# BRENTWOOD BOROUGH COUNCIL DRAFT LOCAL PLAN PREFERRED SITE ALLOCATIONS REG 18 CONSULTATION

Representations on behalf of Croudace Homes

March 2018



## DRAFT LOCAL PLAN PREFERRED SITE ALLOCATIONS REPRESENTATIONS ON BEHALF OF CROUDACE HOMES

#### **MARCH 2018**

Project Ref:	18845/A5
Stratus	FINAL
Issue/Rev:	01
Date:	12 March 2018
Prepared by:	EG
Checked by:	HE
Authorised by:	HE

Barton Willmore The Observatory Southfleet Road Ebbsfleet Dartford Kent DA10 ODF

Tel: 01322 374660 Ref: 18845/A5/EG/djg Email: emma.gladwin@bartonwillmore.co.uk Date: 12 March 2018

#### **COPYRIGHT**

The contents of this document must not be copied or reproduced in whole or in part without the written consent of Barton Willmore LLP.

All Barton Willmore stationery is produced using recycled or FSC paper and vegetable oil based inks.

#### **CONTENTS**

			PAGE NO.
1.0	INT	RODUCTION	01
2.0	EVI	DENCE BASE	05
	i) ii)	Site Selection Methodology Green Belt Review	06 07
3.0	ALL	OCATIONS IN SHENFIELD	09
	i) ii) iii) iv)	Indicative Uses Masterplan Phasing of Sites Evidence Base	09 09 10 11
4.0	ALL	OCATION OF OFFICER'S MEADOW	12
5.0	CON	NCLUSION	14

#### **APPENDICES**

APPENDIX 1	EXTRACT FROM GREEN BELT REVIEW
APPENDIX 2	DEVELOPMENT FRAMEWORK DOCUMENT

#### 1.0 INTRODUCTION

- 1.1 These representations have been prepared on behalf of Croudace Homes and set out comments in response to Brentwood Borough Council's (BBC's) Draft Local Plan Regulation 18 Consultation.
- 1.2 BBC consulted on a Reg 18 Draft Local Plan, including specific policies and site allocations, between February and March 2016. Policy 5.2 detailed the housing target for the Plan period, being 7,240 dwellings, 362 dwellings per annum (dpa).
- 1.3 Since the Local Plan consultation in 2016, new housing need data has been published which results in an increase to the base Objectively Assessed Need (OAN) figure. In accordance with National Policies and Guidance, BBC then assessed this figure and concluded that an uplift is required due to the worsening of the affordability ratio in the Borough and the increased costs of rental levels. This results in a need for 7,600 dwellings over the Plan period, 380 dpa.
- 1.4 Alongside this, BBC has also considered the capacity of sites allocated in the 2016 Reg 18 Local Plan, with some of these having been reduced.
- 1.5 Both of these factors have resulted in BBC needing to allocate additional sites for housing. The current Reg 18 consultation is focused on the housing need and site allocations, with the policies themselves in the process of being updated from the 2016 Reg 18 consultation.
- 1.6 Croudace Homes has an interest in 'Officer's Meadow, Shenfield' (the Site), which forms part of an allocation within the proposed Local Plan for up to 510 units, having been previously proposed for allocation in the 2016 Reg 18 Local Plan. The allocation includes BBC Site references 034, 087, 235 and 276.
- 1.7 Within the 2016 Reg 18 consultation, BBC was not proposing to allocate any sites surrounding Officer's Meadow. Within the current consultation, BBC is now proposing to allocate two further Sites for development, located to the north east, BBC site reference 158, and east, BBC site reference 263. The indicative mix of uses identified within the current consultation are as demonstrated in the below table.

Table 1 Indicative Uses

Site	Uses	Capacity
Officer's Meadow	Housing	510
(034, 087, 235, 276)	C2 care home	60-bed
	Specialist accommodation (gypsy and traveller pitches)	10 pitches
	Land for education, play pitches	
158	Housing	100
	Employment	
263	Housing	215

- 1.8 Combined with the 510 dwellings at Officer's Meadow, this totals 825 new dwellings within the immediate area. Whilst these representations do not object to the allocation of Sites 158 and 263, they do raise concerns regarding the evidence base and specific wording of the allocations.
- 1.9 The Officer's Meadow Site includes the provision of land for education and play pitches. Shenfield High School is located to the south west, with the playing pitches adjacent to Officer's Meadow. There is the potential for collaborative working with the School to meet their needs and provide a new primary school, with Croudace willing to explore such opportunities for joint working.
- 1.10 Notwithstanding our Client's specific land interests, these representations have been prepared in objective terms and assessed against the prevailing planning policy framework in particular the Government's guidance set out in the National Planning Policy Framework (NPPF) (March 2012) and the National Planning Practice Guidance (NPPG) (March 2014).
- 1.11 Paragraph 182 of the NPPF requires that, 'A local planning authority (LPA) should submit a plan for examination which it considers is "sound" namely that is:
  - Positively prepared the plan should be prepared based on a strategy which seeks
    to meet objectively assessed development and infrastructure requirements, including
    unmet requirements from neighbouring authorities where it is reasonable to do so and
    consistent with achieving sustainable development;
  - Justified the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
  - **Effective** the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
  - Consistent with national policy the plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

- 1.12 Paragraph 156 of the NPPF states that LPAs should set out the strategic priorities for the area in the Local Plan. This should include strategic policies to deliver:
  - the homes and jobs needed in the area;
  - the provision of retail, leisure and other commercial development;
  - the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat);
  - the provision of health, security, community and cultural infrastructure and other local facilities; and
  - climate change mitigation and adaptation, conservation and enhancement of the natural and historic environment, including landscape.
- 1.13 Paragraph 157 states that crucially, Local Plans should:
  - plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;
  - be drawn up over an appropriate timescale, preferably a 15-year time horizon, take account of longer term requirements, and be kept up to date;
  - indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;
  - allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;
  - identify areas where it may be necessary to limit freedom to change the uses of buildings, and support such restrictions with a clear explanation;
  - identify land where development would be inappropriate, for instance because of its environmental or historic significance; and
  - contain a clear strategy for enhancing the natural, built and historic environment, and supporting Nature Improvement Areas where they have been identified.
- 1.14 The Government is in the process of revising and updating the NPPF, with consultation commencing on 05 March 2018 and closing on 10 May 2018. The intention is for the revised NPPF to be published in Summer 2018, which will be effective prior to the submission of BBC's Local Plan which is timetabled for submission in late 2018.

- 1.15 The current NPPF states at Paragraph 157 Local Plans should 'be drawn up over an appropriate time scale, preferably a 15-year time horizon'. The revised NPPF clarifies and reinforces this timescale, stating at Paragraph 22 that 'strategic policies should look ahead over a minimum 15-year period from adoption'.
- 1.16 BBC's Local Plan period is between 2018 and 2033, with the current consultation document stating this will be a 15-year period. However, with the Plan not being submitted until late 2018, the Plan will not be adopted until at least 2019 at the earliest. As such, the Plan will not be effective for a 15-year period from adoption and the Plan period should be extended to ensure compliance with the revised NPPF.
- 1.17 The NPPF reinforces the requirement for Councils to deliver the housing needed, with Paragraph 77 requiring a Housing Delivery Test. Where delivery has fallen below 95% of the housing requirement over the past 3 No. years, the Local Planning Authority should prepare an action plan to identify actions to increase delivery in future years. This reinforces the importance of planning for a suitable level of housing and identifying sites through the Local Plan process to ensure there sufficient housing is delivered to meet the identified housing need.
- 1.18 These representations are submitted on behalf of Croudace Homes, following previous representations to the emerging Local Plan including those most recently submitted in March 2016 to the 2016 Reg 18 consultation. These representations are in continuing support of the allocation of land at Officer's Meadow for housing and raise queries and concerns with the Reg 18 focused consultation where necessary.

#### 2.0 EVIDENCE BASE

- 2.1 The NPPF requires Local Plans to be based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area (Paragraph 158).
- 2.2 To inform and support the current Reg 18 focused consultation, BBC has published further evidence base documents, including:
  - Green Belt Study by Crestwood Environmental Ltd, January 2018
  - Habitats Regulation Assessment by AECOM, January 2018
  - Economic Futures 2013-33 by Lichfields, January 2018
  - Strategic Housing Market Assessment Part 1 by Peter Brett Associates, January 2018
  - Site Assessment Methodology and Summary of Outcomes by Brentwood Borough Council, January 2018
- 2.3 However, these are the only updated or new studies published, with others remaining outstanding. Notably this includes transport studies to consider the higher level of growth proposed and the Housing and Economic Land Availability Assessment (HELAA).
- 2.4 The last transport information was published in February 2016, comprising draft highway modelling. The implications of housing and employment growth across the Borough for transport are key considerations that require thorough assessment.
- 2.5 Specifically, in relation to the sites at Shenfield, within previous consultations only the Officer's Meadow Site was proposed to be allocated for development, with technical work undertaken on behalf of BBC and Croudace Homes only considering this quantum of development. The allocation of two additional sites has resulted in an additional circa. 315 homes in the area, which will have implications for the highway network.
- 2.6 There will be particular implications for the nearby Mountnessing Roundabout, which connects to the A12, and its capacity, with improvements potentially required. However, the scale and cost of these cannot be known until transport work is undertaken. In accordance with Paragraph 158 of the NPPF, this should be undertaken prior to the Reg 19 Local Plan consultation to inform the relevant Policies and ensure a comprehensive planned approach is taken to development and the necessary improvements secured.

#### i) Site Selection Methodology

- 2.7 Whilst a Site Selection Methodology has been published to consider the proposed sites, the supporting evidence referred to within it has not been published.
- 2.8 The Site Selection Methodology details a 5 No. stage process for assessing sites, as follows:
  - 1. HELAA
  - 2. Local Plan Spatial Strategy
  - 3. Sustainability Appraisal (SA)
  - 4. Detailed Site Assessment
  - 5. Whole Plan Viability Testing
- 2.9 It is stated that this process will identify sites suitable for allocation in the Local Plan.
- 2.10 However, the published Site Selection Methodology only includes a very high-level assessment of sites within the Borough, with the following undertaken:
  - Sites assessed in capacity terms, passed stage if they could deliver 5 or more dwellings and did not have extant permission;
  - Sites assessed in location terms, passed stage if site has connecting boundary to an existing urban area and would not constitute an extension to a smaller village;
  - Sites assessed through SA;
  - Initial high-level assessment referring to emerging evidence, desktop assessment and relevant submitted site information.
- 2.11 The above high-level assessment does not follow the detailed 5 No. stage process of assessing sites, being at a very high-level and considering the general location of sites rather than detailed assessments.
- 2.12 Furthermore, whilst the SA considers reasonable alternatives, these relate to the distribution of growth across the Borough with the only variables being the potential strategic allocations. As such, the SA does not provide further assessment or clarity of individual sites.
- 2.13 The Site Selection Methodology refers to the need for more detailed site assessment work, stating at Paragraph 3.23 that this will be 'produced later as emerging evidence is published', with Paragraph 3.40 stating that further work will include 'further updates to the HELAA, detailed site assessments and viability assessment'.

- 2.14 The HELAA, detailed site assessment and viability assessment are key aspects of the 5 No. stage process of assessing sites and the absence of these raises concerns at the assessment that has been undertaken of additional allocated sites.
- 2.15 This further detailed work will be required under Paragraph 158 of the NPPF and should be published to support the Reg 19 Local Plan consultation.

#### ii) Green Belt Review

- 2.16 BBC is seeking to meet its identified housing need within its boundaries, in a way that maintains and enhances the unique local character. To achieve this, BBC is seeking to maximise sustainable growth opportunities within the built-up areas and on brownfield sites.
- 2.17 However, with 89% of the Borough being within the Green Belt and 10% being previously developed land, BBC recognises that it cannot meet the full identified housing need without releasing land from the Green Belt.
- 2.18 Following the 2016 Reg 18 consultation, BBC commissioned a Borough Wide Green Belt Review to consider sites within the Green Belt against the five purposes of the Green Belt as defined by Paragraph 80 of the NPPF:
  - 1. To check the unrestricted sprawl of large built-up areas;
  - 2. To prevent neighbouring towns merging into one another;
  - 3. To assist in safeguarding the countryside from encroachment;
  - 4. To preserve the setting and special character of historic towns; and
  - 5. To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 2.19 The study separates the Green Belt areas into parcels to be assessed, with Officer's Meadow considered under reference "43", including land south of Shenfield High School and land to the north east.
- 2.20 The detailed assessments results in an overall assessment of the contribution of each parcel to the Green Belt. These results are summarised as per the following table:

Table 2 Green Belt Rating

Overall Assessment Rating	Number of Parcels
Low	0
Low-Moderate	3
Moderate	28
Moderate-High	20
High	19

- 2.21 Overall Parcel 43 has a moderate contribution, being in the lower scoring half of parcels. In relation to the five purposes of the Green Belt, Parcel 43 is considered as shown in the extract at **Appendix 1**.
- 2.22 The parcel is only one of 23 No. parcels that are "well contained" or "partly contained" when considered against the first purpose of the Green Belt, highlighting the suitability of the Site for development.
- 2.23 In relation to the third purpose of the Green Belt, the parcel is considered as "functional countryside". However, these representations do not consider the Officer's Meadow Site falls within this category, with limited public access and the Site being vacant scrub land.
- 2.24 Furthermore, the land has most recently been used by Network Rail under a temporary planning consent to assist in the construction of Crossrail. This has resulted in some built form, albeit temporary, on the Site, thus further reducing its contribution to the Green Belt.
- 2.25 It is considered the Site falls within the "mixed functions within countryside" category, with the parcel scoring more highly due to the inclusion of a wider area of land.
- 2.26 Overall the parcel is considered to make a moderate contribution towards the purposes of the Green Belt, fulfilling the purposes to some degree with development in the parcel moderately affecting the contributions to the purposes of the Green Belt.
- 2.27 The parcel is ranked within the lowest half of the parcels, highlighting the suitability for development. The parcel covers a large site area, with it submitted that an assessment of the Officer's Meadow Site alone would result in the assessing finding the Site made a lesser contribution to the purposes of the Green Belt and raking lower against the other parcels. Overall the Green Belt review highlights that the Site does not perform highly against the purposes of the Green Belt and does have capacity for development.

#### 3.0 ALLOCATIONS IN SHENFIELD

3.1 As detailed in Section 1 of these representations, the 2016 Reg 18 consultation proposed the allocation of Officer's Meadow but not nearby sites. The current Reg 18 consultation now proposes to allocate two nearby sites, under BBC's references of 158 and 263.

#### i) Indicative Uses

- 3.2 Whilst the current Reg 18 focused consultation document does not include specific policies, it does give an indication of uses expected to be provided on the proposed allocated sites as set out in Table 1 above.
- 3.3 As detailed in Table 1, a 60-bed C2 care home and 10 gypsy and traveller pitches are sought on the Officer's Meadow Site, with the allocations for Sites 158 and 263 for housing and employment only.
- 3.4 Whilst it is acknowledged that BBC is seeking the provision of a care home and gypsy and traveller pitches in the Shenfield area, the sites have not been fully assessed at this stage to determine where the most suitable location for these uses is. They should not be restricted to the Officer's Meadow Site and the relevant Policy in the Reg 19 Local Plan should include provision of these uses across the sites allocated in the Shenfield area.

#### ii) Masterplan

- 3.5 The current Reg 18 consultation document refers to the opportunity for a masterplan for the development of the Officer's Meadow Site and Sites 158 and 263. We have concerns with this approach, with the sites being promoted and controlled by different parties.
- 3.6 The sites are all physically separated, with Ancient Woodland between Officer's Meadow and Site 263, and houses separating Site 158 from the others.
- 3.7 As such, whilst there may be the opportunity to create pedestrian links between the sites and some consideration will be required regarding the most suitable locations for a care home and gypsy and traveller pitches, there are no opportunities to create vehicular links and development will be separated and will be delivered by differing developers.

- 3.8 The masterplan required within the current Reg 18 consultation would be required prior to the submission of planning applications for the sites, delaying the submission of these and ultimately the delivery of housing on the sites. As such, whilst the relevant Local Plan Policy may include an indicative plan to demonstrate how development may be located on the sites, the requirement for a masterplan across all 3 No. of the allocations should not be included to ensure the Officer's Meadow Site can be delivered in a timely manner.
- 3.9 Croudace Homes has had an interest in the Officer's Meadow Site for a number of years, promoting the Site through the Local Plan process. Initial technical work has been undertaken and approaches to development considered, as set out in the Development Framework Document (DFD) submitted with the Reg 18 representations in March 2016 and enclosed for reference at **Appendix 2**. As such, Croudace Homes is seeking to progress an application and delivery on the Site once the Local Plan is suitably progressed and do not wish to add any delays to this already lengthy process.

#### iii) Phasing of Sites

- 3.10 The current Reg 18 consultation Plan does not include any reference to the phasing of the sites in the Shenfield area. Whilst there is existing residential development along Chelmsford Road, this is separated from the majority of the built-up area of Shenfield by Officer's Meadow, as are Sites 158 and 263.
- 3.11 Given their location, the phasing of the sites in the Shenfield area must be managed and guided by the Local Plan to avoid development separated from the built-up area. Officer's Meadow is the logical first phase, adjoining the existing built-up area of Shenfield and being a logical urban extension.
- 3.12 The development of Sites 158 and 263 will then continue the developed area, being a further extension. The development of either of these sites without Officer's Meadow having been delivered first would be physically and visually separated from Shenfield. The relevant Policy in the Local Plan should be clear that Officer's Meadow is to be delivered first, with Sites 158 and 263 to subsequently follow.
- 3.13 Furthermore, Officer's Meadow will provide considerably more housing than Sites 158 and 263, with associated infrastructure as required and appropriate. For development to be comprehensively planned and delivered, the Officer's Meadow scheme should be delivered in the first instance.

#### iv) Evidence Base

- 3.14 As identified in Section 2 of these representations, whilst some evidence base documents have been published alongside the current consultation, others are outstanding. This raises some concerns for Croudace in respect of the allocation of Sites 158 and 263 and the increase in housing within the immediate area over that previously proposed.
- 3.15 Whilst there are benefits to focusing development in an area, this does have a cumulative impact that must be considered and managed.
- 3.16 As detailed above, this is particularly relevant in highway terms with the capacity of the surrounding roads and Mountnessing Roundabout, linking to the A12, required to be assessed.
- 3.17 Similarly, the cumulative impact of development should be assessed in terms of landscape and community infrastructure requirements to ensure the Local Plan makes adequate provision for any required infrastructure improvements.
- 3.18 Whilst Croudace has considered technical constraints, infrastructure and likely community facilities, this has been in relation to the development of Officer's Meadow only. Whilst Croudace can deliver the Site with no adverse impacts on these matters, BBC should publish supporting evidence considering the wider cumulative implications of allocating the surrounding sites to ensure they similarly have no adverse impact.

#### 4.0 ALLOCATION OF OFFICER'S MEADOW

- 4.1 As detailed above, Croudace has been promoting the Officer's Meadow Site for development for a number of years through the Local Plan process, with BBC proposing to allocate it within the 2016 Reg 18 Local Plan.
- 4.2 The Site is located within a sustainable location in close proximity to Shenfield, with regular bus services along Chelmsford Road and easy pedestrian access to Shenfield Station providing access to Crossrail.
- 4.3 The Site benefits from effective physical and visual enclosure, as highlighted in the Green Belt Review published by BBC in January 2018. The Site does not make a high contribution towards the purposes of the Green Belt as set out in Paragraph 80 of the NPPF and confirmed through BBC's Green Belt Review.
- A DFD providing more detailed information on the development proposals accompanied the representations submitted in March 2016 and is included for reference at **Appendix 2**. The DFD includes a summary of the specialist technical assessments that have been undertaken for the Site and demonstrates that the Site can accommodate residential/mixed use development.
- 4.5 The DFD sets out consideration of "Development Options" for the Site as initial explorative options in order to consider the potential opportunities that are available. The options include a range of dwellings between approximately 350 and 600, providing a positive contribution towards meeting housing needs in the Borough.
- 4.6 There is also the opportunity for the Site to provide new/improved community facilities to benefit new and existing residents, including the provision of a new primary school.
- 4.7 The National Planning Policy Framework (NPPF) seeks to achieve sustainable development, with Paragraph 7 setting out that this has three dimensions; economic, social and environmental. Development of the Site would constitute sustainable development against these three dimensions, with benefits including:
  - Provision of a wide range of much needed housing in a highly sustainable location;
  - Provision of generous areas of public open space;
  - Strengthening of Shenfield's vitality and viability;
  - Delivery of a significant number of affordable homes;
  - Contributions towards improved community facilities;

- Making a substantial contribution to meeting the Borough's overall housing need on a well contained site, thereby protecting more sensitive and visual sites from development;
- The creation of direct construction jobs plus additional indirect jobs; and
- New Homes Bonus payment (over 6 year period) of £2.6M generated by the scheme.
- 4.8 The Site is "suitable", "available" and "achievable", as confirmed through BBC's draft Local Plan and supporting evidence. The Site is located within a sustainable location, with numerous benefits arising from its development. It makes a limited contribution to the roles of the Green Belt, with its release from the Green Belt to provide much needed housing being a logical and suitable approach to meeting housing needs.
- 4.9 As detailed above, Croudace Homes has been promoting the Site for a number of years and is seeking to progress a planning application and delivery of homes on the Site once the Local Plan is suitably progressed. There are no significant viability constraints preventing this, with the Site being deliverable.
- 4.10 These representations continue to support the allocation of the Site for residential-led development, assisting BBC in meeting its housing needs within its boundaries in a sustainable manner.

#### 5.0 CONCLUSION

- 5.1 These representations have been prepared on behalf of Croudace Homes to BBC's current Reg 18 Local Plan consultation.
- As a result of updated housing studies, BBC's housing target has increased from 362 dpa to 380 dpa. Alongside this, BBC has reviewed the capacity of sites allocated in the 2016 Reg 18 Local Plan and has reduced some allocations accordingly.
- 5.3 BBC is seeking to meet its housing need within its boundary, seeking to allocate additional sites to meet this increased need accordingly, with the current Reg 18 consultation focused on the increased housing target and site allocations.
- As part of the current consultation BBC has published some additional evidence base studies, including a Borough-wide Green Belt Review. However, other technical information remains outstanding, including an updated HELAA and detailed site assessments.
- 5.5 BBC should finalise these studies and publish them alongside the Reg 19 Local Plan to ensure it is prepared in accordance with Paragraph 158 of the NPPF and the cumulative impact of the proposed development is considered and suitably mitigated.
- The published Green Belt Review identifies that Officer's Meadow does not make a high contribution towards the purposes of the Green Belt, being in the lower half of sites considered. It is one of 23 No. parcels out of 70 No. that is "well contained" or "partly contained", with the majority being "not contained" and weakly associated with an existing large built-up area and having the potential of significant or unrestricted countryside encroachment.
- 5.7 The release of Officer's Meadow from the Green Belt is continued to be supported by Croudace Homes, allowing development of a sustainable Site that will provide numerous economic, social and environmental benefits in accordance with the NPPF.
- 5.8 Officer's Meadow is located in close proximity to Shenfield High School, with an opportunity to work collaboratively with the School to deliver a new primary school and potential improvements to the High School as part of the development.

- 5.9 Additional sites are proposed to be allocated around Officer's Meadow, being Sites 158 and 263. Whilst Croudace Homes has no objection in principle to these sites being developed, the relevant Policy in the Reg 19 Local Plan should require additional uses, including a C2 care home and provision for gypsy and traveller pitches, to be provided in the most suitable location across the sites.
- 5.10 The Policy should also provide clarity in terms of the phasing of the sites, with development at Officer's Meadow being the first phase and Sites 158 and 263 to follow. The development of Sites 158 and 263 initially would result in development physically and visually separated from the built-up area of Shenfield, rather than being a logical extension.
- 5.11 Development at Officer's Meadow will provide an extension to the built-up area of Shenfield, comprising sustainable development. The Site has been confirmed to be "suitable", "available" and "achievable" throughout the Local Plan process, with Croudace seeking to deliver development once the Local Plan is suitably progressed.

#### **APPENDIX 1**

#### **EXTRACT FROM GREEN BELT REVIEW**



## Green Belt Study Part II: Green Belt Parcel Definition and Review

Report Reference: CE-BW-0585-RP05 - Draft v6i

26 January 2018



**Produced by Crestwood Environmental Ltd.** 

**WORKING DRAFT** 

Crestwood Report Reference: CE-BW-0585-RP05 - Draft v6i

Version & Status	Date Produced	Written / Updated by:	Checked & Authorised by:
Draft v1i	22-03-2017	Neil Furber (Director and Principal Landscape Architect)	Karl Jones (Director and Principal Landscape Architect) and Adam Collinge (Principal Landscape Architect)
Draft v2i	14/6/2017	Raj Bains (EIA Co-ordinator)	Adam Collinge (Principal Landscape Architect)
Draft v3i	9/11/2017	Raj Bains (EIA Co-ordinator)	Adam Collinge (Principal Landscape Architect)
Draft v4	11/01/2018	Adam Collinge (Principal Landscape Architect)	Karl Jones (Director and Principal Landscape Architect)
Draft v5	26/01/2018	Adam Collinge (Principal Landscape Architect)	Karl Jones (Director and Principal Landscape Architect)
Draft v6	26/01/2018	Adam Collinge (Principal Landscape Architect)	Karl Jones (Director and Principal Landscape Architect)

This report has been prepared in good faith, with all reasonable skill, care and diligence, based on information provided or known available at the time of its preparation and within the scope of work agreement with the client.

We disclaim any responsibility to the client and others in respect of any matters outside the scope of the above.

The report is provided for the sole use of the named client and is confidential to them and their professional advisors. No responsibility is accepted to others.

Crestwood Environmental Ltd.
Units 1 & 2 Nightingale Place
Pendeford Business Park
Wobaston Road
Pendeford
West Midlands
WV9 5HF

Fax: 01902 229 563

Email: info@crestwoodenvironmental.co.uk Web: www.crestwoodenvironmental.co.uk

### **CONTENTS**

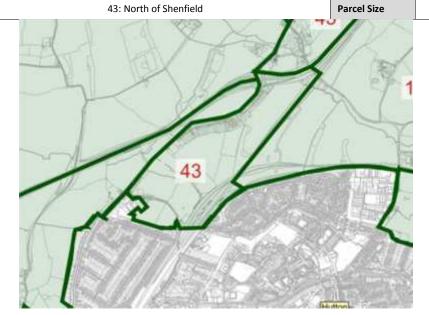
1	INTRO	DDUCTION	3
	1.1	THE BRIEF	3
	1.2	CRESTWOOD ENVIRONMENTAL	3
	1.3	DOCUMENT STRUCTURE	4
	1.4	SCOPE	4
	1.5	ASSUMPTIONS	5
2	METH	ODOLOGY AND PROCESS	7
	2.1	GUIDANCE	7
	2.2	PROCESS OVERVIEW	8
	2.3	DEFINITIONS	
	2.4	IDENTIFICATION OF GREEN BELT PARCELS	
	2.5	DETERMINATION OF THE ASSESSMENT CRITERIA	
	2.6	BASELINE STUDY	
	2.7	PRESENTATION OF ASSESSMENT	25
3	ASSES	SMENT RESULTS & RECOMMENDATIONS	27
	3.1	ASSESSMENT RESULTS	27
	3.2	CONCLUSIONS AND RECOMMENDATIONS	33
LIST O Table 1 Table 3 Table 4 Table 5 Table 6 Table 7 Table 8 Table 9		Definitions	17 19 21 23 24 28 29
Table 1		Summary of Combined Overall and Individual Purposes Assessment Results	
LIST O	F APPI	ENDICES:	

Appendix L1	Parcel Assessment Sneet Pro-forma
Appendix L2	Summary of Assessment Results – Assessment Results Order
Appendix L3	Summary of Assessment Results – Size of Parcel Order
Appendix L4	Summary of Assessment Results – Parcel Reference Order
Appendix L5	Detailed Parcel Assessment Sheets

Appendix L6	Figure 1 – Strategic Green Belt Review: Assessment Parcels
Appendix L7	Figure 2 - Overall Contribution of Parcels to Green Belt Purposes
Appendix L8	Figure 3 - Contribution of Parcels to Green Belt Purpose No. 1
Appendix L9	Figure 4 - Contribution of Parcels to Green Belt Purpose No. 2
Appendix L10	Figure 5 - Contribution of Parcels to Green Belt Purpose No. 3
Appendix L11	Figure 6 - Contribution of Parcels to Green Belt Purpose No. 4
Appendix L12	Brentwood Historic Town information and Local Conservation Area Designations

#### **Brentwood Borough Strategic Green Belt Study**

Parcel No. and Name



64.74ha

Parcel- settlement relationship (Containment):	Wholly / Largely contained by large built up area	Abuts large built up area   'Urban' extension	Near but clear separation	Limited association to large built up area	Distant association (visual) only or none
Comments:					

Predominant Landscape Scale:	Intimate	Small		Medium	Large	Expansive
Predominant level of Enclosure:	Confined	Quite Enclos	sed	Partial Enclosure	Quite Open	Exposed
Public Access within	recreation			Open general access	Permissive general access	PRoW route access
Parcei		Permissive paths			Informal access	No access
Overall level of Landscape Representativeness:	Highly representativ	re Main	, ,	oresentative / minor detractions	Equal representative / non- represe <mark>ntative</mark>	Weakly representative/ degraded
Primary Land Use/Cover	Arable Farmla	armland				
Secondary Land Use/Cover	Pastoral Farmland, Woodland, Recreation Ground and dwellings along roads.					
Intervisibility within parcel and to the adjacent parcels	Limited views within the parcel due to mature field boundary hedgerows with trees. Views to adjacent parcels limited by built development in places and road corridors with tree belts along embankments.					

Does the parcel abut any neighbouring administrative area?	No
Could the parcel extend beyond the Brentwood Borough boundary?	No

#### **Brentwood Borough Strategic Green Belt Study**

#### **ASSESSMENT OF GREEN BELT PURPOSES**

Purpose 1: to check the unrestricted sprawl of large built-up areas							
Criteria	wc		PC		NC	Comments:	
Parcel Containment:	Within large bu	ilt up area	Abuts large built up area		Separate from large built up area	Land contained by Shenfield and surrounding infrastructure (rail and main road)	
Theoretical Development Type:	'Infillin	g'	'Urban Extension'		New settlement   Development separated from large built up area		
Boundary:	Strong/De	finite	Weak/Degraded/Unclear		None		
Parcel Openness:	Enclosed/Sma Limited/no co encroachment	untryside	Medium scale countryside - Some encroachment potential		Large scale 'open' countryside - potential for unrestricted encroachment		
Relative contribution of Parcel to Green Belt Purpose:							
Well-Contained (WC)		Partly	artly Contained (PC)		Not Contained (NC)		

Purpose 2: to prevent neighbouring towns merging into on another							
Criteria		NCG	MCG	ICG	С	CG	Comments:
Interlying physical barriers:	Sub	stantial / strong	Moderate	Unsubstantial, but functional	Ab	sent	
Views between Towns	Non	e / Very Distant	Some / Distant	Filtered / Obscured / Reasonably Close	Direct / Close		A12 is major intervening barrier to northwest
Countryside Gap / Coalescence Risk (Development Sensitivity):	to	el not considered o form part of ountryside gap etween towns	Forms minor part of wider countryside gap between towns / Minor physical narrowing of gap	Forms large proportion of countryside gap between towns / Physical narrowing of gap & potential visual coalescence	Forms majority of countryside gap between 'towns' / Coalescence Risk		
Relative contribution of Parcel to Green Belt Purpose:							
Non-Critical Gap (NCG) Minor Co		Minor Coun	tryside Gap (MCG)	Important Countryside Gap (ICG)		Critical Countryside Gap (CCG)	

Purpose 3: to assist in safeguarding the countryside from encroachment							
Criteria	LCF	MFC	FC	Comments:			
Land-use:	e.g. Buildings	Mixed	Typical 'Countryside' uses				
Land-cover:	e.g. Built / Hardscaping	Mixed	Natural / Landscaping				
Access:	No Public Access	No Public Access  Some access (informal, permissive) or low number of PRoW		Predominantly rural land use – but heavy influence by local infrstructure			
Relative contr	Relative contribution of Parcel to Green Belt Purpose:						
Limited Countryside Functions (LCF) Mixed		Functions within Countryside (MFC)	Functional Countryside (FC)				

Purpose 4: to preserve the setting and special character of historic towns							
Criteria	LRHT		MRHT	SRHT			
Historic Town relationship:	No / Limited physical and/or visual relationship with Historic Town		Moderate physical and/or visual relationship with Historic Town	Strong physical and/or visual relationship with Historic Town			
Relative contribution of Parcel to Green Belt Purpose:							
Limited Relationship with Historic Town (LRHT) Moder			rate Relationship with Historic Town (MRHT)	Strong Relationship with Historic Town (SRHT)			
Comments:							

#### **Overall Assessment**

Overall Contribution of Parcel to Green Belt Purposes	Low	Moderate	High
Comments:			

#### **APPENDIX 2**

#### **DEVELOPMENT FRAMEWORK DOCUMENT**



BARTON WILLMORE

Croudace HOMES.CO.UK



## **CONTENTS**

#### 1. INTRODUCTION

Purpose of the Document
Site Description
Document Content

#### 2. CROUDACE HOMES

#### 3. SITE CONTEXT AND OPPORTUNITY

Local Services and Amenities Accessibility

## 3. PLANNING POLICY CONTEXT / GREEN BELT RELEASE

Meeting Housing Needs Green Belt Enhancing Local Services and Amenities Existing Densities

#### 4. SITE APPRAISAL

Landscape and Visual
Green Belt Assessment
Ecology
Access and Circulation
Flooding and Drainage
Archaeology
Noise

#### **5. CONSTRAINTS AND OPPORTUNITIES**

Constraints
Opportunities

#### **5. DEVELOPMENT PROPOSALS**

Overview

Site Design Principles

**Development Options** 

Option 1

Option 2

Option 3

Option 4

#### **6. COMMUNITY BENEFITS**

Community/Social Benefits and opportunities
Environment Benefits
Economic Benefits

#### 7. SUMMARY AND NEXT STEPS

Next Steps

## 1. INTRODUCTION

#### **PURPOSE OF THE DOCUMENT**

This document has been prepared on behalf of Croudace Homes, to accompany written representations (Barton Willmore, March 2016) to Brentwood Borough Council's (BBC) Regulation 18 Draft Local Plan (DLP, January 2016). 'Officer's Meadow, Shenfield' (hereafter referred to as 'the Site') forms part of a proposed allocation within the DLP for 600 dwellings, in addition to the potential for open space, sport uses and/or Crossrail 'Park and Walk' facility.

The Site Allocation Maps (January 2016) which support the DLP include 3no. sites in the proposed allocation. It should be noted that Croudace Strategic has controlling land interest in Site 034 only, and therefore whilst development proposals have taken sites 235 and 087 into account, this document is in respect of Site 034.

Barton Willmore submitted representations on behalf of Croudace Homes to the SGOC (January 2015), including a previous iteration of this document, in order to demonstrate the suitability of the Site for Green Belt release.

Since this submission, further site specific work has been undertaken. This includes further technical work, and the consideration of further "development options" for the Site. These are initial explorative options to demonstrate the potential opportunities that are available through the Site's allocation for development.

The options included could accommodate approximately 350-600 dwellings, and provide significant and positive contribution towards future housing needs in the Borough. These could be delivered in the short term. There is also the opportunity to provide new/improved community facilities, to benefit new and existing residents.

#### SITE DESCRIPTION

The following description excludes the "potential additional land" areas set out within Section 8 of this document.

The Site is circa 20.6 ha and lies to the north east of Shenfield, within the Green Belt, as defined by BBC's Local Plan Proposals Map (2005).

The Site is greenfield and comprises a series of fields enclosed by a combination of hedgerows with mature trees, woodland and residential properties. The Site was formerly in agricultural use but is now mainly rough pasture/scrubland, although the field in the southern part of the Site remains in limited farming use. The eastern part of the Site (approximately 1.55 ha) comprises a belt of Ancient Woodland now separated from the original Arnold's Wood by the railway. A Public Right of Way (PRoW FP 272\_86) passes along the eastern edge of the Site in a north-south direction, linking Alexander Lane and Chelmsford Road.

The Site is bound by Chelmsford Road (A1023) to the north-west and a ribbon pattern of residential properties with long gardens to the north. Arable farmland and the elevated Great Eastern Main Line/Southend railway line form the eastern boundary. The most southerly field has a frontage of approximately 100m to Alexander Lane. The southern-most sections of the Site adjoin Shenfield High School playing fields.

Anglian Water (AW) owns an unkempt, largely overgrown area of land which borders the south-eastern part of the Site. It is understood that the AW land functions as a Flood Detention Basin associated with the stream, which flows east-west through and alongside the southern parts of the Site before outfalling to watercourses beyond the Chelmsford Road. The stream is essentially a valley floor in the local landscape context and marks the low point of the Site, with the landform rising from this part of the Site to the northern and southern boundaries.

An application (15/01503/FUL) was recently permitted for a temporary change of use of an area of grassland/scrubland to land used in conjunction with the construction and implementation of Crossrail, and internal development, for a period of 2 years and 1 month to facilitate Crossrail works (Decision Notice dated 17 February 2016). It is noted that Condition 3 of the permission requires that, no later than 31 March 20178, the Site shall be returned to the same condition as it was prior to the commencement of development.

#### **DOCUMENT CONTENT**

The remainder of this document provides:

- An overview of Croudace Homes and its ethos as a high quality housebuilder throughout the south east of England (Section 2);
- An assessment of existing local amenities and connections, and existing settlement patterns and character (Section 3);
- Planning Policy Context, including Green Belt release (Section 4);
- An appraisal of the Site, including initial technical studies, which demonstrates that the Site is suitable for development (Section 5). This includes a Site specific Green Belt assessment;
- Outline the constraints and opportunities of the Site that formed the technical basis of the potential development options (Section 6);
- Information on the potential options for development and the estimated dwelling capacity of each option against varying densities (Section 7);
- A summary of the potential Social and Economic Benefits of the proposed development (Section 8); and
- Suggested way forward (Section 9).

Overall, the document demonstrates that the Site is suitable for development and should be included as a Strategic Green Belt allocation in future revisions of the Local Plan.







### 2. CROUDACE HOMES

Croudace Homes is a family owned house building company operating in both the private and public housing sectors throughout the south east of England. Its philosophy is to create homes of the highest quality backed up with a first class customer service, regardless of value or tenure.

#### A successful, family owned business

Established in 1946, Croudace Homes remains steadfastly privately owned, the sole shareholders being the children and grandchildren of the founder. This is unusual for a company of this size and gives it a significant advantage over its competitors.

Croudace is ranked in the top three most successful house-building companies in the south of England in terms of turnover, profitability, quality and customer service.

Being a family owned business, a rare and genuine ethos of care is evidenced in every aspect of the company.

The company is proud of its history and traditional values – but the modern, stylish homes it produces are completely up-to-date and feature the latest home comforts. Croudace has a well-earned reputation as a producer of fine homes of excellent design, high build quality and contemporary internal specification.

#### A wide choice of housing

Croudace Homes offers an ever-widening range of homes, from affordable starter homes and apartments through to town houses and luxury family homes with up to six bedrooms in both traditional and contemporary architectural styles suited to the location of the site.

In 2015, Croudace Homes completed the sale of 407 dwellings. This included 120 sales of affordable homes to Registered Providers made under the provisions of Section 106 planning arrangements on private sale sites.

Approximately £12k per dwelling was paid in community contributions, totalling £5.7M for the year.

#### Attention to detail

Great attention is given to detail; both internal and external design, the specification of fixtures and fittings and an exceptional finish. This applies to the buildings and their landscaping to create attractive, viable and sustainable dwellings to serve the long-term needs of customers. The inhouse design team's top priority is to achieve best value for customers; but thoroughly testing high quality products, that ensure that they not only look good but are thoroughly fit for purpose, rather than simply choosing to a budget.

#### **Quality is paramount**

Reputations for quality and service are hard earned. Croudace has a clear objective to remain in the upper echelons of those building high quality homes to suit the needs of a range of households. It was pleasing that in its first inclusion in the high profile annual survey conducted by the NHBC/HBF (having previously been excluded on volume thresholds) Croudace secured the maximum 5 star rating, and is delighted to have repeated their success for the third year running in the most recent awards for 2015.

Further independent recognition of high standards came from NHBC and Local Authority Building Control awards for build quality. In addition, Croudace won 'Best Family Home' for the second running at the prestigious London Evening Standard New Homes Awards; and two Site Managers won national quality awards for their work.





#### Developing communities with a sense of place

Croudace developments are designed to be communities with a real sense of place; attractive, safe and enjoyable environments in which to live.

The company contributes to local needs to create thriving neighbourhoods rather than simply housing estates. It takes its responsibility towards the immediate and wider community seriously, incorporating play and sports facilities, hosting community fun days and events, sponsoring local organisations and raising money for local charities – all part of its commitment to making a Croudace Homes' development a desirable and social place to make a home.

#### **Staff and Training**

Croudace acknowledges that there is a skills shortage in the construction sector and as a Company believes it has a responsibility to encourage young people into the industry. It is actively involved with the HBF in a number of areas at senior level, and contributes in initiatives to invest and encourage apprentices, graduates and school leavers into house building and more widely construction.

The 5% Club aims to encourage, train and invest in the future generation which fits very well with Croudace's ethos, vision and values. Croudace was keen to be part of this group, to network with other likeminded companies, share ideas and lobby relevant bodies where appropriate.



Since becoming a member it has exceeded the 5% target with 11% of its employees on sponsored programmes of some kind. It invests heavily in training and has structured programmes that are either two, three or four years in duration (depending on discipline and level) where apprentices and graduates are allocated a mentor and training programme specific to them.

## 3. SITE CONTEXT AND OPPORTUNITY

The DLP sets out a settlement hierarchy for the Borough. It identifies Shenfield as a Category 1 settlement and correctly recognises that, alongside Brentwood, Shenfield should be the focus for development (Policy 5.1).

Shenfield also scored highly in the Settlement Hierarchy within the previous POLP (July 2013), with Brentwood and Shenfield being identified as the only 'main town' settlements in Tier 1 of the settlement hierarchy and therefore offer the most scope for sustainable development, with a range of shopping, employment areas, secondary schools, health and leisure facilities, supported by shopping centres around the rail station and other local shopping parades.

#### **LOCAL SERVICES AND AMENITIES**

The centre of Shenfield is an 'important local centre' (as defined in the adopted Local Plan 2005), and contains a wide range of retail and leisure outlets.

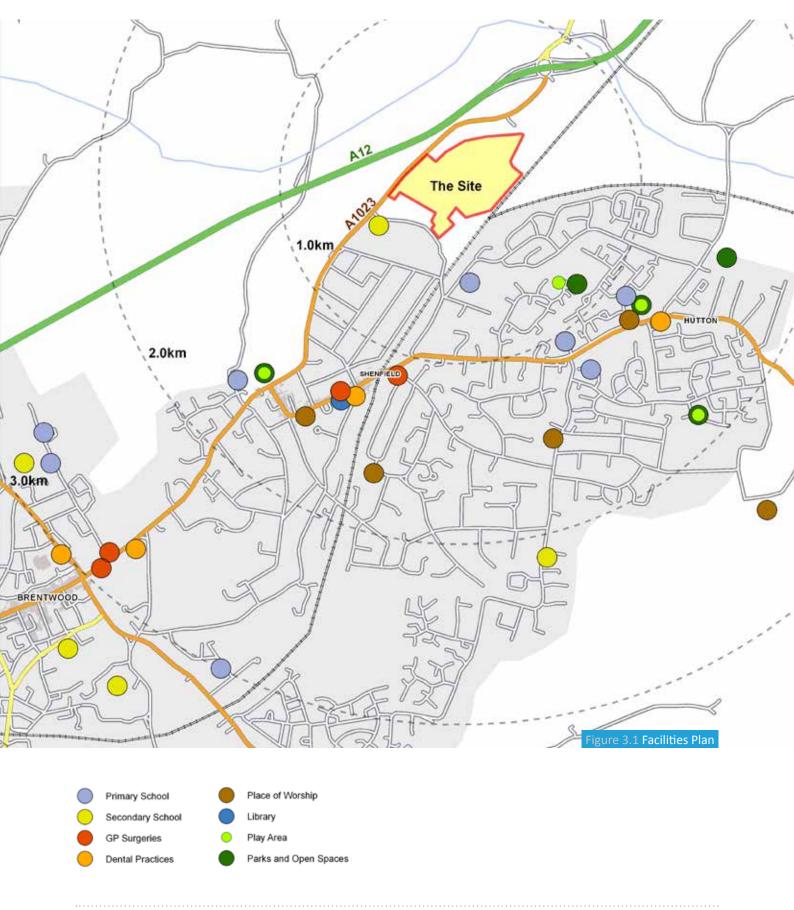
There is a public library in Hutton Road, two dental and two doctor's surgeries within a 2km radius of the Site. In addition, six places of worship, four play areas and six parks/open spaces exist within a 2km radius of the site.

There are six primary schools within a 2km radius of the Site and four secondary schools within a 4km radius of the Site.

According to the Commissioning School Places in Essex (2015-2020) there will be 765 surplus secondary school places by 2019-20 at Shenfield High School, located adjacent to the Site. The projections take account of new housing (i.e. the estimated phasing of housing developments published by each Local Planning Authority in its housing trajectory figures). The document notes that housing requirements should be treated with caution as they will be subject to potential amendment through the period 2013 to 2018, as some housing requirements have not been subject to formal adoption by LPA's. If necessary, the proposed development would provide a financial contribution towards the improvement of primary schools within the catchment.







#### **ACCESSIBILITY**

Shenfield is closely linked with Brentwood to the south and the settlement centre lies only 2.4km miles apart (Figure 3.1). The Site has direct access to Chelmsford Road (A1023) and is less than ½ mile from the roundabout junction with the A12, which in turn is only 4 miles from Junction 28 on the M25.

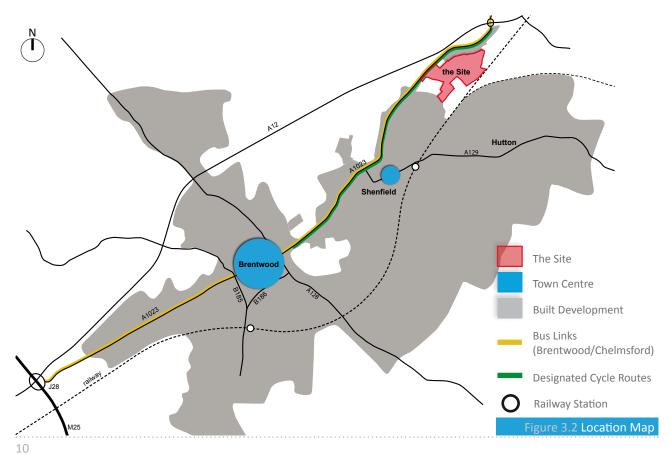
Shenfield Station is just over a 10 minute walk from the Site. Frequent and fast trains are available providing an excellent service to Liverpool Street Station, London in 23 minutes.

Such services are likely to be significantly improved when Crossrail is fully implemented. Shenfield is set to become the eastern terminus of the 118km Crossrail route, which will cross central London in tunnel, terminating at Maidenhead to the west. Crossrail is likely to transform the way people travel in London and the South-East and its completion would inevitably have positive implications for Brentwood/Shenfield.

Bus services run along the Chelmsford Road and provide regular links to Brentwood and Chelmsford. A dedicated cycle route exists along the Chelmsford Road which links the Site with Brentwood and Shenfield to the south. As previously mentioned a public footpath traverses the Site.

#### **ENHANCING LOCAL SERVICES AND AMENITIES**

All the above demonstrates that the Site has strong accessibility credentials, and it is a highly appropriate location for further development to meet the Borough's housing needs.



The increase in residents created through the development of the site will bring substantial social and economic benefits to the area, as well as the existing local services and amenities. This is explored further in Section 8.

The development of the Site also offers the potential to provide further community facilities, or, where relevant/necessary, contribute towards there enhancement. This is explored further in Section 7.

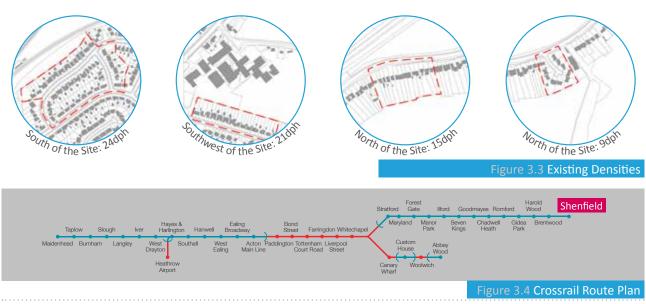
#### **EXISTING DENSITIES**

Whilst the existing densities within Shenfield are relatively low, the NPPF requires LPAs to set their own approach to housing densities to reflect local circumstances. Whilst existing local character is an important consideration, other 'local circumstances' and policy considerations also need to be considered:

- Optimising the potential of Sites to accommodate development and make efficient use of land;
- Sustainability of the area and the level of accessibility to local facilities and public transport;
- The conclusions of Site specific technical work.

DCLG are currently consulting on proposed changes to the NPPF until 22 February 2016. The Government is proposing a change in the NPPF that would expect LPAs, both in plan-making and in decision-taking, to require higher density development around commuter hubs wherever feasible. Shenfield would be classed as a commuter hub, in accordance with the proposed definition, as it is a place which will have a service running at least every 15 minutes during normal commuting hours, and indeed Crossrail will run 12 trains per hour at peak times from Shenfield station. Subject to the outcome of the consultation, the development of the Site could provide an opportunity to encourage development in well-connected areas and take advantage of the availability of new transport infrastructure through the arrival of Crossrail.

Section 9 sets out further information on proposed densities.



# 4. PLANNING POLICY CONTEXT / GREEN BELT RELEASE

#### STRATEGIC HOUSING LAND AVAILABILITY ASSESSMENT

BBC's SHLAA (October 2011) and subsequent preferred options site assessment (2013), both conclude that the Site is suitable for development in the short term (5-10 years). Furthermore, the initial site specific technical work summarised within this document supports BBC's conclusions, and collectively they demonstrate that the site is 'suitable' 'available' and 'achievable'. The Site is therefore considered 'Deliverable'.

#### **MEETING HOUSING NEEDS**

As set out in Section 1, this document is submitted to BBC's Regulation 18 Draft Local Plan, and accompanies written representations (Barton Willmore, March 2016).

The DLP document, under Policy 5.2, sets a housing requirement of 362 dpa for the Plan period (2013-2033) equating to 7,240 additional dwellings in total. BBC has undertaken a sequential approach to the selection of sites for future development. This approach seeks to encourage the effective use of brownfield land in accordance with National policy. However as identified in Policy 5.2, only 1,296 dwellings can be accommodated on brownfield sites within urban areas. BBC therefore, identifies additional allocation sites within the Green Belt for residential development, including the Site, in order to meet its housing target.

#### **GREEN BELT**

Section 9 of the NPPF considers the protection of Green Belt land, in that its fundamental aim is to prevent urban sprawl by keeping land permanently open in order to maintain the essential Green Belt character of openness and their permanence. The NPPF (para 80) states that the Green Belt is intended to serve five purposes:

- To check the unrestricted sprawl of large built-up areas;
- To prevent neighbouring towns merging into one another;
- To assist in safeguarding the countryside from encroachment;
- To preserve the setting and special character of historic towns; and
- To assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Paragraph 83 of the NPPF states that Green Belt boundaries, once established, should only be altered in exceptional circumstances, **through the preparation or review of Local Plans.** 

The Site is assessed against the "five purposes" of the Green Belt, in the following Section. This assessment demonstrates that the Site could be released from the Green Belt without significant impacts on its purpose.

## 5. SITE APPRAISAL

The site is assessed against the "five purposes" of the Green Belt, in the following section. This assessment demonstrates that the site could be released from the Green Belt without significant impacts on its purpose.

#### LANDSCAPE AND VISUAL

A Preliminary Landscape and Visual Appraisal (LVA) of the Site and its surroundings has been carried out during December 2015 to assess the existing landscape character and visual context of the Site; relevant landscape policies and character assessments and the opportunities and constraints of potential residential development.

In summary, LVA concluded:

- The Site is considered to have the capacity for residential development as it is not covered by any national, regional or local landscape designations;
- The Site is very well contained in relation to the surrounding landscape by existing residential built form, road and rail infrastructure and vegetation;
- The proximity to existing residential dwellings, transport corridors and the Anglian Water facility has already eroded the agricultural character of the Site and results in an urban fringe character to the Site;
- Where visible, the Site is seen in the existing context of the surrounding residential settlement patterns;
- There is an existing vegetation structure within the Site which can form the basis of a new landscape framework and a Green Infrastructure layout;
- While there are a number of trees within the Site covered by Tree Preservation Orders (TPO 27/96) and Ancient Woodland, development can incorporate these features by being offset from their root protection areas;
- Development within the Site would need to be set within a robust landscape framework to soften and integrate the new built form; and
- Development on the Site would not have a detrimental impact on the surrounding landscape and visual amenity generally.

#### **GREEN BELT ASSESSMENT**

The LVA also includes an assessment of the Site in relation to the Green Belt purposes stated in Paragraph 80 of the NPPF (as set out in Section 4).

The Site is considered to make a very limited contribution to **checking the unrestricted sprawl of large built-up areas,** for the following reasons:

- It is bound to the north and south by existing built form and road networks; to the east by woodland and rail infrastructure and to the west by residential built form and the A1023.
- Therefore, the Site has the ability to accommodate residential development without contributing to an increase in the extent of unrestricted sprawl of Shenfield's settlement pattern;
- Due to the Site's position between existing residential properties, development of the Site would not constitute a disorganised nor unattractive extension of Shenfield.
- The vegetated framework within the Site in combination with the residential built form and road infrastructure would form a robust, defensible and permanent edge to development within the Site and a legible boundary to the Green Belt.

The Site is considered to make a very limited contribution in **preventing neighbouring towns merging.** Notably:

- While development would result in a technical reduction in the distance between Alexander
  Lane and the residential properties bordering the northern edge of the Site, the perception of
  separation between these two areas is already weakened by the existing inter-visibility;
- Development of the Site would not alter the distance between Shenfield and Mountnessing as development would not extend any further north-east than the existing ribbon development on the A1023;
- Similarly, the separation distance between Shenfield and Doddinghurst would be maintained as development would not extend further north-west. Given the extent of existing settlement patterns to the east and south of the Site, the Site does not contribute to the prevention of the merging off Shenfield, Brentwood and Billericay.

The Site is considered to make a very limited contribution to the **assisting in safeguarding the countryside from encroachment**. Notably:

- The Site is enclosed physically by existing residential development, the A1203 and Alexander Lane:
- While there would be a technical reduction in the extent of countryside as a result of development within the Site, this would be very localised and very minor in extent; being perceived from adjacent to the Site only;
- The audible and visual intrusion of passing motorists along the A1023 and trains on the railway line influence the Site and reduce its perceived countryside characteristics, whilst the vegetation and built forms that enclose the Site limit a visual connection with the wider landscape;

As there are no historic towns within the vicinity of the Site, the Site is considered not to make any contribution to this purpose of the Green Belt. Should the Site be brought forward for development, then it would not prejudice other derelict or other urban land being brought forward.

Therefore, the Site makes a very limited contribution to the NPPF Paragraph 80 Green Belt purposes as it is well contained by existing built form and infrastructure, exhibits defined and defensible boundaries and is strongly influenced by the adjoining urban / built elements. Development, set within a robust landscape, framework would provide the opportunity to enhance the existing landscape and biodiversity of the Site while maintain defensible and robust boundaries to the Green Belt.

#### **ECOLOGY**

As set out above, Ancient Woodland is present in the north east corner of the Site. This forms part of Arnolds Wood Local Wildlife Site, the majority of which lies to the other side of the railway line. There are no other identified statutory or non-statutory ecological designations present within the Site.

A Phase I preliminary habitat survey has been carried out on the Site. Further Phase II studies will be carried out as necessary. Opportunities are available for habitat creation and faunal enhancement such that the proposals have the potential to give rise to net gains for biodiversity.

#### **ACCESS AND CIRCULATION**

A preliminary appraisal of the potential vehicular access strategy has been undertaken. It is envisaged that the principal vehicular access will be provided from Chelmsford Road (A1023) and that subject to more detailed investigations a secondary/emergency access could be provided onto Alexander Lane.

Essex County Council has been consulted upon the principles of access and this is reflected in the proposals. A future Transport Assessment will have regard to the preliminary consultation with ECC and the Highways England, and would follow national guidance.

A sequence of proposed pedestrian and cycle routes will provide connections to local services, amenities and bus stops and will enhance and complement existing routes, and connect into the exiting PROW network.

#### FLOODING AND DRAINAGE

A small part of the Site adjoining Chelmsford Road lies within the Environment Agency Flood Zones 2 and 3. However the majority of the Site lies within Flood Zone 1 where there is the lowest probability of flooding and where new development should be steered.

A preliminary drainage strategy will be prepared, which will involve the controlled discharge of surface water to existing watercourses and connection to existing public foul mains. Studies are ongoing, but in terms of foul drainage, Anglian Water has confirmed no capacity issues with the existing network. Further studies will confirm if any further upgrades are required in order to accommodate the proposed development.

#### **ARCHAEOLOGY**

An Archaeological Desk-Based has been undertaken and concludes that apart from a Second World War bomb crater there are no records detailing heritage assets within the Site. However, given the proximity of a Roman Road, there is potential archaeological interest within the Site which might warrant further more intrusive investigation.

#### **NOISE**

A noise level survey has been undertaken. Railway noise and road traffic noise from the Chelmsford Road and the A12 does have an impact on noise levels, but all of the Site lies within either (former) noise exposure Category A or Category B. There is therefore only limited need for noise mitigation measures, and these will be taken into account through the design process for the Site.





### 6. CONSTRAINTS AND OPPORTUNITIES

From the above and the LVA the identified constraints of development of the Site are:

#### **CONSTRAINTS**

- Green Belt designation covers the whole Site; however the Site is considered to make a very limited contribution to the stated Green Belt purposes, due to the enclosure by existing built form, road and rail infrastructure;
- The sloping landform across the Site, which may require localised cut and fill to integrate new built form:
- While the Site is generally well contained from within the wider landscape, there are close range views from adjoining roads/residential back gardens; however the Site is seen within the context of existing built form and the incorporation of a new landscape framework would aid in softening and integrating the new built form;
- Existing vegetation: Ancient Woodland/County Wildlife Site. Mature trees (TPOs) on the Site; however the development can incorporate and enhance these features;
- Public Right of Way: FB86 crosses the eastern edge of the Site and can be incorporated as part of the new Green Infrastructure framework;
- Anglian Water access to Flood Detention Basin;
- Watercourses:
- Flood Zones 2 and 3: Slight impact;
- Rear gardens of neighbouring residential properties along boundary: Sensitive edge; to which the development can respond positively through new planting along this boundary; and
- Potential noise: From railway line and Chelmsford Road.

#### **OPPORTUNITIES**

- Proximity of new housing to Shenfield local centre. Provide new green links through the Site (pedestrian/cycleways) connecting to the north/south public right of way, Chelmsford Road and Alexander Lane;
- Affordable housing (inc Starter Homes) and family market housing;
- New areas of open space and play facilities to be shared by the local community as part of a new Green Infrastructure framework;
- Watercourses: potential green corridor/SUDS;
- Enhance structural landscape (trees/vegetation) across the Site using native species to enhance biodiversity;
- Retain existing mature trees, Ancient Woodland and TPO trees as key features for creating a series of green spaces across the Site; and
- Improved connectivity and contributions to existing public transport facilities through a sustainable Travel Plan;





Existing Water Courses ^

Contours/Spot Heights (Metres AOD) ^

Public Rights of Way \*



Green Belt ^^



Listed Buildings  $\sim$ 



Ancient Woodland #



Tree Preservation Order \*\*



High / Medium Flood Zone



New native planting to provide landscape screening and structure



Existing vegetation to be retained and enhanced



Partial Views

Potential open space



Potential residential development areas, set within a robust landscape framework and offset from root protection areas

## 7. DEVELOPMENT OPTIONS

#### **OVERVIEW**

A number of explorative development options have been produced to demonstrate the potential opportunities that are available as part of any development of the Site. The wide range of options seek to demonstrate to BBC the opportunities that are available, which could be secured through the Local Plan development allocation.

The Options set out could accommodate between circa 350-600 dwellings, dependent of densities/ uses/layout proposed, and could therefore make a significant and positive contribution towards meeting future housing needs in the Borough, in the short term. The development could also provide a number of community facilities.

This scale of development gives rise to an increased need for education provision, inc Primary school places. Following discussions with Shenfield High School, which are to be maintained, it is also understood that there is a desire to enhance existing sports/recreational facilities. These two considerations present an opportunity to provide for a new Primary school within the area, and deliver a cohesive development that incorporates the existing School and Borough playing fields to the south/west of the Site, in order to comprehensively provide for improved recreational facilities alongside a new Primary School.

Two of the four options set out below therefore include "potential additional land", as follows:

- School Playing Fields- circa 6.7ha
- BBC Playing Fields- circa 1.65ha

These options will therefore provide either:

- improved recreational facilities to serve Shenfield High School as part of the proposed development; or
- a new primary school, to create a "through school" with the existing High School. This would include dual-use, new and improved recreational facilities.
- These options would maximise the number of units capable of being delivered as part of the development, meaning there is less reliance on the development of other less sustainable sites in order for BBC to meet its housing requirements.

#### **SITE DESIGN PRINCIPLES**

All options are based on a number of key design principles, which are set out below.

- Provide a sustainable development on the edge of Shenfield with safe pedestrian/cycle connections to the centre as well as to nearby schools, minimising the need for car journeys and promoting a healthy, active lifestyle.
- Deliver high quality family housing that reflects the ethos of Croudace Homes.
- Integrate the development into the existing landscape and adopt an environmentally sensitive approach, minimising the impact on the surrounding Green Belt and adjacent County Wildlife Site.

- Provide an enhanced green link north/south through the Site and a series of interlinking green spaces aligned east/west.
- Provide a distinctive, high quality development in terms of individual buildings, urban form and spaces, which draws on the traditions of the area.
- Create a safe and attractive place in which to live, which fosters a sense of community.
- An east/west green corridor across the Site, linking the existing public footpath to Chelmsford Road and comprising a multifunctional open space alongside the stream. This linear open space could accommodate surface water attenuation basins and provides an opportunity for enhanced biodiversity and informal recreation.
- A substantial north/south green corridor along the eastern edge of the Site which includes the ancient woodland, the East Field, two main groups of TPO trees (G2&G3) and the public footpath.
- New access road from Chelmsford Road.
- Reinforcement of existing hedgerow/tree screen along northern boundary to preserve the privacy of neighbouring residential properties fronting Chelmsford Road.
- Subject to detailed design, density of development will vary across the Site with higher densities in the central and southern parts of the Site and lower density housing on the northern part.
- The existing mature trees will be retained and protected, providing a mature, attractive setting for the development. The spaces around these trees will be designed as informal open space and play areas to encourage a variety of outdoor activities for all ages.

#### **DEVELOPMENT OPTIONS**

The overall deliverability of the Site will depend on the detailed layout, proposed uses and proposed densities. The density of the development will vary across the Site responding to the character of Shenfield and identified constraints and opportunities. It is envisaged that higher densities could appear in the central and southern parts of the Site, and lower density housing in the northern part. The density will also take account of National and local policies at the appropriate time.

The 4 No. Development Options are illustrated below/opposite, along with the key development components and net density ranges for each Option. Net density is based on the developable area, excluding areas of open spaces, landscape buffer and drainage features. Whilst the net density would be higher than neighbouring development, the overall gross density would only be between 16 and 23 dph because of the provision of significant areas of open space on the Site.



# Site Boundary Approximately 20.6 hectares Proposed Residential Development Approximately 12 hectares Proposed Primary Roads Proposed Green Links (Pedestrian/Cycle/Emergency Access) Public Right of Way Route to Shenfield Railway Station Existing Woodlands, Copses and Tree Belts Ancient Woodland / County Proposed Areas of Open Space/ Landscape Buffers Potential Local Centre/ Community Facility Proposed Play Area (NEAP) Existing Watercourses, including

some existing drainage channels

#### **OPTION 1**

The illustrative Masterplan demonstrates how the Site could be developed and sets out the main design principles for access (vehicular and pedestrian), developable areas, open space and landscape strategy.

- Provision of circa 360 to 480 dwellings;
- Proposed Green Link to Alexander Lane;
- Proposed areas of open space/landscape buffer;
- Provision of a NEAP and potential Local Centre/Community Facility.

Developable Area	Density in dph		
Area	30	35	40
12ha	360	420	480





# DEVELOPMENT OFFICERS MEADOW FRAMEWORK DOCUMENT SHENFIELD

#### **OPTION 2**

- Provision of between approximately 333 and 444 dwellings;
- Provision of Park and Stride to accommodate between 260 and 310 parking spaces;
- Proposed Green Link to Alexander Lane;
- Proposed areas of open space/landscape buffer;
- Provision of a NEAP and potential Local Centre/Community Facility.

Developable Area	Density in dph		
Area	30	35	40
11.1ha	333	389	444



# Site Boundary Approximately 25.2 hectares Proposed Residential Development Approximately 12 hectares Proposed Vehicular Access Points Proposed Primary Roads Public Right of Way Route to Shenfield Railway Station Chelmsford Road (A1023) Junction with Alexander Lane Bollards - Alexander Lane No Through Road (Pedestrian/Cycle/Emergency Access) Existing Woodlands, Copses and Tree Belts Ancient Woodland / County Wildlife Site Proposed Areas of Open Space/ Landscape Buffers Proposed Tree Belts Park & Stride Approximately 0.77 hectares Approximately 2 hectares to Include I hectares of School Playing Fields Improved/Dual Use Playing Fields Potential Local Centre/ Community Facility Proposed Play Area (NEAP) Existing Watercourses, including some existing drainage channels Figure 7.3 Option 3

#### **OPTION 3**

- Provision of approximately 360 to 480 dwellings;
- Provision of a 2FE Primary School comprising 1ha of building, and 1ha of school playing fields;
- Improved/dual use of existing playing fields located to the south;
- Provision of Park and Stride to accommodate between 260 and 310 parking spaces;
- Provision of bollards on Alexander Lane to prevent through traffic, with the exception of pedestrian/cycle/emergency access.
- Proposed Green Link to Alexander Lane;
- Proposed areas of open space/landscape buffer;
- Provision of a NEAP and potential Local Centre/Community Facility.

Developable Area	Density in dph		
Area	30	35	40
12ha	360	420	480





# DEVELOPMENT OFFICERS MEADOW FRAMEWORK DOCUMENT SHENFIELD

#### **OPTION 4**

- Delivery of between 441 and 588 dwellings;
- Provision of Park and Stride to accommodate between 260 and 310 parking spaces;
- Improved/dual use of existing playing fields located to the south;
- Propod Green Link to Alexander Lane;
- Proposed areas of open space/landscape buffer;
- Provision of a NEAP and potential Local Centre/Community Facility.

Developable Area	Density in dph		
Area	30	35	40
14.7ha	441	515	588





Figure 7.5 Aerial Perspective based on Option 1

### 8. COMMUNITY BENEFITS

Paragraph 152 of the NPPF confirms that LPA's should seek opportunities to achieve each of the Economic, Social and Environmental dimensions of sustainable development, and net gains across all three.

#### **COMMUNITY/SOCIAL BENEFITS AND OPPORTUNITIES**

There are a number of potential community benefits which could arise from development of the Site, including contributions towards existing community facilities and/or the provision of community facilities on site.

#### This could include:

- Improved recreational facilities to serve Shenfield High School, and/or a new primary school;
- The provision of a Park and Stride facility to serve the Crossrail station. This would aid sustainable travel and utilise the benefits of Crossrail;
- Provision of the most needed type of family housing in a highly sustainable location;
- Creation of plays areas such as NEAP/LAP/LEAP for the benefit of existing and future residents;
- Provision of extensive open space to address the current accessible open space deficiencies in Shenfield;
- Strengthening of Shenfield's vitality and viability, which will shortly benefit from the arrival of Crossrail;
- Creation of pedestrian links via Alexander Lane to Shenfield centre and railway station;
- Delivery of affordable homes (inc Starter Homes) to meet local need;
- Development of a Site that would be well contained within the landscape, thereby meeting housing need, but protecting more sensitive and visual sites within the landscape; and
- Enhanced footpaths/green links to the wider countryside for dog-walkers and leisure users.

The above would need to be considered in line with the relevant planning "tests" on S106 set out within Community Infrastructure Levy Regulations (as amended) 2010 and the NPPF (para 204).

#### **ENVIRONMENTAL BENEFITS**

The Site is located on the edge of Shenfield which offers a wide range of retail, leisure and community facilities. Shenfield already benefits from excellent transport links which are likely to be further improved in the foreseeable future.

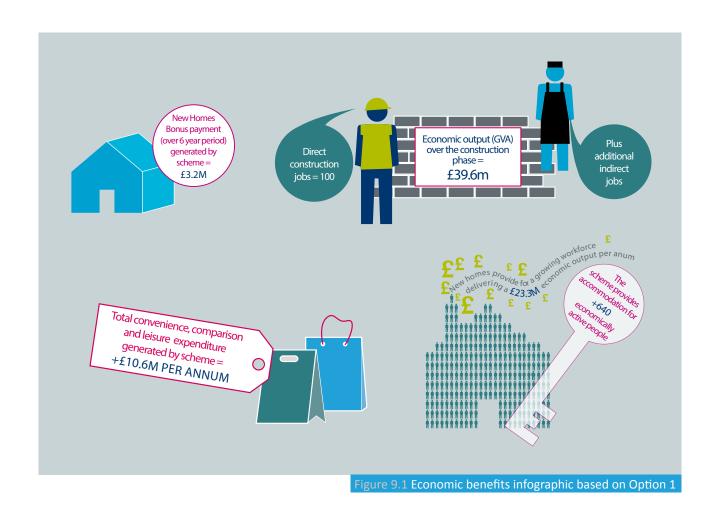
The Site lies within comfortable walking distance of the centre of Shenfield and the railway station in particular. By virtue of its location and the intention to provide new and improved pedestrian/cycle routes, development of the Site would play a significant part in reducing reliance on the car for local journeys. The arrival of Crossrail will further improve the sustainability of the site.

The surface water drainage strategy for the Site is based on SuDs principles and all necessary utilities/ services are understood to be available. This would ensure that there is no increase in flooding as a result of the proposed development.

It is acknowledged that there will be some adverse impacts on the Site by virtue of the change in land use and evident change from fields as a result of the introduction of new built form. However, these impacts would be localised to the Site only and close range views, as in the wider context the Site would be seen within the existing context of residential built form and Shenfield's settlement pattern. The proposals will ensure appropriate ecological mitigation is provided to ensure limited impacts on wildlife and habitats, and overall biodiversity enhancements.

#### **ECONOMIC BENEFITS**

The following summary highlights the substantial need positive impact the proposed scheme will have on the local economy. .



### 9. SUMMARY AND NEXT STEPS

This document is submitted to accompany written representations to BBC's Regulation 18 Draft Local Plan consultation in respect of Officer's Meadow, Shenfield on behalf of Croudace Homes.

BBC's sequential approach to the selection of sites for future development has identified that its housing requirement cannot be accommodated on brownfield land within urban areas, and therefore, additional allocation sites within the Green Belt are proposed to be allocated for residential development. This includes Officer's Meadow in Shenfield, as part of a proposed allocation within the DLP for 600 dwellings, in addition to the potential for open space, sport uses and/or Crossrail 'Park and Walk' facility.

Shenfield represents one of the two most sustainable settlements in the Borough, and is recognised as a sustainable location for future growth. Shenfield's sustainability will be increased considerably following the arrival of Crossrail. It is therefore considered that a proportionate amount of future housing growth should be allocated to Shenfield in the emerging growth strategy.

The Site is assessed as 'suitable', 'available' and 'achievable' in BBC's SHLAA (2010). Further, the site is considered 'Deliverable' for the following reasons:

- The Site has strong sustainability credentials and significant locational advantages, being on the edge the built up area of Shenfield and well contained within the landscape;
- Investigations into Ecology, Access, Landscape, Drainage Archaeology, Utilities/Services, and Noise have indicated that there are no obvious barriers to the development of the Site;
- Apart from new high quality housing, the release of the Site for development could deliver a
  wide range of community benefits, including a new 2FE Primary School and 'Park and Stride'.
- The Site is currently available for development in the immediate future, and can therefore contribute to BBC's housing supply in the short term;
- No significant technical or environmental constraints to development have been identified;
- Croudace is a long established house building company with considerable experience in promoting and delivering developments containing a wide range of new dwellings throughout the South-East;
- Croudace is keen to secure the delivery of new housing at Officers Meadow at the earliest possible opportunity.

#### **NEXT STEPS**

Croudace Homes will continue to:

- Undertake further technical studies to gain a greater understanding of the opportunities and constraints of the Site, and to demonstrate it suitability for development;
- Continue to engage with BBC and Shenfield High School through the Local Plan process.

The Observatory
Southfleet Road
Ebbsfleet
Dartford
Kent
DA10 0DF
tel: 01322 374 660

fax: 01322 374 661 www.bartonwillmore.co.uk

Document Status:	Final
Revision:	06
Author:	Various
Prepared by:	MW
Checked by:	НА
Authorised by:	НА
Issue Date:	March 2016

© The contents of this document must not be copied or reproduced in whole or in part without the written consent of The Barton Willmore Partnership.

All plans are reproduced from the Ordnance Survey Map with the permission of the Controller of HMSO.

Crown Copyright Reserved. Licence No. 100019279.