



**DRAFT LOCAL PLAN (2013 – 2033)**  
**LOCAL DEVELOPMENT PLAN FOR BRENTWOOD BOROUGH**  
**JANUARY 2016**

**REGULATION 18 CONSULTATION**

**REPRESENTATIONS SUBMITTED ON BEHALF OF COUNTRYSIDE PROPERTIES (UK) LTD  
IN RELATION TO LAND AT DODDINGHURST ROAD, BRENTWOOD**

On behalf of our client, Countryside Properties (UK) Ltd, we write to make representations on the Draft Local Plan (2013 – 2033), which was published for consultation on 10<sup>th</sup> February 2016. Countryside also has an interest in West Horndon which is the subject of a separate representation.

**Introduction and Background to Representations**

These representations are made on behalf of Countryside Properties, who have a particular interest in the site known as Land at Doddinghurst Road (either side of A12), Brentwood. The site has been promoted for development by Countryside and the landowner throughout the preparation of the Plan, and these representations should be read alongside those submitted at the previous stages of consultation.

Countryside is an award winning local developer with a commitment to design and place-making excellence. The previous representations set out the initial proposals for the site and included a preliminary masterplan, which set out the indicative layout for the site. Further detailed work has been undertaken in the intervening period and the vision for the development has subsequently evolved, resulting in a opportunity to deliver a prestigious, high quality development. In this respect, the Site Appraisal, which accompanies these representations, includes an indicative proposal for the development and sets out emerging design principles for the site. The current preliminary masterplan for the site is also included at Figure 1 below.

The proposals comprise the provision of residential development on both the northern and southern parcels of land. The northern parcel can accommodate a higher proportion than the southern and development will be sensitive to the wider Green Belt surroundings. Detailed design work has not been undertaken at this stage, but it is proposed to deliver traditional style units, designed to Countryside's high standard, with a mix of type and tenure.



Figure 1: Preliminary Masterplan

Countryside has also undertaken detailed assessments of the site to demonstrate its suitability, deliverability and appropriateness for development. The assessments accompany the representations and are summarised below:

### Landscape and visual impact

A Landscape and Green Belt Appraisal has been prepared by The Landscape Partnership and provides a review of the existing character and context of the site, assesses the current role of the site in performing the key functions of the Green Belt and assesses the potential effects on the functioning Green Belt if the site was developed.

The Appraisal concludes that overall, the contribution of the site to the functioning Green Belt in and around Brentwood is very small, and is consistent with the Council's own assessment of the site's limited contribution to the Green Belt. It is considered that the site as a whole does not make a significant contribution to performing the Green Belt functions as set out in the NPPF and the local function as set out in the current Local Plan, and that development of the site could be accommodated without significantly adversely affecting the future performance of the Green Belt in

the area. Indeed, the assessment identifies the presence of a long term and defensible Green Belt boundary in the form of Doddinghurst Road.

#### Transport and Access

Countryside have commissioned Odyssey Markides to advise on transportation and access related matters for the site. The technical assessment demonstrates that a safe and suitable access for the northern parcel development can be provided along Doddinghurst Road, further access points are also available from two points on Viking Way. The assessment also confirms that the necessary junction and associated visibility splays to serve the development can be accommodated. The findings of the pba report are noted with regards to the existing issues at junction 3 (A128 Ongar Road/Doddinghurst Road). Odyssey Markides have undertaken an initial appraisal of what localised improvements could be implemented at junction 3. One option to regulate the flow of vehicles could be signalisation of this junction which would provide significant improvements to the performance of the junction compared to the existing situation, even with the proposed development.

In respect of the southern part of the site, the assessment concludes that secondary access can be taken from Russell Close and Karen Close. Russell Close and Karen Close can accommodate the additional traffic flow, even with on-street car parking, and the existing Doddinghurst Road/St Kilda's Road junction would also continue to operate within capacity.

#### Social Infrastructure

A Social Infrastructure Review has been undertaken as the proposed development will accommodate new residents who, in turn, will generate demand for a range of social infrastructure. The Review, undertaken by Quod, confirms that, in isolation, the proposed development will not create sufficient demand to support new facilities.

The Interim Sustainability Appraisal of the Brentwood Local Plan (February 2016) also confirms that the A12 corridor is a focus for growth, through a number of smaller extensions. It is confirmed that a number of these, including Land off Doddinghurst Road, are well located, with the site also being in close proximity to Brentwood Community Hospital, which has capacity.

However, in order to mitigate the additional demand for school places and healthcare arising from new housing development in and around Brentwood urban area, a co-ordinated approach involving major sites will be required to ensure an optimal and efficient solution.



### Archaeological Assessment

CgMs Limited were commissioned by Countryside to undertake a detailed Archaeological Desk Based Assessment of the land parcels. This established that the site does not lie within an area of archaeological priority as designated by Brentwood Borough Council and that the site can be considered to have only a modest potential for the later prehistoric.

### Drainage

A preliminary drainage strategy has been prepared by Ardent Engineering Ltd and confirms that the site is suitable for development. The strategy will employ a range of SuDS measures which will convey, store and provide treatment of run-off prior to discharge at greenfield run-off rates. The surface water drainage strategy has been designed to accommodate the peak 1 in 100 year storm event, with an additional allowance of 30% for future climate change.

### Noise

A Desktop Noise Assessment has been undertaken by Ardent Engineering Ltd and confirms that, subject to appropriate mitigation measures, internal and external areas of the proposed development will fall within an acceptable noise environment. Further detailed assessment works will also be undertaken as the proposals progress.

### Air Quality

The site falls outside of any Air Quality Management Areas (AQMA), although it is recognised that two AQMAs have been declared within close proximity and are located along the A12. Therefore, further monitoring of the air quality will be undertaken and taken into consideration during the scheme preparation and suitable mitigation measures exist to overcome any impact that may exist.

### **Draft Local Plan (2013 – 2033)**

In our previous representations we outlined why the site continued to be a suitable location for development, with no constraints to bringing forward the delivery of the site. It is therefore welcomed that the site has been included within the Draft Local Plan as a housing land allocation. These representations are therefore made in the context of the on-going promotion of the site for residential use and cover the relevant sections of the Plan in turn.

## **Chapter 5 – Spatial Strategy**

It is welcomed that the Council acknowledge at paragraph 5.13 that the fundamental issue facing the Borough through the spatial strategy evolution is the finite capacity of brownfield sites within urban areas. We also welcome the acknowledgement that the release of Green Belt will be required to meet the development needs of the Borough.

### *Policy 5.1 – Spatial Strategy*

We support Policy 5.1 as it adopts an approach which seeks to meet local needs. We consider that the proposed limited release of Green Belt for development within transport corridors, strategic locations and urban extensions provides the optimal solution for achieving the development needs of the Borough. In particular, focusing development along the A12 corridor to the main Towns of Brentwood and Shenfield is considered the most sustainable approach to delivering growth in this area, particularly in light of the introduction of Crossrail to these areas in 2017.

### *Policy 5.2 – Housing Growth*

Policy 5.2 confirms that the Council recognise the objectively assessed housing need for the Borough equates to 362 new dwellings per year, more than double the Borough's previous target under the East of England Plan. The policy identifies provision for 7,240 new dwellings over the Plan period 2013 – 2033, which will be achieved through the development of a range of sites, including brownfield land, strategic sites and greenfield urban extensions in the Green Belt. We support the measures taken to address the housing needs of the Borough and acknowledge that a proportionate approach to Green Belt release has been taken.

The development of our clients' land off Doddinghurst Road (either side of the A12) as a housing allocation is considered essential to the achievement of the strategy vision through the delivery of strategic objectives SO1, SO2, SO3, SO9 and SO13.

## **Section 6 – Managing Growth**

### *Policy 6.1 – Sustainable Development*

We support Policy 6.1 as it adopts the same principles as Paragraph 14 of the National Planning Policy Framework (NPPF). In this respect, it seeks to promote the delivery of sustainable development, which is welcomed.

## **Section 7 – Sustainable Communities**

### *Policy 7.2 – Housing Mix, Types and Tenures*

We support the Council's approach to providing a balanced mix of housing types and tenure taking into account the Strategic Housing Market Assessment and Council's Housing Strategy. However, we also encourage the Council's flexible approach and the confirmation that the housing mix will be based on negotiation, site constraints and development viability.

It is acknowledged that self-building is advocated by the Housing and Planning Bill, which is currently going through Parliament. However, it is considered that the requirement for developments of 100 or more dwellings to provide a minimum of 5% self build properties is overly onerous. Indeed, the Housing and Planning Bill notes that requirements should be based on demand for self-build and custom housebuilding in the local authority area. We would therefore request that justification is provided for the 5% figure set out at Policy 7.2.

We would also suggest that Policy 7.2 is amended to reflect particular site constraints, and consider that the increased flexibility could be achieved through implementing the following wording:

*“Developments of 100 or more dwellings will be expected to provide a minimum of 5% self build properties, subject to site characteristics and constraints. The inclusion of self build properties on smaller sites will also be encouraged.”*

### *Policy 7.3 – Residential Density*

We support the design-led approach proposed by the Council in respect of residential density and the indicative numbers of dwellings per hectare set out by the policy. We also welcome that flexibility is afforded where the special character of the surrounding area or other site constraints make such densities unachievable.

### *Policy 7.4 – Housing Land Allocations*

Policy 7.4 includes details of the housing land allocations to be delivered over the Plan period 2013 – 2033. This approach is welcomed and complements the strategic site allocations that are set out at Policy 6.6. Indeed, it is important to ensure that a sufficient range of smaller urban extension sites are allocated in order to provide a steady supply of new housing. In this respect, it is welcomed that a

range of smaller sites have been allocated for residential development and will enable the Council to maintain a rolling five year land supply.

Following our representations made to previous rounds of consultation on the Plan, we welcome that Land at Doddinghurst Road (either side of A12), Brentwood has been identified as an allocation and that the contribution the site can make to housing delivery in the Borough is recognised. The site will deliver a small scale urban expansion to Brentwood, which will provide a logical extension to the existing urban area without encroaching into the countryside beyond well-defined and defensible boundaries. The site is identified for approximately 250 dwellings, which is considered appropriate for the site. The level of flexibility provided in respect of the number of units to be delivered is also welcomed.

In respect of delivery, we confirmed in our previous representations that the site is within a single ownership, with no known constraints to its deliverability and is developable within the first 5 years of the plan period. It is therefore considered that the phasing estimate for the delivery of the site (5-10 years, as set out at Appendix 2 of the Plan), sets a longer timescale than required. It is also considered that the requirement set out at Policy 7.4 for planning applications submitted in advance of the indicative phasing to only be approved if further tests are undertaken is overly onerous. It is our opinion that the phasing estimates set out at Appendix 2 should be viewed as indicative, rather than forming the basis to introduce additional barriers to the delivery of allocated sites that have already been rigorously tests to ensure their suitability for development.

#### *Policy 7.5 – Affordable Housing*

It is noted that the Council will seek to ensure that affordable housing will meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices (criteria g.). However, we would question whether it would be possible to implement this part of the policy in practice given the provisions set out in the Housing and Planning Bill. For instance, it is anticipated that, once the Bill has been passed, local authorities will be under a duty to promote the supply of starter homes regardless of local needs. We would therefore request justification on how this element of the policy would work in practice, and suggest the wording of this element of the policy will evolve once the Bill has been passed.

However, we welcome Section h iii) of the policy, which allows flexibility where proposals cannot viably support the provision of the full affordable housing requirement. We support the opportunity for developers to submit evidence which demonstrates the level of affordable housing that can be provided without jeopardising the viability of the development. This is in accordance with the NPPF

which states that in pursuing sustainable development, careful attention to viability and costs in plan-making and decision-taking must be taken and that plans should be deliverable (Paragraph 179 of the NPPF).

## **Section 9 - Environmental Protection and Enhancement**

### *Policy 9.12 – Site Allocations in Green Belt*

As set out previously, it is welcomed that selected sites will be de-allocated from Green Belt to allow development to take place and provide new defensible boundaries to protect open countryside. This approach is in accordance with the NPPF, which allows Green Belt boundaries to be altered in exceptional circumstances, through the preparation or review of the Local Plan (paragraph 83). We therefore consider that Policy 9.12 is 'sound'.

However, in order to ensure consistency with Policy 7.2 we would suggest that the wording of Policy 9.12 is amended to allow the housing mix provided to not only be based on the range of needs indicated by evidence, but also on negotiation, site constraints and development viability. We therefore request that Policy 9.12 is amended to reflect this, and consider this could be achieved through the following wording in the first paragraph:

*“There will be a mix of housing on site to provide for a range of needs as indicated by evidence. The final housing mix, type and tenure will be subject to negotiation, account will be taken of the nature, constraints, character and context of the site and development viability.”*

## **Section 10 – Quality of Life and Community Infrastructure**

### *Policy 10.4 – Design*

### *Policy 10.6 – High Quality Design*

We agree that a high quality design is required for all developments, as it is an integral part of ensuring the delivery of sustainable development, as set out in the NPPF (Chapter 7). The criteria set out in Policies 10.4 and 10.6 have sought to address those points listed in Paragraph 58 of the NPPF and, therefore, are in accordance with national guidance.

We welcome Policy 10.6, which, on the whole, provides sufficient flexibility for the design of development to be guided through individual circumstances rather than being dictated by strict policy requirements. However, we consider that justification in respect of certain criteria, such as f) and g)





(which relate to heritage assets), should only be required by proposals for new development where the particular issues are material to the application. This is in accordance with Paragraph 59 of the NPPF, which states that design policies should avoid unnecessary prescription or detail and should concentrate on *“guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development”*.

### **Conclusion**

As stated above, Countryside Properties support the principles put forward in the Local Plan in general and the allocation of the site known as Land at Doddinghurst Road, either side of A12, Brentwood for residential development of circa 250 dwellings. The site is located within a highly sustainable location, providing the ability to accommodate a small scale urban expansion and the land is within a single ownership with no known constraints to its deliverability. However, it is considered that the site is developable within the first five years of the plan period and can make an immediate contribution to the housing targets set out for the Borough.

We trust that our representations will be given full consideration through the Draft Local Plan (2013 – 2033) consultation process and that our details will be included on the Council’s database to ensure we are notified of all future stages of this document.

**COLLIERS INTERNATIONAL**  
**MARCH 2016**