

**Brentwood Draft Local Plan  
Preferred Site Allocations Consultation  
(Regulation 18)**

**Representations made on behalf of Countryside Properties**

**Land off Doddinghurst Road, Brentwood**

**Reference: 023A and 023B**

**March 2018**

## Executive Summary

- This representation has been made on behalf of Countryside Properties by Strutt & Parker in relation to the Brentwood Borough Council Preferred Site Allocations Consultation. The representation concerns Land at Doddinghurst Road, Brentwood.
- The site at Doddinghurst Road, Brentwood provides a sustainable and deliverable option for residential development in the Brentwood Borough.
- The site is known in the Council's plan-making process as Site 023A and Site 023B and is allocated as a potential site for residential development. Brentwood Borough Council have stated that the site can provide up to 200 dwellings on site, however further work undertaken by external consultants suggests that the site could provide up to 250 dwellings on site.
- Given that the site has previously and is currently being promoted by a large housebuilder, it is considered that the site could come forward in the short term. The site can provide dwellings within Brentwood, which is defined in the Consultation document as a 'Main Town'.
- The analysis and content within the accompanying studies and plans provide further evidence for the availability, achievability and suitability of the site for residential development.
- The sites allocation in the Local Plan for residential development is considered justified, effective, and consistent with national policy and would ensure that the Local Plan meets development needs.

## 1. Background and Overview

- 1.1 These representations are submitted by Strutt & Parker on behalf of Countryside Properties (UK) Ltd in relation to the Brentwood Borough Council Preferred Site Allocations Consultation Document (Regulation 18) and in particular with regards to our clients land at sites 023A and 023B, Land off Doddinghurst Road, Brentwood in particular.
- 1.2 The site at Doddinghurst Road is located adjacent to existing residential development and is split by the A12.
- 1.3 Site 023A measures at approximately 5.99ha and Site 023B measures at approximately 2.2ha. The Council have defined the net developable area of Site 023A as 4.49ha and 023B as 1.65ha, with an indicative dwelling yield stated in the consultation document to be 200.



- 1.4 As the Council will be aware, representations have previously been made on behalf of Countryside Properties and site including in the most recent 2016 Draft Local Plan Consultation. 'Countryside was founded in Essex 60 years ago by Alan Cherry and has since established a reputation for delivering high quality developments. With the ethos 'creating places people love', Countryside's achievements are exemplified through having won more Housing Design Awards than any other house builder. Countryside is a major development and place-maker, having secured planning permission and building out developments in varying scales: from smaller 30 dwelling schemes on the edge of village's through to large urban extensions of 3,500 new homes plus associated community facilities. Countryside has a proven track record of delivery. The company is headquartered in Brentwood and has a proud legacy of local sites such as Clements Park and the Square on Hart Street.'

- 1.5 In the Brentwood Borough Council Preferred Site Allocations Consultation Document (Regulation 18) the sites are identified as potential land for residential development with the larger site to the north referenced as 023A and the site to the south referenced as 023B.
  
- 1.6 The allocation of the site off Doddinghurst Road for residential development represents a sustainable and deliverable proposal to help meet housing needs over the coming plan period. This representations set out comments on the Local Plan Regulation 18 consultation document, as well as providing detail on the sustainability and deliverability of the site with regards to technical considerations and latest assessment work.

## **2. Brentwood Local Plan Regulation 18 Consultation**

### **Spatial Strategy**

- 2.1. The Spatial Strategy in the Brentwood Borough Council Preferred Site Allocations Consultation Document (Regulation 18) looks to provide context for managing change and shaping how the area develops in the future. The Spatial Strategy sets out the level and location of development and provides the basis of delivering Brentwood Borough Council's vision, strategic objectives, planning policies and land allocations.
- 2.2. The previous iteration, the Draft Local Plan (2016) set out a clear spatial vision and strategy for the Borough. The strategy focused on delivering sustainable communities by concentrating new development on land within the Borough's transport corridors.
- 2.3. The A12 Corridor, Brentwood and Shenfield in particular being the main focus for development. The Draft Local Plan (2016) in particular sought to bring forward new homes, businesses and employment opportunities within this specific transport corridor.
- 2.4. The Spatial Strategy set out in the Preferred Site Allocations Document retains this focus transport corridor-led growth including the A12 Corridor at Brentwood and Shenfield. This strategy is supported and ensures the majority of development is focused in locations most accessible to services, employment and the transport network.
- 2.5. The proposed allocation of Site 023A and 023B at Doddinghurst Road, Brentwood, relates well to this spatial strategy.
- 2.6. Due to the potential expansion of settlements and additional housing growth, we also note that the Council have reviewed the 2016 Draft Local Plan Settlement Hierarchy and the details of additional housing growth.
- 2.7. Each settlement is defined as either Category 1 – Main Town, Category 2 – Village Service Centre, Category 3 – Large Villages or Category 4 – Smaller Villages.
- 2.8. Sites 023A and 023B are within Brentwood. Brentwood being defined as a 'Main Town'.
- 2.9. The Preferred Site Allocations document now estimates that there will be a total of 9,980 dwellings within Brentwood by the end of the New Local Plan period – 2033. This is an increase of 939 dwellings, which are to be provided through Brentwood Borough Council's allocations. The focus on sustainable locations of growth in Brentwood is therefore supported.

## **Housing – Need and Supply (Paragraphs 38 to 50)**

- 2.10. The previous iteration of the emerging Local Plan, the Draft Local Plan (2016) set out an objectively assessed housing need for the Borough, which equated to 362 dwellings per annum for the lifetime of the plan (2013-2033). This totalled 7,240 dwellings across the plan period.
- 2.11. The Preferred Site Allocations Regulation 18 consultation document sets out that objectively assessed needs based on Office of National Statistics Mid-Year Population Estimates results in a need of 348 dwellings per annum which it is stated remains lower than the 360 dwellings per annum set out in the 2016 Draft Local Plan.
- 2.12. At para 40 the consultation document states that test of the projections to assess “if they are a reasonable reflection of underlying trends” have indicated that the official short-term (5 year) forecast is particularly unstable and the longer term demographic projections indicate a much lower demographic baseline figure for the borough of circa 280 dwellings per annum.
- 2.13. The plan goes on to set out that a degree of market signal uplift has been applied which it is stated is a matter of professional judgment. A 30% uplift above the new 280 dwellings per annum baseline, plus a small contingency of 6% should new official projections indicate a slightly different position to that forecasted has therefore been used.
- 2.14. The above calculation therefore leaves an objectively assessed housing need of circa 380 dwellings per annum or 7,600 dwellings across the plan period (2013-33).
- 2.15. Whilst we are supportive of the increase in the housing target set out in the latest plan we have concerns that this does not presently properly represent the full extent of housing need. In particular the reduction of the stated need of 348 dpa to 280 dpa based on tests of underlying trends. Given the subjective nature of these tests, and the fact it is not yet known whether short term trends will indeed become the new normal for the longer term we would urge a precautionary approach here to ensure housing needs are fully met.
- 2.16. It therefore could be suggested that using 348 dpa as a baseline before applying the proposed 36% increase would be a more appropriate methodology. This would result in a housing need of 473 dpa or 9,466 over a 20 year plan period. This also more accurately reflects the projections emerging from the government proposed standard housing needs methodology.
- 2.17. As highlighted in the consultation document the government has also consulted on a methodology for a standardised approach to calculating local housing need in England. Whilst we note that Brentwood Borough Council has responded to this consultation outlining concerns over the proposed methodology and datasets, this nonetheless presently remains the direction of government policy and is based on the work of the

Local Plan Expert Group. This approach would see an increase in Brentwood housing need to 454 dwellings per annum.

- 2.18. To ensure the plan is fully robust we suggest it is important to plan for this higher level of growth. Additionally in order to ensure delivery throughout the plan period it is important the supply includes sufficient sites that are deliverable in the early part of the plan period in addition to any strategic or new settlement allocations.
- 2.19. With the standardised methodology in mind, Brentwood Borough Council need to provide an extra 74 dwellings per year and a total of 1,480 dwellings throughout the plan period (2013 – 2033). Sustainable sites therefore need to be allocated in the emerging Local Plan to provide for this increased need and density of allocated sites such as Doddinghurst Road, Brentwood should be maximised where possible.

### **Housing Supply and Housing-led Allocations**

- 2.20. The land at Doddinghurst Road, Brentwood (sites 023A and 023B) is identified in the consultation document as a preferred site allocation for residential development.
- 2.21. The consultation document states that both sites have the opportunity to be self-contained urban extensions or infill, given that they both adjoin existing residential properties at two boundaries.
- 2.22. The land at Doddinghurst Road has been previously proposed for allocation in Brentwood Borough Council's emerging draft Local Plan 2016 consultation. At this time the site was identified as having potential for 250 units.
- 2.23. We note that the preferred site allocations document (January 2018) now states that the indicative dwelling yield of 023A and 023B is 200 dwellings. A density study has been undertaken by JTP and forms part of this representation. A copy of the density study can be found at Appendix C. This confirms that parcels 023A and 023B can accommodate up to 250 dwellings. A plan indicating the potential extent of developable area and the proposed density can be found in the accompanying study.
- 2.24. Given that the most recently standardised methodology for calculating local housing need has stated that the Borough need to provide 72 more homes per annum in comparison to their primary calculations, it is considered the Council should take the opportunity to maximise on density of housing on sites which are sustainable and deliverable.
- 2.25. The density study confirms that a development of 250 dwellings would result in 35.6 dwellings per hectare. Key characteristics of a development site with an average of 35 dwelling per hectare include;

- Predominately 2/2.5/3 storey houses with key corners and frontages, featuring 3 storeys where possible;
- Dwelling frontage set back from the edge of pavement 1-2m; and
- Orthogonal street patterns, with occasional softening which responds to nodes and particular elements of the surrounding landscape.

2.26. These are characteristics that we will take into consideration in the future development of the site.

2.27. The analysis of the site within the preferred site allocations document also states that the site could come forward within 5 to 10 years. Work is currently being undertaken on the deliverability of the site which demonstrates that the site could come forward for development within the next 5 years. Further details on the deliverability and the sustainability of the site can be found below.

2.28. Technical work on the site has been progressed as detailed later in this document and there are no reasons why this site cannot come forward to provide a sustainable and high quality development to meet housing needs.

## **Sustainability Appraisal**

2.29. The Preferred Site Allocations Document is supported by a range of technical work, including the Sustainability Appraisal (SA) January 2018. The SA presents a number of sustainability issues/objectives which have been established through SA scoping. Together, these sustainability topics and objectives provide a methodological framework for the appraisal of potential allocation sites including sites 023A and 023B. Further detail on the analysis of 023A and 023B found within the SA is outlined below.

### **Site 023A**

2.30. The SA indicates that the allocation of site 023A will have a number of positive effects in relation to the SA objectives. The SA analysis states that site 023A is in good proximity to services such as a secondary school, a primary school, and a GP Surgery. The allocation of both sites at Doddinghurst Road will enable a substantial level of investment into the immediate area and will support a thriving urban community.

2.31. The SA, through its analysis also states that the site at Doddinghurst Road is in an 'Amber' proximity to Ancient Woodland, Local Wildlife Site and the Green Belt. The development will not unacceptably impact on woodland or wildlife sites. Additional Green Belt work has been undertaken by Countryside Properties which indicates the importance of the parcel to the Green Belt. The site will therefore not adversely impact on the aforementioned issues and remains deliverable and sustainable. We suggest the Sustainability Appraisal is amended to acknowledge that depending on implementation the site will not adversely impact in this regard.



2.32. The SA states that site 023A is in 'red' proximity to an Air Quality Management Area (AQMA). The AQMA BRW4 to the west of the site will not be adversely impacted by the site given points of access for vehicles would be to the east. The proximity of the A12 is an existing constraint that will be taken into account as part of the development and there is potential for the site to form part of an air quality management strategy.

### **Site 023B**

2.33. The SA indicates that the allocation of site 023B will have a number of positive effects in relation to the SA objectives. The SA analyses states that site 023B at Doddinghurst Road is in good proximity to a Secondary School, a Primary School, and a GP Surgery. The allocation of both sites at Doddinghurst Road will enable a substantial level of investment into the immediate area and will support a thriving urban community.

2.34. The SA analysis states that site 023B is in an 'amber' proximity to woodland, a conservation area and the Green Belt. Again we suggest the Sustainability Appraisal is amended to acknowledge that depending on implementation the site will not adversely impact in this regard.

2.35. The SA States that site 023B is within a 'red' proximity to an Air Quality Management Area (AQMA). As with site 023A the AQMA BRW4 to the west of the site will not be adversely impacted by the site given points of access for vehicles would be to the east. The proximity of the A12 is an existing constraint that will be taken into account as part of the development and there is potential for the site to form part of an air quality management strategy.

2.36. Both sites are being actively promoted by an established house builder with a proven track record of providing high quality development within Essex. The sites are deliverable for housing and as such, its allocation is considered to contribute towards an effective strategy.

### **3. Site Deliverability**

3.1. The site represents a deliverable, sustainable and achievable site for residential development. A number of technical reports and associated documents have been completed which demonstrate this. The below section provides a summary of these documents.

#### **Density Study**

- 3.2. A Density Study (January 2018) has been undertaken by JTP Architects.
- 3.3. As per Paragraph 2.23 of this representation, the Preferred Site Allocations Document (January 2018) states that the indicative dwelling yield of the site is 200 dwellings.
- 3.4. The Density Study confirms that the total site area is 8.02ha and the total developable area is 6.17ha. Furthermore, it confirms that the site can accommodate up to 250 dwellings with 180 dwellings on Site 023A and 40 dwellings on parcel 023B, which results in 40 dwellings per hectare and 25 dwellings per hectare, respectively.
- 3.5. The Density Study also provides a Developable Area Plan which illustrates the developable area, the existing trees and root protection areas (RPA), the easements and attenuation and drainage. The plan proposed that the most significant existing trees and foliage are retained.
- 3.6. Furthermore, the Study characterises the existing landscape features of Site 023A as three naturally formed developable areas. This natural formation will enable an orthogonal street pattern and regular frontage and a more efficient layout of a potentially higher density.
- 3.7. The study characterises Site 023B as a more irregular shape due to the present underground services. Furthermore, the Density Study identifies that the site has more constrained access opportunities. This has led to a more organic layout of a potentially lower density.
- 3.8. Given the evidence in the Density Study, the site could accommodate up to 250 dwellings. Further detail on how the site could present a sustainable development opportunity can be found in the summaries below.

#### **Green Belt**

3.9. A Landscape and Green Belt Appraisal was produced in March 2016 by The Landscape Partnership. The Appraisal has reviewed and compared the Draft Green Belt Review. A summary of this review is below:

Purpose 1 – To check the unrestricted sprawl of large built-up areas.

- BBC Draft Assessment: Low Contribution
- The Landscape Partnership agree that the site is well-contained and consider that the overall contribution of the site to Purpose 1 is Low/Very Minor.

Purpose 2 – To prevent neighbouring towns from merging into one another.

- BBC Draft Assessment: Moderate Contribution
- The Landscape Partnership states that Purpose 2 should be based on its contribution to maintaining separation between Brentwood town and the neighbouring towns. The role of the site should therefore be classed as ‘Separation Retained’ as development will not lead to merging of towns or significantly reduce the countryside ‘gap’.
- The Landscape Partnership also states that the classification of Purpose 2 could be ‘Not Applicable’ as this definition is used for sites contained within an existing town for which infilling would not lead to a reduction in the distance between two or more distinct towns.

Purpose 3 – To assist in safeguarding the countryside from encroachment.

- BBC Draft Assessment: High Contribution (Functional Countryside)
- The Landscape Partnership state that the site has ‘Limited or no public access’ but has a land use type which falls within the types considered appropriate to Green Belt. The site should therefore be described as making a moderate contribution to Purpose 3.

Purpose 4 – To preserve the setting and special character of historic towns.

- BBC Draft Assessment: Low Contribution (Limited Relationship with Historic Town).
- The Landscape Partnership confirm that the site does not contribute to Green Belt Purpose 4.

3.10. Furthermore, the Landscape and Green Belt Appraisal confirmed that the overall assessment rating for the contribution of Site 23A/B to Green Belt purposes should be ‘Low’.

## **Air Quality**

3.11. An Air Quality Assessment was undertaken by Ardent Consulting Engineers in February 2017. The assessment reviews air quality constraints affecting the site.

3.12. The assessment concludes that it is unlikely that the proposed development will be considered high risk in terms of construction impacts. It also suggests that there has been a general improvement in local air quality over recent years which is evidenced by

the monitored concentrations which are detailed within the report. Nevertheless, the assessment recommends that mitigation measures may need to be adopted as part of the development and be further considered in due course.

- 3.13. The assessment recommends that the impact of any potential increase in traffic flow on the local road network should be determined by way of a detailed air quality assessment.
- 3.14. Given the proximity of the A12, there is the potential for the introduction of a new exposure adjacent to the A12. This is dependent on the distance between individual units and the A12 which is to be addressed through careful design by the Architects.

### **Archaeology**

- 3.15. An Archaeological Desk Based Assessment was undertaken by CGMS Consulting in November 2014.
- 3.16. The assessment confirms that the site does not lie within an area of archaeological priority, as previously designated by Brentwood Borough Council. It confirms that the site can be considered to have a modest potential for the late prehistoric.
- 3.17. The assessment also confirms that the site has remained undeveloped land through its documented history.
- 3.18. The assessment anticipates that Essex County Council archaeological advisors may request additional archaeological mitigation measures, initially in the form of a geophysical survey.

### **Desktop Noise Report**

- 3.19. A Desktop Noise Report was completed by Ardent Consulting Engineers in March 2016.
- 3.20. The Noise Report concludes that subject to appropriate mitigation measures, the proposed internal and external areas of the proposed development could be demonstrated to be within desirable noise levels, subject to a detailed assessment.
- 3.21. The report states that ambient vibration levels may be a concern due to the sites proximity to the A12. These will need to be further addressed during more detailed assessment works.
- 3.22. Furthermore, a Noise Feasibility Plan has also been produced by Ardent Consulting Engineers. The plan provides a number of layout recommendations for Glazing, Ventilation, Rear Gardens and Balconies and Standalone Barriers. The Noise Feasibility Plan also outlines the closest possible building line on site which has reasonable attenuation and the recommended approximate minimum effective extent of an acoustic barrier. The plan also provides dimensions between the site and the nearest channel of the A12.

## **Drainage Strategy**

- 3.23. A Drainage Strategy Technical Note was produced by Ardent Consulting Engineers in 2016. The note confirms that existing foul and surface water sewers navigate the site, together with a number of watercourses which will continue to serve the site, post development.
- 3.24. The report also confirms that the site is within Flood Zone 1 and is therefore suitable for residential development. The note suggests that subject to further investigation and detailed design, a Flood Risk Assessment and Detailed Drainage Strategy can be prepared to support a successful planning application for the development.

## **Phase 1 Habitat Survey**

- 3.25. A Phase 1 Habitat Survey was produced by SES in 2014. The survey concluded that the habitats on site have the potential to be of value to protected species, as well as being of general biodiversity value themselves. As a result, the Phase 1 Habitat Survey recommends that the following works are undertaken;
- Reptiles (presence/likely absence survey – northern site only);
  - Badgers (monitoring of setts on site);
  - Bats (tree inspection surveys, activity surveys);
  - Breeding Bird (walkover survey during breeding bird season, generally March to August); and
  - Invertebrates (walkover survey to establish value for rare and vulnerable beetles).
- 3.26. It is considered within the survey that any potential adverse impacts from the proposed development upon specific protected species will be able to be wholly mitigated for with careful design.

## **Social Infrastructure Review**

- 3.27. A Social Infrastructure Review was produced by Quod in February 2017. The review looked to provide an assessment of the likely impact of the development of the site on the demand for school places and healthcare provision.
- 3.28. The review confirms that based on average household sizes for the area, it is anticipated that the site could accommodate a resident population of approximately 600 people and generate demand for 68 primary school places and 45 secondary school places.
- 3.29. In line with this estimated growth, the review provides a summary of the education and healthcare provision within Brentwood.

- 3.30. The review states that although a number of existing primary schools in the Brentwood urban area are being expanded or are due to be expanded, Essex County Council is still expecting to be facing a deficit of places by 2020/21, with the Preferred Site Allocations Document stating that there is an estimated deficit of 541 places by 2021/2022 for Primary Schools. In terms of Secondary School Provision, the Preferred Site Allocations document states that there will be an estimated deficit of 9 places by 2021/22.
- 3.31. In terms of healthcare provision, the report confirms that the capacity to absorb additional demand arising from developments in the Brentwood Urban Area is limited. The Preferred Site Allocations document confirms this and states that there is likely to be significant pressures on GP Surgeries due to housing growth in the Borough throughout the lifetime of the plan.

### **Transport**

- 3.32. A Transport Technical Note was prepared by Ardent Consulting Engineers in January 2018. The technical note provides an initial review of the anticipated highway and transportation impacts, based on a potential development of up to 250 dwellings at the site.
- 3.33. The note confirms that vehicular access to the site could be provided from Doddinghurst Road for the 23A of the site and provided via the extension of Karen Close and Russell Close at the 23B parcel.
- 3.34. In response to local concerns regarding the suitability of existing public transport provision, the note suggests that the site could generate an additional 7 peak hour bus trips and 35 peak hour rail trips. It is considered that there is sufficient capacity to accommodate these trips. The note confirms that there does not appear to be any specific issues relating to public transport.
- 3.35. The technical note confirms that the impacts on surrounding roads including Doddinghurst Road and Ongar Road would not be severe and should not be a reason for the site not to be allocated.
- 3.36. The note confirms that there are no highways issues that would prevent the site from being allocated for residential development in the emerging Local Development Plan.
- 3.37. The above studies demonstrate that the site is deliverable and sustainable.

## **4. Summary**

- 4.1. The sites allocation in the Local Plan for residential development is justified, effective, consistent with national policy, and would help meet ensure that the local plan meets development needs. Furthermore, the analysis and content within the accompanying studies and plans provide further evidence for the availability, achievability and suitability of the site for residential development.