

Brentwood Local Plan Strategic Growth Options & Dunton Garden Suburb Consultations

Representations on behalf of Anderson Group In respect of Land south of Redrose Lane and east of Nine Ashes Road, Blackmore



Quality Assurance

- Subject: Representations to the Brentwood Local Plan Strategic Growth Options & Dunton Garden Suburb Consultations
- Client name: Anderson Group
- Type of report: Written Representations

Prepared by:	Steven Butler BSc	(Lana)	
Flepaled by.	Sleven Duller DSC		

Signed

Date

February 2015

Reviewed by: Ray Houghton BSc (Hons) DipTP MRTPI

Signed



Date

February 2015





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1 Introduction

- 1.1 These representations have been prepared in respect of land south of Redrose Lane and east of Nine Ashes Road, Blackmore (the "Site"). The Site is 3.3 hectares and is under the control of Anderson Group, the full extent of which is identified on the plan at Appendix 1 to this report.
- 1.2 This report has been written in order to correspond to the questions set out in the Strategic Options consultation document which are of relevance to Blackmore and to the Site, and to which Anderson Group has an interest.
- 1.3 This report also provides a response to the concurrent Dunton Garden Suburb consultation, a written response to which is sent to both Brentwood and Basildon Borough Councils for consideration in their respective Local Plans.
- 1.4 To date Anderson Group has commissioned evidence in respect of landscape, ecology, flood risk, highways and utilities, the conclusions of which are assimilated into the Urban Design Framework document at Appendix 2, and have shaped the Illustrative Masterplan proposals shown at Appendix 3. The illustrative masterplan shows how a residential development of the Site could be delivered in a manner that is sympathetic to its surroundings. We therefore invite Brentwood Borough Council to consider it favourably in the preparation of the Local Plan.

2 Local Plan Strategic Options Consultation – Responses to the Questions

Question 2 – do you agree with the issues raised in each of these areas?

- 2.1 Our response is in respect of area (A) "The North of the Borough".
- 2.2 We broadly **agree** with the facts stated about area (A) insofar as it is comprised of a collection of villages and that the road network provides connections from these locations to the A414 and M11. We also welcome the consideration of the general release of sites to meet local need within this part of the Borough.
- 2.3 However, whilst the release of brownfield land in the Green Belt and land on the edge of villages is considered (para 2.15), we are concerned that the Plan stops short of making explicit reference to the release of *suitable greenfield Green Belt* land on the edge of these existing settlements. It would be unsustainable for brownfield sites in isolated locations to be allocated for residential development simply because they are previously developed, a view which is shared by the Interim Sustainability Appraisal¹.
- 2.4 The release of *suitably located greenfield Green Belt land* should be considered as another potential option in area (A); this is particularly pertinent in the case of Blackmore, a village within area (A) in which the SHLAA identifies brownfield capacity of only 1 dwelling (a site which is situated within the existing settlement boundary), yet there is an identified local need significantly in excess of this brownfield capacity.
- 2.5 In considering that Green Belt release is a suitable option, we would reassure the Council that *Hundal v South Buckinghamshire DC* [2012] demonstrates that <u>housing need</u> is capable of justifying a change in the Green Belt boundaries. Taking this point into practice, St Albans City and District Council (another Metropolitan Green Belt authority) is preparing its Local Plan to meet full objectively assessed housing

¹ Interim SA page 32 – within the "Economy and Employment" section of the Appraisal table



need with Green Belt release on the basis that 'exceptional circumstances'² <u>do exist</u> because there is insufficient capacity on suitable brownfield sites and no alternative locations beyond the Green Belt.

2.6 Without the release of greenfield Green Belt land in Blackmore, the Local Plan would be incapable of delivering sustainable growth in the village in accordance with locally identified need. The Council should therefore release greenfield Green Belt land because there are locations within area (A) where the identified local need cannot be accommodated on brownfield sites alone.

Question 3 – Do you have any comments on the appropriateness of particular sites?

- 2.7 Yes. Land south of Redrose Lane and east of Nine Ashes Road, Blackmore is an appropriate site for residential development and should be released from the Green Belt because it is suitable, available and deliverable. The Site is referred to in Appendix 1 to the consultation document as *Land south of Redrose Lane, north of Woollard Way, Blackmore,* and in the SHLAA as site reference G070.
- 2.8 The Landscape Appraisal and Urban Design Framework at Appendix 2 to this Report identifies that the Site has the capacity to deliver between approximately 40 and 56 dwellings, taking account of public open space, infrastructure requirements, and the Council's and local community's likely preferred development density. Crucially, this could be delivered in a way that would not cause harm to its Green Belt function.
- 2.9 The Indicative Masterplan at Appendix 3 shows how the development of the Site responds to the constraints as set out below.
- 2.10 In respect of **Green Belt**, paying particular respect to the National Planning Policy Framework's five Green Belt purposes:
 - To check unrestricted sprawl of large built-up areas At present there is no defensible boundary to the north of Blackmore. The Site is constrained to the north by Redrose Lane, to the east by Fingrith Hall Lane, and to the east by Nine Ashes Road. Building as far as Redrose Lane would not increase sprawl because development would be restricted by the defensible boundaries;
 - To prevent neighbouring towns from merging into one another developing the site would not cause the settlement of Blackmore to merge with other settlements to the north; even by using the most prudent of measurements, the nearest settlement of any notable size is Nine Ashes (a small village), some 1km to the north west of the site's north-western boundary;
 - To assist in safeguarding the countryside from encroachment Redrose Lane, Fingrith Hall Lane and Nine Ashes Road all form defensible boundaries to development. These boundaries are readily recognisable and likely to be permanent, whereas the current garden fences to properties on Woollard Way are not. The release of the Site would therefore solidify the Green Belt boundary in this location and ensure that encroachment into the countryside would not occur;
 - To preserve the setting and special character of historic towns The Site does not impact upon the setting of the village centre when viewed from the Green Belt as it would be viewed in the context of the neighbouring residential development;
 - To assist in urban regeneration, by encouraging the recycling of derelict and other urban land The Local Plan consultation document accepts that there are insufficient suitable brownfield sites to meet OAN. The release of Green Belt to meet housing need is required and would therefore have little or no impact upon the principle of encouraging urban regeneration, particularly in the rural area.

² As defined by National Planning Policy Framework paragraph 83



- 2.11 In respect of **landscape and visual impact**, the visual envelope of the Site is considered small and views are primarily contained to properties and areas adjacent to the north. Blackmore and the Site are generally screened from longer distance views by intervening vegetation. The areas of higher ground around Blackmore are not high or close enough to provide views of the Site. Similarly, in areas where the Site may be visible it would be located in the context of surrounding development, so the visual impact of development would not be significant.
- 2.12 The indicative masterplan shows potential **vehicle access** points off Woollard Way. This would be capable of providing suitable means of access into the Site in a manner that would not compromise safety or highways authority's technical requirements.
- 2.13 In terms of **infrastructure**, our investigations with Anglian Water reveal that there is sufficient capacity (in particular within the foul water network) to accommodate a development on the Site.
- 2.14 There are no overriding **ecological** constraints on the Site. Further survey work would be need to identify the presence (or otherwise) of protected or notable species but it is considered that such mitigation could be accommodated within the masterplan proposals.
- 2.15 The Site is within an acceptable location for new residential development in terms of **flood risk** because it is flood zone 1. Adequate SuDS could be accommodated within the Site.
- 2.16 The Site is **sustainably** located because it is within easy walking distance of all the services, facilities and amenities on offer in Blackmore village.
- 2.17 In addition to the above factors, a scheme on this Site could provide such benefits as:
 - Private and affordable housing through a range of mix and type of dwellings in accordance with local rural needs;
 - S106 monies and New Homes Bonus. Such S106 monies could be used to mitigate impact of development upon local facilities (such as the primary school);
 - An enhancement to local services caused by the increase in footfall from the development's new population;
 - High quality public open space within the scheme;
 - Defensible Green Belt boundary to the north of Blackmore;
 - Development that respects and reinforces the local character;
 - Economic benefits from increased footfall from new residents, maintaining the viability of the village's services and facilities.
- 2.18 We consider that the land south of Redrose Lane and east of Nine Ashes Road is the most suitable site in Blackmore for residential development. Appendix 4 of this Report contains our assessment of the other sites which were submitted for consideration in the Local Plan process, including those sites previously deemed unsuitable in the SHLAA for added robustness.
- 2.19 Appendix 5 contains our Sustainability Appraisal for the Site (updated since the 2013 Preferred Options Consultation) to take account of further evidence in respect of landscape, Green Belt and utilities. It may be seen that there are no major negative impacts associated with the development of the site from a sustainability perspective.



2.20 Having regard to the above, the Land south of Redrose Lane and east of Nine Ashes Road is therefore appropriate for residential development and should be released from the Green Belt.

Question 6 – 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)?

- 2.21 We consider that greenfield sites on the edge of villages should be considered for release, particularly where there is insufficient brownfield land to provide for locally generated need for new development in villages such as Blackmore. Our reasons for this stance are threefold.
- 2.22 Firstly, we have assessed the Site against the five Green Belt functions at 2.9 of this Report and conclude that development would not cause harm to its Green Belt function. This, together with the exceptional circumstances set out at 2.5 above, demonstrates that the allocation of the site through Local Plan preparation would be in accordance with Green Belt policy.
- 2.23 Secondly, the Interim SA identifies a lack of suitably located brownfield land in the rural area (across the whole Borough, not just in area (A) the North of the Borough). This equates to only four sites, which, "*by their very nature tend to be located away from or on the periphery of existing urban centres*" (Interim SA para 11.3.3). Taking this point further, the Interim SA also identifies greenfield sites in the rural area as "*better connected and less isolated than [brownfield] locations*" (at page 32 within the Economy and Employment tab).
- 2.24 Thirdly, Blackmore is one of the larger villages in the Borough and it therefore follows that an adequate and proportionate level of growth is attributed to it. The SHLAA identifies capacity for only 1 unit on appropriately located brownfield land (i.e. within the village itself). It would be inappropriate to restrict the level of growth in Blackmore during the next Local Plan period simply because the village has very little brownfield land, particularly when compared with the other villages in the North of the Borough, and particularly when there is evidence demonstrating a level of local need that would require the release of Green Belt land in Blackmore.
- 2.25 There is therefore no sustainability or Green Belt justification for not releasing greenfield sites on the edge of villages, in particular Blackmore.



3 **Response to the Dunton Garden Suburb Consultation**

3.1 Our response to this consultation is made in the context of Anderson Group's land interest in Brentwood Borough only. We therefore do not wish to comment on the suitability of the Garden Suburb insofar as it affects Basildon Borough Council's Local Plan.

Impact of the Garden Suburb upon the Overall Spatial Strategy

- 3.2 We acknowledge that both Brentwood and Basildon Borough Councils are obliged to provide housing in accordance with their full OAN. We generally welcome the consideration of Green Belt land as necessitated by the OAN and recent case law (see as referenced above). However we consider that the Council should not use this as an opportunity to seek to maximise the apportionment of numbers to an allocation in this location <u>at the expense of</u> sustainable Green Belt release in other suitable locations in the Borough, particularly in the villages.
- 3.3 We note that the maximum suggested figure of 6,000 units is exactly double the requirement for Green Belt release in Brentwood Borough, when the Borough-wide brownfield capacity of 2,500 is deducted from the total housing requirement of 5,500. We also note that the administrative boundary line cuts approximately halfway through the development shown on the illustrative diagram on page 8 of the consultation document (we appreciate that this diagram is for illustrative purposes at this stage). We assume that the overall quantum of development within an allocation on the Garden Suburb site would be apportioned on a spatial basis taking account of the number of residential units that could be accommodated on either side of the administrative boundary line.
- 3.4 Our comments in this regard are comprised of two main concerns:
- 3.5 Firstly, the larger the scale of an allocation on this site (i.e. nearer the 6,000 unit maximum), the further west it would push the built development of the urban area of Basildon, giving rise to a significant and very real perception of coalescence with West Horndon, contrary to Framework advice;
- 3.6 Secondly, having regard to Brentwood Borough's residual requirement (once the 2,500 brownfield capacity is deducted from the 5,500 total OAN requirement) an allocation of this size runs the very serious risk of unduly depriving the remainder of Brentwood Borough of the growth it needs to develop throughout the Plan period.
- 3.7 If the Councils were to seek to deliver the Garden Suburb in its totality (i.e. 6,000 units), such an approach would be unsustainable because it would fail to plan properly for the needs of Brentwood Borough as a whole, and in particular those locations where there is an identified requirement for locally generated need which cannot be accommodated solely on suitable brownfield land, such as Blackmore.
- 3.8 If the Councils are minded to take forward the Garden Suburb proposals, we consider that it should be 'scaled down' to a size that enables adequate and proportionate provision of sustainable development for the remainder of Brentwood Borough within the forthcoming Local Plan period.

Sustainability Appraisal

3.9 We note that the Garden Suburb proposal sits alongside the Council's Local Plan process, rather than forming part of it. We also note that the proposal has been assessed on its own merits and "*does not consider its sustainability performance relative to other possible alternative developments*" (para 1.14 of the SA/HRA commentary document). However, the Interim SA for the Local Plan considers the Garden Suburb proposal against the other alternative growth options in the Borough. We therefore question why the Garden Suburb SA document does not do the same.



- 3.10 We are concerned with this key omission from the SA/HRA because it is currently not yet understood what sustainability implications a proposal of this size, in this location, would have upon the growth prospects of the rest of Brentwood Borough. Furthermore, we are concerned that a Garden Suburb proposal could form part of a Submission Local Plan, generally considered as an advanced stage in the process, the next stage in Brentwood Borough Council's Local Plan process (Interim SA para 15.1.1), without having previously been tested or consulted upon.
- 3.11 We would therefore welcome the publication of a revised SA/HRA for the Garden Suburb proposals, whose sustainability impact is assessed against the alternative growth options at the earliest opportunity prior to the publication of the next stage of the Local Plan.

Summary

3.12 We object to the Garden Suburb proposal in its totality and consider that it should be scaled down to ensure adequate and proportionate provision of sustainable development for the remainder of Brentwood Borough, in particular the rural areas. We would welcome the publication of a revised SA/HRA which assesses the Garden Suburb's sustainability impact against the alternatives.

4 Summary of Representations

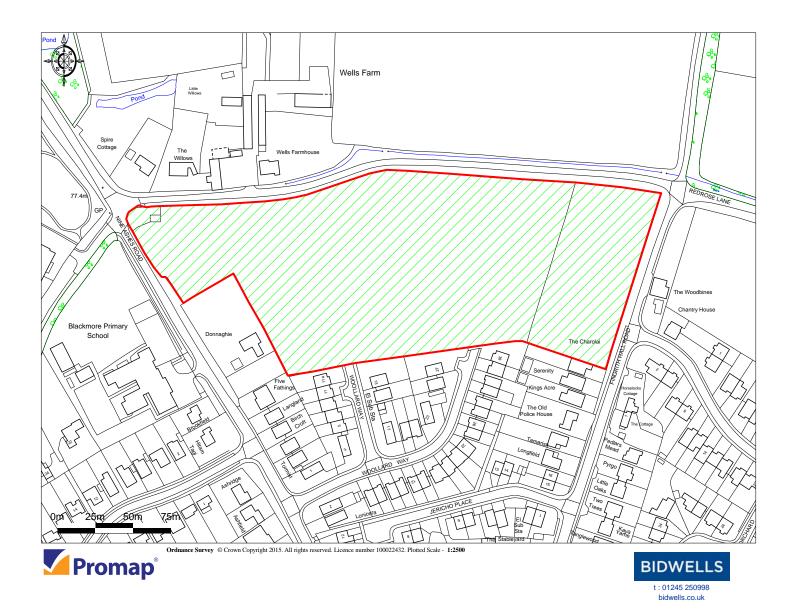
- 4.1 We support the general consideration of Green Belt release because we consider that 'exceptional circumstances' exist through the Brentwood Local Plan process to do so. We consider that the Council should consider the release of greenfield Green Belt sites, particularly in Blackmore, because there is a significant lack of suitable brownfield land and it would therefore be wholly unsustainable to release isolated brownfield sites in the Green Belt for development simply because they are previously developed.
- 4.2 The release of Land south of Redrose Lane and east of Nine Ashes Road for residential development would have no significant Green Belt or landscape impact and is less constrained than other locations in Blackmore. The supporting evidence and Illustrative Masterplan demonstrate its appropriateness in terms of other planning policy and material considerations.
- 4.3 In respect of Dunton Garden Suburb, we consider that it should be 'scaled down' to a size that enables adequate and proportionate provision of sustainable development for the remainder of Brentwood Borough within the forthcoming Local Plan period. Failure to scale down the proposals would have significant negative sustainability impacts because it would fail to plan properly for the needs of Brentwood Borough as a whole, and in particular those locations where there is an identified requirement for locally generated need which cannot be accommodated solely on suitable brownfield land, such as Blackmore.



Appendices



Site Location Plan – Land south of Redrose Lane and East of Nine Ashes Road



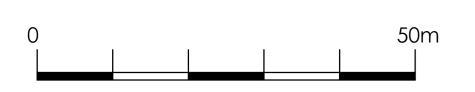


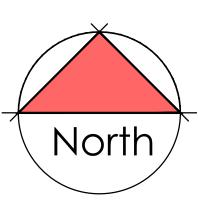
Landscape Appraisal and Urban Design Framework

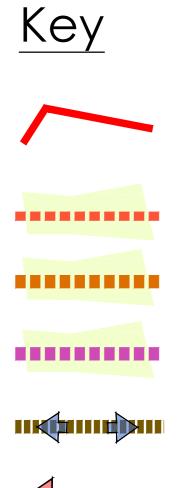


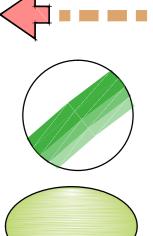
Illustrative Masterplan





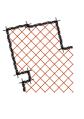


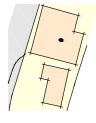




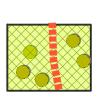












Development Boundary

- Primary Road
- Shared Surface
- Private Drives
- Pedestrian Link
- Local Access Road

Landscaped Buffer

Public Open Space

Illustrative Tree Planting

Illustrative Hedge Planting

Residential development

OS Map data

Frontage to Public Realm

Development Entrance Realm

Project:-Land to the South or Redrose Lane, Blackmore, Brentwood Description:-

Master Plan





Revision:www.jcndesign.co.uk ~ info@jcndesign.co.uk ~ 01376 572977



Comparative Assessment of Alternative Sites in Blackmore

Comparative Assessment of Alternative Sites in Blackmore



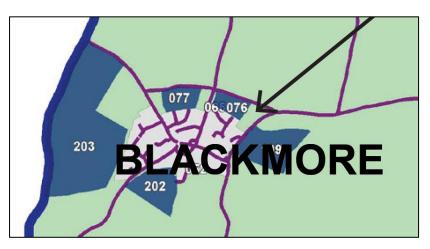
Date:	February 2015
Our ref:	Brentwood Local Plan Strategic Options Consultation
Subject:	Land south of Redrose Lane and east of Nine Ashes Road, Blackmore

Below is an assessment of the benefits and constraints posed by the alternative potential residential development sites in Blackmore, when compared with the land under the control of Anderson Group.

The Anderson Group Site

Site 077 (SHLAA ref. G070) – Land to the south of Redrose Lane and east of Nine Ashes Road, Blackmore (referred to in the SHLAA as being north of Woollard Way) – this site was considered as "suitable" in the SHLAA. Please also refer to our accompanying Sustainability Appraisal of the Site.

The Alternative Sites



Above: An extract from the Local Plan Strategic Options Consultation (page 19)

Site 076 (SHLAA ref. G070A) – Land to the South of Redrose Lane, north of Orchard Piece, Blackmore.

Benefits

- Good proximity to village centre amenities
- Considered suitable in the SHLAA

Constraints

- Does not have clear defensible Green Belt boundaries on all sides caused by the listed building and its associated curtilage along Fingrith Hall Lane, and the open field adjacent to the east
- Isolation from the village hall and primary school
- Uncertainty concerning access to utility connections from the land to the south which may affect deliverability

Comparative Assessment of Alternative Sites in Blackmore



Land south of Redrose Lane and east of Nine Ashes Road, Blackmore February 2015

Site 065 (SHLAA ref. G146) - Land adjacent to 1 & 3 Orchard Piece, Blackmore

Permission was granted under 11/01055/FUL for a single dwelling, which is now under construction. This site is no longer applicable.

Site 052 (SHLAA ref. B140) - Land rear of Little Jericho, Church Street, Blackmore

Permission granted under 12/00109/FUL for conversion of garage/workshop to one bedroom dwelling. If the permission is implemented the site is no longer applicable. The site's indicative capacity is only 1 dwelling in any event.

Site 199 (SHLAA ref. G041) - Land to the East of Ingatestone Road, Blackmore

<u>Benefits</u>

Proximity to village centre amenities

Constraints

- Poorly related to existing development and exposed. Development would cause substantial Green Belt harm
- Considered unsuitable in the SHLAA

Site 202 (SHLAA ref. G044 (S)) - Land to the South of Blackmore, east of Blackmore Road

Benefits

Proximity to village centre amenities

Constraints

- Permissive Open Access through the site (through the Environmental Stewardship Scheme). Risk of application for Village Green status if development were proposed
- Within Conservation Area and open landscape, and the east to west tree belt through the site forms an attractive introduction to the village from Blackmore Road
- Considered unsuitable in the SHLAA

Site 203 (SHLAA ref. G044 (W)) - Land to the West of Blackmore, west of Blackmore Road

Benefits

None identified

Constraints

- Poorly related to existing settlement and exposed. Development would cause substantial Green Belt and landscape harm
- Considered unsuitable in the SHLAA



Sustainability Appraisal of the Site

Sustainability Appraisal (updated February 2015)

Local Plan site 077 (SHLAA site G070) - Land south of Redrose Lane and east of Nine Ashes Road, Blackmore

	Appraisal Criteria	Appraisal Results	Notes	SA Rating
	Air Quality	No constraints	Nearest AQMA is more than 1km away	
	Biodiversity	No constraints	Not within 500 metres of a LWS, SSSI, or any other statutory designated site	
	Climate Change Mitigation	Within 200 metres of an existing bus stop on The Green.	There are several bus routes with direct and frequent links to key jobs and services in Brentwood town centre (and Brentwood mainline train station), Grays, Romford and Chelmsford	
	Proximity to Heritage Assets	No significant constraints but mitigation may need to be considered	The site is 150 metres away from, but is not visible from, the Blackmore Conservation Area. The Woodbines (Grade II Listed) is within 20 metres of the eastern boundary of the site, on the eastern side of Fingrith Hall Lane. Wells Farmhouse (Grade II Listed) is on the northern side of Redrose Lane, within 20 metres of the site. Horselocks Cottage (Grade II Listed) is within 20 metres of the site to the south east. Some impact.	
	Flooding	No constraints	The Environment Agency Flood Map shows that the site is within Flood Zone 1	
ENVIRONMENTAL	Landscape	Within the Green Belt. Greenfield land. Impact of development could be mitigated.	The site is Green Belt but is adjacent to residential land uses to the south and west, and is contained within Redrose Lane and Fingrith Hall Lane; these are defensible boundaries. The site is not within or near to a Special Landscape Area. In locations where the site may be visible it would be located in the context of surrounding development. The Landscape Appraisal concludes that landscape and Green Belt impacts would be limited with a sensitively planned development.	
Ш	Contamination	No constraints	Existing horsiculture use presents no contamination constraints.	
	Neighbouring land uses	No constraints	Residential land to the south and east. Arable farmland to the north. Grazing land to the east. The site would be compatible with surrounding land uses.	
	Highways impact	No constraints	There are a number of unencumbered potential access points for both vehicles and pedestrians.	
	Minerals safeguarding	No constraints	The site is not within a Minerals Safeguard Area as identified on the Submission Replacement Essex Minerals Local Plan.	
	Water quality and resources	No constraints	Initial investigations with AWS confirmed that development foul flows would be acceptable and that there is sufficient capacity within its network. Doddinghurst Water Recycling Centre has capacity to treat flows from the Site without on-site mitigation or any other works necessary.	
	Within Hazard Zone	No	Not within HSE hazard zone.	
	Distance to primary school	Less than 100 metres	Blackmore Primary School is adjacent to the site on Nine Ashes Road. It currently has a surplus of 33 places with a forecast surplus of 18 spaces in 2016/17 (ECC Commissioning School Places in Essex 2012-2017)	
IAL	Distance to secondary school	More than 1km	Not within walking distance however there are daily school bus services to Shenfield High School, Becket Keys CofE School, Brentwood County High School, Ursuline County High and St Martin's School.	
SOCIAL	Distance to Open Space	Less than 300 metres	The Green in Blackmore is protected in the adopted Local Plan (designation LT2, LT5).	
	Proximity to services	Less than 200 metres	Village post office, neighbourhood store, public house and restaurant/café are all within 200 metres.	
	Housing capacity	Between approx 40 and 56 new dwellings	Indicative capacity based on Green Belt, landscape/townscape constraints, public open space and infrastructure requirements, together with the likely preferred development density.	N/A
	Employment land designation?	No	Nearest employment designations are in Brentwood therefore travel to those locations would be required from residents of the site. However a change of use of the site to residential would not result in the loss of existing employment land.	
	Retail designation?	No	Residential development of the site would not result in the loss of a designated retail area (as identified in the adopted Local Plan). The nearest designated retail areas are in Brentwood and Ingatestone. Residents of the site would be required to travel to these areas however there is a good offer locally in Blackmore, which would reduce the need to travel for convenience goods and would maintain the viability of these local services.	
ECONOMIC	Preferred alternate use?	None	If development were to occur on this site there is no preferred alternate use to residential.	
	Site viability	No known significant constraints	No known constraints.	

		Constrainte		
	Agricultural Land Classification		The ALC map classes these grades as "good" quality land. However the majority of the rest of the Borough is of the same classification therefore the release of land in order to achieve sustainability objectives would be inevitable.	

OTHER COMMENTS	Planning History	NO CONSTRAINTS	There is no known planning history on the site (based on assessment of Brentwood Borough Council's planning history search webpage).	
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CONCLUSION The site is sustainable in many respects and there are a high number of positive impacts. There are a number of minor negative impacts but these may be mitigated by sensitively designed development. There are no major negative impacts.

Key to SA rating:	Positive / neutral impact
	Minor negative impact
	Major negative impact





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