

Brentwood Draft Local Plan Consultation  
Representations in support of land east  
of Nag's Head Lane, Brentwood



On behalf of Crest Nicholson Eastern

March 2016

## Quality Assurance

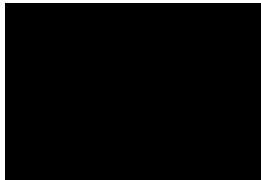
Site name: Land east of Nag's Head Lane, Brentwood

Client name: Crest Nicholson Eastern

Type of report: Written Representation

Prepared by: Steven Butler MRTPI

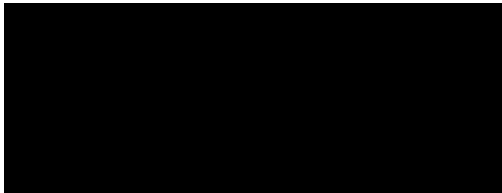
Signed



Date 23 March 2016

Reviewed by: Ray Houghton MRTPI

Signed



Date 23 March 2016



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**Appendix 1 Development Brochure – land east of Nag’s Head Lane**

# 1 Introduction

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- 1.1 These representations have been prepared on behalf of Crest Nicholson Eastern in support of the proposed allocation of the land east of Nag's Head Lane for residential development of 150 new homes. Appendix 1 contains a Development Brochure demonstrating the deliverability of development on the site.
- 1.2 Set out below are our responses to the particular policies of relevance to Crest Nicholson's land interests in the site.

# 2 Our Responses to the Draft Policies

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## Policy 5.1 – Spatial Strategy

- 2.1 We support the policy insofar as it relates to the following:
- Brentwood and Shenfield being the focus for new development within the A12 corridor;
  - Proposals to allocate land within and on the edge of the Brentwood Urban Area to assist with achieving a five-year supply of housing; and
  - That the Plan proposes to meet the Borough's objectively assessed need in full.

### Focus for new development within the A12 corridor

- 2.2 We agree with paragraph 5.19 of the policy's supporting text which says that "Brentwood is a suitable location for growth, given excellent transport links, access to jobs and services and town centre facilities. Developing in the wider Brentwood Urban Area would support the redevelopment and regeneration, underpin the viability of the town centre and provide opportunities for development where access to services and jobs is greatest."
- 2.3 It follows that the existing urban area of Brentwood should be apportioned a proportionate level of growth and we therefore also support the proposed designation of Brentwood as the Main Town within the settlement hierarchy (para 5.24).

### Maintaining a five-year housing land supply

- 2.4 The proposed allocation of sites on the edge of the existing Brentwood Urban Area strikes an appropriate balance between the need to provide strategic scale development swiftly and certainty of delivery, in accordance with the Framework. Allocating sufficient urban extensions on appropriate sites on the edge of the Brentwood Urban Area, such as the land east of Nag's Head Lane, would enable development to be delivered in the short term.

### Meeting full objectively assessed housing need

- 2.5 We consider that the Plan is fully justified in proposing to meet its objectively assessed housing need (OAHN) in full through the release of Green Belt land, in accordance with the Framework guidance. The Local Plan process is the correct forum in which to release Green Belt land for development, the extent of evidenced local housing need is significantly higher than planned for under the previous Local Plan and the Plan would be unable to deliver the housing requirement on brownfield sites alone. These considerations combine to warrant exceptional circumstances<sup>1</sup> sufficient to justify the planned release of Green Belt land

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<sup>1</sup> Framework paragraph 83 definition

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in order to meet OAHN. As we have outlined in previous rounds of this Local Plan Review process, there is ample comparable case law to support this position.

- 2.6 Furthermore, we consider that there are no insurmountable constraints that could reasonably inhibit the Local Plan from accommodating its full OAHN entirely within the borough. Many other Green Belt local planning authorities, including neighbouring Basildon Borough Council, are also proposing Green Belt release as a means of delivering full OAHN so we fully support the proposals in this respect.
- 2.7 We therefore support Policy 5.1 – Spatial Strategy insofar as it relates to the Brentwood Urban Area and OAHN.

### **Policy 6.5 – Key Gateways**

- 2.8 We support this policy. The policy seeks contributions from development proposals in the vicinity of key gateways into the Borough in order to provide opportunities to enhance a positive impression of the Borough. Nag's Head Lane is within close proximity of the Brook Street junction (M25/A12) and development of this allocated site would provide an excellent opportunity for enhancements to be funded or included within the scheme. Details may be agreed at a later stage of the planning process.

### **Policy 7.4 – Housing Allocations**

- 2.9 We support the proposed allocation of site 032 – land east of Nag's Head Lane, Brentwood for 150 dwellings. The site is wholly in accordance with the spatial strategy, the site selection criteria and the Sustainability Appraisal, in particular because:
- It is highly accessible – Nag's Head Lane is strategically well placed close to Brook Street that its access to the strategic road network would not encounter the town centre and would therefore not make a significant addition to this congestion. Nag's Head Lane itself comprises a footway along the entire extent of the Site, providing pedestrian access to Brook Street and London Road. Bus stops on Brook Street (in both directions) are no more than a 5 minute walk from the centre of the Site and Brentwood rail station is 2.5km to the east. There is an opportunity to provide a controlled pedestrian crossing facility across the eastern arm of the Brook Street / Nag's Head Lane junction, significantly enhancing pedestrian connectivity to local bus routes and facilities along this part of Brook Street / London Road;
  - Defendable Green Belt boundaries – the East Anglian Mainline and Nag's Head Lane provide excellent strong defendable permanent physical boundaries that would enable development to be delivered on the site in a manner that would not run contrary to the five Green Belt purposes<sup>2</sup>.
  - It is highly sustainable – drawing again upon the Site's proximity to key transport interchanges such as Brentwood station and M25 J28 and community facilities, these are benefits that many other sites not proposed for allocation do not benefit from;
  - It would balance the strategic growth of Brentwood town providing much needed residential development at this western gateway location;

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<sup>2</sup> Framework paragraph 80

- No significant ecological constraints – There are no major constraints on the site. Further survey work to establish the presence or absence of protected or notable species is ongoing. An appropriate mitigation and enhancement strategy will be provided;
- Low Flood Risk – the site is in flood zone 1, an acceptable location for new residential development in terms of flood risk;
- No significant noise constraints – A preliminary desk-top assessment undertaken by Ardent identifies that road traffic from the M25, A12, A1023, Nag's Head Lane and from trains on the adjacent railway line are the primary local noise sources. No single noise source is dominant and can be mitigated with appropriate layout and noise treatments;
- It would provide significant planning benefits – the following are some of the benefits a scheme on this site would be capable of providing:
  - Private market and affordable housing through a range of mix and type of dwellings including smaller family housing (informed by Brentwood Borough Council's Housing Department);
  - Payments including additional Council Tax, S106 monies and New Homes Bonus;
  - Such monies (above) could contribute towards providing opportunities to improve the visual appearance of the western approach into Brentwood (through for example new signage/public art);
  - In excess of 200 new jobs, directly or indirectly associated with the scheme either through construction or the supply chain;
  - There would be an enhancement to local services caused by the increase in footfall from the development's new population. We draw immediate attention to the support this Site has already attracted from established local businesses. Page 21 of the Design Development Framework quotes the managers of these businesses;
  - Net benefit in terms of junction capacity and pedestrian connectivity – see page 16 of the Design Development Framework; and
  - High quality public open space within the scheme.
- Early delivery would be ensured – it is imperative that the early delivery of the site is ensured in order to meet the Council's expectations in respect of meeting its five year supply requirements. Crest Nicholson, current National Housebuilder of the Year (five years running), has a proven track record of delivering high quality, generously landscaped residential schemes in the short term. It is a local company based at Academy Place in Brentwood, opposite the site.

2.10 We therefore consider that the proposed allocation of Nag's Head Lane is wholly justified and in accordance with the Plan.

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

2.11 We agree with the policy insofar as it relates to the proposed de-allocation of the land east of Nag's Head Lane from the Green Belt and allocation for residential development of approximately 150 dwellings. We

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would assure the Council that its general approach to the release of land from the Green Belt in order to accommodate OAHN is justified.

## 3 Conclusion

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- 3.1 This representation provides support for the parts of policies 5.1 (Spatial Strategy), 7.4 (Housing Allocations) and 9.12 (Site Allocations in the Green Belt) which are of relevance to Crest Nicholson's land interests in the land east of Nag's Head Lane, Brentwood. We also provide support for policy 6.5 (Key Gateways) in which the development of the site would be a significant contributor towards.
- 3.2 We consider that the proposed allocation of the land east of Nag's Head Lane is wholly justified because the site accords with the spatial strategy, is highly sustainable, would contribute significant planning benefits including a gateway feature to the western approach to Brentwood town in accordance with policy 6.5 and would be delivered in the short term by the locally based National Housebuilder of the Year, Crest Nicholson.

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# Appendices



# Appendix 1

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Development Brochure – land east of Nag’s Head Lane

