Site : Land between 339 and 361 Roman Road, Mountnessing, Ingatestone CM15 OUJ

1.0 Introduction

The purpose of this submission is to seek to have the site included for residential development when the revised Plan (the Proposed Submission Document) is prepared, scheduled for release by Brentwood Borough Council for public consultation in early 2014.

2.0 Site Description

The site comprises a parcel of land along the existing built frontage of Roman Road.

It is located between properties No. 339 and 361.

To the north east of the site is a private driveway giving access to a dwelling located to the rear of the site, Hillrise Farm, 341 Roman Road.

The front part of the site comprises overgrown shrub, bush and small tree vegetation. The rear part of the site is grassland.

The site is approximately 61m wide and 55m deep.

A 1:1250 Location Plan is attached showing the site edged red.

3.0 Site Assessment

The existing pattern of development in the locality of the site comprises a mostly built up frontage in Roman Road opposite the site, and mostly built up frontage on the southern side of Roman Road from 303 to the North, down to 361 to the South, next to the site.

It is the only un-built on gap along this part of Roman Road.

The site therefore qualifies for 'Infilling development' in accordance with paragraph 89 of the National Planning Policy framework (NPPF).

The NPPF allows limited infilling in villages, now also allowable in the Green Belt.

4.0 Proposals

It is proposed to build three detached dwellings on the site.

The scale and form of the development would echo the detached dwellings opposite. Indeed, the three dwellings opposite, nos. 322 to 326 occupy a site of a similar width to that proposed.

Each of the dwellings would be of a reasonable size.

The design would use materials from the Essex Vernacular palette, and have a form and style appropriate for this village location.

As per the dwellings opposite, it is probable that some of the dwellings would pick up on the Arts and Crafts references, as do other dwellings in the locality.

5.0 Brentwood Borough Council's Assessment of the Site

Previous assessment of site locations for housing Borough wide was undertaken by Atkins Ltd.

The final report of the Strategic Housing Land Availability Assessment was published in October 2011.

This site was not assessed by Atkins.

However in discussions with Brentwood Borough Council Local Plans Team, it was confirmed that the potential of the site was known / recognised.

Following an exchange of emails with Brentwood Borough Council, it was confirmed that the site would be included in the appraisal for proposed residential development and taken account of prior to publication of the Preferred Options for Consultation document.

The site has not been put forward as a preferred options site.

Indeed, no provision for new housing within Mountnessing Parish has been included at all.

However, another site in Roman Road was assessed by Atkins; between 375 and 361 Roman Road.

Atkins assessment of that site was that it was not suitable for development as it would constitute ribbon development some distance outside the existing Mountnessing village envelope, adding to the coalescence of the village with the town of Brentwood. I concur with this assessment.

Along Roman Road, and to the south of our site and no. 361, the existing pattern of development is much more sporadic.

Large gaps exist between the existing dwellings, with, in fact, only two dwellings existing on the road frontage of Roman Road between 361 and Lower Road.

The two sites are, in Planning terms, wholly different.

Our site can provide an obvious infill for this part of Roman Road, as previously explained, with the existing dwelling 361 providing a natural 'end stop' and limit of development on the south side of the road.

In addition, development of our site would be compatible with the fully developed opposite side of the road and facing the site, the natural limit of the northern side of this developed part of Roman Road finishing some greater distance to the south west.

Arguably, our site was missed off Atkins analysis and report. I firmly believe that if it had been examined in any detail, the site would have been included as a Greenfield Site Assessed and Deemed to Have Potential for Residential Development.

6.0 Local Support

My client has had a number of meetings with the joint site owners.

He informs me that Mountnessing Parish Council would not object to an application for residential development on this site. They had particularly wished that any proposal for housing should take account of the general pattern and character of the existing built form of development adjacent and opposite the site.

They considered three detached dwellings would be appropriate.

7.0 Analysis and comment on Brentwood Borough Council's Preferred Options for Consultation Document July 2013

- The council have determined that up to 5600 new homes is the housing need for the next 15 years. However, the draft local plan proposed only 3500 new homes. Inclusion of this site will help to meet this shortfall.
- In the Brentwood Local Plan newsletter Issue 3 September 2013, the Council acknowledge that government, through its Planning Inspectors, do not consider development in the Green belt a reason not to meet local housing need.
- Chapter 2, page 9, alternative Option 3: Semi Dispersed Growth (larger villages) takes the view that it would be difficult to deliver sustainable growth due to a number of factors. These are cited as :
 - lack of sewage treatment capacity to the north of the Borough
 - limited public transport to serve development
 - poor access to services

None of these criteria are applicable to this site or should prove a barrier to its development.

Mountnessing has a number of services in the village, including shops, public houses etc. It is served by a bus route. It is less than 2 miles from the mainline railway station at Ingatestone, which can be reached by bicycle or on foot or by public transport.

- Policy DM11 rightly states and acknowledges the NPPF para. 89 which allows 'limited infilling in villages'.
- The following Policy DM12 sets out those areas in the Borough that it considers are established areas of development. It does not detail the criteria for assessment as to how these areas qualify to be established areas of development, and how other sites in the Borough do not.

It is suggested that certain parts of certain villages, for example our site, could be considered to be an established area of development. If this is the case, then building on this infill plot would be supported by the draft local plan. It is suggested that the analysis of those areas that would constitute established areas of development is unduly restrictive.

• In the same policy DM12, the Council state that the NPPF should not be relied upon to formulate local Plan Policy.

This is an interesting approach by the Council, in that they note what the Government wishes but deliberately choose a different approach.

It is stated that their preferred approach is to provide exact locations where limited infilling is acceptable to prevent urban sprawl. If the Government had wanted Local Planning Authorities to take this again, unduly restrictive approach, it would have directed hem accordingly.

For example, a caveat could have been inserted to say that limited infilling in villages is acceptable, but not where it creates urban sprawl.

The particular characteristics of this site have been outlined above such that development of the site, in an existing ribbon of development on both sides of the road is not urban sprawl.

• The matter of infilling, since the publication of the NPPF in March last year has been a hot topic.

Many Local Planning Authorities have been getting to grips with the Framework allowing infilling in villages, including now in the Green Belt.

Indeed, one neighbouring Local Planning Authority, have been asked to re-consider their stance on the definition of what they define as infilling following the Public Examination Hearings conducted by the Inspector.

She thought that the Local Planning Authority's definition of infilling was unduly restrictive. In that case, the proposed modification now includes:-

"However, in assessing the number of properties that could be accommodated within these small gaps, the City Council will have regards to the character and context of the development pattern of the immediate area. Additionally, where a site lies within the Metropolitan Green Belt, the development must not conflict with the purposes of including land within the Green Belt"

Clearly the Government, through its Inspectors, is seeking to expand the opportunities for development on infill plots, rather than severely limit those opportunities as per the Draft Local Plan.

8.0 Other Relevant Matters

As stated no provision for any new dwellings, of any size, are proposed for Mountnessing. Every village, of any size, needs an amount of new housing to accommodate the natural growth of the village, to provide for its residents.

How the Draft Local Plan does met Mountnessings future housing need? No doubt the Parish will make their own comments and representations.

I understand that Brentwood Borough Council Members would prefer lower density housing schemes, as proposed on our site, rather than higher density.

The optimum number of dwellings are proposed for the site, so as to keep low density, but not under utilizing the sites potential.

This site, and other sites like it, could be favoured by respondents, as less overall harm might be caused to the Green Belt, as it is a smaller site.

9.0 Conclusions

For the reasoning as outlined above, I believe it has been demonstrated that the site could be included as part of the Council's future housing provision for the forthcoming Plan period either because i) after further analysis, the site is considered suitable for inclusion in its own right or, ii) it is suitable for inclusion as an infill plot, and its inclusion would not, with this particular site, change the character of the Green Belt or cause any damage to it.

Signed.....P A Scott 1st October 2013 MSc MRICS ABEng IHBC