

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

**Representations made on behalf of The Chelmsford
Diocese Board of Finance (CBDF)**

Land to the south of Lodge Close, Hutton

Site Reference: 033

March 2018

1. Background and Overview

- 1.1 These representations are submitted by Strutt & Parker on behalf of The Chelmsford Diocesan Board of Finance (CDBF) in relation to the Brentwood Borough Council Preferred Site Allocations Consultation Document (Regulation 18) and in particular with regards to our clients land at site 033, Land to the south of Lodge Close, Hutton.
- 1.2 The site to the south of Lodge Road is located directly adjacent to existing residential development and the defined settlement boundary for Hutton. The site is also located within the Hutton Village Conservation Area.
- 1.3 The site, as shown on the plan provided in Appendix A measures approximately 1.3 Hectare. The Council have defined the net developable area of the site at 1.18 Hectare, with an indicative yield of 35 dwellings.
- 1.4 Representations have previously been made on behalf of the CDBF in relation to this site, including the Call for Sites in 2009, the Core Strategy consultation and the Neighbourhood Consultation in 2011.
- 1.5 In the Brentwood Borough Council Preferred Site Allocations Consultation Document (Regulation 18) the site is identified as a green belt site on the edge of the Brentwood urban area. The site is shown to be discounted as a potential housing site due to availability and heritage impact.
- 1.6 It is considered that allocation of the land to the south of Lodge Close, Hutton for residential development would represent a sustainable and deliverable proposal to help meet housing needs 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.

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) set 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 set out in the Preferred Site Allocations Document retains this focus transport corridor-led growth including the A12 Corridor at Brentwood and Shenfield. This strategy is supported and ensures the majority of development is focused in locations most accessible to services, employment and the transport network.
- 2.5. The site reference 033, being located directly adjacent to the established built-up area of Hutton, relates 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 the 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 033 is located on the edge of the Brentwood urban area and Brentwood is defined as a 'Main Town'.
- 2.9. The Preferred Site Allocations document makes provision for 1,440 dwellings on green belt on the edge of the Brentwood Urban Area end of the New Local Plan period – 2033. The recognition of the need to allocate green belt sites and the focus on sustainable locations for growth on the edge of the Brentwood urban area is welcomed and generally supported.
- 2.10. However it is noted that there is no provision for additional housing through Local Plan allocations in or around the sustainable location of Hutton. Given that Hutton is a sustainable settlement with excellent links to transport, facilities and services it is

considered that some growth should be allocated to the settlement, such as the land to the south of Lodge Close, Hutton.

- 2.11. 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 the subject of these representations is designated as Green Belt, it performs poorly in respect of the five functions of the Green Belt (National Planning Policy Framework, Para.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.
- 2.12. In respect of the above, Site 033 should be considered for an allocation for housing. The development of the site would not impact the function of the Green Belt in this location, which is immediately adjacent to Hutton, a 'main town' with facilities and services that could support sustainable growth. Development in this location would also accord with the Brentwood Borough Council Spatial Strategy.

Housing – Need and Supply (Paragraphs 38 to 50)

- 2.13. 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.
- 2.14. 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.
- 2.15. At para 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.
- 2.16. 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.
- 2.17. 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).
- 2.18. 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.

- 2.19. 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.
- 2.20. 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.
- 2.21. 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.
- 2.22. With the standardised methodology in mind, Brentwood Borough Council need to provide an extra 74 dwellings per year and a total of 1,480 additional 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, including the site to the south of Lodge Close, Hutton.
- 2.23. It is essential that the Borough Council has realistic delivery expectations within any allocations to ensure the deliverability of the plan across its lifetime. This is particularly important where there is a reliance on strategic sites to deliver the majority of new homes within the plan period.
- 2.24. It is noted that a significant amount of the development being proposed in the Plan, will be delivered on strategic sites. Delays to the delivery of strategic sites for any number of reasons could lead to the LPA not being able to meet its housing requirement in full. To ensure the plan is effective, as defined by paragraph 182 of the NPPF, a plan must be deliverable over its periods and therefore the Council should take a cautious assessment of delivery on strategic sites.
- 2.25. Any undersupply across the period should be offset with the allocation of small and medium sites that will be deliverable within the plan period, such as the land to the south of Lodge Close, Hutton. This approach would ensure that a plan is deliverable across the plan period, provide a mix of development opportunities in sustainable locations and generally offer a more flexible local plan in accordance with the requirements of paragraph 14 of the NPPF.

Housing Supply and Housing-led Allocations

- 2.26. Site 033 has not been allocated for residential development through the Preferred Site Allocations Document.
- 2.27. The land to the south of Lodge Close, Hutton has previously been assessed through the Council's Strategic Housing Land Availability Assessment (SHLAA) produced in 2011. The site (previously referred to as land to the south east of Hutton site reference G089) was defined by the Council in the SHLAA as suitable, available and achievable and could deliver 13 dwellings, within 1 to 5 years.
- 2.28. A more detailed site assessment was undertaken in the Draft Site Assessment Document (2013). The site was also defined as suitable, available and achievable within the Draft Site Assessment Document (2013) for the reasons set out below:

Suitable: The site was considered suitable as it is adjacent to existing residential development, and therefore it would be compatible with the surrounding land uses. There is access to the road network and existing community facilities. The development of the site would represent an extension to the existing urban area and would have minimal impact on the countryside. Consideration would need to be given to development impact on the Conservation Area.

Available: It was confirmed that the site is available for residential development.

Achievable: Infrastructure and services on the site were considered to be achievable due to the proximity of the site to an existing residential area. The site was identified as being located within an attractive residential area within the Hutton Village Conservation Area, and therefore the design would need to reflect this.

Deliverable: The site was identified as likely to come forward in the Plan period of 0-5 years.

- 2.26 Despite the positive assessment of the site as set out above, it has been discounted due to availability and heritage impact, but not however due to its location within the Green Belt.
- 2.27 The site may have also been assessed within the Housing Economic Land Availability Assessment (HELAA) (2017). Despite being a required part of the evidence base needed for the preparation of a Local Plan (as specified in the National Planning Policy Framework, para 159), a site assessment has not yet been published by Brentwood Borough Council, and therefore no comments can be made within this representation.

Sustainability Appraisal

- 2.28 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 found within the SA is outlined below.

Site 033

2.29. The SA indicates that the allocation of site 033 would have a number of positive effects in relation to the SA objectives. The SA analysis states that site performs well ('Green') in relation to proximity to nature reserves. In addition to this, the following were assessed to be no issue ('white'):

- proximity to an Air Quality Management Area
- SSSI
- Ancient Woodland
- Local Wildlife Site
- Woodland
- Scheduled Monument
- Registered Park/Garden
- Listed Building
- Flood Zone
- Special Landscape

2.30. The SA, through its analyses also states that the site to the south of Lodge Close is an 'Amber' in relation to Primary School, Secondary School, Green Belt and Agricultural Land. The site is classified as grade III agricultural land, and is not in agricultural production.

2.31. In relation to education, the draft Local Plan acknowledges that schools and healthcare are particular local infrastructure issues which need to be addressed over the Plan period, and therefore many sites are identified as being 'Red' or 'Amber'. The allocation of the site will enable a level of investment into local school place provision as appropriate (to be confirmed by Essex County Council) and required at the time, and will support a thriving urban community. All of the schools within the vicinity of the site are accessible by public transport.

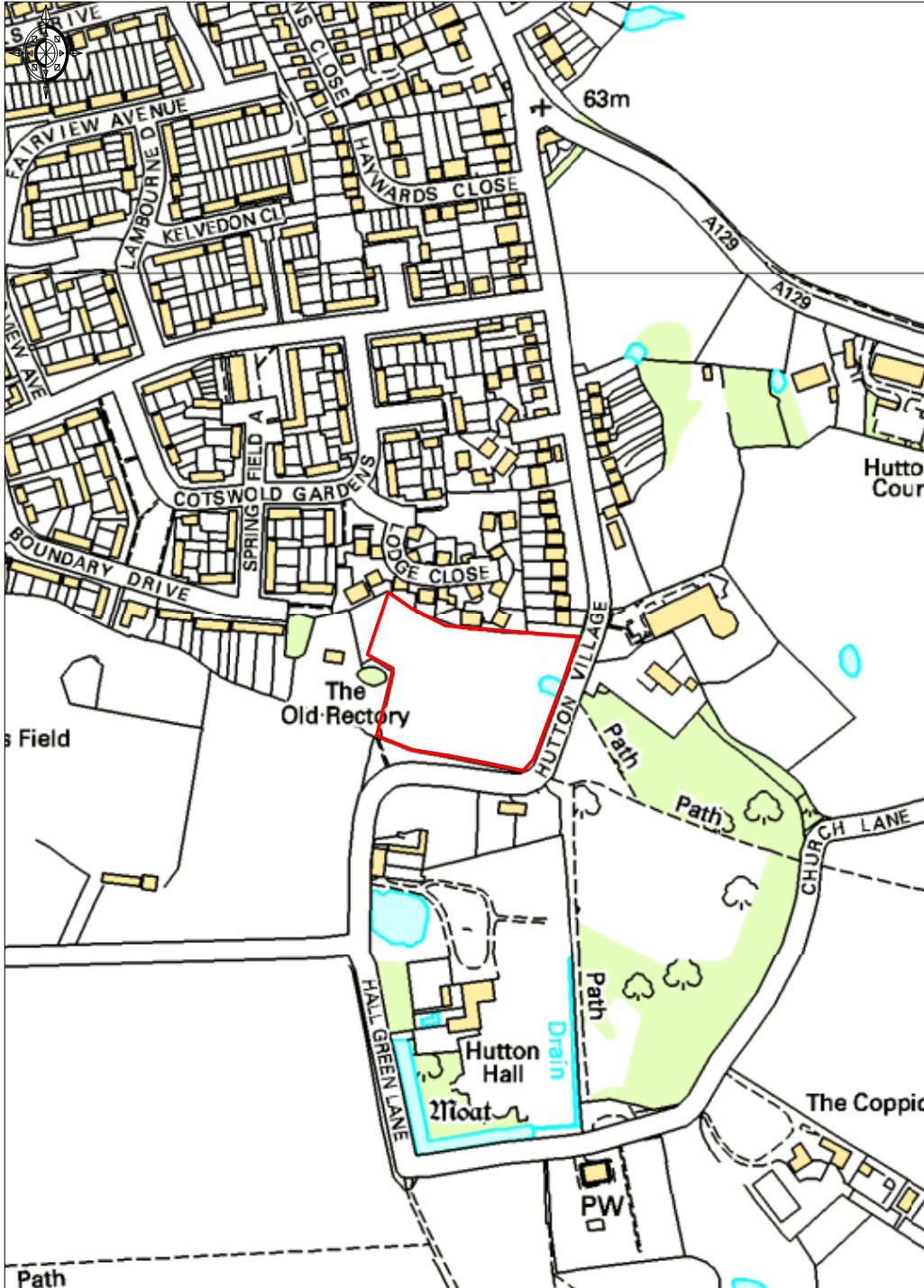
2.32. In relation to the Green Belt, the assessment is binary in its approach – if a potential site falls within the defined Green Belt, it will be given an 'Amber' score. Whilst the methodology notes that the Green Belt is not specifically a landscape designation, and as such potential effects on the setting have not been appraised; a blanket 'Amber' score is arbitrary. In a Borough that is predominantly within the Green Belt, we consider that a 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, ensuring that sites are considered in relation to others.

2.33. The Green Belt work undertaken by the Council itself indicates that this parcel is not of wider importance to the Green Belt. The site has strong physical barriers and overall has been assessed as only making a moderate contribution to Green Belt purposes.

- 2.34 The SA, through its analyses states that the site performs poorly ('Red') against Conservation Area criterion. Again, this is a blanket assessment based purely on the fact that the site is located within the Hutton Village Conservation Area. This is considered arbitrary. It is considered that a high quality residential development scheme on the scale proposed could be accommodated within the site without adversely impacting on the character and appearance of the Conservation Area.
- 2.35 The site will therefore not adversely impact on the aforementioned issues and remains deliverable and sustainable. We suggest the Sustainability Appraisal is amended to acknowledge that depending on implementation the site will not adversely impact in this regard.

Appendix A

Land to the south of Hutton



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