

Land at Blackmore Road, Blackmore

Brentwood Strategic Growth Options Consultation

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1.0 Introduction

- 1.1 This representation has been prepared to the Brentwood Borough Council Strategic Growth Options Consultation on behalf of Mrs A. Topham.
- 1.2 The purpose of this submission is to provide representations on the consultation, as well as to provide further detail on the suitability of our client's land at Blackmore to support appropriate sustainable development and to meet objectively assessed housing need within the emerging Local Plan.
- 1.3 The response below provides background information on the client's site as well as response to the Brentwood Borough Council Strategic Growth Options Consultation questions. Comments are also made in response to the proposed Dunton Garden Suburb consultation.
- 1.4 The questions addressed in detail are:
 - Do you agree with the broad areas, for the purpose of considering approaches to growth?
 - Do you have any comments on the appropriateness of particular sites?
 - In order to provide for local need is it preferable for Greenfield sites on the edge of villages to be released, or to develop brownfield sites (both within the Green Belt)?

2.0 Site and Surroundings

- 2.1 The site is located at Blackmore Road to the south west of Blackmore and has a total site area as shown on the attached plans of approximately 2.4 ha. Taking into account the proposed land for open space and potential land that could be provided to the community the area of proposed residential development is approximately 1 ha. As shown on the attached plan the site is therefore considered to have potential to sustainably provide 35 homes to meet local needs including market and affordable housing.
- 2.2 The site is located adjoining the existing settlement boundary and is particularly well enclosed by existing established trees and vegetation.
- 2.3 The site is identified in the Strategic Growth Options consultation as potential option for growth. The annotation on page 19 of the current consultation document refers to there being "several options on the edge of Blackmore, such as site refs: 076 & 077 south of Redrose Lane". The site at Blackmore Road, reference number site 202, is shown on the plans however is not referred in the text of the plan.
- 2.4 The site has been previously identified in the Brentwood Strategic Housing Land Availability Assessment (SHLAA) as site reference G044. Site G044 was however larger in size than that proposed for allocation by my client and in particular extending further to the south into open countryside. The previous site proposed had a much larger area of approximately 4.6 ha. At that time of the preparation of the previous SHLAA the site reference G044 was shown as a greenfield discounted site. The reasons for this were stated as: "None of the site is suitable for development as it is poorly related to the existing village envelope, and would form an unacceptable intrusion into the countryside on the western side of Blackmore Road and lies partly within the Conservation Area on the eastern side of Blackmore Road."
- 2.5 The site now proposed for allocation as shown on the attached plans covers a reduced area, is enclosed by existing landscape buffers, and is very well related to the existing settlement boundary. The site does not currently make a significant contribution to the purposes of including land in the green belt or in visual landscape terms. The site currently remains in agricultural use as a meadow with some footpaths and permissive public access having previously been allowed.
- 2.6 The site therefore now represents a sustainable option for allocation. It is proposed that those parts of the site within the Conservation Area will be made available in the form of new formal public open space.
- 2.7 The site should therefore be considered suitable, available and achievable for development and should be allocated through the current Local Plan. In view of the need to meet housing needs it is considered to be essential that as part of the new Local Plan that the revised site area and attached proposals are given full consideration.
- 2.8 Development in this location would help to support the viability and vitality of existing services and potentially provide new services in line with paragraph 55 of the National Planning Policy Framework (NPPF).

3.0 Planning Proposals

- 3.1 Enclosed with this submission are the following drawings which demonstrate the evolution of the proposals on this site in response to constraints and opportunities.
 - Location Plan
 - Constraints Plan
 - Site Context
 - Indicative Street Scene
 - Proposed Illustrative Scheme
- 3.2 The constraints plan identifies the key issues affecting the development site to allow for their consideration in the proposed illustrative design. A particular consideration has been the Grade I Listed Priory Church St Laurence located to the south east of the site. The church itself is enclosed in substantial grounds and is separated from the site. The scheme has been designed so has to provide for a new area of formal community open space to the east of the site which will enhance the area closest to the church.
- 3.3 A drainage easement exists across the site which it is proposed would be diverted as part of the proposals to allow for the development.
- 3.4 The site context plan provides indication of the views around the site including the existing substantial tree border that follows the southern edge of the site. This serves to
- 3.5 The indicative street scene provides an example of the type and form of development that could be achieved in this location.
- 3.6 The illustrative layout demonstrates the type of sustainable and high quality development that could be achieved in this location. The layout shows how 35 homes to meet local needs can be provided alongside new landscaping provision.
- 3.7 A key benefit of the proposals is the delivery of a new area of formal public open space to the east of the site. It is proposed that this space could be made formally available to the community and secured for ongoing community use. Public footpaths across the field will also remain unaffected by the proposals.

4.0 Strategic Growth Options Consultation

4.1 The following section provides specific answers to the questions raised in the current planning consultation.

Q1: Do you agree with the broad areas, for the purpose of considering approaches to growth?

- 4.2 The broad areas identified in the plan are generally supported. It should however also be emphasised that there are smaller scale opportunities in other areas of the Borough for development that could provide modest extensions to well-serviced settlements and support the Borough's need for housing in rural areas.
- 4.3 Adequate sites in villages outside of the key growth areas should be considered as suitable sites for residential development in order to comply with the National Planning Policy Framework's desire to promote sustainable development in rural areas by locating housing "where it will enhance or maintain the vitality of rural communities" as stated in Paragraph 55.
- 4.4 The option of small scale village growth in the north of the Borough, identified as Growth Option A within the Strategic Growth Options Consultation documents, is supported. Although the transport network may restrict large scale growth in these villages, the small scale release of green belt at village development boundaries could provide the growth required to maintain prosperous rural economies and enhance the vitality of rural communities, in line with the NPPF. Our clients site at Blackmore at set out above provides a particularly sustainable opportunity for development.

Dunton Garden Suburb

- 4.5 The need to allocate significant additional land for housing of between four and six thousand homes is supported. It is considered, however, that an adequate spread of housing needs to be provided across the Borough in order to meet the housing demand of communities in different areas and importantly provide a range of deliverable sites.
- 4.6 The proposed scale and strategic nature of the potential allocation at Dunton will present the council with significant challenges in the delivery of housing in the short term. As set out in paragraph 47 of the NPPF to boost significantly the supply of housing, local planning authorities should 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. It is important that the plan allocates sufficient deliverable sites o meet this need early in the plan period.

- 4.7 The infrastructure requirement for large strategic sites such as Dunton will be considerable and a development of this size is not likely to come forward until later in the plan period.
- 4.8 The allocation of land at Blackmore will not only help support the rural community, but it will be of a scale that can be delivered in the short term to meet the housing requirements for the early years of the plan period (prior to Dunton Garden Suburb being delivered). It will also assist in providing the choice and competition for market land as set out within the NPPF.

Q3: Do you have any comments on the appropriateness of particular sites?

- 4.9 Strutt and Parker LLP are acting on behalf of Mrs A. Topham in order to promote land south of Blackmore Road, Blackmore.
- 4.10 The site is adjacent to the existing settlement boundary and presents a logical extension to the well-serviced village of Blackmore. The village offers a local convenience store, a primary school, a sports club, pubs and restaurants and other community facilities and services. The village is also in close proximity to Brentwood and Chelmsford which provides a further extensive range of educational, retail and leisure facilities for village residents. Brentwood and Chelmsford are a 25 minute bus journey from a bus stop situated at the site, on Blackmore Road. Buses run at least once an hour to Brentwood, and at least once every 2 hours to Chelmsford.
- 4.11 The land is in single ownership and has been previously submitted to the Council (SHLAA ref: G044) for consideration due to its potential to provide residential development. The Council has therefore previously considered the potential for this site and recognises that it is achievable. As set out in more detail in section 2 and 3 above the site is smaller than that previously considered in the SHLAA, and is particularly well related to the existing trees at the boundary of Blackmore. The developable area of the site would not extend into the conservation area with a new area of public open space being proposed in this area. The indicative layout can be seen on the attached drawing which will be the subject of further engagement with the Council and local community to ensure that the local housing and community needs are met to the best of the site's ability.
- 4.12 The site's position in relation to the existing settlement boundary ensures that development here would have a minimal impact on the green belt and would be in-keeping with the current settlement layout. There is existing development to the north of Blackmore Road and so a small village extension to the south would reflect this pattern. The site's reduction in size now ensures the site does not encroach into the wider countryside and green belt. The site is well-screened from the open countryside beyond the site to the south by substantial trees and planting. Access is achievable direct to Blackmore Road.

- 4.13 There is a conservation area that covers the eastern portion of the site, and associated with this, a number of listed buildings in close proximity. The indicative layout has taken this into consideration and limits development to the western portion of the site to reduce any potential impacts on this area of historic significance.
- 4.14 Additionally the area of the site within the client's and located closer to the church can also potentially be made available for community or church uses as part of the proposals.
- 4.15 The site presents no significant constraints that may affect the delivery of the site and it is therefore recommended that it is allocated through the new Local Plan to meet local needs.

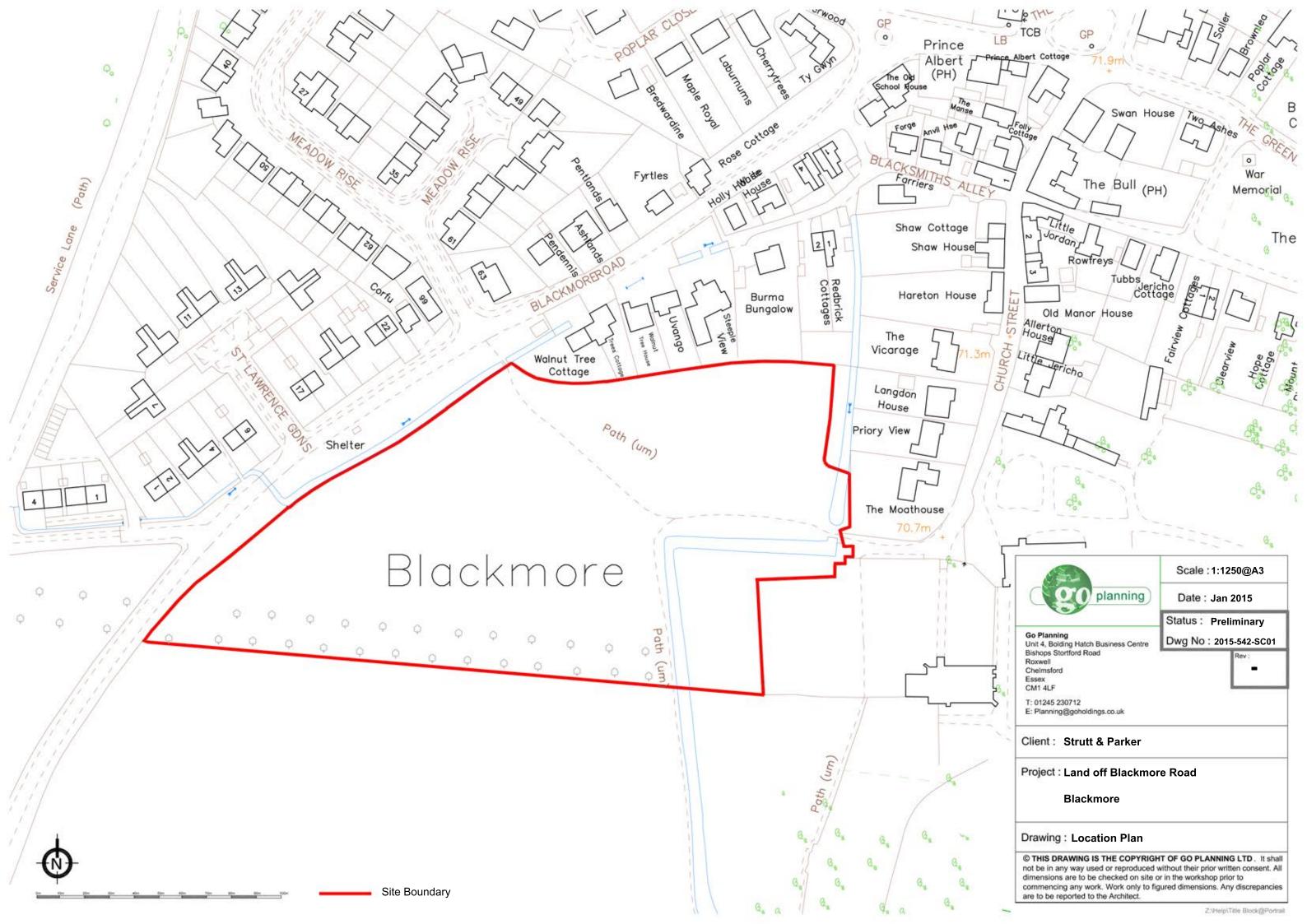
Q6: In order to provide for local need is it preferable for Greenfield sites on the edge of villages to be released, or to develop brownfield sites (both within the Green Belt)?

- 4.16 The Strategic Growth Areas Consultation document at paragraph 3.3 recognises that objectively assessed housing needs are around 360 dwellings per annum, equivalent to approximately 5,500 homes over a 15 year plan period.
- 4.17 The plan also however recognises that to meet objectively assessed needs and account for past unmet need a higher level of growth is likely to be required. This is stated in the Council's evidence base to be in the region of 6,200 dwellings (413 per annum over a 15 year plan period). It is clear therefore that there remains a very significant need for housing with the Brentwood Borough. In order to meet this objectively assessed need it is important that the council allocate appropriate sustainable sites in all areas of the borough that can contribute to meeting needs whilst avoiding significant harm to the Green Belt.
- 4.18 The objectively assessed housing needs for Brentwood Borough Council far exceed the availability of brownfield land in the borough. The council cannot provide a sustainable level of housing in the borough without considering suitable greenfield land opportunities.
- 4.19 Release of green belt sites should particularly be considered when land is adjacent to existing settlement boundaries and will therefore have a minimal impact on the openness of the countryside. Sites should be considered where they are sustainably located and well-situated with regards to existing community facilities and services.
- 4.20 Suitable sites such as our client's land at Blackmore are already well enclosed within the landscape and can be brought forward whilst avoiding harm to the Green Belt.

5.0 Conclusion

- 5.1 The Strategic Growth Areas Consultation document makes clear there is a significant need for housing in Brentwood in order to meet objectively assessed needs consistent with the NPPF.
- 5.2 As set out in response to the consultation questions above it is considered important that a range of housing sites are delivered including in villages in order to meet housing needs and support the vitality of rural communities.
- 5.3 The site at Blackmore Road, Blackmore represents a particularly sustainable and appropriate opportunity to meet housing needs. The site can be delivered whilst avoiding encroachment beyond existing well established and defined site boundaries and can deliver important community benefits including need space for use by the local community. It is considered that the site should be supported for allocation by the Council as work on the Local Plan progresses.

Appendix 1 - Location Plan



Appendix 2 - Constraints Plan

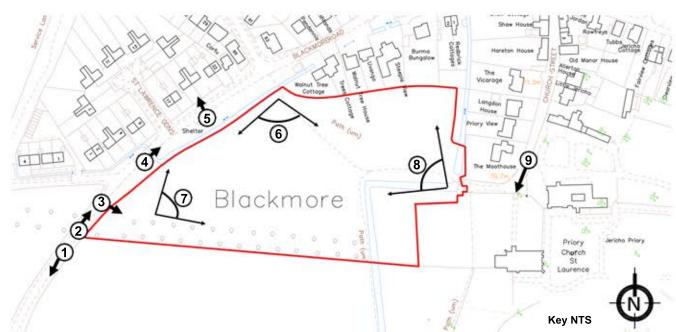


Appendix 3 - Site Context

Land Off Blackmore Road - Site Context























Appendix 4 - Indicative Street Scene







Scale: 1:200@A3

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Project : Land off Blackmore Road

Blackmore

Drawing: Streetscene

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Appendix 5 -- Proposed Illustrative Scheme

