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## **BRENTWOOD LOCAL DEVELOPMENT PLAN**

### **Preferred Site Allocations Consultation**

### **January 2018**

### **REPRESENTATIONS ON BEHALF OF HALLAM LAND MANAGEMENT**

1. These representations are submitted on behalf of Hallam Land Management (HLM) who have an interest in Land West of Ongar Road, Brentwood, a site which could help meet the development needs of the Borough. The representations focus on how an attractive, viable and sustainable development can be delivered, with significant infrastructure improvements, to the benefit of existing and future residents.

#### **Site Description**

2. Land West of Ongar Road is situated to the west of the urban area of Brentwood and south of Pilgrim's Hatch. In total the land amounts to approximately 48ha; a site location plan accompanying these representations makes clear the extent of the site. This is similar to the extent of site 302c in the Council's Site Selection Methodology.
3. The existing use of the land is predominantly for agriculture and associated uses.
4. The highest point is broadly within the centre of the site, which then gently slopes down to the north and falls away more quickly to the south east. The land is relatively well contained, with a strong sense of enclosure in the northern part of the site especially. From the higher ground there is intervisibility with Brentwood town centre.
5. The key habitats on site at Land West of Ongar Road are the deciduous woodland at The Bogs to the south and High Wood to the north, which is a designated Local Wildlife Site (LWS) and Ancient Woodland.
6. To the west of the site are existing residential properties and a cricket club fronting Sandpit Lane and the archaeological remains of an Iron Age settlement, which is designated as a Scheduled Monument. Beyond this is Weald Park, which is a conservation area and registered park and garden.

#### **Highway Infrastructure**

7. In relation to site 302c the Council's 'Site Selection Methodology & Summary of Outcomes' states that the site has been discounted due to deliverability. From discussions with Council officers, it understood that this relates to offsite road infrastructure.

8. Indeed, the Council's SA cites this as a reason for discounting a strategic site option at North of Brentwood. In addition this is why another strategic site option at Pilgrim's Hatch is now considered unreasonable:

*"Pilgrims Hatch - There is potentially a strategic opportunity to deliver targeted enhancements to community infrastructure; however, proposals are not advanced, and it is difficult to envisage a scheme, on the basis of sites identified through the HELAA. Furthermore, as per north of Brentwood, there is uncertainty regarding precisely how necessary road infrastructure upgrades would be achieved."*

Para 6.3.3 Interim SA Report, January 2018

9. It is understood that the strategic site option referred to above is land to the north of Ongar Road, adjacent to Pilgrim's Hatch, however it is assumed that the same conclusion has been reached in relation to site 302c, which is why the Council have deemed it unsuitable.
10. Hence, it is recognised that one of the significant challenges for the Brentwood LDP is the impact of development on the existing highway network, in particular the potential for further queueing traffic at junctions in Brentwood town centre and the consequential impact on Air Quality Management Areas, including those at Ongar Road/A12 and Wilson's Corner. Therefore, on paper, site 302c is little different to other potential site options, adjacent to the urban area.
11. However, Land West of Ongar Road has the potential to help provide a technical solution to the above traffic problems. Having regard to the Council's existing evidence, HLM are developing a strategy to demonstrate that the necessary road infrastructure can be achieved and the highway network is not an overriding constraint to the allocation and development of the site.
12. A key issue is the ability of car users to access the strategic road network such as the M25 and A12 avoiding Brentwood Town centre. Through improvements to offsite routes and junctions traffic could potentially be routed west along Weald Road and then along Weald Park Way. This solution would provide a quicker and easier alternative to circumvent the congested junctions at peak periods in the centre of Brentwood.
13. Providing an alternative route as envisaged would also contribute towards a solution for tackling air quality locally. National planning policy states that Local Plans should contribute towards improvements in air quality. It is noted that this is part of the SA assessment criteria but not a strategic objective for the Local Plan itself.
14. The provision of a main spine road through the site from Ongar Road to Weald Road would mean that existing car journeys borne from Pilgrim's Hatch and Brentwood could utilise this alternative route. It is recognised that some choose to use Sandpit Lane already, but this is neither a safe nor an attractive route, with limited ability to be improved. The proposed spine road, would mean that Sandpit Lane could be downgraded and its use limited, thereby improving highway safety as well as the setting of the heritage assets of Weald Park and the scheduled monument by removing most existing vehicular traffic.



15. The proposed route via Weald Park Way could also offer improvements to the setting of heritage assets in South Weald village and to the amenity to existing residents by discouraging use of the village as an alternative route.
16. In addition, Land West of Ongar Road could provide for improved public transport with a bus service connecting to the town centre and train station. Further, cycle and pedestrian links could be provided on and off site for the betterment of the local area. This could include cycle connectivity to both the town centre and Weald Park including the provision of cycle paths along Weald Road, which could make a significant difference to modal shift.

### **Green Belt**

17. Having reference to the Green Belt, the Council's latest assessment states that the site's overall contribution to Green Belt purposes is moderate-high (parcel 34). It is somewhat inevitable that this is the case given the site's location on the edge of the existing urban area, however it is noted that it performs better than many other parcels on the urban edge, which are deemed to have a high overall contribution to Green Belt purposes. .
18. Furthermore, the site is well contained with strong barriers to prevent settlement coalescence. It is contained on two sides by urban development and Weald Park provides a strong, natural defensible boundary to the west.

### **Other Constraints**

19. It is considered that other constraints and designations that the Council have identified within and adjacent to the site can be addressed through careful assessment and masterplanning and do not prevent the whole of the site being developed.
20. The SA assessment of site 302c identifies heritage as a potential constraint. HLM will undertake settings assessment which will identify which parts of the site should remain open, in order to preserve and enhance the significance of heritage assets such as Weald Park.
21. In addition, an ecological assessment will be prepared to identify the appropriate buffers to existing habitats such as High Wood.

### **Opportunities**

22. Land West of Ongar Road has the opportunity therefore to deliver a sustainable urban extension to Brentwood and can address the key constraints highlighted above. The site is in a sustainable location, with existing links to Brentwood's services and facilities. In addition to the highways and heritage benefits mentioned the following benefits are of note:
  - a) The site could accommodate approximately 800 dwellings and provide a mix of units to meet a range of housing needs (subject to detailed assessment).
  - b) Safe and suitable primary accesses could be achieved from Ongar Road and Weald Road, for which discussions have taken place with the highways team at Essex County Council.



- c) The estimate of dwellings is based on approximately 50% of the site being used for the provision of green infrastructure, including the provision of amenity open space, allotments, play space, SUDs, and strategic planting.
- d) The significant quantum of non-developable area also ensures that hedgerows and trees can be retained and enhanced; and improved habitat connectivity. Appropriate buffers can also be provided to existing habitats such as a High Wood LWS.
- e) Furthermore, a significant gap between Weald Park and the site can be accommodated which means that appropriate structural planting can be provided to maintain and enhance this and other heritage assets and their setting. In addition, there is an opportunity to provide green links across the site to access the park.
- f) It is noted that the Council is paying careful attention to the need for additional infrastructure, with primary education provision currently at capacity. The site has the potential capacity to provide land for a primary school to help address this. Appropriate contributions to offsite infrastructure can also be made.
- g) The site can enhance sustainable travel options, by improving walking and cycling to Brentwood town centre, utilising existing and potential connections along Ongar Road and Weald Road. Along with potential bus connections, this offers access to Crossrail at Brentwood station, by means other than car, along with all the other services and facilities the town has to offer.

### **Deliverability**

- 23. The site is in single ownership and can be delivered quickly. First completions on site could be achieved within 5 years and the site could be fully built out prior to the end of the plan period, using typical construction methods. As alluded to the site could deliver an attractive housing led scheme with homes at an appropriate density, with the requisite green infrastructure, community facilities and necessary parking provision.

### **Recommendations**

- 24. It is understood that the Council is currently finalising the evidence base in relation to the site assessments. It is recommended that the above highway impacts, which are unique opportunities to Land West of Ongar Road, are taken account of in the next iteration of the evidence base in relation to highways modelling for the plan. Further, on the basis of the above representations we dutifully request the Council reconsider its current high-level assessment of the deliverability of Land West of Ongar Road as it is considered that the concerns over the highways impacts can be addressed and road infrastructure improved for the benefit of the town and its air quality.
- 25. Land West of Ongar Road can address housing growth focussed on where the housing needs derive, which is predominantly the urban area of the borough. Brentwood is the principal urban settlement for the borough and the most sustainable location to direct the majority of growth given its level of services, facilities and fast access to London by train. Furthermore, the site accords with the Plan's spatial strategy, which directs growth within the strategic transport corridors, and can make best use of existing services and facilities. The site should therefore be considered a reasonable alternative for strategic growth in the next iteration of the Sustainability Appraisal.



26. It is recognised that this latest iteration of the Local Plan identifies sufficient sites to meet Brentwood's Objectively Assessed Housing Need. It is also understood that the Council's evidence base in relations to site assessments is still crystallising. In addition, the housing requirement may differ subject to the Government's proposed changes to the calculation of housing needs. On this basis, it is considered that Land West of Ongar Road is a suitable site, deliverable wholly within the plan period that the Council could allocate should either housing needs or supply change. This could be a safer option for the Council to rely upon, in order to ensure the submitted Local Plan is deemed sound, rather than exploring accelerated growth at Dunton Hills Garden Village. It would also be in accordance with the growth strategy for the plan, which recognises Brentwood as the main urban area of the borough.
27. In the above circumstances, should the Council be minded to allocate Land West of Ongar Road it is considered that exceptional circumstances for amending Green Belt boundaries exist. This is due to the availability of land outside the Green Belt and the lengths that the Council have gone to maximise brownfield land, density and its Duty to Co-operate discussions, (tests envisaged by the new draft NPPF). Therefore, exceptional circumstances would exist to amend the Green Belt boundaries to enable the development of Land West of Ongar Road due to the overriding housing need and the relative suitability and deliverability of other Green Belt site options.
28. However, if the Council is satisfied that no changes need to be made to the site allocations currently proposed, it should consider the requirement for safeguarding land in accordance with the NPPF. The Council should satisfy themselves that the Green Belt boundaries will not need to be amended at the end of the plan period and that it can meet longer term development needs. Safeguarding land would also ensure that the plan is sufficiently flexible to respond to changing needs. Clearly, there are significant uncertainties relating to additional housing need, in particular in relation to addressing unmet needs from London. This is considered the principal basis for exceptional circumstances necessary to amend the Green Belt boundaries for safeguarding purposes.

### **Summary**

29. The allocation of Land West of Ongar Road could provide the Council with more flexibility over its housing land supply or meet additional housing needs. The site could not only deliver housing but also help solve an existing spatial problem in relation traffic congestion and air pollution. There will be a need for offsite highway improvements and these could be delivered by the developer. Key additional public benefits include the potential for improvements to the setting and enjoyment of Weald Park, the provision of appropriate infrastructure and enhanced connectivity.

