
Brentwood Local Plan

Planning Representations

Prepared by Savills (UK) Ltd on behalf of Crest Nicholson Eastern in respect of Land North of Orchard Piece, Blackmore (Local Plan Policy R26)



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1. Representations

Introduction

- 1.1 These representations have been prepared by Savills (UK) Ltd on behalf of Crest Nicholson Eastern (Crest) in response to Brentwood Borough Council's Local Plan Pre Submission Document (February 2019). The Pre-Submission Local Plan presents the Council's vision for how the borough will develop over the next 17 years, from 2016 to 2033.
- 1.2 We have previously submitted representations on behalf of Crest to earlier consultation versions of the emerging Brentwood Local Development Plan; including the Strategic Growth Options in 2015, the Draft Local Plan in 2016 and the Draft Local Plan Preferred Site Allocations in 2018.
- 1.3 These representations are made in relation to the Pre Submission Local Plan (February 2019) and specifically relate to proposed site allocation ref. R26 'Land north of Orchard Piece, Blackmore' which is being promoted by Crest. We note that as part of the previous consultation on the Draft Local Plan in 2016, there was support received from a number of local residents regarding the allocation of this site (ref. 076) for housing.
- 1.4 A Vision Statement prepared by Thrive Architects is enclosed at Appendix 1. This Statement articulates how approximately 40 dwellings can be delivered as part of a high quality, generously landscaped scheme. The illustrative layout shown carefully considers the site's opportunities and constraints and has been informed by detailed technical studies undertaken in liaison with statutory consultees.
- 1.5 This report sets out the key areas that Crest wish to make representations upon. In responding to this consultation, these comments take into account Paragraph 35 of the NPPF which requires Local Plans to be sound. To meet this requirement they should be positively prepared, justified, effective and consistent with National Policy.

Settlement Strategy

- 1.6 The draft Pre Submission Local Plan states at paragraph 2.8 that in accordance with the NPPF, housing in rural areas should be located where it will enhance the vitality of rural communities, to ensure villages grow and thrive.



- 1.7 As part of the Council's Settlement Hierarchy Assessment, Blackmore is identified as a 'Rural Village' or Category 3 Settlement, which is defined as a village that provides day to day needs for local residents, where limited urban extensions are encouraged to meet local needs.
- 1.8 However, Blackmore is unique in comparison to other Category 3 Settlements due to its more clearly defined spatial configuration and range of centrally located village services.
- 1.9 Enclosed by permanent boundaries on all sides, Land North of Orchard Piece makes only a "moderate" contribution to the purposes of including land within the Green Belt (BBC's Green Belt Study, November 2018) and represents the most suitable, logical and obvious extension to any village in the Borough. In contrast, the majority of the Borough's other villages are characterised by more linear, sporadic settlement boundaries preventing logical extensions.
- 1.10 Pre-Submission Local Plan paragraph 2.16 states minimal amendments are proposed to the Green Belt boundaries surrounding larger villages in order to retain the character of the borough, in line with the spatial strategy. In this respect, it is proposed that site ref. R26 be removed from the Green Belt and allocated for new housing, to help meet an identified need for new housing in rural locations. This is also critical in terms of addressing localised affordability issues and retaining the viability and vitality of local shops and services.
- 1.11 The Local Plan's approach to releasing Green Belt land (including Land North of Orchard Piece) at Category 3 settlements is therefore considered to be compliant with Para 136 of the NPPF and is fully supported.

Housing Need

- 1.12 The Pre Submission Local Plan seeks to provide 7,752 residential dwellings during the plan period (2016-2033). These dwellings will be delivered at an average rate of 310 dwellings per year to 2022/23, followed by 548 dwellings per year from 2023/24-2033.
- 1.13 Draft Policy SP02 'Managing Growth' states that new development within the Borough will be directed towards the proposed site allocations. Green Belt land on the edge of larger villages, such as site allocation ref. R26, is recognised within the draft Plan as making an important contribution to the required housing provision in the Borough.
- 1.14 As set out in our previous representations (dated March 2016), we still have some concerns about the significant reliance on the proposed development of Dunton Hills Garden Village to meet the Borough's housing need. The Pre-Submission Draft Local Plan states this site would provide 2,700 new homes, which equates to 35% of the borough's housing need. There are concerns in respect of a third of the housing



supply coming from one source and it is highly questionable whether such a large scale concept can be relied upon to address the borough's significant housing need.

- 1.15 This increases the importance of the Borough's smaller site allocations including Land North of Orchard Piece, that are capable of being delivered in the short term.

Land north of Orchard Piece, Blackmore

- 1.16 These representations strongly support the principle of allocating Land north of Orchard Piece, Blackmore (R26) which we consider should be released from the Green Belt, in order to meet the existing and future housing and socio-economic requirements within Blackmore. This approach is entirely appropriate, in accordance with the Settlement Strategy outlined above.
- 1.17 The proposed site allocation is considered to promote sustainable development, and in accordance with draft Policy SP01 'Sustainable Development' will ensure that the character and setting of Blackmore village is preserved and enhanced.
- 1.18 An extract of the proposed site allocation (Policy R26) is included below for ease of reference:



- 1.19 The allocation acknowledges that the site is considered to be deliverable within the next two to three years. This is fully supported.
- 1.20 Land North of Orchard Piece was initially allocated for housing in the Draft Local Plan (2018) for approximately 40 dwellings. This more closely accords with Policy HP03 of the current Pre-Submission Plan which seeks to “achieve a net density of at least 35 dwellings per hectare net or higher”. A density of 35 dwellings per hectare applied to the site’s net developable area of 1.52 hectares (as identified in the Plan) equates to 53 dwellings.
- 1.21 However, the current Pre-Submission Plan reduces the quantum of homes allocated at Land North of Orchard Piece to approximately 30 dwellings.

- 1.22 The single paragraph justification provided in the supporting Sustainability Appraisal (SA) states that *“Ahead of the 8th November 2018 Extraordinary Council meeting the Council worked to explore potential adjustments to the strategy, as previously published, in light of representations received, with the Council reaching the tentative conclusion that, whilst all of the January 2018 allocations remain suitable, there was a need to reduce the number of homes allocated to certain sites³⁸”* Footnote 38 then states *“Specifically: the yield of the two adjacent sites at Blackmore was reduced by 26 homes to take account of the potential need for surface water flooding measures on site.”*
- 1.23 Ardent Consulting Engineers have undertaken detailed technical work relating to flooding and drainage to inform proposals for the site. In terms of drainage the site is located within fluvial Flood Zone 1 (less than 0.1% chance of flooding in any year or a 1:1000 year chance). The Brentwood Strategic Flood Risk Assessment (SFRA – Nov 2018) shows that the Site is in an area that is not vulnerable to groundwater flooding.
- 1.24 Some residents have noted incidents of surface water ponding along Redrose Lane during excessive periods of rainfall. However, the area noted is beyond the eastern boundary of the site where the watercourse is culverted under Redrose 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 the proposed dwellings in the north east corner of the site will be raised by approximately 300mm. In addition, ditches along the boundary of the development could be implemented.
- 1.25 The engineered Sustainable Drainage System (SuDS) will provide a betterment to the existing situation by managing the flow of surface water discharge rates into the surrounding network. CNE continue to liaise with both ECC and the EA in this regard.
- 1.26 Therefore, although the principle of the site’s allocation is fully supported, the reduction in quantum of homes from 40 to 30 homes does not align with detailed technical evidence, nor is it compliant with Plan Policy HP03 which seeks to maximise the density of development (at a minimum of 35 dwellings per hectare) through a design-led approach.
- 1.27 The appended Vision Statement articulates how approximately 40 dwellings can be delivered as part of a high quality, generously landscaped scheme, reflective of the existing density and pattern of surrounding residential development. The illustrative layout carefully considers the site’s opportunities and constraints and has been informed by detailed technical studies undertaken in liaison with statutory consultees.
- 1.28 To ensure the Plan is Sound, we therefore request that the wording of the site allocation be amended to reinstate the indicative capacity of the development to circa 40 units.

- 1.29 Draft Policy R26 states that a minimum of 25% of the proposed dwellings should be reserved for people with a strong and demonstrable local connection or those over 50 years of age, and these dwellings should comprise affordable housing:

POLICY R26: LAND NORTH OF ORCHARD PIECE

Land north of Orchard Piece, Blackmore, as shown in Appendix 2, is allocated for housing development. Development proposals should consider the following:

A. Amount and Type of Development

- a. provision for around 30 new homes of mixed size and type.
- b. A minimum of 25% of the proposed dwellings to be reserved for people with a strong and demonstrable local connection or those over 50 years of age. These dwellings should comprise affordable housing. A person with a strong local connection should meet one of the following criteria:
 - (i) existing local residents requiring separate accommodation; or
 - (ii) close relatives of existing local residents who have a demonstrable need to either support or be supported by them; or
 - (iii) people whose work provides an important and necessary local service.

In the context of this policy "local" means a parish or ward, or in exceptional circumstances, adjacent parishes or wards.

- 1.30 Crest are supportive in principle of this approach, to ensure priority for affordable housing is given to local people. However, there are a number of concerns with the clarity and enforceability of these requirements.
- 1.31 Firstly, there is no definition of the type or tenure of 'affordable housing' that 25% of the dwellings should comprise. It is not clear if these are affordable dwellings that would be provided by a Registered Provider (RP) or those which would be retained and sold by the developer. If these dwellings are for affordable rent, to be let by an RP, then it would be up to that RP to work with the Council to ensure that the dwellings are reserved for local people. As such, we suggest greater clarification is required
- 1.32 If affordable housing could comprise other affordable products, such as those in intermediate tenure then it is acknowledged that it would be the developer's responsibility to ensure that 25% of the dwellings are provided to those with a local connection. As such, the Council would need to provide further detail as to



how 'residents requiring separate accommodation' or 'close relatives of existing local residents who have a demonstrable need to either support them or be supported by them' would be defined and identified.

- 1.33 Flexibility should also be built into the wording of this policy to ensure that this provision of 25% dwellings to be reserved for local residents is subject to market demand and that within a certain time frame, if there is no interest in these units from those with a demonstrable local connection, then these units could be provided to alternative occupiers. This would need to be secured in the S106 agreement attached to any planning permission for the site.
- 1.34 Overall, we strongly support the proposed allocation of this site, which would help to meet an identified local housing need and maintain the character and vitality of an important rural village.



Appendices

Appendix 1: Land North of Orchard Piece, Blackmore - Vision Statement