

Brentwood Preferred Site Allocations Consultation (Regulation 18)

Representations made on behalf of Countryside Properties

Land at Bayleys Mead, Hutton, Brentwood

Site Reference: 030A/B

March 2018



Executive Summary:

- This representation has been made on behalf of Countryside Properties by Strutt & Parker in relation to the Brentwood Borough Council Preferred Site Allocations Consultation. The representation concerns Land at Bayleys Mead, Hutton.
- The site at Bayleys Mead, Hutton provides a sustainable and deliverable option for residential development in the Brentwood Borough.
- The site is known in the Council's plan-making process as 030A. 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. In all other areas within the Sustainability Appraisal, the site scores well and is a suitable, deliverable and achievable site for development.
- We consider for the binary approach that has been taken to discounting Green Belt sites to be restrictive and not conducive to the identification of potential sites for redevelopment in Brentwood Borough to ensure that recognised housing needs in the area are robustly supported. A fine grain assessment of Green Belt sites would help to identify a number of opportunities that could be considered for allocation, such as land at Bayleys Mead, Hutton.
- The site should be considered for development, given that it is currently being promoted by a housebuilder and is suitable for short term delivery. The site can also provide dwellings in Hutton, a sustainable Category 1 Main Town, where there are currently no sites allocated for development as part of the Regulation 18 Preferred Site Allocations.
- To ensure the plan is fully robust, we suggest that it is important to plan for a higher level of growth that is based on realistic delivery expectations. The supply should include a sufficient number of sites that are deliverable over shorter timescales to help reduce the pressure on higher risk strategic or new settlement allocations that would not necessarily be able to support housing needs in the early stages of the plan period.
- Furthermore, the analysis and content within the accompanying studies further evidence the deliverability, achievability and suitability of the site for development and why it should therefore be allocated by Brentwood Borough Council as a site for residential development.
- We consider there to be outstanding opportunities for the plan to identify sustainable sites that are suitable for delivering housing over short timescales to ensure that the Plan is flexible and robust, and well-prepared to meet housing needs over the entirety of the plan period.

1. Background and Overview

- 1.1 These representations are submitted by Strutt & Parker on behalf of Countryside Properties (UK) Ltd in relation to the Brentwood Borough Council Preferred Site Allocations Consultation Document (Regulation 18) and in particular with regards to our clients land at 030A, Land at Bayley's Mead, Hutton, Brentwood. A plan showing the site is provided as Appendix A to this representation.
- 1.2 As the Council will be aware, representations have previously been made on behalf of Countryside Properties and in respect of both sites 030A/B on the Preferred Options Consultation in October 2013 and the Strategic Growth Options Consultation February 2015. This representation relates to Site 030A only.
- 1.3 'Countryside was founded in Essex 60 years ago by Alan Cherry and has since established a reputation for delivering high quality developments. With the ethos 'creating places people love', Countryside's achievements are exemplified through having won more Housing Design Awards than any other house builder. Countryside is a major development and place-maker, having secured planning permission and building out developments in varying scales: from smaller 30 dwelling schemes on the edge of village's through to large urban extensions of 3,500 new homes plus associated community facilities. Countryside has a proven track record of delivery. The company is headquartered in Brentwood and has a proud legacy of local sites such as Clements Park and the Square on Hart Street.'
- 1.4 Site 030A has been discounted as a site for residential development through the Local Plan process, for reasons which are considered in more detail later within this representation.
- 1.5 Site 030A measures approximately 2.36 hectares. The Council have defined the net developable area of the site as 1.66 hectares with an estimated 30 dwellings on site.
- 1.6 The site at Bayley's Mead, Hutton is allocated as Green Belt land.
- 1.7 The allocation of the site at Bayley's Mead, Hutton for residential development would represent a sustainable and deliverable proposal to help meet housing need over the coming plan period. This representation set 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 and latest assessment work.

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 previous iteration, the Draft Local Plan (2016) sets out a clear spatial vision and strategy for the Borough. The strategy focused on delivering sustainable communities by concentrating new development on land within the Borough's transport corridors.
- 2.3. The A12 Corridor, Brentwood and Shenfield in particular being the main focus for development. The Draft Local Plan (2016) in particular sought to bring forward new homes, businesses and employment opportunities within this specific transport corridor.
- 2.4. The Spatial Strategy for the Preferred Site Allocations Consultation Document continues to focus on supporting transport-corridor led growth – including the A12 corridor at Brentwood and Shenfield. Furthermore, the spatial strategy also looks to consider growth in settlements in terms of their relative sustainability linked to services and facilities.
- 2.5. Given that Site 030A at Bayley's Mead is located within Hutton along the A12 corridor, the allocation of the site would relate well to this spatial strategy.
- 2.6. 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 details of additional housing growth.
- 2.7. Each settlement is defined as either Category 1 – Main Town, Category 2 – Village Service Centre, Category 3 – Large Villages or Category 4 – Smaller Villages.
- 2.8. Site 030A is within Hutton, with Hutton being defined as a 'Category 1 - Main Town'.
- 2.9. The Preferred Site Allocations document estimates that there will be 6,270 new dwellings provided in Hutton by the end of the New Local Plan period – 2033. This provision is to be generated through proposed development sites however, with no dwellings being provided through Local Plan allocations. Given that Hutton is a sustainable settlement with excellent links to transport, facilities and services, it should be considered that some growth should be allocated to the settlement.
- 2.10. The Spatial Strategy also states that Green Belt land will only be considered after all sustainably located, suitable, available and deliverable brownfield sites have been identified. Although the site is designated as Green Belt, it can be demonstrated that the site performs poorly in respect of the five functions of the Green Belt (National Planning

Policy Framework, Paragraph 80) and that the release of the land would therefore not result in an adverse effect on the Green Belt. Further detail on this is provided later in this representation.

- 2.11. In respect of the above, Site 030A should be considered for allocation. The development of this site would not impact the function of the Green Belt in this location and is immediately adjacent to Hutton, a 'main town' with facilities and services that could support sustainable growth. Development here would also accord with the Brentwood Borough Council Spatial Strategy which directs growth towards the A12 transport corridor.

Housing – Need and Supply (Paragraphs 38 to 50)

- 2.12. 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.
- 2.13. 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.
- 2.14. 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.
- 2.15. 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.
- 2.16. 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).
- 2.17. 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.
- 2.18. 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.

- 2.19. 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.
- 2.20. To ensure the plan is fully robust we suggest it is important to plan for a higher level of growth that is based on realistic delivery expectations. The supply should include a sufficient number of sites that are deliverable over shorter timescales to help reduce the pressure on higher risk strategic or new settlements allocations that would not necessarily be able to support housing needs in the early stages of the plan period.
- 2.21. 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. Site 030A should be considered for residential development within the emerging Local Plan.

Housing Supply and Housing-led Allocations

- 2.22. Site 030A has not been allocated for residential development through the Preferred Site Allocations Document.
- 2.23. The land at Bayley's Mead, Hutton has previously been assessed through the Council's Strategic Housing Land Availability Assessment (SHLAA) produced in 2011. The site was defined by the Council in the SHLAA as suitable, available and achievable and could deliver up to 105 dwellings, within 5 to 10 years.
- 2.24. A more detailed site assessment was undertaken in the Draft Site Assessment Document (2013). This assessment confirmed that there were no constraints on the land which would affect any proposed development. The site was also defined as suitable, available and achievable within the Draft Site Assessment Document (2013) for the reasons set out below.
- 2.25. The site was defined as suitable, as it is considered that it is natural extension to the existing residential area of Hutton and the development of the site would have minimal impact on the countryside. The site was also considered as suitable due to its close proximity to public transport routes and services and facilities.

- 2.26. The site was defined as available for residential development. The site is being actively promoted by an established house builder with a proven track record of providing high quality development within Essex.
- 2.27. The site was defined by the Council as achievable as it is within an attractive residential area. Furthermore, no contamination issues on site are known.
- 2.28. Despite the positive assessment of the site as set out above, it has been discounted within the Preferred Site Allocation document due to its location within the Green Belt.
- 2.29. 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.

Sustainability Appraisal

- 2.30. 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 the supported proposed allocations – including site 030A. Further detail on the analysis of site 030A found within the SA is outlined below.
- 2.31. The SA indicates that the allocation of site 030A would have a number of positive effects in relation to the SA objectives. The SA analysis states that site 030A is in good proximity to a secondary school, but in ‘red’ proximity from a GP surgery and a primary school. Willowbrook Primary School is located within 1 mile of the site, which is considered to be within walking distance to the site. The nearest GP Surgery, Mount Avenue Surgery is located 1.5 miles from the site. Mount Avenue Surgery is defined in the Regulation 18 document to be 1 of 3 surgeries within the District which has an average of 0.58 GPs per 1,000 patients, which is the national average. Furthermore, Mount Avenue Surgery has a large catchment area, therefore it is considered that it would provide service to those living at the site. Furthermore, Brentwood Community Hospital is located less than 3 miles from the site.
- 2.32. The SA, through its analysis also states that the site at Bayley’s Mead is in an area that ‘performs poorly’ in respect of its proximity to Ancient Woodland, Local Wildlife Site, Woodland and Green Belt. The proposed development of the site will not unacceptably impact on Ancient Woodland, Woodland or a Local Wildlife Site. This scoring is considered to be highly assumptive and rules out the potential of sites being landscaped and providing opportunities for the enhancement such features and local biodiversity. Being within 400m of a local wildlife site does not necessarily mean that there will be direct impacts on the site.

- 2.33. In relation to Green Belt, the assessment is binary in its approach – if a potential site falls within the defined 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 predominantly set within the Green Belt, we would consider that further assessment of 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.
- 2.34. Green Belt work undertaken by the Council itself indicates that this parcel is not of wider importance to the Green Belt. The site will therefore not adversely impact on the value of the Green Belt in this location, remains deliverable and sustainable. We suggest the Sustainability Appraisal is amended to acknowledge that the development of the site will not necessarily negatively impact these environmental assets.
- 2.35. In general, we consider that the Interim SA Report is simplistic in its approach to individual site assessment. The SA has used a predominantly 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.
- 2.36. The site is being actively promoted by an established house builder with a proven track record of providing high quality development within Essex. The site is deliverable for housing and as such, the allocation of the site would contribute towards an effective strategy.

3. Site Deliverability

- 3.1. The site represents a deliverable, sustainable and achievable site for residential development. There has been some technical reports and associated documents completed which demonstrate this. The below section provides a summary of these documents.

Access & Connectivity

- 3.2. The site is considered to have good access and connectivity to the surrounding area. The vehicular and pedestrian access to the site is proposed to be from Bayley's Mead. The access arrangement was considered as satisfactory through the 2013 Draft Site Assessment.
- 3.3. The site is approximately 1.5 miles from Shenfield Station (less than a 30 minute walk). Shenfield Station provides frequent services to London Liverpool Street, Chelmsford, Colchester and Ipswich and settlements between. These destinations also provide connections to the wider national transport network. Shenfield Station is also the terminus for the new Elizabeth Line which is part of Crossrail. Crossrail provides frequent services into Central London.
- 3.4. A public bus stop is located approximately 200m from the site. This bus stop provides frequent services to Basildon Town Centre, Brentwood High Street, Billericay and Shenfield Rail Station, amongst services to smaller neighbouring settlements.
- 3.5. The site is well connected to the surrounding road network. The site is located approximately 2.5 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.
- 3.6. Given the high access and connectivity levels of the site, it is evident that Site 030A is within a sustainable location and should therefore be considered as a site for residential development.

Ecology

- 3.7. An ecological appraisal was undertaken by Green Environmental Consultants Ltd. In September 2013.
- 3.8. The ecological appraisal states that the site is abandoned farmland which is being colonised by scrub and tree species from woody boundary habitats. There are mature trees, mostly on two of the boundaries which may be used by bats or nesting birds. Otherwise the potential of the site is poor.
- 3.9. The ecological appraisal recommends further bat survey work to be undertaken on site and for the mature boundary trees to be protected and enhanced.

- 3.10. The ecological appraisal concludes that there are no significant or major impacts on a significant resource to be expected through the development of the site, but recognises that loss of scrub and some trees is likely to occur. This could be easily mitigated and enhanced through a landscaping scheme to support any future development on the site.

Geo-Environmental/Engineering

- 3.11. A preliminary engineering appraisal was undertaken in February 2013. This appraisal includes details on foundations, highways, drainage and contamination.
- 3.12. The geo-environmental appraisal concludes that there are no significant physical geo-environmental constraints to development on the site.

Drainage

- 3.13. The preliminary engineering appraisal states that foul water from the proposed development would discharge to the existing pumping facility and thereafter to the sewer in Hanging Hill Lane.
- 3.14. The appraisal states that storm run-off from the developed site would discharge at the ditch.
- 3.15. The existing surface water catchment for the local residential area drains into a 600mm diameter pipe which discharges via a headwall into the western end of the northernmost ditch within the site. This ditch runs across the site and continues eastwards beyond. The Environment Agency map indicates that an interconnecting ditch system eventually outfalls to the River Can. The appraisal states that drainage storage is likely to be provided through the design of a sustainable urban drainage system which may include a combination of contributing elements, swales, ponds and underground cellular storage.

Contamination

- 3.16. The preliminary engineering appraisal states that an intrusive soil investigation will be required to confirm whether the soil on site is contaminated. The appraisal states that in view of the perceived history of the land, this is unlikely to be the case.

Highways

- 3.17. The preliminary engineering appraisal states that the current width of Bayley's Mead is 5.5m which could support a development of 30 dwellings.
- 3.18. The appraisal states that the sight line visibility from Bayley's Mead onto Hanging Hill Lane is about 2.4m x 65m to the right hand side with the 'y' distance being much greater to the left. The requirement for a 30mph road is 2.4 x 43m. Even if measured vehicle speeds in Hanging Hill Lane are greater, for example up to 37mph, then the visibility requirement for that speed (2.4 x 59m) is still achieved.

3.19. The appraisal concludes that there is no objective reason as to why the existing access road could not support the development of Site 030A.

Green Belt

3.20. 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 five purposes of the Green Belt.

3.21. An Individual Sites Assessment, which is assess HELAA sites, lesser performing Green Belt parcels and other identified sites is set to be made available later in the plan-making process.

3.22. In this 2018 Working Draft Green Belt Study, the site is within Green Belt Parcel 14. It should be noted that Parcel 14 is a large area which extends beyond Hutton and into Basildon. The site should be considered on its own merits as well as of part of such a large area which could have diverse characteristics and ranging value. Below we have considered the specific merits of Site 030A notwithstanding the assessments made of the parcel as a whole.

3.23. 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

Parcel 14 is defined by the Council as 'not contained'. The site 030A is contained on two out of four boundaries by built form however and on remaining boundaries by established vegetation and hedgerows that 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

Parcel 14 is defined by the Council as a 'Critical Countryside Gap' (CCG). The site is adjacent the eastern limit of Hutton Mount. The next settlement to the east is Billericay and this is some distance away with a large green gap between the two. Other parts of Hutton already extend closer to Billericay without posing any risk of merging.

Purpose 3: To assist in safeguarding the countryside from encroachment

Parcel 14 is defined by the Council as 'Functional Countryside' (FC). The site itself is overgrown, covered in dense vegetation, and not suitable for public access. It is not agricultural and is therefore not considered functional.

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

Brentwood Borough Council have stated that Parcel 14 has a 'moderate relationship with a historic town'. Site 030A is some distance from the town centre however with no direct relationship. It is directly associated with contemporary housing developments at Bayley's Mead and surrounding roads, which present limited historic character.

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

Brentwood Borough Council have not provided an analysis for Purpose 5. It is considered that the development of this Green Belt site that has limited environmental value and offers a minimal contribution to the Green Belt when assessed against its five intended purposes helps to support housing delivery in sustainable locations in the Brentwood Borough whilst protecting other Green Belt sites of much higher environmental value.

3.24. Overall, Brentwood Borough Council have assessed Parcel 14 as having a 'high' contribution to the 5 purposes of the Green Belt. The above review of Site 030A recognises that this assessment is not necessarily reflective of the qualities of every site within the parcel however. We think that there should be a finer grain level of assessment of land within these parcels however. The above analysis of land at Bayleys Mead, Hutton demonstrates that there remains small scale opportunities for sustainable development within the wider parcels and that the Local Plan should give consideration to the allocation of such sites.

4. Summary

4.1. The analysis and content within the accompanying studies evidence the deliverability, achievability and suitability of the site for development and why it should therefore be allocated by Brentwood Borough Council as a site for residential development. We consider there to be outstanding opportunities for the plan to identify sustainable sites that are suitable for delivering housing over short timescales to ensure that the Plan is flexible and robust, and well-prepared to meet housing needs over the entirety of the plan period.