

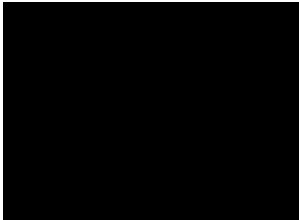
October 2013

Brentwood Borough Council: Local Plan 2015 - 2030

Preferred Options (October 2013)

Planning Representations

Prepared by Savills UK on behalf of Crest Nicholson Eastern



Executive Summary

The Preferred Options Local Plan does not provide sound reasoning for proposing a housing target significantly below objectively assessed need (OAN)

Within the Preferred Options Local Plan (July 2013) Brentwood Borough Council (BBC) acknowledge that there is an OAN of between 4,960 and 5,600 dwellings (equating to an average annual requirement of 331 to 373 dwellings per annum) across the plan period of 2015 to 2030.

However, BBC argue the provision of a lower target of 3,500 dwellings because “facilitating growth at the OAN level would worsen existing traffic congestion problems, require sites to be developed in landscape-sensitive locations, be difficult to service through necessary infrastructure and have a generally urbanising effect through loss of the Green Belt.”

This approach is considered fundamentally unsound, as it does not accord with the clear requirements of the NPPF to boost significantly housing supply and is contrary to the consistent approach taken by the Planning Inspectorate (PINS) at Core Strategy / Local Plan Examinations during the last year.

PINS Inspectors continue to reinforce the NPPF’s key message to significantly boost housing supply (examples include Blaby, Denbighshire, Kirklees, Rushcliffe, Coventry, Melton and Waverley). Failure to meet OAN must be justified in NPPF terms as a whole (Waverley). Adverse impacts of loss of agricultural land and non-designated countryside are outweighed by the benefits of housing development (Blaby, Denbighshire), even in the case of Green Belt (Halton, Hertsmere, Rushcliffe, Waverley, Coventry) unless there are clear physical and environmental fixed constraints (Eastbourne, Shepway) or National Park and European habitat designations (Wealden).

PINS has outlined that it is taking an uncompromising line on promoting housing growth and that the identification of OAN should be the starting point of plan making. They have emphasised that Local Planning Authorities should explore all reasonable options to fulfil OAN. Where constraints are not fixed (i.e. they are not physical constraints such as floodplain), LPAs should plan positively to overcome the identified constraints. These unfixed constraints include transport capacity and landscape impact.

BBC’s reasoning (based on unfixed constraints) for reducing the level of housing required to meet OAN by approximately 30-40% or 1,460-2,100 dwellings is therefore considered unsound.

The Preferred Options Local Plan does not provide a robust evidence base to support the reasoning provided for the reduced housing target

Throughout the Preferred Options Local Plan, BBC justify their preferred housing growth strategy on evidence base documents that are “forthcoming”. These forthcoming documents include, but are not limited to, an Infrastructure Delivery Plan, Traffic Modelling Study, Utilities Study, Strategic Housing Market Assessment and a Landscape and Green Belt Assessment.

This ‘pre-emptive’ and unjustified approach used to formulate key Local Plan policies is contrary to NPPF (paragraph 82) which states that “*the Plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence*”, and is therefore clearly unsound.

The lack of an appropriate evidence base published concurrently with the draft Local Plan renders the process of consultation unacceptably obscure. As a result, the Plan appears to be based on an assertion-led strategy, with the evidence base still to be finalised after the policies on which they should inform have been published.

Given the lack of transparency in the Plan preparation process, the 'preferred' growth strategy is instead considered an entirely new approach which has not been consulted on robustly at any of the previous consultation stages.

Furthermore, the Sustainability Appraisal (August 2013) “accompanying” (published seven weeks after) the Local Plan does not adequately address the methodology and justification for the selection of their housing target. Further comment on the Sustainability Appraisal will be submitted by Savills UK on behalf of Crest Nicholson Eastern during the amended consultation period for the document.

Even against the proposed lower housing target, BBC identify a 5 year land supply shortfall

The NPPF (paragraph 47) requires local authorities to “*identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements*”. Even against the lower annual housing target of 200 dwellings per annum (as identified within Policy S2), BBC’s Housing Trajectory is not capable of demonstrating a 5 year housing supply. If BBC were to adopt a NPPF compliant housing target more in line with the acknowledged objectively assessed need within the Borough, the position would be considerably worse still.

In the context of a low housing target and a five year land supply shortfall, the most sustainable sites at each of the Larger Villages should be allocated in order to meet settlement specific housing needs and retain the viability and vitality of local shops and services

In order to meet BBC’s significant housing shortfall against OAN, it is recognised that Green Belt land will need to be released around Brentwood town as the largest settlement in the Borough. However, there is also a requirement to meet local, settlement specific housing needs to address localised affordability issues and retain the viability and vitality of local shops and services.

A Local Housing Requirements Study for Blackmore, prepared by Barton Wilmore (August 2013) concludes that projected household growth at Blackmore will generate a need for between circa 81-98 dwellings over the next 20 years (or approximately 60-75 though the proposed Plan Period 2015-2030). However, Blackmore is one of the “villages excluded from the Green Belt (other than West Horndon)” which are collectively only allocated 200 dwellings between 2015 to 2030. If, for example this allocated figure was distributed evenly between the eleven villages, it would only provide for circa 18 dwellings over the Plan period, which is clearly significantly below the local need identified above for Blackmore.

Within BBC’s SHLAA (2011) and “Draft Site Assessment” (July 2013) which supports the Local Plan, “Land South of Redrose Lane, Blackmore (ref G070A)” is identified as appropriate for housing development for 89 units. It should be noted that a design-led approach has resulted in an initial scheme of approximately 40 residential units. A Vision Statement has been prepared which identifies the benefits and opportunities for the site which is enclosed as Appendix 1.

BBC states in the Assessment that the site is:

- *Suitable: The site is located adjacent to the settlement boundary and contained by Redrose Lane, Fingrith Hall Lane and Chelmsford Road. The site comprises land used for grazing. The*

site is bounded on one side by residential properties. Development in this location would help to support the viability and vitality of existing services and potentially provide new services

- *Available: The site is available for residential development; and*
- *Achievable: Residential development on this site would be achievable due to its location within an attractive area. Due to its size this site would be brought forward by a medium sized developer.*

Despite the positive appraisal of the site, the Assessment concludes that it should be discounted as it “does not meet the Draft Plan Spatial Strategy” i.e. No Green Belt land release at Large Villages due to a housing number significantly below OAN.

Therefore, should, as these representations argue, a higher level of housing to meet OAN be adopted by BBC, a logical spatial strategy would include the allocation of the most sustainable residential sites at each of the Larger Villages to meet locally generated housing needs. We consider that Land South of Redrose Lane, Blackmore, (ref G070A) is the most appropriate site for residential development in Blackmore. Subsequently, the site should be allocated for residential use in the next iteration of the Local Plan.

The proposals would result in a number of socio economic community benefits including retaining the viability and vitality of local shops and services. A summary of the socio economic benefits of the scheme can be found in Vision Statement which can be found in Appendix 1.

Representations Main Text

Introduction

- 1.1 These planning representations have been prepared by Savills UK on behalf of Crest Nicholson Eastern for Brentwood Borough Council's Local Plan Preferred Options (July 2013).

Vision (Paragraph 1.34)

- 1.2 General support is given for the Vision as it emphasises, in line with the NPPF (paragraphs 17, 19 and 21), the Plan's support for growing the economy and fostering development which responds to "*local community needs*". It should be noted that local community needs should be met at a settlement specific level.
- 1.3 Despite supporting the Vision, it is not considered that the wording and approach contained within the consultation document reflects this Vision to support "*local community needs*". Accordingly, this will be commented on throughout these representations.

Strategic Objective: S08 (Paragraph 1.35)

- 1.4 We do not wish to comment in detail at this stage on the majority of the Strategic Objectives identified within the consultation document, however comment is made in relation to S08.
- 1.5 Given the importance of significantly boosting housing growth at a rate that more than meets OAN (as identified within NPPF paragraphs 47 to 55), it is considered that Strategic Objective S08 should be moved to the top of the list of Strategic Objectives.
- 1.6 Notwithstanding this, given the importance of delivering housing that responds to local community needs, as identified within the Vision, it is considered that the following amendments should be made to the wording of Strategic Objective S08 (as currently numbered):

*"SO8: Plan for housing that meets the needs of the Borough's population **as a whole, as well as its individual settlements**¹, and contributes to creating inclusive, balanced and sustainable communities."*

Spatial Strategy: Policy S1 - Spatial Strategy

- 1.7 It is considered that the current wording of Policy S1 is unsound as it does not accord with the NPPF.

¹ Bold text as additional text

Green Belt

- 1.8 The NPPF (paragraph 17) identifies one of its core planning principles as protecting the Green Belt, however it also states (paragraph 83) that in the preparation, or review of Local Plans, Local Planning Authorities “*should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period*”.
- 1.9 Policy S1 of the consultation document states that the Borough “*aims to protect the Green Belt*” and that “*other than that required to accommodate a strategic allocation at West Horndon and minor changes to accommodate proposed development on existing development sites in the Green Belt, no change to Green Belt boundaries is envisaged*”. To date, as part of the emerging Local Plan process, Brentwood Borough Council have not conducted a review of their Green Belt, and given that there is an NPPF requirement to boost significantly the supply of housing, it is not sound or justified for BBC to state that no change to Green Belt boundaries is envisaged.

Alternative Options

- 1.10 Policy S1 also notes the ‘alternative’ options considered as part of the 2009 Issues and Options consultation. This consultation helped to form the basis for the selection of the ‘Preferred Option’ within S1.
- 1.11 Given that the Issues and Options consultation occurred almost four years ago, we question whether this work can be considered up-to-date. In the interim between the Issues and Options document and the publication of the Preferred Options document, the NPPF has been published and the Regional Spatial Strategy relevant to Brentwood Borough Council has been revoked. Accordingly, given the impact the NPPF has had on spatial planning, it is argued that the alternative options should be reconsidered, particularly in relation to the increased emphasis that the NPPF places on housing and economic growth. The issue of ensuring that key policies are based on an up-to-date housing evidence has been raised by a number of Inspectors at EIPs (North Warwickshire Local Plan for example).
- 1.12 Additionally, paragraph 2.2 notes that the justification for the selection of the ‘preferred option’ included consideration of land availability, development requirements (informed by objectively assessed need), scale of growth proposed, the existing settlement pattern and hierarchy and capacity of places to accommodate growth in a sustainable matter. We agree with this approach based on objectively assessed need, but do not consider that method is accurately reflected within the Policy on housing figures, as discussed below in relation to paragraph’s 2.9, 2.20, 2.26 and 2.37.

“Limited” Development

- 1.13 Notwithstanding the above comments, we note that at the other villages (beyond those named specifically within Policy SP1) within the Borough “*limited*” development should take place at a level commensurate with services and facilities available and which maintains local amenity and distinctiveness.
- 1.14 In the interest of clarity and in order to accord with the overall Vision, identified within the consultation document, it is considered that the word “*limited*” be deleted to support the NPPF’s goal to boost significantly the supply of housing. Accordingly, it is considered that

the 'limit' for such development should be defined by OAN at a settlement specific level, as derived from the Government's population and household projection figures.

5 Year Housing Land Supply

- 1.15 It is also considered that S1 – Spatial Strategy should make reference to identifying and maintaining a 5 year supply of housing land as per the NPPF (paragraph 47). The necessity to maintain this supply will be discussed later in these representations, in relation to paragraph 2.37.

S1 Justification: Development in Villages excluded from the Green Belt (Paragraph 2.9)

- 1.16 Paragraph 2.9 suggests that 200 dwellings will be built in villages excluded from the Green Belt, other than West Horndon (which has a separate allocation of 1,500). Given that the Local Plan will have a 15 year scope, this means that only 13.33 dwellings will be built per annum across all the eleven villages excluded from the Green Belt.

- 1.17 It is considered that this figure of 200 units will not be sufficient to facilitate development to meet "*local community needs*" at a settlement specific level, as identified within the Local Plan Vision. A Local Housing Requirements Study for Blackmore has been prepared (April 2013) by Barton Wilmore. The report demonstrates how a range of between 81 and 98 dwellings will be required in Blackmore between 2011 and 2031 (4 to 5 new dwellings per annum). This figure of 81- 98 units projected for Blackmore is only 102 units less than the *entire* allocation for villages excluded from the Green Belt within the Local Plan. On this basis, clearly the current approach advocated within the Local Plan is unsound.

- 1.18 Furthermore, the overall housing strategy and target is heavily reliant on the 1,500 allocation in West Horndon. Such reliance on a single site within a Local Plan is not a sustainable approach, and is one that has been heavily criticised by a number of Inspectors.

S1 Justification: Background Work to Inform the Spatial Strategy (Paragraph 2.20)

- 1.19 It is considered that paragraph 2.20, and the process it identifies to support the Local Plan is unsound as it does not accord with the key principles of the NPPF.

"Significant Proportion"

- 1.20 Paragraph 2.20 states that "*The preferred spatial strategy seeks to accommodate a significant proportion of this (objectively assessed) development need*". This approach does not accord with the NPPF (paragraph 47), as Local Plans should plan to exceed housing targets, not simply accommodate a "significant proportion" of the identified housing need.

- 1.21 When considering the Local Plan's of Blaby, Denbighshire, Kirklees, Rushcliffe, Coventry, Melton and Waverley, Inspector's have concluded that it is essential for Local Plans to facilitate the boosting of housing supply, in accordance with the NPPF (Paragraph 47). More specifically, Inspector's in Dacorum, Hertsmere and Milton Keynes identified that OAN (defined by the Sub-National Population Projections from the Office for National Statistics, using the latest available data) should be the starting point of plan making.

- 1.22 The Plan makes provision for 3,500 dwellings over the plan period, however OAN, based on household and population projection figures, suggests this figure should be at least 5,600

dwellings. 3,500 dwellings only represents approximately 60% of OAN within BBC, and thus cannot be described as a 'significant' proportion.

- 1.23 In September 2013, an Inspector (Lichfield DC) concluded "*I am concerned that the plan as submitted is unsound in that it does not make adequate provision for the objective assessment of housing need contained in its own evidence base.*" It is considered that this is precisely the approach currently being taken by BBC.

Limits to Growth

- 1.24 Paragraph 2.20 also states that "*Growth above a certain level would lead to significant impacts: notably harm to the landscape, Green Belt, settlement identity and character and town centre traffic congestion*".
- 1.25 While we acknowledge that the Local Plan must respond to the Borough's environmental characteristics, BBC as noted above have not yet carried out a Green Belt assessment, and to conclude that growth above a certain level would lead to "significant impacts" is entirely unjustified.
- 1.26 The Plan appears to be based on an assertion-led strategy, with the evidence base still to be finalised after publication of key policies. Given the lack of transparency in the Plan preparation process, the 'preferred' growth strategy is based on constraints that have not been assessed. It instead represents an entirely new approach which has not been consulted on robustly at any of the previous consultation stages.
- 1.27 Notwithstanding the lack of evidence explaining the reasoning behind the Plan's inability to meet OAN, PINS have outlined that the constraints identified by BBC should not be used to limit growth required to meet OAN. Local Plan Inspectors have concluded that adverse impacts, including the loss of Green Belt (Halton, Hertsmere, Rushcliffe, Waverley and Coventry), agricultural land and non-designated countryside (Blaby and Denbighshire) can be outweighed by the benefits of housing development.
- 1.28 PINS have identified that LPAs should explore all reasonable options to fulfil OAN. Where constraints are not fixed (i.e. they are not physical constraints such as floodplain), LPAs should plan positively to overcome the identified constraints. It is therefore clear that unfixed constraints including transport capacity and landscape impact should not be used as reasons to limit growth below OAN.

Policy S2: Amount and Distribution of Residential Development and Policy DM23: Housing Land Allocations – Major Sites (paragraph 4.93)

- 1.29 For the reasons set out in our response to Policy S1, a target of only 3,500 dwellings is considered fundamentally unsound as it does not meet OAN.
- 1.30 The NPPF (paragraph 47) requires local authorities to "*identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements*". Even against the lower annual housing target of 200 dwellings per annum (as identified within Policy S2), BBC's Housing Trajectory is not capable of demonstrating a 5 year housing supply. If BBC were to adopt a NPPF compliant housing target more in line with the acknowledged objectively assessed need within the Borough, the position would be considerably worse still.

- 1.31 In addition to the overall level of housing being proposed, the distribution of housing growth is also considered unsound as it does not allocate a sufficient number of homes to each of the Borough's Large Villages.
- 1.32 In order to meet BBC's significant housing shortfall against OAN, it is recognised that Green Belt land will need to be released around Brentwood town as the largest settlement in the Borough. However, there is also a requirement to meet local, settlement specific housing needs to address localised affordability issues and retain the viability and vitality of local shops and services.
- 1.33 As identified in our response to Policy S1, a Local Housing Requirements Study for Blackmore, prepared by Barton Wilmore (August 2013) concludes that projected household growth at Blackmore will generate a need for circa 81- 98 dwellings over the next 20 years (4-5 dwellings per annum or 60 - 75 dwellings over the plan period). However, Blackmore is one of the "villages excluded from the Green Belt (other than West Horndon)" which are collectively only allocated 200 dwellings between 2015-2030. If, for example this allocated figure was distributed evenly between the villages, it would only provide for circa 18 dwellings over the Plan period, which is clearly significantly below the local need of circa 60 - 75 dwellings required at Blackmore.
- 1.34 In addition to not allocating sufficient housing to the Borough's Large Villages, there are also questions raised over the appropriateness of focussing almost half of the Borough's growth in the village of West Horndon. The level of growth proposed would almost quadruple the size of the village and is almost equal to that proposed in Brentwood, a regionally significant settlement. Such reliance on a single site within a Local Plan is not a sustainable approach, and is one that has been heavily criticised by a number of Inspectors.
- 1.35 Without the ability to review the majority of the evidence base documents pertinent to this matter we can only continue to raise concern that the draft Local Plan in its current form is wholly unsound.
- 1.36 In addition to the overall housing growth target and the distribution of this target, the approach used to allocate sites in the Local Plan is considered fundamentally unsound.
- 1.37 Within the justification for Policy S2 and DM23 (paragraph 4.93) it states that the Council has based the allocation of sites upon factors including impact on Green Belt, landscape, visual amenity and impact on highways.
- 1.38 Given that the Council has not yet conducted a Landscape and Green Belt Assessment or sufficient Transport Modelling in addition to other areas of necessary evidence base work, the Council's site selection (based on an insufficient housing target) is not justified, and is therefore unsound.
- 1.39 The evidence base that has been published identifies sites that are included within BBC's SHLAA (2011) and "Draft Site Assessment" (July 2013) as being suitable, available and achievable within the Plan period that have not been included as housing allocations within the consultation document. Within BBC's SHLAA (2011) and "Draft Site Assessment" (July 2013) which supports the Local Plan, "Land South of Redrose Lane, Blackmore (ref GA70A)" is identified as appropriate for housing development. It should be noted that a design-led approach has resulted in an initial scheme of approximately 40 units.

1.40 BBC further states in the Assessment that the site is:

- *“Suitable: The site is located adjacent to the settlement boundary and contained by Redrose Lane ,Fingrith Hall Lane and Chelmsford Road. The site comprises land used for grazing. The site is bounded on one side by residential properties. Development in this location would help to support the viability and vitality of existing services and potentially provide new services;*
- *Available: The site is available for residential development; and*
- *Achievable: Residential development on this site would be achievable due to its location within an attractive area. The connection cost of infrastructure and services are likely to be in line with what would be expected for a site of this size as would any developer contributions that would be applied to the site. Due to its size this site would be brought forward by a medium sized developer.”*

1.41 Despite the positive appraisal of the site, the Site Assessment concludes that it should be discounted as it “does not meet the Draft Plan Spatial Strategy” i.e. No Green Belt Land release at Large Villages due to a housing number significantly below OAN.

1.42 Therefore, should, as these representations argue, a higher level of housing to meet OAN be adopted by BBC, a logical spatial strategy would include the allocation of the most sustainable residential sites at each of the Larger Villages to meet locally generated housing needs. Land South of Redrose Lane (approximate 40 units) is the most appropriate site at Blackmore as identified in BBC’s evidence base work to date. Subsequently, the site should be allocated for residential uses in the next iteration of the Local Plan.

Policy S2 Justification: Paragraph 2.26

1.43 In discussion of the background work to inform the housing figure, paragraph 2.26 identifies that national policy makes it clear that household and population projections should be the starting point for identifying ‘objectively assessed need’ for development, taking account of migration and demographic change.

1.44 Full support is given to this approach, however, for the reasons noted above, it is clear that BBC have not sought to use this approach in the formation of their housing figures, and as a result fall considerably short of the required OAN within the Borough.

Paragraph’s 2.29 and 2.32

1.45 Paragraph’s 2.29 and 2.32 of the consultation document identify that BBC has commissioned a number of technical studies to inform their view of how OAN can be met and how many homes can be accommodated. These documents are noted as including: Objectively Assessed Needs for Brentwood, Housing Growth Scenarios, Landscape and Green Belt Assessment, Transport Modelling and a SHMA update. Paragraph 2.29 acknowledges that the majority of this work has not yet been published, and on this basis it is considered that the selection of a Preferred Option (which consequently rules out other approaches) is unsound. The absence of relevant technical work in order to support this decision is contrary to all four tests of soundness identified within paragraph 182 of the NPPF: positively prepared, justified, effective and consistent with national policy.

1.46 This flawed approach is for example highlighted in paragraph 2.32 which states that *“Evidence suggests that a higher level of growth would significantly worsen existing traffic*

congestion problems (Traffic Modelling Study – forthcoming)”. It is considered that without the forthcoming Traffic Modelling Study, the Council do not possess the necessary up to date evidence base.

Brentwood Borough Housing Trajectory (Paragraph 2.37)

- 1.47 In order to ensure housing supply is boosted significantly, the NPPF (paragraph 47) requires local authorities to “*identify and update annually a supply of specific deliverable sites sufficient to provide five years worth of housing against their housing requirements with an additional buffer of 5%...to ensure choice and competition in the market for land.*”
- 1.48 Paragraph 2.37 and figure 2.2 of the consultation document identify BBC’s housing trajectory. When these figures are judged against even the lower annual housing requirement of 200 dwellings², the trajectory shows that BBC are not capable of demonstrating an 5 year housing land supply, even when excluding the additional 5% buffer required by the NPPF. If BBC were to adopt a higher housing target to meet OAN (at least 5,600 or 373 dwellings per annum), this situation would significantly worsen, as discussed above in relation to paragraph 2.20.

Policy DM1: General Development Criteria

- 1.49 This policy is generally considered appropriate. It should be noted that housing need should be considered as an exceptional circumstance where the need for development outweighs harm caused by other factors. This approach accords with the NPPF (paragraph 187) in looking for solutions, rather than problems regarding development options.

Policy DM24: Affordable Housing

- 1.50 In line with the NPPF (paragraph 50 and 159), the Policy appropriately identifies that viability, which should be supported by a toolkit appraisal, shall be taken into account in the negotiation of rates of affordable housing.
- 1.51 Furthermore, Policy DM24 should allow for off-site contributions subject to a robust demonstration that such contributions would be necessary to mitigate the impact of development itself and a more viable option. This suggested approach would better accord with the NPPF (paragraph 187) in looking for solutions rather than problems, and working proactively to ensure developments improve the economic, social and environmental conditions of the area.

² It should be noted that this figure is derived from BBC’s suggested housing target of 3,500 dwellings across the plan period, which does not fully meet objectively assessed need, based on Government household and population projection figures.

Appendices

Appendix 1: Land South of Redrose Lane Vision Statement

LAND AT REDROSE LANE, BLACKMORE



50 Years
1963-2013



Contents

- 1.0 Introduction**
- 2.0 Site and Surroundings**
- 3.0 Borough-wide Planning Context**
- 4.0 Settlement Specific Planning Context**
- 5.0 Strategic Housing Land Availability Assessment**
- 6.0 Opportunities and Constraints Plan**
- 7.0 Concept Plan Development**
- 8.0 Access and Design Principles**
- 9.0 Layout Plan**
- 10.0 Socio Economic Benefits**
- 11.0 Conclusions**

1.0 Introduction

Introduction

This document is submitted as part of the supporting case for the residential redevelopment of Land at Redrose Lane, on behalf of our client Crest Nicholson.

Crest Nicholson is one of the UK's premier house builders, and has assembled a team of leading advisors including Savills, LAP and Ardent Consulting Engineers, who will assist with developing proposals for the site. The aim is to make the very best of the unique opportunity to deliver a high quality and sustainable new residential development within Blackmore, which would contribute towards meeting the settlement and the Borough's housing and socio-economic needs.



2.0 Site and Surroundings

Site and Surroundings

The 1.6 hectare site is located adjacent to the settlement boundary of the village of Blackmore, within the administrative area of Brentwood Borough Council (BBC). The site lies to the south of Redrose Lane, and adjoins the settlement boundary to the south which is characterised by two storey terraced and detached housing. The site's eastern boundary is characterised by established trees and the western boundary by Fingrith Hall Lane. To the north, across Redrose Lane lies Redrose Farm, which contains a two storey house and a collection of agricultural buildings and structures.

The existing access from the single track Redrose Lane (via a gated field access) is at the site's northern boundary.

In terms of public transport, local bus services operate from the centre of the village. Served destinations include Chelmsford City Centre, Ongar and Brentwood Railway Station.



Site within urban context

3.0 Borough-wide Planning Context

Borough-wide Planning Context

BBC is currently consulting on its Preferred Options Local Plan. The consultation period closes on the 2nd October 2013.

Within the Preferred Options Local Plan, BBC acknowledge that there is an objectively assessed need (OAN) for between 4,960 and 5,600 dwellings across the plan period of 2015 to 2030.

However, BBC have suggested that the Borough can only achieve a target of 3,500 dwellings within the Plan Period. The reasons provided for only meeting circa 60% of the identified housing need include the impact upon traffic congestion, landscape-sensitive locations, infrastructure capacity and the Green Belt.

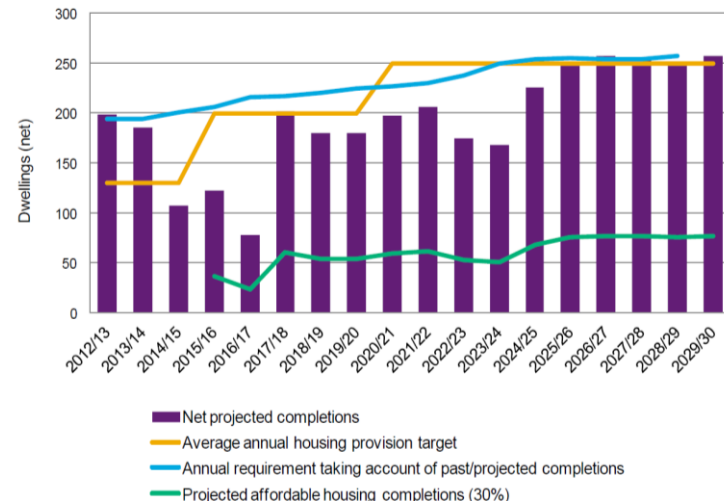
BBC's approach is considered fundamentally unsound, as it does not accord with the clear requirements of the NPPF to boost significantly housing supply and it is contrary to the consistent approach taken by the Planning Inspectorate (PINS) at Core Strategy / Local Plan Examinations during the last year.

PINS have reinforced that OAN should be the starting point of the Local Plan.

They have emphasised that Local Planning Authorities should explore all reasonable options to fulfil OAN. Where constraints are not fixed, LPAs should plan positively to overcome the identified constraints. These unfixed constraints include transport capacity and landscape impact.

Even against BBC's inadequate housing target their housing trajectory graph (below) demonstrates a significant housing supply shortfall over the next 10 years.

Additional sites at each settlement will therefore need to be identified to address this housing shortfall.



4.0 Settlement Specific Planning Context

Settlement Specific Planning Context

The Preferred Options Local Plan also suggests that 200 dwellings will be built in “villages excluded from the Green Belt,” other than West Horndon (which has a separate allocation of 1,500) within the plan period. Given that the Local Plan will have a 15 year scope, this means that only 13.33 dwellings will be built per annum across all 11 villages “excluded from the Green Belt” (including Blackmore). This clearly does not meet the projected local demand for housing within these villages.

A settlement specific Housing Needs Assessment has been prepared by Barton Wilmore (dated August 2013) which sets out the future local housing requirements within Blackmore. The document projects that household growth within Blackmore will generate a need for between 60 and 75 dwellings over the plan period (4 to 5 new dwellings per annum). This is considered the minimum level of growth necessary, being based on demographic change.

The proposed development site would provide in the region of 40 new homes which will meet the future needs of Blackmore for the next 10 years. Meeting settlement specific need is also critical in terms of addressing localised affordability issues and retaining the viability and vitality of local shops and services.



5.0 Strategic Housing Land Availability Assessment

Strategic Housing Land Availability Assessment (SHLAA)

The SHLAA identifies potential sites for future development within the Borough. The Brentwood SHLAA was published in October 2011 and is also contained as part of the draft Site Assessment published in 2013 which makes reference to the subject site. The site reference is G070A. BBC state that in the Assessment that the site is:

“Suitable: *The site comprises land used for grazing. The site is bounded on one side by residential properties. Development in this location would help to support the viability and vitality of existing services and potentially provide new services;*

Available: *The site is available for residential development, and;*

Achievable: *Residential development on this site would be achievable due to its location within an attractive area. Due to its size this site would be brought forward by a medium sized developer”.*

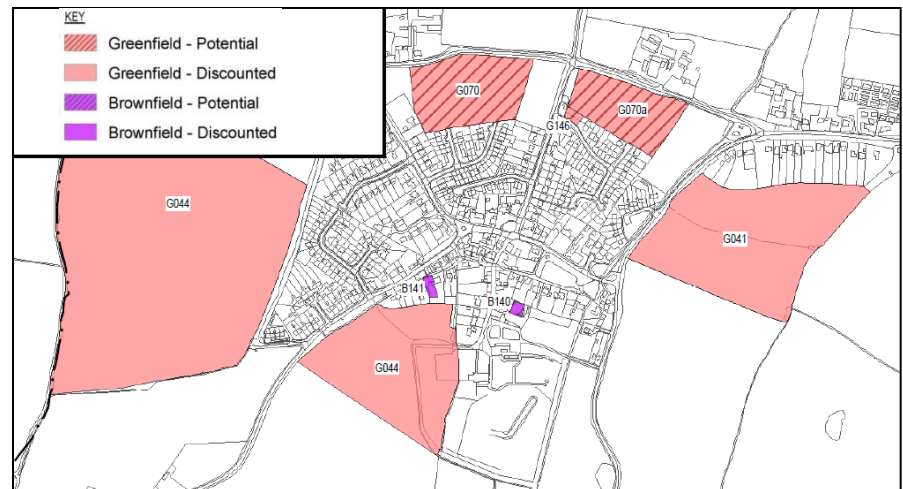
A total of 7 sites (not including the subject site) are considered in the SHLAA. Two of the sites are on brownfield land and can only achieve approximately 1 dwelling (B140 and B141). The remaining 5 sites are located on greenfield land. Three of these sites are discounted due to the unacceptable intrusion into the countryside G041, G044 south and G044 west). One other site can only achieve one dwelling (G146).

The remaining Green Belt site G070 lies to the west of the subject site. This site has many similarities due to its close proximity to the subject site.

However it is more open in nature, does not have a clear defensible boundaries on all sides and development would have a greater impact on existing residential properties.

As such it is considered that the subject site is the most appropriate site in the SHLAA due to its enclosed nature (with defined boundaries on all sides) that would represent a natural extension to existing residential development.

It has the potential to deliver approximately 40 homes which would assist to meet the projected housing needs of Blackmore over the next ten years.



6.0 Opportunities and Constraints Plan



The Woodbines Listed Building



Orchard Piece No. 1 & 3



Orchard Piece view of No. 72



Redrose Farm



Redrose Farm

7.0 Concept Plan Development

Concept Plan Development

The proposals seek to complement the site's existing features and constraints.

Key Design Features

- Achieve high quality new homes;
- Develop a scheme that delivers an area of public open space as a key feature of the scheme;
- A design that respects neighbouring properties;
- Design a layout which reflects the existing street pattern;
- Provide a new road junction from Redrose Lane comprising a shared surface;
- Comprehensive Landscaping Strategy to create an attractive location for residents to live;
- Respect services and utilities crossing the site both over and underground; and

• We are aware of previous drainage issues on Redrose Lane. Ardent have been appointed to advise on the drainage strategy for the site. As part of the proposed development it is likely that the proposed floor levels will be raised slightly in the north east corner of the site to ensure that the proposed development will not be affected by drainage issues.



8.0 Access and Design Principles Plan



9.0 Layout Plan



10.0 Socio Economic Benefits

The infographic below prepared by Barton Willmore provides a summary of the socio economic benefits of the scheme.



APPROXIMATELY 40 DWELLINGS, LAND TO THE SOUTH OF REDROSE LANE, BLACKMORE

The NPPF sets out three dimensions to sustainable development, these being economic, social and environmental.

In its economic role, the planning system is required "to contribute to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation and by identifying and coordinating development requirements, including the provision of infrastructure" [para 7, NPPF].

The NPPF confirms that pursuing sustainable development involves seeking positive improvements to people's quality of life, including:

- Making it easier for jobs to be created in cities, towns and villages; and
- Improving the conditions in which people live, work, travel and take leisure; and widening the choice of high quality homes.

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ECONOMIC PROFILE

Household Growth

HOUSEHOLD GROWTH IN THE LOCAL AUTHORITY BETWEEN 2011-2021

Source: CLG 2011 Interim Household Projections



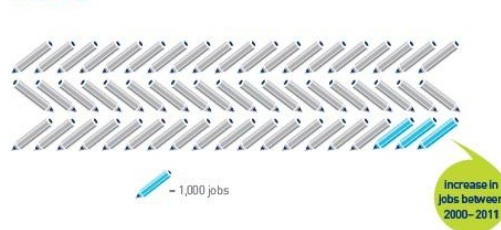
HOUSEHOLD GROWTH COMPARISON



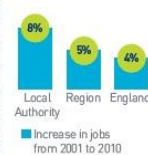
Employment Profile

JOB GROWTH IN THE LOCAL AUTHORITY BETWEEN 2000-2011

Source: NOMIS



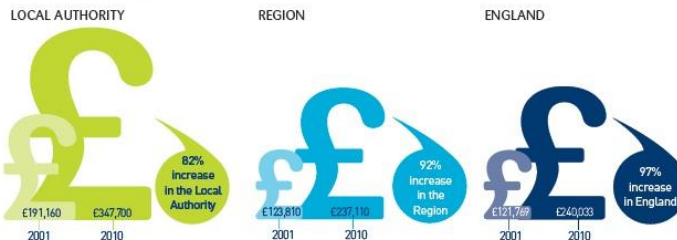
JOB GROWTH COMPARISON



Average House Price Index

HOUSE PRICE BETWEEN 2001-2010 COMPARISON

Source: CLG/Land Registry



ECONOMIC IMPACT OF PROPOSED SCHEME

Paragraph 152 confirms that Local Planning Authorities should seek opportunities to achieve each of the economic, social, and environmental dimensions of sustainable development, and net gains across all three. The following summary highlights the substantial net positive impact that the proposed scheme will have on the local economy, which is entirely consistent with NPPF policy.

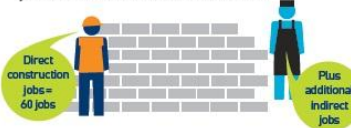
ADDITIONAL COMMERCIAL EXPENDITURE



ADDITIONAL NEW HOMES BONUS



JOBS CREATED DURING CONSTRUCTION



ADDITIONAL LABOUR FORCE AND ECONOMIC OUTPUT ON COMPLETION



11.0 Conclusions

Conclusions

The land at Redrose Lane should be considered for a sustainable residential development for a number of key reasons, as outlined in this document, including the following:

- There is an identified shortfall of housing at a borough and settlement specific level within BBC;
- It has been identified that in order to meet the settlement specific needs of Blackmore, at least 4-5 units should be completed each year;
- The site could sustainably deliver around 40 much needed new homes meeting Blackmore's housing need for the next ten years;
- The site is considered to be the most sustainable location within Blackmore compared to other competitor sites;
- The site has good links to existing transport networks and infrastructure (as acknowledged by BBC);
- The site is well screened, with defensible boundaries on four sides, ensuring that visual impact from the proposals will be minimal, and considerably less than other promoted sites;
- The site is located within an area of established residential character, that presents itself as a logical extension to the existing settlement boundary;
- No environmental or ecological constraints have been identified on the site that would prevent its development for residential use; and
- The proposals would result in a number of significant socio-economic community benefits.

