



Brentwood Local Plan

Response to Main Modifications

Prepared by Savills (UK) Ltd on behalf of Crest Nicholson in respect of Land North of Orchard Piece, Blackmore (Local Plan Policy R26) MM108

November 2021

Response to Main Modifications

- 1.1 These representations are made in response to the Schedule of Potential Main Modifications dated September 2021 in relation to Policy R26 Land at Orchard Piece, Blackmore.
- 1.2 There are a number of changes proposed set out in main modification MM108 which relates to Policy R26.
- 1.3 We welcome the increase in the number of units which has been increased from ‘around 20 new homes’ to ‘around 30 new homes’. However we consider that the site has capacity to achieve circa 40 new homes as originally identified in the draft Plan for site R26 which equates to a net density of 26 dwellings per hectare.
- 1.4 In our previous representations in response to the ‘*Examination Note F79 on Kelvedon Hatch and Blackmore Village Densities*’ (see enclosure 1), we provided an assessment of comparable development areas within Blackmore. We conclude that a density of circa 25-26 dwellings per hectare is characteristic of this part of Blackmore (Wollard Way which is closest to the site) is appropriate for the site.
- 1.5 A development of 40 units would equate to density of 26 dwellings per hectare. We also note that even at 40 units this is way below the requirement of draft HPO3 which requires densities of 35 dph.
- 1.6 We refer to Paragraph 125 of the NPPF which states that:
- “where there is an existing or anticipated shortage of land for meeting identified housing needs, it is especially important that planning policies and decisions avoid homes being built at low densities, and ensure that developments make optimal use of the potential of each site. In these circumstances:*
- a) plans should contain policies to optimise the use of land in their area and meet as much of the identified need for housing as possible.... and:*
- b) the use of minimum density standards should also be considered for other parts of the plan area. It may be appropriate to set out a range of densities that reflect the accessibility and potential of different areas, rather than one broad density range.*
- 1.7 In light of Paragraph 125 of the NPPF, it is considered that policy R26 is unsound as it is not consistent with national planning policy as the site allocation does not optimise the development potential of the site. Brentwood cannot demonstrate a five year land supply of housing and as of March 2021 they acknowledge that their land supply is 1.95 years. As such the Council should be seeking to optimise development not seeking to constrain it.

- 1.8 There is no robust justification provided by the Council why the number of units was reduced from 40 homes within the previous plan. In light of this Crest Nicholson take the view that the site allocation should be increased to 40 homes.

MM108 1.B Cycle Connections

- 1.9 Part 1.B states that the proposals should provide good pedestrian and cycle connections to routes identified in the Brentwood Cycle Action Plan or other relevant evidence.
- 1.10 Having reviewed the Brentwood Cycle Action Plan 2018 there are no planned new cycle routes that come in close proximity to Blackmore and therefore Part 1.B is not relevant in this case. The second part of 1.B states 'or other relevant evidence'. This is very ambiguous and it is not clear what evidence is being referred to. Crest Nicholson are supportive of encouraging more sustainable modes of transport such as walking and cycling however it is considered that this specific point should be removed.

3.a Infrastructure Contributions

- 1.11 Part 3 is a new section added to Policy R26. It states that:

'Applicants will also be required to make necessary financial contributions via planning obligations towards: off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes)'

- 1.12 Policy MG05 and BE08 require contributions towards highway infrastructure however the policies do not specifically identify any specific highway improvements. Policy R26 does not specify any particular highway improvements in relation to the site.
- 1.13 Crest Nicholson consider that it is not necessary to include this requirement within the draft site allocation. If highway improvement works are required around the site, they would be normally discussed and agreed at the planning application stage. It is considered that they do not need to be referred to in the site allocation unless the works are specified. It is not clear from the evidence base if any highway works have been specifically requested for R26.

Inconsistencies with Text

- 1.14 We note that there are some errors in the text.
- 1.15 On Page 240 under the section that reads 'Amend paragraph 9.201 to read', the MM document incorrectly locates R26 as "north of Blackmore on land off Redrose Lane and Woollard Way". The site is not located off Woollard Way.

- 1.16 On pages 239 and 240 the documents refers “to vehicular access via Redrose Lane, Orchard Piece or Fingrith Hall Lane”. While access via Fingrith Hall Lane may be possible for site R25, it is not for site 26.
- 1.17 We suggest that these changes are amended in the final document.

Summary

- 1.18 In order to make the plan sound we consider that the following changes need to made to Policy R26. This includes.

“Land north of Orchard Piece, Blackmore, as shown in Appendix 2, is allocated for around 40 new homes”

~~Remove 1.b provision provide for good pedestrian and cycle connections to routes identified in the Brentwood Cycle Action Plan or other relevant evidence~~

- 1.19 Remove Part 3:

~~‘Applicants will also be required to make necessary financial contributions via planning obligations towards: off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes)’~~



Enclosure 1

Brentwood Local Plan

Response to Examination Note F79 on Kelvedon Hatch and Blackmore Village Densities



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- 1.1 At the Local Planning Examination Matter 7, the Council explained to the Inspector why the number of units for Site R26 had been reduced. One of the main reasons stated by the Council was in relation to the character of the area and specifically that Blackmore is characterised by low density housing. The Council was asked to prepare a document that provides the average net density for Blackmore as a comparison to the indicative density figure in the site allocation.
- 1.2 The F79 document states that the average residential density in Blackmore is 20 dwellings per hectare. This figure was calculated by using the area of Blackmore and the number of homes.
- 1.3 We have also looked at the net densities for the areas of housing located near to the site including Wollard Way, Orchard Piece and Meadow Rise to provide a better understanding of the densities of the housing to the north of Blackmore and closest to the site.

Wollard Way
Number of Homes 41
Area 1.6 Hectares
Density 25 dph



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Orchard Piece
Number of Homes 51
Area 2.4 hectares
Density 21.25 dph



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Meadow Rise
Number of Homes 64
Area 3.31 hectares
Density 20.44 dph



- 1.3 The calculations above show that the residential areas of Meadow Rise, Orchard Piece and Wollard Way have residential densities of between 20 dph and 25 dph.
- 1.4 The quantum of units identified in the draft Plan for site R26 was previously 40 units which equates to a net density of 26 dph. It has been reduced in the examination Local Plan to 13 dph (20 units).

- 1.5 The Council reduced the number of units citing local concerns however there are no reasons based on sound planning reasons why the site capacity was reduced. At the examination officers suggested that a lower capacity was chosen to reflect the character of the area. In light of the information within document F79 and the densities mentioned above, there is no justification in relation to character that would require the provision of a net density of 13 dph. A net density of 13 dph hectare would not optimise or make best of use of the site as required by the NPPF. As such we consider a density of circa 25-26 dwellings per hectare is characteristic of this part of Blackmore (Wollard Way which is closest to the site) and is also still below the requirement of draft HPO3 which requires densities of 35 dph.
- 1.6 It is noted that Brentwood approved a scheme for redevelopment of land at Red Rose farm which achieved residential density of 19 dph, which was deemed appropriate in this location. Whilst the site comprises previously developed land it holds a more exposed location separated from built development, when compared with this site.
- 1.7 Whilst the site is undeveloped land it holds a closer relationship with existing built development, delivered at higher density than would be afforded under the current drafting of the site allocation. The Essex Design Guide comprise criteria for development at higher densities in rural areas. It is indicated that densities in the region of 20 dph can be achieved through built layout which achieves continuous built frontage, in the form of terraced and semidetached dwellings. Existing residential context along Meadow Rise, Orchard Piece and Woolard Way comprise a series of semidetached and terraced dwellings in linear form which read as continuous frontage. It is conceivable that similar form of development could be achievable across the majority of the site, with a softening of built form to the northern frontage.
- 1.8 The NPPF and Local Plan outline a requirement to optimise residential density in a manner which positively responds to local character. As indicated, we contend that the site holds capacity for development at greater density. Design quality will ultimately inform the quantum of residential delivered on site. However, it is contended that a higher density could be achievable on site.
- 1.9 **In light of the above we request that the quantum of development for Policy R26 should be for around 40 homes as per the previous iteration of the draft Local Plan. There is no justification for a net density figure of 13 dph on this site.**