

LOCAL DEVELOPMENT PLAN

INTRODUCTION

The Parish Council met and debated the 2018 version of the draft Local Development Plan (LDP) and agreed the following as its submission to the consultation process.

We examined the Borough-wide proposals in full along with supporting appendices and reports. Our response primarily concerns each of the four allocated 'preferred' sites in our Parish together with the impact on the community of the combination of these separate housing developments.

Previous iterations of the LDP, in preparation since 2009, failed to identify a single plot of land within our Parish as suitable to count towards the Borough's targets. There were good reasons then not to impose inappropriately conceived housing estates in this rural area. Those same reasons apply today. Seemingly, the difference in 2018 is a further increase in the required housing quota coupled with the threat of Ministerial intervention; and commercially vested pressure from third-party developers – leading to the hasty requisitioning of land formerly deemed unsuitable for development.

We understand that change is inevitable, indeed desirable when it recognises and adapts to the needs of the host community to deliver complementary growth. Our preferred approach to achieving this desired balance relies on Parish Council members' shared awareness of the special circumstances of the area, its environment, demographics, infrastructure and -- most importantly -- people.

As it applies to our Parish, the LDP allotted an inequitable burden of additional housing: four separate housing estates leading to a minimum extra 116 dwellings. In Blackmore village itself this amounts to a 28.6% increase in the housing stock. All other contiguous parishes in the north and west of the Borough have no allocation at all, apart from Kelvedon Hatch. Elsewhere three of the parished areas of the Borough, Fryerning, Herongate, and Ingrave also escape attention from the planners. The exceptional circumstances attached to development at West Horndon and on the outskirts of Ingatestone are not comparable to the character and status of our Parish.

THE SITES

076 Orchard Piece, Blackmore.

This site is within a long-established Greenbelt zone. It serves as a final barrier against urban encroachment to the north of the settlement of Blackmore village. Until being left fallow this agricultural land has traditionally been farmed as pasture and arable. It faces on to working farms uninterrupted as far as the boundary with Epping Forest District. Should consent be given to proceed with the LDP in respect of this site, the Borough's stated intent is to apply for withdrawal of its Greenbelt designation. Residents, those living nearby and others who object to the loss, will vigorously contest the application citing among other objections, that the extent of the development is inappropriate; contrary to the intention of Greenbelt legislation to permanently provide and protect open space; and fails to meet the threshold of exceptional need.

The site is subject to frequent surface water inundation. Water spill from this field contributes to localised flooding of the adjacent Redrose Lane. At times of exceptionally heavy rainfall the depth of water makes the road impassable to traffic and pedestrians. The source of the Wid river draws from the natural drainage of this field. The adjoining strip of open land between Redrose Lane and Chelmsford Road has the Wid tributary running alongside. This marshy ground is also prone to waterlogging and contributes to periodic flooding and subsequent closure of the Chelmsford/Mountnessing Road junction as well as submerging parts of the village green within the Conservation Area. Extensive works should already have been undertaken by the responsible authority to alleviate the present drainage failings. These would have to be expanded, and in place, before even minor development allowed.

This site and site 077 Woollard Way are separated only by the narrow Fingrith Hall Lane. The sub-heading **Blackmore Village** covers aspects of the LDP that are common to these two sites.

The final sections of this submission address the Parish-wide implications of the LDP as it impacts the village and settlements of Hook End and Wyatts Green.

077 Woollard Way, Blackmore

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85B Recreation Field, Tipps Cross

This site is within a long-established Greenbelt zone. It is a well-used and well-kept recreational field and an integral part of the range of leisure and educational facilities provided by the Trustees of Tipps Cross Remembrance Hall.

Residents, those living nearby and others who object to the loss, will contest an application that seeks de-registration from Greenbelt protection. The challenge to the application would rely on the LDP's incorrect definition of the site as 'small village infill'; misjudgement in representing it as 'connected to the existing Doddinghurst urban area'; and the irreplaceable loss of the only public recreation land in Tipps Cross.

Further objections include the inappropriate density of the development and the plan being contrary to the intention of Greenbelt legislation to permanently provide and protect open space.

The LDP fails to take account of the unique circumstances attached to this site. Tipps Cross Remembrance Hall is on ground acquired by Brentwood Council in 1986 with the stated intention of enabling the continued use of the existing sport field and community hall. The then hall had been a local amenity since 1924 when built alongside a cricket field on land gifted by a resident to local ex-servicemen. The field originally spread into separately owned land. When the privately owned segment was sold as horse pasture, the reduced size was no longer viable for cricket so became a two-court croquet lawn and grassed play area for children.

A replacement hall supervised by Brentwood Council's Recreation Department was erected in 1991, and the new amenity renamed in honour and perpetual memory of the dead of the two World Wars. The Borough ran the facility at a heavy loss before surrendering management in 1992 to the Parish Council who formed a trusteeship to take control. The Trustees, now with charity status, have successfully maintained and improved the facilities and balanced the budget until the present day. The ability of the Trustees to sustain continued daily use of the Remembrance Hall for its many diverse groups of users is seriously compromised by the threat to annexe the field.

Events held on the field provide for community socialisation – as evidenced by the Borough's Community Service department reserving it to stage a Family Fun Day in August 2018.

The field was added in 2017 to a Borough register of 'realisable assets', creating a financial incentive for the late selection for development of a site not previously under consideration.

294 Chestnut Field, Tipps Cross

This site is within a long-established Greenbelt zone. It is a pleasant and undisturbed section of open space situated alongside residential gardens. With the croquet lawn of Tipps Cross Remembrance Hall, it forms the final barrier between households of the Hook End settlement and encroachment of urban sprawl. Residents, those living nearby and others who object to the loss, will vigorously contest an application that seeks de-registration from Greenbelt protection. The challenge to the application would cite the LDP's incorrect definition of the site as 'small village infill' and misjudgement in representing it as 'connected to the existing Doddinghurst urban area'. Further objections include the inappropriate density of the development when combined with that of the neighbouring plot and the plan being contrary to the intention of Greenbelt legislation to permanently provide and protect open space.

Sites 085B and 294 Blackmore Road

There are five new homes, as of February 2018, being converted from a former commercial garage on Blackmore Road in close proximity to the proposed dual development. Coupled with the LDP allocation this will produce a new streetscape and building line of 25 homes at a density that will detract from the existing character of the area.

There is variance in copies of the LDP seen by the Parish Council over the period in which Chestnut Field is due to be developed. Both phase one (1-5 years) and phase two (5-10 years) have been given – again indicating the allocation has been hurriedly included without proper research as to its viability.

Blackmore village

The village centre encompasses a Conservation Area of special architectural and historic interest. The award citation states: “The village is attractive, well defined and self contained, substantially enclosed by hedges and trees. The river Wid flows around and through the village.” The LDP proposals would invade the defined nature of the settlement by creating housing estates to obliterate the existing margins.

Substantial road and surface water drainage works would have to be completed before Redrose Lane is equipped to safely accommodate increased volumes of traffic and pedestrian use. Redrose Lane itself (a rare extant example of a 'plague detour route', a track used by travellers to bypass villages infected during outbreaks of the Black Death) would retain its ancient name but lose all visual resemblance of its origin.

There is a lack of assurance in the LDP that programmes are in place to ensure essential infrastructure and utility service upgrades would be in place before any development proceeds.

The Parish

There are three main settlements in our widespread rural Parish, each separated by tracts of fields given over to agriculture, woodland, and common land. Two of them, Blackmore and Hook End, have without prior notice been allocated a total of 116 new homes to be built over the Greenbelt along with an indeterminate number of permitted Traveller homes. The third, Wyatts Green, has not been allotted any enforced new housing but is included in subsidiary LDP documents as having several potential alternative sites under investigation.

The repercussions of the four new housing estates will be most felt by those closest to the developments should they go ahead. However there is also danger of permanent disadvantages Parish-wide if the LDP is adopted without amendment.

These unfavourable consequences include:

Education - Blackmore Primary School is the only school in the Parish. Pupil numbers are at capacity of 175. Additional staff and classroom space will be required to account for the extra households in the Parish. Further demand will come from newly 'regularised' travellers sites and housing developments currently or imminently being constructed outside the LDP area but for which Blackmore is the most convenient choice. We can find no evidence the Education Authority has prepared or activated a programme to complete the enlargement of the school premises and recruitment of staff required by as early as 2020. There is no secondary school within five miles of the village centre.

Health – The Parish does not have a GP surgery. While some residents are registered with practitioners in Chipping Ongar or Brentwood, most attend the Deal Tree Health Centre in Doddinghurst. Already operating a three-week wait for appointments, any significant increase in patient numbers can only worsen the Health Centre's ability to provide timely care.

Character – Again quoting from the Conservation Area statement: “Blackmore is a remote settlement to the north-east of Brentwood and east of Ongar. It is on a relatively flat site surrounded by open fields in lightly rolling countryside.” This remoteness – equidistant from Chelmsford, Chipping Ongar and Brentwood – is one of its attractions but also creates logistical challenges for residents and businesses. ‘Dwellings’ providing accommodation suitable for key workers; starter homes for young families and single adults seeking independent ownership; and, a particular local need, one or two bed homes for the elderly, would contribute to the sustainable ‘organic’ advancement of the Parish, its environment and character. The latter requirement would further benefit the community by releasing family homes, often occupied by a single elderly person, back into the housing stock. However, estates of the size envisioned in the LDP and driven by developers’ commercial imperative to maximise profits jeopardise the ability to avoid becoming just another commuter dormitory indistinguishable from the urban suburbs.

Transport – There are no A-rated roads in the Parish. It is instead intersected by minor roads and narrow country lanes, often of only single-vehicle width. Heavy goods transport use the Parish as a through route between motorways and A-roads. The hourly and two-hourly bus services are geared to shoppers needing access to Chelmsford, Chipping Ongar or Brentwood and have no evening or Sunday service. The closest railway station is Shenfield – 50 minutes and two bus changes away; £16 one-way by taxi; 12 minutes by car. Ingatestone and Brentwood railway stations similarly cannot be reached without changing buses and not at all by public transport after 6pm and Sundays. While these factors contribute to the Parish’s own recreational and leisure facilities being well-patronised, it also leads to a high-level of household multi-vehicle private car ownership. A shortage of safe roadside parking causes disruption in the village centre; in Wyatts Green a long stretch of road is a permanent danger to pedestrians. A substantial increase in the number of vehicles in use in the Parish will exacerbate these problems and the LDP has no strategy to overcome them.

CONCLUSION

There is an inherent unfairness in the LDP as it applies to the Parish. As noted in our Introduction – discounting the exceptional position of West Horndon, Ingatestone, and Kelvedon Hatch as 'Village Service Centres' – we alone of the parishes have been targeted for an overwhelming number of new homes. We are not classified in the LDP as a Village Service Centre, i.e. providing adequate services and facilities. Yet, adjoining Doddinghurst parish, a Village Service Centre, is left untouched by the LDP.

Brentwood, with its many empty retail properties, has ample scope to absorb the unjustifiable housing numbers allocated to us. What would be preferable: refurbishment into apartments of the desolate former Post Office on the High Street or the obliteration of a community's small and only recreational field? The LDP also reveals how disproportionate this allocation is by comparison with the intended outcome for the town of Brentwood itself. There the LDP's stated aim is to reduce the percentage of housing it provides for the Borough by 2% while our parish, located the furthest distance from the town centre, is allocated a series of developments that will see its village centre increase by 28.6%. The town centre provides immediate walking-distance access to all services and amenities making it the most obvious and attractive option for assimilating the population increase the LDP seeks to accommodate.

Further opportunities are also contained within the LDP to reduce the discriminatory burden placed on our Parish. As mentioned above, parcels of land in other areas could take their share; the LDP itself has spare capacity in the target totals it has set and these should be reconfigured in light of the extraordinarily high number allocated to us.

Determining the merits or otherwise of the LDP is hampered by the blanket use of 'dwelling' for each intended new home. While this maybe appropriate for urban parts of the Borough with streetscapes lacking architectural interest and scenic outlooks, the imprecision of the term is of major concern. If the LDP's proposals are based solely on reaching 'dwelling' targets without specifying the suitability, type and construction, it is a flawed process. The absence of this key information raises the prospect the Borough will lose oversight by devolving decision making for these crucial elements to each site's property developer without reference to local needs.

As outlined in the sub-heading *Character*, we are committed to examining possibilities that provide for increased housing choice and availability. After full account is taken of the unique nature and needs of the Parish, that may present an opportunity for construction on a more favourable plot or support for granting a Greenbelt exception within the footprint of an LDP allocated site. The LDP fails to provide for that outcome. The adverse consequences outweigh any perceived benefits.

Therefore, we object to the LDP as currently drafted.