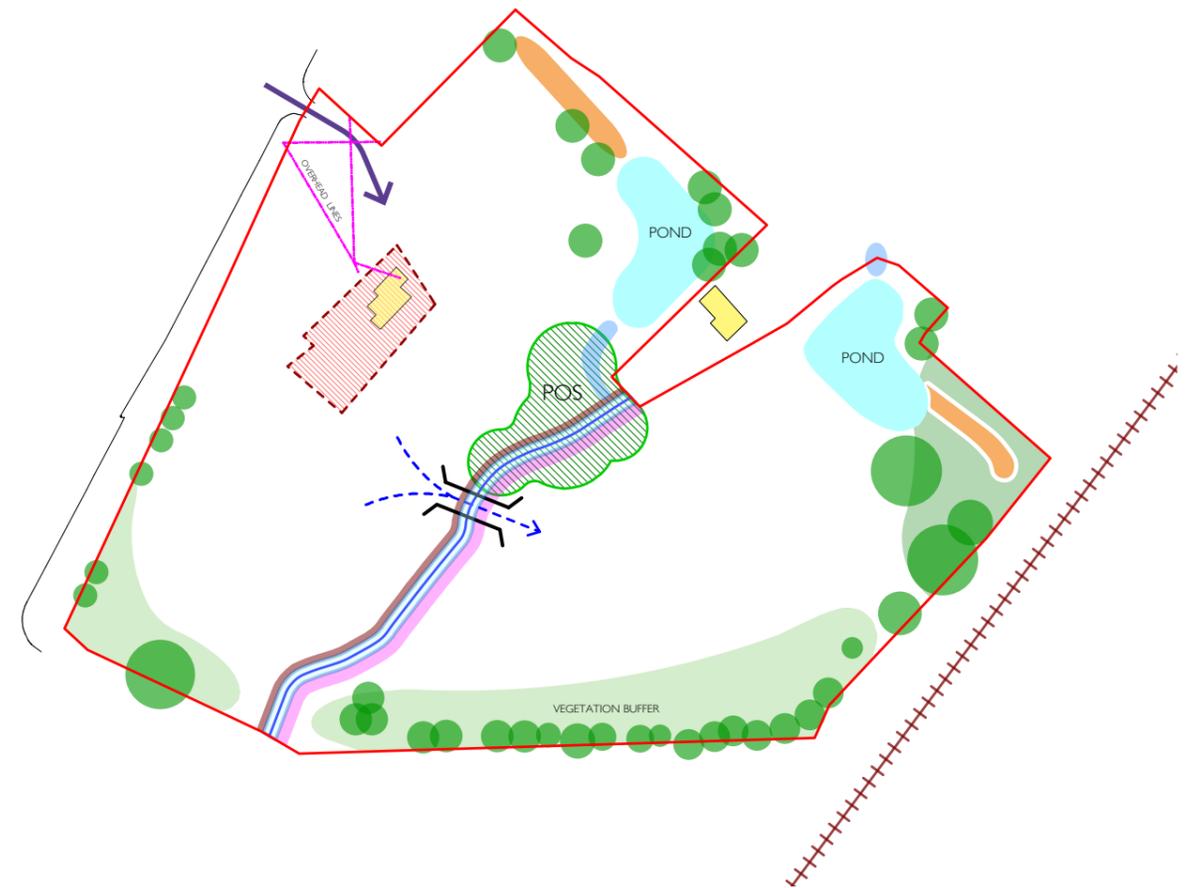
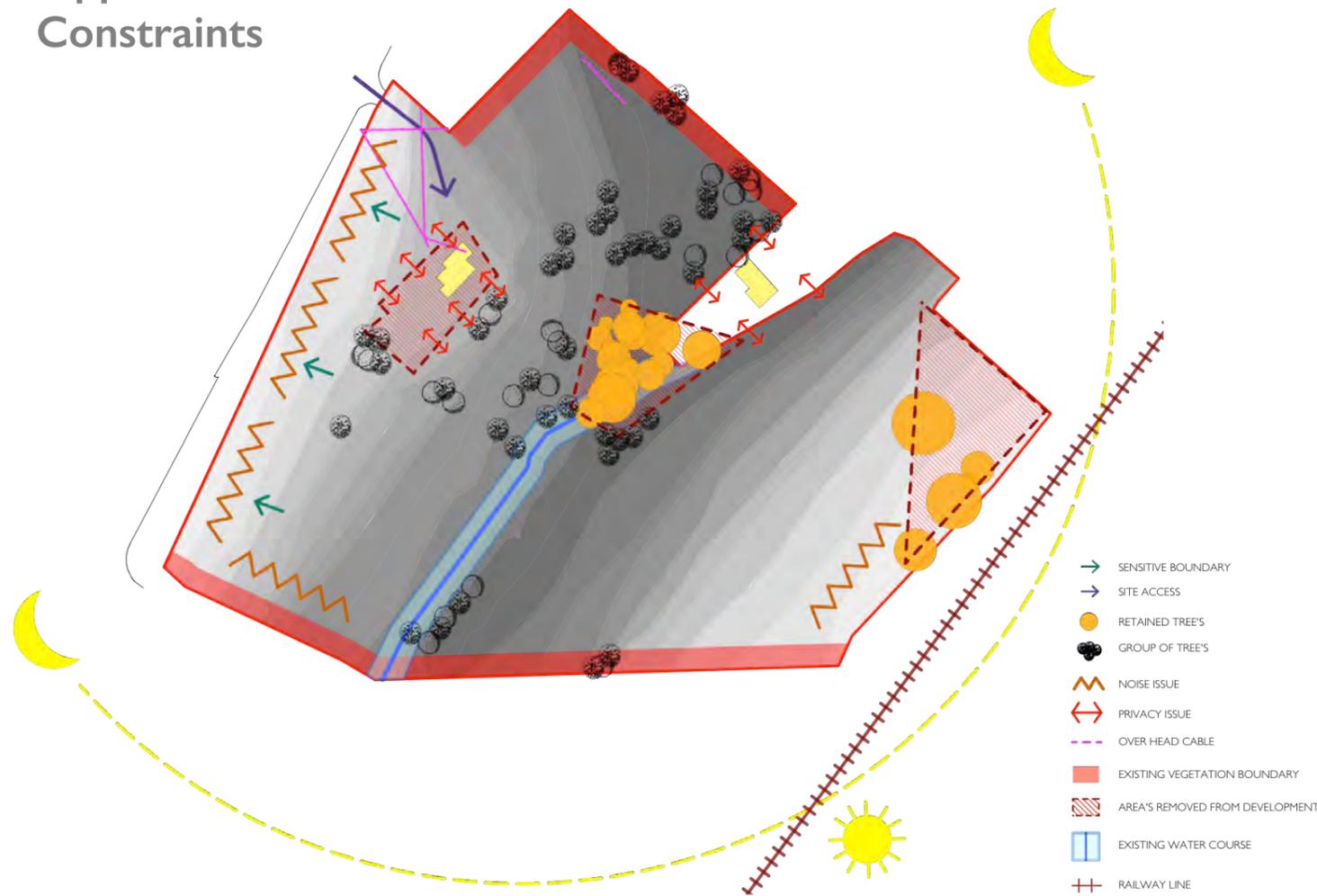
The site is gently sloping towards its centre, towards a watercourse which runs south-west to north-east.

As the site slopes downwards towards the watercourse, there is an opportunity to position larger properties in this natural valley setting.



SITE SECTION: B

Opportunities and Constraints



The site is constrained between the A12 at its North-West and the Railway to the South-East, which while ensuring it is well connected, also provides local sources of noise which need to be taken account of. Site access is from Roman Rd, running parallel with the A12 on the west of the site, which connects with the High Street, local shops and community facilities.

Projecting into the site from the north- east is a house which the site wraps itself around. A further private dwelling is surrounded by the site, to which access must be maintained. An opportunity is offered to incorporate this house into the overall composition of any new settlement while privacy issues for both houses must also be accounted for.

Running through the centre of the site is an existing watercourse which could be exposed and together with some balancing ponds which are required to ensure storm drainage is attenuated, also provides a potential water themed landscape feature - a strong visual amenity for future residents.

There are a number of trees on the site, including a high quality collection trees in the centre growing either side of the existing watercourse which offer the chance for large public open space focal point to a new community.

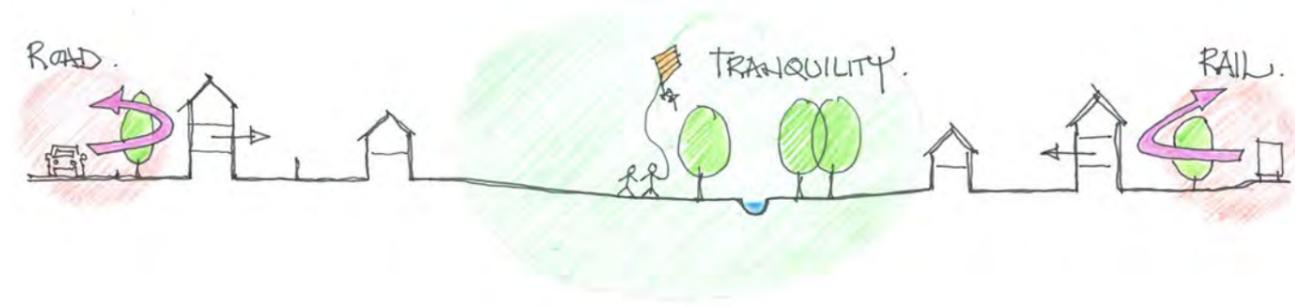


Site Design Concept

The concept is therefore to take account of the topography to ensure the site is focussed on a restored watercourse at the bottom of the gently sloping valley.

New proposed buildings can therefore be positioned as acoustic buffers at the east and west of the site to mitigate against existing sources of noise including the road, the railway and the refuse and recycling centre.

This then provides for a tranquil green heart to the scheme where the concept is very much buildings overlooking the water themed landscape of existing trees, watercourse, new swales and balancing ponds.



Scheme Sketch Design

The sketch design for a new community with a density of 25 dwellings per hectare is therefore illustrated on the next page.

A run of eleven houses, together with an apartment building to the west provides the necessary acoustic mitigation from the road. These are aligned along a new street parallel to Roman Road which sits between the A12 and our site. Another run of dwellings provides a smaller acoustic buffer to the less noisy railway to the south-west.

Site access is from Roman Road and leads through via the route hierarchy to the centre of the site and east-west towards a series of private drives. These routes define pockets of housing bordered by buildings at their edge so that a softer centre of garden private amenity space can be delivered. The existing dwelling in the site is therefore incorporated into this composition.

Towards the west of the site, starting at its centre, this typology can be loosened so that it becomes more about buildings set within a tranquil natural landscape. This more informal typology allows for views across the retained trees, watercourse and new balancing ponds and swales. A natural border of retained trees and landscaping along the northern boundary, allows for a varied ecology of wildlife including great crested newts to occupy the balancing ponds and swales as their new habitat.





References

Brentwood Borough Council (2016a) *Brentwood Draft Local Plan 2013 - 2033, Local Development Plan for Brentwood Borough*. January 2016. Brentwood: Brentwood Borough Council.

Brentwood Borough Council (2016b) *Brentwood Draft Local Plan 2013 - 2033 Supporting Document: Pattern Book*, January 2016. Brentwood: Brentwood Borough Council.

Brentwood Borough Council (2016c) *Brentwood Draft Local Plan 2013 - 2033 Supporting Document: Site Allocation Maps*, January 2016. Brentwood: Brentwood Borough Council.