

Brentwood Preferred Site Allocations Consultation (Regulation 18)

**Representations made on behalf of Barnoaks Management
Ltd.**

Land South of the B1002, Ingatestone

Reference: 078

March 2018



Contents

1. Background and Overview	1
2. Brentwood Local Plan Regulation 18 Consultation.....	2
3. Sustainability Appraisal	6
4. Site Deliverability.....	7
5. Conclusions & Summary.....	11

Appendices

Appendix A: Location Plan

Appendix B: Proposed Site Plan prepared by Grafik

Appendix C: Landscape and Visual Issues Scoping Report prepared by Nigel Cowlin

Appendix D: Landscape Advisory Plan prepared by Nigel Cowlin

Appendix E: Access Appraisal by Ardent Engineers

1. Background and Overview

- 1.1 These representations are submitted by Strutt & Parker on behalf of Barnoaks Management Ltd. In relation to the Brentwood Borough Council Preferred Site Allocations Consultation and in particular with regards to Land south of the B1002, Ingatestone.
- 1.2 The site is identified as Site 078 in the Council's plan-making process. The site is not currently allocated for residential development within the Preferred Site Allocations document, however is allocated for residential development within the Habitats Regulations Assessment (2018). A Location Plan showing the site is provided at Appendix A of this representation.
- 1.3 The site has previously been submitted through the Council's Call for Sites (2011) and was included in the Strategic Housing Land Availability Assessment (SHLAA) (2011). The site was referenced in the SHLAA as G020 and was defined as a Greenfield parcel with potential. More recently, the site was submitted as part of the Housing and Economic Land Availability Assessment (HELAA) in 2017.
- 1.4 The site measures at approximately 1.8ha and could support the development of up to 50 dwellings.
- 1.5 The site is located adjacent to the eastern edge of the settlement boundary of Ingatestone, on land, which is currently allocated as Green Belt.
- 1.6 The allocation of land south of the B1002, Ingatestone for residential development would represent a sustainable and deliverable proposal to help meet local housing needs over the coming plan period. This representation sets out comments on the Local Plan Regulation 18 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 A: Location Plan

Appendix B: Proposed Site Plan prepared by Grafik

Appendix C: Landscape and Visual Issues Scoping Report prepared by Nigel Cowlin

Appendix D: Landscape Advisory Plan prepared by Nigel Cowlin

Appendix E: Access Appraisal by Ardent Engineers

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) (January 2018) looks to provide the 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 a focus on transport-led corridor growth, including at the A12 corridor at Shenfield and Brentwood. It also looks to include 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 development.
- 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 Each settlement is defined as either Category 1 – Main Town, Category 2 – Village Service Centre, Category 3 – Large Villages or Category 4 – Smaller Villages.
- 2.5 Site 078 is within Ingatestone, which is defined as Category 2 – Village Service Centre.
- 2.6 The Preferred Site Allocations document estimates that there will be a total of 2,136 dwellings within Ingatestone by the end of the New Local Plan Period – 2033. This is an increase of 218 dwellings, which are to be provided through Brentwood Borough Council's residential allocation.
- 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 38-50)

- 2.11 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.
- 2.12 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.
- 2.13 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.
- 2.14 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).
- 2.15 Whilst we are supportive of the increase in the housing target set out in the latest plan we have concerns that this 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.

- 2.16 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.
- 2.17 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. This approach would see an increase in Brentwood housing need to 454 dwellings per annum.
- 2.18 To ensure the plan is fully robust we suggest it is important to plan for this higher level of growth. 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.
- 2.19 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 Site 078 should be maximised where possible.
- 2.20 Timing is also 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 short-term. Site 078 is available for development in the short-term.

Housing Supply and Housing Led Allocations

- 2.21 The Land to the South of the B1002, Ingatestone is not allocated for residential development through the Preferred Site Allocations Consultation document. It is however allocated for residential development through the Habitats Regulations Assessment (2018), which forms part of the technical evidence base for the Regulation 18 Consultation.
- 2.22 The Preferred Site Allocations Document states that the site has been discounted due to the potential impact of development on the Green Belt. The rejection of the site is not considered justified and the Council should look to update the Regulation 18 Document to state that the site is allocated for residential development, in line with the Habitats Regulation Assessment (2018).
- 2.23 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.

3. Sustainability Appraisal

- 3.1 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 and 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 site 078. Further detail on the sites analysis within the SA is outlined below.
- 3.2 Within the Sustainability Appraisal (SA), the performance of sites is categorised on the following scale:
- Dark Green – Site performs particularly well
 - Light Green – Site performs well
 - No Shading – No issues in terms of this criterion
 - Amber – Site performs poorly
 - Red – Site performs particularly poorly
- 3.3 The SA indicates that Site 078 is well located in terms of GP Surgery Provision. The New Folly Surgery is located less than 400m from the site. Furthermore, the SA indicates that Site 078 is well located in terms of Secondary School Provision. The Anglo European School is located less than 700m from the site.
- 3.4 The SA indicates that the site ‘performs poorly’ in terms of location to a Primary School. The site is located within 0.5 miles of both an infant school and a junior school. It is considered that the primary school provisions within Ingatestone are within walking distance to the site and therefore should not be defined as ‘performs poorly’ within the SA.
- 3.5 The SA states that the site ‘performs poorly’ in terms of proximity to a Conservation Area. Part of Ingatestone High Street is defined as a Conservation Area, however site 078 is not within this designation and is located at least 400m from the defined Conservation Area. As such, the proposed development of the site will not unacceptably impact on the Conservation Area. Being within an ‘Amber’ distance to the Conservation Area does not necessarily mean that there will be direct impacts on the designation.
- 3.6 The SA states that the site ‘performs poorly’ in terms of proximity to an AQMA. The site is located approximately 1 mile from AQMA BRW6 at the A12/Fryerning Lane. It is considered that the AQMA will not be adversely impacted by the site, given the distance between the two.
- 3.7 Both sites are being actively promoted. The site is deliverable for housing and as such, the allocation of the site, in line with the Habitats Regulation Assessment (2018) is considered to contribute towards an effective strategy.

4. Site Deliverability

- 4.1 The site represents a deliverable, sustainable and achievable site for residential development. A number of technical reports and associated documents have been completed which demonstrate this. The below section provides a summary of these documents.

Layout

- 4.2 A Feasibility Layout has been prepared by Graffik Architecture and accompanies this representation. The layout is indicative in nature and illustrates how 54 dwellings can be accommodated on site.
- 4.3 The Layout shows how the site could provide an infill development to the already existing settlement of Ingatestone, without adversely harming the landscape character of the area or the character of Ingatestone itself.
- 4.4 The Feasibility Layout also shows the potential proposals for landscaping on site. These proposals have been formed through careful consideration of the existing landscape character of Ingatestone and in line with the Landscape and Visual Issues Scoping Report and Landscape Advisory Plan which has been prepared by Nigel Cowlin and accompanies this representation.

Landscaping

- 4.3 A Landscape and Visual Issues Scoping Report and a Landscape Advisory Plan has been prepared by Nigel Cowlin and accompanies this representation.
- 4.4 It is proposed that there is to be retained and enhanced landscaping on site. Dense planting and landscaping is proposed to be retained and implemented at the eastern and southern boundaries of the site. This takes into account the Grade II Listed Building, Rays which is located beyond the eastern boundary of the site. By providing dense planting at this boundary, it will ensure that the development proposal has no adverse effect on the listed building.
- 4.5 The Feasibility Layout also illustrates that planting will be retained at the western boundary of the site at the High Street, where access to the site is proposed. Furthermore, it is illustrated that the existing oak tree at the western part of the site will be retained to provide a substantial area of Open Space on the site.
- 4.6 The Scoping Report suggests that these simple design controls and landscape mitigation measures, such as the protection of existing field boundary hedgerows, along with retaining an open space around the mature Oak Tree at the front of the site, would help to ensure that the proposed development would be as successful as possible in landscape and visual terms.
- 4.7 The Scoping Report found that the visual influence of the site to surrounding locations was found to be limited due to the built up nature of the surrounding area, for example the ribbon development to the north and the settlement edge of Ingatestone to the south. The report states that development of the site should be considered as a logical area for infill along the B1002.

- 4.8 The report concludes that in terms of overall consideration of landscape and visual issues, the site is within a good location for development, where effects would be modest and local character and amenity should not be notably harmed.

Green Belt

- 4.9 The Landscape and Visual Issues Scoping Report prepared by Nigel Cowlin, also provides commentary on the site's position within the Green Belt.
- 4.10 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.
- 4.11 An individual site assessment, which assess HELAA sites, lesser performing Green Belt parcels and other identified sites is set to be made available later in the plan-making process.
- 4.12 In the 2018 Working Draft Green Belt Study, the site is within Green Belt Parcel 9a. It should be noted that Parcel 9 is subdivided into Parcel 9a which is contained within the north east of Ingatestone by infrastructure and Parcel 9b which falls south of the rail line and extends away from Ingatestone.
- 4.13 The parcel was assessed against the five purposes of the Green Belt as follows:

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

- 4.14 Parcel 9a is defined by the Council as 'Part Contained'. The site is defined as 'Part Contained' as it abuts a large built up area. Furthermore, the potential development of the site would constitute an 'urban extension'. The assessment states that 'Part Contained' sites have weak/degraded/unclear boundaries. We disagree with this comment, Site 078 has clear natural boundaries at the east and to the south. Furthermore, it is proposed that as part of the development, there will be further planting at the boundaries of the site.

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

- 4.15 Parcel 9a is defined by the Council as an 'Important Countryside Gap' (ICG). The analysis states that parcels of this type are unsubstantial but functional. Furthermore, the analysis states that the parcel forms a large proportion of countryside gap between towns or the development of the site would result in the physical narrowing of the gap and potential visual coalescence.
- 4.16 As per the accompanying Landscape and Visual Issues Scoping Report, it is considered that the site would result in a coherent infill development between two existing areas of developed land. The report confirms that the proposed development would not result in bringing the two settlements of Margaretting and Ingatestone any closer together.

Purpose 3: To assist in safeguarding the countryside from encroachment

- 4.17 Parcel 9a is defined as Brentwood Borough Council a 'Functional Countryside' (FC). The site adjoins existing residential development and the proposed development would constitute infill development. A new Green Belt boundary would be robust and would ensure that development would encroach into the countryside.

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

- 4.18 The Council have confirmed that Parcel A has a 'limited relationship with Historic Town'. We agree with this statement.

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

- 4.19 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 purposes. 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.
- 4.20 Overall, Brentwood Borough Council have assessed Parcel 9a as having a 'moderate' contribution to the 5 purposes of Green Belt. The findings of the parcel are summarised as *"Development would form an urban extension, with some countryside encroachment. Some minor reduction in gap to Margaretting to NE but not significant due to the scale of site if developed". The above review of Parcel 9a recognises that this assessment is not necessarily reflective of the qualities of every site within the parcel.*
- 4.21 The above review of Parcel 9a recognises that this assessment is not necessarily reflective of the qualities of every site within the parcel.
- 4.22 The Landscape and Visual Issues Scoping Report provides commentary on the site's position within the Green Belt. The report states it is generally in agreement with the above findings on all but the assessment of Purpose 2 : To prevent neighbouring towns from merging into one another.
- 4.23 The Study states that the existing gap from the settlement boundary of Ingatestone to Margaretting is approximately 2km. Furthermore, development of the site would result in the boundary of Ingatestone being approximately 150m closer to Margaretting. The development is regarded as a logical area of 'infill' and as such there may be no actual or perception of a reduction in the gap between these two settlements.
- 4.24 Furthermore, the report concludes that in regards to the site's position within the Green Belt, it is considered that it should be regarded more favourably in relation to Green Belt considerations and the Brentwood Borough Council Green Belt Study under represents the suitability of this site for development. Using the same methodology, the report states that the overall assessment for the site should be a low to moderate contribution to Green Belt purposes, rather than moderate, as per the BBC Green Belt Study.

Access & Connectivity

- 4.25 The site is considered to have good access and connectivity to the surrounding area. Both pedestrian and vehicle access is achievable directly from the High Street (B1002). A Site

Access Plan has been prepared by Ardent Consultants and accompanies this representation. The Site Access Plan also illustrates a 2m wide footway at the south-west of the site which will connect the site to the existing pedestrian network. The implementation of the pedestrian footpath is subject to further topographical investigations.

- 4.26 The Site Access has been positioned in a way that avoids the Root Protection Area (RPA) of the existing Oak Tree on site.
- 4.27 The site is located adjacent to the existing settlement boundary of Ingatestone and presents a logical infill development to the village service centre. Ingatestone offers local retail, a primary school, a secondary school, a GP Surgery as well as a number of other community facilities and services.
- 4.28 The site is located less than 100m from a bus stop which is located on the High Street. This provides services to Chelmsford City Centre and to other surrounding settlements. Furthermore, the site is located less than 1 mile from Ingatestone Railway Station which provides frequent services to London Liverpool Street, Shenfield, Chelmsford and Colchester, along with other surrounding settlements.
- 4.29 The site is well connected to the surrounding road network. The site is located less than 1 mile 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.
- 4.30 Given the high access and connectivity levels of the site, it is evident that Site 078 is within a sustainable location and should therefore be considered as a site for residential development.

5. Conclusions & Summary

- 5.1 This representation sets out the position of Site 078, Land South of the B1002, Ingatestone, in the context of the Brentwood Preferred Site Allocations Consultation (Regulation 18) (2018) and the supporting evidence base.
- 5.2 The Site is known in the Council's plan-making process as Site 078. The site has been discounted by Brentwood Borough Council in the Preferred Site Allocations Consultation 2018 for residential development. The site has however been allocated for residential development within the Habitats Regulation Assessment prepared by AECOM on behalf of Brentwood Borough Council.
- 5.3 The site should continue to be allocated for residential development throughout Brentwood's plan-making process. The site has been actively promoted through the Local Plan process and can provide a suitable infill development in Ingatestone, a Category 2 – Village Service Centre.
- 5.4 The analysis and content within the accompanying studies and plans provide further evidence for the availability, achievability and suitability of the site. The site is deliverable and provides opportunity to help meet the Borough's housing need in the short and medium term.
- 5.5 The continued allocation of the site in the Local Plan for residential development would be justified, consistent with National Policy and would help ensure the Local Plan meets development need and is positively prepared.