

**Brentwood Draft Local Plan
Preferred Site Allocations Consultation
(Regulation 18)**

Representations made on behalf of Mrs A. Topham

Land at Blackmore Road, Blackmore

Brentwood Borough Council Site Reference: 202B

March 2018

1. Background and Overview

- 1.1 These representations are submitted by Strutt & Parker on behalf of Mrs A. Topham in relation to Brentwood Borough Council Preferred Site Allocations Consultation Document (Regulation 18) and in particular with regards to our clients land to the South of Blackmore, off Blackmore Road, which is known as Site Reference 202B in Brentwood Borough Council's plan-making process.
- 1.2 Site 202B measures at approximately 2.73ha. The Council have stated that the site has an indicative dwelling yield of 35.
- 1.3 As the Council will be aware, representations have previously been made on behalf of Mrs A. Topham and the site, through the Brentwood Strategic Growth Options Consultation (January 2015) and more recently the HEELA (2017).
- 1.4 In the Brentwood Strategic Growth Options Consultation, the site was defined as a Strategic Growth Site under reference 202.
- 1.5 The site has since been discounted for residential development through the Preferred Options Site Allocations Document. The Council's reasoning for discounting the site is Green Belt impact.
- 1.6 The allocation of the site off Blackmore Road for residential development would represent a sustainable and deliverable proposal to help meet housing needs over the coming plan period. This representation sets out comments on the Local Plan Regulation 18 consultation document, as well as providing detail on the sustainability and deliverability of the site with regards to technical considerations.
- 1.7 This representation is accompanied by the following documents:
 - Appendix 1: Location Plan
 - Appendix 2: Site Plan (On request of the landowner)
 - Appendix 3: Site Context
 - Appendix 4: Constraints Plan
 - Appendix 5: Flood Risk Assessment and Surface Water Drainage/SUDS Strategy prepared by Evans River and Coastal
 - Appendix 6: Developable Area

2. Brentwood Local Plan Regulation 18 Consultation

Spatial Strategy

- 2.1. The Spatial Strategy in the Brentwood Borough Council Preferred Site Allocations Consultation Document (Regulation 18) looks to provide context for managing change and shaping how the area develops in the future. The Spatial Strategy sets out the level and location of development and provides the basis of delivering Brentwood Borough Council's vision, strategic objectives, planning policies and land allocations.
- 2.2. The Spatial Strategy set out in the Preferred Site Allocations Document retains this focus on transport corridor-led growth, including at the A12 corridor at Brentwood and Shenfield. The Spatial Strategy also looks to introduce some growth to the larger villages to enhance the range and the choice of local housing options, but also to promote the retention and development of local services and community facilities. The Spatial Strategy is supported, and ensures that development is focused at sustainable locations.
- 2.3. Due to the potential expansion of settlements and additional housing growth, we also note that the Council have reviewed the 2016 Draft Local Plan Settlement Hierarchy and the details of additional housing growth.
- 2.4. Furthermore, each settlement is defined as either Category 1 – Main Town, Category 2 – Village Service Centre, Category 3 – Large Villages or Category 4 – Smaller Villages. Site 202B is within Blackmore, which is defined as a 'Large Village'.
- 2.5. As such, the proposed allocation of Site 202B at Land to the south of Blackmore, off Blackmore Road relates well to the Spatial Strategy, which directs proportionate growth to the Borough's larger villages.
- 2.6. The Preferred Site Allocations document estimates that there will be a total of 432 dwellings within Blackmore by the end of the Local Plan period – 2033. This is an increase of 96 dwellings, which are to be provided through Brentwood Borough Council's site allocations.
- 2.7. Although not within the defined settlement boundary of Blackmore, the site does lie adjacent to it. The allocation of the site provides an option of delivering a small extension to the existing residential area of Blackmore, which is considered to have significant merit for a number of reasons.
- 2.8. Small extensions to existing settlements have a strong potential to integrate with existing communities and to form relatively unobtrusive and in-keeping additions to existing towns and villages. Furthermore, sustainability benefits of extensions to existing areas include the positive economic and social impacts that accompany the provision of new homes to a settlement. The provision of new homes to a settlement helps support local facilities and services, helping to sustain the vitality of a settlement. Extensions to existing settlements can also help ensure facilities, services and jobs are accessible to alternatives to the private car, with resultant sustainability benefits. New developments

will also result in sustained local economic benefits related to additional local expenditure, with additional expenditure on goods and services by future occupiers of the site.

- 2.9. National policy is clear on the importance of promoting thriving rural communities, with the NPPF identifying this as one of the Core Planning Principles. At Paragraph 28 of the NPPF, it states that planning policies should help ensure the retention and development of local services and facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.
- 2.10. Further to the requirements of the NPPF, the Planning Practice Guidance (PPG) explains how Local Planning Authorities should support sustainable rural communities. This states (at Paragraph: 001 Reference ID: 50-001-20160519) the following:

“It is important to recognise the particular issues facing rural areas in terms of housing supply and affordability, and the role of housing in supporting the broader sustainability of villages and smaller settlements”.

And

“A thriving rural community in a living, working countryside depends, in part, on retaining local services and community facilities such as schools, local shops, cultural venues, public houses and places of worship. **Rural housing is essential to ensure viable use of these local facilities**” (emphasis added).

Housing Need and Supply (Paragraphs 38 to 50)

- 2.11. The previous iteration of the emerging Local Plan, the Draft Local Plan (2016) set out an objectively assessed housing need for the Borough, which equated to 362 dwellings per annum for the lifetime of the plan (2013-2033). This totalled 7,240 dwellings across the plan period.
- 2.12. The Preferred Site Allocations Regulation 18 consultation document sets out that objectively assessed needs based on Office of National Statistics Mid-Year Population Estimates results in a need of 348 dwellings per annum which it is stated remains lower than the 360 dwellings per annum set out in the 2016 Draft Local Plan.
- 2.13. At paragraph 40 the consultation document states that test of the projections to assess “if they are a reasonable reflection of underlying trends” have indicated that the official short-term (5 year) forecast is particularly unstable and the longer term demographic projections indicate a much lower demographic baseline figure for the borough of circa 280 dwellings per annum.
- 2.14. The plan goes on to set out that a degree of market signal uplift has been applied which it is stated is a matter of professional judgment. A 30% uplift above the new 280 dwellings per annum baseline, plus a small contingency of 6% should new official

projections indicate a slightly different position to that forecasted has therefore been used.

- 2.15. The above calculation therefore leaves an objectively assessed housing need of circa 380 dwellings per annum or 7,600 dwellings across the plan period (2013-33).
- 2.16. We are supportive of the increase in the housing target set out in the latest plan as it confirms to the Government's objectives to increase housing supply as per the NPPF. However, we have concerns that the housing target does not presently properly represent the full extent of housing need. In particular the reduction of the stated need of 348 dpa to 280 dpa based on tests of underlying trends. Given the subjective nature of these tests, and the fact it is not yet known whether short term trends will indeed become the new normal for the longer term we would urge a precautionary approach here to ensure housing needs are fully met.
- 2.17. It therefore could be suggested that using 348 dpa as a baseline before applying the proposed 36% increase would be a more appropriate methodology. This would result in a housing need of 473 dpa or 9,466 over a 20 year plan period. This also more accurately reflects the projections emerging from the government proposed standard housing needs methodology.
- 2.18. As highlighted in the consultation document the Government has also consulted on a methodology for a standardised approach to calculating local housing need in England. Whilst we note that Brentwood Borough Council has responded to this consultation outlining concerns over the proposed methodology and datasets, this nonetheless presently remains the direction of government policy and is based on the work of the Local Plan Expert Group. The Government has made clear its intention to involve the standard methodology with the publication of the draft NPPF in March 2018. This approach would see an increase in Brentwood housing need to 454 dwellings per annum.
- 2.19. To ensure the plan is fully robust we suggest it is important to plan for this higher level of growth – it should be noted that the NPPF states “Local Plan should meet objectively assessed needs, *with sufficient flexibility to adapt to rapid change*” (Paragraph 14, emphasis added). Additionally in order to ensure delivery throughout the plan period it is important the supply includes sufficient sites that are deliverable in the early part of the plan period in addition to any strategic or new settlement allocations.
- 2.20. With the standardised methodology in mind, Brentwood Borough Council need to provide an extra 74 dwellings per year and a total of 1,480 dwellings throughout the plan period (2013 – 2033). Sustainable sites therefore need to be allocated in the emerging Local Plan to provide for this increased need and density of allocated sites such as Doddinghurst Road, Brentwood should be maximised where possible.
- 2.21. Timing is of relevance to the housing need and supply. It is important that the New Local Plan allocates sufficient sites that can be delivered in the relatively short-term.

Housing Supply and Housing-led Allocations

- 2.22. Site 202B has presently not been allocated for residential development through the Preferred Site Allocations Consultation Document.
- 2.23. The land to the south of Blackmore, off Blackmore Road has previously been assessed through the Council's plan-making process. The site was previously identified in the Brentwood Strategy Housing Land Availability Assessment (SHLAA) (2011) as site reference G044. Site G044 was larger than site 202B and extended further to the south into the open countryside. The site was defined as a greenfield discounted site by the Council. This was due to the sites relation to the existing village envelope, the unacceptable intrusion into the countryside on the western site of Blackmore Road and the partial designation within the Conservation Area on the eastern side of Blackmore Road.
- 2.24. Following the assessment of site 202B through the SHLAA (2011) the site proposed for allocation was reduced in size to what the accompanying Location Plan now shows. This reduction in size resolves the issues which have been identified. The reduced site is enclosed by existing landscape buffers and is well related to the existing settlement boundary to the north. This can be seen in Appendix 2.
- 2.25. The site has also been previously identified as a potential option area for growth within the Strategic Growth Options Document (2016). Page 19 of the document states that there are "several options on the edge of Blackmore, such as site reference numbers 076 and 077, South of Redrose Lane". Site 202B is shown on the plans, however is not referenced within the text.
- 2.26. Despite the positive assessment of the site within the Strategic Growth Options Document (2016), the site has been discounted within the Preferred Site Allocations Document due to its potential impact on the Green Belt. The rejection of the site is not considered justified.
- 2.27. The site has also been assessed within the Housing Economic Land Availability Assessment (HELAA) (2017), however a site assessment has not yet been published by Brentwood Borough Council, and therefore no comments can be made within this representation. We would welcome the opportunity to review details in due course, and provide feedback to assist in the plan-making process.

Sustainability Appraisal

- 2.28. The Preferred Site Allocations Document is supported by a range of technical work, including the Sustainability Appraisal (SA) January 2018. The SA presents a number of sustainability issues/objectives which have been established through SA scoping. Together, these sustainability topics and objectives provide a methodological framework for the appraisal of potential allocation sites – including those site which have been discounted.

2.29. Within the Sustainability Appraisal, the performance of sites is categorised on the following scale:

Dark Green – Site performs Particularly Well

Light Green – Site performs well

No Shading – No issue in terms of this criterion

Amber – Site performs poorly

Red – Site performs particularly poorly

2.30. The SA indicates that Site 202B is well related to a primary school, but is in 'red' proximity to a GP Surgery and Secondary School. Both Ongar Academy and Shenfield High School are located approximately 3.5 miles from the site and the closest GP Surgery, Deal Tree Health Centre is located approximately 1.5 miles from the site. The site is still relatively close to these facilities and services.

2.31. The SA, through its analysis states that the site is an 'Amber' distance from a designated Local Wildlife Site(s). The proposed development of the site will not unacceptably impact on the Green Belt or a Local Wildlife Site. The scoring is considered to be highly assumptive and rules out the potential of sites being landscape-led and providing opportunities for the enhancement of such features and local biodiversity. Being within a 'moderate' proximity to a Local Wildlife Site does not necessarily mean that there will be direct impacts on the site.

2.32. The SA states that the site is within an 'Amber' distance to the Green Belt. The assessment is binary in its approach – if a potential site falls within the Green Belt, it will be given an 'Amber' Score. Whilst the methodology notes that the Green Belt is not specifically a landscape designation, and as such potential effects on the setting have not been appraised, a blanket 'Amber' score on anything seems arbitrary. In a borough that is predominately set within the Green Belt, we would consider that further assessment of the site's individual effect on the openness and permanence at the early plan-making stage would assist in providing a more useful and fair assessment, again ensuring sites are considered in relation to others. We understand that a Green Belt Review has also been published as part of their evidence base, and the findings of this in relation to the site are discussed in the following section.

2.33. The SA also identifies that the site is within a 'red' proximity to an existing Conservation Area. A small eastern part of the site does encroach into the Blackmore Conservation Area. An indicative layout has taken this into consideration and limits development at this boundary of the site to reduce any potential impacts on this area which is of historic significance.

2.34. Finally, the SA states that the site is 'red' in terms of Agricultural Land. The site is currently in agricultural use. The Natural England Agricultural Classification Map – Eastern Region states that the Site is classed as Grade 1 Agricultural Land. The Natural

England website states that the maps are not sufficiently accurate for use in the assessment of individual fields or sites any enlargement could be misleading.

- 2.35. The site may be defined as agricultural land, however it is not currently in agricultural use or providing an agricultural service. The site cannot be considered to be used for agricultural purposes. The size of the site is problematic for potential farm machinery. Furthermore, the location of the public footpath on site makes it unlikely that livestock could be placed on the site. The site is providing open amenity space for the village, which would be not be lost through development proposals.
- 2.36. In general, we consider the Interim SA Report is simplistic in its approach to individual site assessment. The SA has used a predominately spatial or 'GIS' (use of Geographical Information Systems) approach to the assessment of each criteria, using the distance between the site and various factors to judge the extent to which it either achieves or opposes certain objectives. This represents a very simplistic assessment of sustainability, which should consider environmental, social and economic impacts.
- 2.37. The site has been actively promoted through the Council's plan-making process. It is a deliverable site for housing and the allocation of the site would contribute towards an effective strategy.

3. Site Deliverability

- 3.1. The site represents a suitable, available and achievable site for residential development. There have been some technical reports and associated plans completed which demonstrate this. The below section provides a summary of these documents.
- 3.2. The development of the site not only provides the opportunity for residential development, but also an area of open space for the settlement of Blackmore. Furthermore, part of the site could provide an area of land for the extension of the grounds of St. Laurence Church.

Access & Connectivity

- 3.3. The site is considered to have good access and connectivity to the surrounding area. Both pedestrian and vehicle access is achievable directly from Blackmore Road.
- 3.4. There is a public footpath located at the northern part of the site. The footpath leads from Blackmore Road to the south of the site. The footpath runs along the eastern border of the site. This is outlined in the accompanying constraints plan.
- 3.5. The site is located adjacent to the existing settlement boundary of Blackmore and presents a logical extension to the village. The village offers a local convenience store, a primary school, a sports club, pubs and restaurants and other community facilities and services.
- 3.6. The site is within close proximity to Brentwood and Chelmsford which both provide an extensive range of educational, retail and leisure facilities for village residents. Brentwood and Chelmsford are a 25 bus journey from a bus stop which is located at the boundary of the site on Blackmore Road. Buses run at least once an hour to Brentwood and at least once every 2 hours to Chelmsford. This bus stop also provides frequent services to other surrounding settlements.
- 3.7. The site is well connected to the surrounding road network. The site is located 4 miles from the A12. The A12 provides efficient access to settlements across Essex and East Anglia such as Chelmsford, Colchester and Ipswich, as well as a direct connection to the M25.
- 3.8. Given the high access and connectivity levels of the site, it is evident that Site 202B is within a sustainable location and should therefore be considered as a site for residential development.

Flood Risk and Drainage

- 3.9. The site is within Flood Zone 1, and is therefore suitable for residential development according to the Environment Agency.

- 3.10. A Flood Risk Assessment and Drainage/SUDS Strategy has been prepared by Evans Rivers and Coastal Ltd to investigate the possibility of groundwater flooding and flooding from other sources at the site.
- 3.11. The Assessment has confirmed that there is a low risk of groundwater flooding, however as a precaution the proposed dwellings will be raised by 150mm and a *Water Exclusion Strategy* will be applied to foundations.
- 3.12. The Assessment includes a plan of areas which may be at risk of flooding. The proposed layout will ensure that no dwellings are built on these areas, and instead are built around them. Given this, the potential developable area of the site is approximately 2.1ha. As such, the site could provide circa 26 dwellings.
- 3.13. The Assessment also clarifies that there is a very low to high surface water flooding risk across the site and it is recommended that all built development is located across very low risk areas in the first instance. Furthermore, it is confirmed that safe access and egress will be available at all times.
- 3.14. A drainage easement exists across the site. It is proposed that this would be diverted as part of the proposals to allow for development.
- 3.15. The report confirms that an assessment of the practical use of sustainable drainage techniques has been carried out. The assessment states that as soil types will not support the effective use of infiltration devices, it is proposed that surface water is attenuated through the use of permeable paving prior to discharge into the existing watercourse system.
- 3.16. The potential residential development of the site could reduce the potential flood issues on site. These issues are specified within the Flood Risk and Drainage Assessment.
- 3.17. Further information on the proposed SUDS strategy and detail on the Flood Risks at the site can be found within the accompanying assessment prepared by Evans River and Coastal.

Green Belt

- 3.18. As part of this iteration of the emerging Local Plan, Brentwood Borough Council have undertaken a Green Belt Study (January 2018). This study looks to provide an assessment of Green Belt parcels against the five purposes of the Green Belt.
- 3.19. An individual site assessment, which assesses HELAA sites, lesser performing Green Belt parcels and other identified sites is set to be made available later in the plan-making process.
- 3.20. In the 2018 Working Draft Green Belt Study, the site is within Green Belt Parcel 3. It should be noted that Parcel 3 is a large area which extends beyond Blackmore and into the Epping Forest District.

3.21. The size of Parcel 3 is inappropriate. The site should be considered on its own merits as well as part of such a large area which could have diverse characteristics and ranging value. Below we have considered the specific merits of Site 202B, notwithstanding the assessments made of the parcel as a whole.

3.22. Furthermore, the site is bounded by a dense tree belt at all of its boundaries and is therefore separate from the surrounding landscape.

3.23. The parcel was assessed against five purposes of the Green Belt as follows:

Purpose 1: To check the unrestricted sprawl of large built up areas

3.24. Parcel 3 is defined by the Council as 'not contained'. Site 202B is contained on two out of four boundaries by built form, and remaining boundaries by established vegetation and hedgerows which could be incorporated and enhanced as part of a landscaping scheme that would support the redevelopment of the site.

Purpose 2: To prevent neighbouring towns from merging into one another

3.25. Parcel 3 is defined by the Council as a 'Critical Countryside Gap' (CCG). The site is adjacent the southern limit of Blackmore. Surrounding settlements to Blackmore include Mill Green, Nine Ashes, Stondon Massey and Wyatts Green. There is a large gap in between all these settlements and Blackmore. The site's development would enable the provision of a new robust Green Belt boundary and together with the substantial separation distance between neighbouring settlements would ensure that no coalescence would occur.

Purpose 3: To assist in safeguarding the countryside from encroachment

3.26. Parcel 3 is defined by the Council as 'Functional Countryside' (FC). The site is therefore defined by the Council as 'Agricultural'. The existing trees and hedgerows at the boundary of the site would make it difficult to farm a field of this size with Agricultural Machinery. Furthermore, the location of the public footpath on site results in the site not being considered for livestock grazing. The public footpath is a community asset and should not be removed.

3.27. A new Green Belt boundary would be robust and would ensure that development would not encroach into the countryside.

Purpose 4: To preserve the setting and special character of historic towns

3.28. Parcel 3 is defined by the Council as having a 'strong relationship with a historic town'. Site 202B is some distance from the centre of Blackmore, however with no direct relationship. The site is located close to existing residential development.

Purpose 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land

- 3.29. Brentwood Borough Council have not provided an analysis of Purpose 4. It is considered that development of this site has limited environmental value and offers minimal contribution to the Green Belt when assessed against its five intended purpose. The New Local Plan should be helping support housing delivery in sustainable locations in the Brentwood Borough whilst protecting other Green Belt sites of much higher environmental value.
- 3.30. Overall, Brentwood Borough Council have assessed Parcel 3 as having a 'high' contribution to the 5 purposes of the Green Belt. The above review of Site 202B recognises that this assessment is not necessarily reflective of the qualities of every site within the parcel however, as the parcel size is too large and therefore inappropriate.

4. Summary

- 4.1. Land to the south of Blackmore, off Blackmore Road provides a sustainable and deliverable option for residential development in Brentwood Borough.
- 4.2. The site is known in the Council's plan-making process as Site 202B. It has been discounted by Brentwood Borough Council as a potential site for residential development, due to the potential impact of development on the Green Belt.
- 4.3. The site should be considered for development, given that it has been actively promoted for residential development. The site is suitable for short-term delivery. The site can also provide dwellings within Blackmore, a Category 3 Large Village, where there are currently only 96 dwellings allocated for development as part of the Regulation 18 Preferred Site Allocations.
- 4.4. Furthermore, the analysis and content within the accompanying studies and plans provide further evidence for the availability, achievability and suitability of the site for development. It should therefore be allocated by Brentwood Borough Council as a site for residential development as it is a deliverable site and provides opportunity to help meet the Borough's housing need.
- 4.5. The accompanying Flood Risk and Drainage Report has stated that there are areas of the site which are at risk of flooding for medium risk events (Figure 9). As a result, the layout of the site will look to provide dwellings in the areas which will not be effected by potential flood risks. These areas are coloured in white at Figure 9. Given this, the potential developable area of the site is approximately 2.1ha. As such, the site could provide circa 26 dwellings. A plan of this site area can be found at Appendix 6.
- 4.6. The allocation of the site in the Local Plan for residential development would be justified, effective, consistent with National Policy, and would help ensure the Local Plan meets development need and is positively prepared.