



**BRENTWOOD
BOROUGH COUNCIL**

Brentwood Draft Local Plan Preferred Site Allocations

January 2018

COMMENT FORM

From 29 January to 12 March 2018 we are consulting on the next stage of the Brentwood Local Plan: Preferred Site Allocations. You can view and comment on the consultation document online at www.brentwood.gov.uk/localplan

Alternatively, please use this form to share your views on the contents of the document.

All responses should be received by Monday 12 March 2018

Please return forms to Planning Policy Team, Brentwood Borough Council, Town Hall, Brentwood, Essex CM15 8AY, or alternatively attach completed forms and email them to planning.policy@brentwood.gov.uk

Data Protection

All personal information that you provide will be used solely for the purpose of the Local Plan consultation. Please note whilst all addresses will be treated as confidential, comments will not be confidential. Each comment and the name of the person who made the comment will be featured on the Council's website.

By submitting this form, you are agreeing to these conditions.

PERSONAL DETAILS

Title:	Mr	First Name:	Mark	Last Name:	Bedding
Address:					
Post Code:		Telephone Number:			
Email Address:					

YOUR COMMENTS

Please indicate which section(s) of the Preferred Site Allocations document that you are commenting on (where applicable please clearly state the section/heading or paragraph number):

Please see below

Please specify if you Support, Object or are providing a General Comment:
(tick as appropriate)

Support

Object

General Comment

Comments (please use additional sheet if required):

Crest Nicholson Eastern (CNE) support the Plan in principle and in particular the allocation of site 076; Land South of Redrose Lane, north of Orchard Piece, Blackmore (hereafter referred to as “the site”).

As identified in the table on page 85, CNE support the suggested quantum of approximately 40 homes, to be delivered in the first phase of the Plan period (delivery forecast years 1-5).

The allocation is justified in the current iteration of the Plan and its evidence base. The Plan recognises the importance of “sustainable growth of existing larger villages to provide improved housing choice and protect services and facilities” (Strategic Objective 3).

BBC’s “Assessment of Potential Housing, Employment and Mixed Use Sites in the Green Belt” (March 2016) states that land north of the existing post WWII residential area has containment offered by Redrose Lane which would represent the absolute northern limit of Blackmore. Development here would not lead to coalescence with other villages and would have a limited relationship with its historic core.

BBC’s Green Belt Study (January 2018) concludes that Parcel 2 within which the site falls provides a “low to moderate” overall contribution to Green Belt purposes (the lowest contribution rating in the District).

BBC’s Sustainability Appraisal of the Local Plan (undertaken independently by AECOM, January 2018) states that “the proposal to allocate several sites at the larger villages in the north of Brentwood (163 homes in total; in comparison to the 2016 Draft Plan approach of nil allocations) gives rise to very limited concerns. The main proposed focus of growth is at two adjacent sites to the north of Blackmore (96 homes), which are unconstrained by nature conservation designations.”

As detailed in previous representations and the enclosed Vision Statement undertaken by CNE (March 2016), the site is considered entirely suitable for residential development on the following grounds:

- Blackmore is identified as a “Large Village” but is unique given its more clearly defined spatial configuration and range of centrally located village services. Land to the north of the village enclosed by Redrose lane represents the most suitable, logical and obvious extension to any village in the district. In contrast, the majority of other villages are characterised by more linear, sporadic settlement boundaries preventing logical extensions.
- In the context of natural population growth driven by an ageing population and worsening housing affordability, it is critical that Blackmore accommodates new homes over the Plan period to 2033.
- It has been identified that in order to meet the natural population growth of Blackmore, at least 4-5 units should be completed each year.
- The site would deliver around 40 much needed new homes meeting Blackmore’s housing need for the next ten years with delivery within the first two years of Local Plan adoption.
- A mix of house types would be delivered catering for families, first time buyers and those wanting to downsize.

- 35% affordable housing would be provided for local people (guaranteed through a Local Lettings Plan) to ensure younger generations can afford to stay in village they grew up in.
- The provision of family housing would ensure the village has a wider age diversity enabling the retention of its working age population and securing the long term viability of shops and services.
- No technical or environmental constraints have been identified that would prevent the early delivery of residential development.
- The site is considered the most suitable at Blackmore due to its scale, level of containment, and limited Green Belt/landscape impact (as confirmed in BBC's Local Plan evidence base).
- CNE based locally in Brentwood would deliver the scheme within two years of Local Plan adoption. Crest Nicholson has been building new homes for over 50 years and is a market leader in the planning, design and construction of high quality, community-led residential schemes. Crest are proud to have been awarded national 'Housebuilder of the Year' twice in the last three years alongside a collection of industry excellence awards. They have achieved more CABE Building for Life Gold Awards than any other housebuilder which reflects their approach to high quality design and the creation of sustainable communities.

Although the Plan is supported in principle, minor amendments are sought to the following sentences:

Para 34: ~~In addition, we are introducing a limited~~ A sustainable level of growth in our larger villages is proposed to enhance the range and choice of local housing options but also to promote the retention and development of local services and community facilities.

This ensures consistency with Strategic Objective 3.

Para 66: The proposed housing allocations for the larger ~~more~~ sustainable villages are more limited in size and scale but will at a local level provide a valuable crucial role in enhancing the housing mix, introducing new affordable housing and help support local shops and services. As smaller greenfield sites ~~they are likely to be attractive to smaller builders and~~ they have the possibility greater potential of being built out relatively quickly to support housing delivery within the early stages of the Plan being adopted.

This emphasises the importance of growth at Large Villages and deletes the implication that small builders can deliver more quickly, when in fact the opposite argument could be made.

Table on page 85 relating to allocation: Delete "~~Access considerations on Redrose Lane~~" and "~~Surface water flooding considerations.~~" under heading "Site Constraints". There are no technical constraints relating to highways or drainage preventing early delivery.

In terms of drainage the site is located within Flood Zone 1 (less than 0.1% chance of flooding in any year or a 1:1000 year chance). It is acknowledged that there have been incidents of surface water ponding recorded during excessive periods of rainfall along Redrose Lane, however the area affected is beyond the eastern boundary of the site (around the 71.5m contour) where the watercourse is culverted under the Lane.

Given the local topography, the flooding depth in Redrose Lane has a negligible impact upon the site. As a precautionary measure, it is intended that the minimum floor level of proposed dwellings in the north east of the site will be raised by circa 300mm. Nevertheless, the engineered SUDS strategy will of course provide a significant betterment to the existing situation in terms of managing the flow of surface water discharge rates, reducing the risk of flooding to Redrose Lane. CNE continue to liaise with both ECC and the EA in this regard.

In relation to access considerations, provision of a new road junction from Redrose Lane comprising a shared surface is entirely acceptable in policy, technical and capacity terms, as confirmed by ECC Highways.

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