



**BRENTWOOD  
BOROUGH COUNCIL**

## **Brentwood Pre-Submission Local Plan (Regulation 19)**

January 2019

### **COMMENT FORM**

From Tuesday 05 February to Tuesday 19 March 2019 we are consulting on the next stage of the Brentwood Local Plan: Pre-Submission Local Plan (Regulation 19). You can view and comment on the consultation document online at:

**[www.brentwood.gov.uk/localplan](http://www.brentwood.gov.uk/localplan)**

Alternatively, please use this form to share your views on the contents of the document.

All responses should be received by 5PM Tuesday 19 March 2019.

Please return forms either by attaching completed forms by email to **[planning.policy@brentwood.gov.uk](mailto:planning.policy@brentwood.gov.uk)** or alternatively by post to Planning Policy Team, Brentwood Borough Council, Town Hall, Brentwood, Essex CM15 8AY.

#### **How to complete the representation form:**

This form consists of two sections – Section A: Personal Information, and Section B: Your Representation. Please note that your representation cannot be accepted without completing information identified in Section A.

The Local Plan Pre-Submission (Regulation 19) consultation consists of more formal and technical questions focused on the four Tests of Soundness and whether the Local Plan is compliant with relevant legislation. Comments are to be focused on three core areas – is the Plan positively prepared (referred to as ‘soundness’), does the Council adhere to the Duty to Cooperate, and is the Plan legally compliant (addressed by question 3 of this comment form). These terms are defined below:

- a) **Soundness:** Local Planning Authorities must prepare a Local Plan based on relevant and appropriate evidence base. They are required to publish these documents on their website. The evidence used to develop the Brentwood Local Plan can be found on the Council’s website under Evidence Base.
- b) **Duty to Cooperate:** Throughout the plan-making process discussions have taken place with various statutory consultees and neighbouring authorities. A summary of these meetings can be found within the Duty to Cooperate Statement, published as part of the Regulation 19 consultation. This is a live document and will be updated prior to being submitted to the Secretary of

State.

- c) **Legally Compliant:** Local Planning Authorities must prepare a Local Plan which adheres to the requirements as set out in the National Planning Policy Framework (NPPF), planning practice guidance, and other relevant planning regulations & legislation.

Question 4 of this comment form asks for further information on your opinion of the Plans 'soundness'. According to the National Planning Policy Framework (NPPF) para 35, Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound. Plans are 'sound' if they are:

- a) **Positively prepared** – providing a strategy which as a minimum seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and consistent with achieving sustainable development
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the NPPF.

Please keep in mind the information provided above to assist with correctly completing your comment form. For additional information on what the difference is between a Regulation 18 and Regulation 19 Local Plan consultation, please view the FAQ's published on-line [www.brentwood.gov.uk/localplan](http://www.brentwood.gov.uk/localplan)

#### **Data Protection**

All personal information that you provide will be used solely for the purpose of the Local Plan consultation. Please note whilst all addresses will be treated as confidential, comments will not be confidential. Each comment and the name of the person who made the comment will be featured on the Council's website.

By submitting this form, you are agreeing to the above conditions.

**Section A: Personal Details**

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## Section B: Your Representation

Please complete a separate sheet for each representation that you wish to make. You must complete 'Part A – Personal Details' for your representation to be accepted.

Representations cannot be treated as confidential and will be published on our Consultation Portal. Any representations that are considered libelous, racist, abusive or offensive will not be accepted. All representations made will only be attributed to your name. We will not publish any contact details, signatures or other sensitive information.

Full Name	GL Hearn (on behalf of Tesco)
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### **READ THIS FORM IN CONJUNCTION WITH REPRESENTATIONS REPORT SUBMITTED**

Question 1: Please indicate which consultation document this representation relates to?

The Local Plan

Sustainability Appraisal

Habitat Regulations Assessment

Question 2: Please indicate which section of the indicated document identified above that you are commenting on (where applicable please clearly state the section / heading or paragraph number).

Duty-to-Cooperate

Pre-Submission Local Plan

Sustainability Appraisal

Habitats Regulation Assessment

Green Belt

**READ THIS FORM IN CONJUNCTION WITH REPRESENTATIONS REPORT SUBMITTED**

Question 3: Do you consider the Local Plan is:

Sound? YES  NO

Legally Compliant? YES  NO

Compliant with the Duty to Cooperate? YES  NO

Question 4: If you consider the Local Plan unsound, please indicate your reasons below (please tick all that apply):

The Local Plan has not been positively prepared

The Local Plan is not justified

The Local Plan is not effective

The Local Plan is not consistent with national planning policy

Question 5: Please provide details of either:

- Why you consider the Plan to be sound, legally compliant, or adheres to the Duty to Cooperate; or
- Why you consider that the Local Plan is unsound, is not legally compliant, or fails to comply with the Duty to Cooperate

**READ THIS FORM IN CONJUNCTION WITH REPRESENTATIONS REPORT SUBMITTED**

The preparation of Brentwood Local Plan is supported and our comments aim to help it pass the NPPF (2019) test for soundness.

At present, we consider that the Local Plan is unsound and additional work is required to revise the Local Plan. Specifically it is:

- not positively prepared – objectively assessed development needs are not met, duty to cooperate doesn't consider unmet needs.
- not justified – reasonable alternatives are not suitably assessed and the preferred strategy is not suitably justified.
- not effective – the growth strategy is questionable, over ambitious completion rates and over reliance on strategic site.
- not consistent with national policy – Local Plan is not in conformity with NPPF (2019) e.g. objectively assessed development needs are not met, plan period is incorrect, no five year housing land supply is demonstrated etc.

This is a serious matter and we recommend that Brentwood Borough Council thoroughly reviews the approach to plan-making in order to prepare a sound Local Plan.

Our main recommendations are summarised as follows:

- Use 2014-based household projections as basis for the Local Plan. This means local housing needs baseline is 454 dwellings per annum;
- Set a housing requirement in Policy SP02 of 9,265 dwellings (which takes account of a 20% buffer);
- Re-balance the stepped trajectory approach to bring forward more housing in the first five years. This will also help address the five year housing land supply issue;
- Undertake additional work in respect of Duty to Co-operate, Sustainability Appraisal and Habitats Regulation Assessment;
- Undertake updated Green Belt assessment;
- Identify the Hopefield Site as a Housing Allocation in the new Local Plan as part of the revised and sound development strategy.

Please continue on a separate sheet if necessary

Question 6: Please set out what modification(s) you consider necessary to make the Local Plan sound or legally compliant, having regard to the matters that you identified above.

You will need to say why this modification will make the Local Plan sound or legally compliant. Please be as accurate as possible.

**READ THIS FORM IN CONJUNCTION WITH REPRESENTATIONS REPORT SUBMITTED**

Recommended modifications:

- Use 2014-based household projections as basis for the Local Plan. This means local housing needs baseline is 454 dwellings per annum. This is required to comply with the NPPF (2019).
- Set a housing requirement in Policy SP02 of 9,265 dwellings (which takes account of a 20% buffer). This is required to comply with the NPPF (2019).
- Re-balance the stepped trajectory approach to bring forward more housing in the first five years. This will also help address the five year housing land supply issue. This is required to comply with the NPPF (2019).
- Undertake additional work in respect of Duty to Co-operate, Sustainability Appraisal and Habitats Regulation Assessment. This is required to comply with the NPPF (2019) and legal tests.
- Undertake updated Green Belt assessment.
- Identify the Hopefield Site as a Housing Allocation in the new Local Plan as part of the revised and sound development strategy. This is required to address the above matters especially in relation to delivering the growth strategy and meeting five year housing land supply.

Overall the benefits of the proposals represent “exceptional circumstances” in accordance with the NPPF (2019) – regardless of any increase in housing provision – which would allow for the site to be released from the Green Belt for housing.

- Significant community benefit by securing the future of Hopefield Animal Sanctuary. Hopefield will be granted long-term freehold for visitor centre.
- Opportunity to provide a great legacy for the town for recognised important community facility / Asset of Community Value;
- High quality and attractive new residential scheme within landscaped setting;
- New homes (including 35% affordable housing) to meet local needs.
- Significantly improved accessibility and connectivity through new footpath / cycleway connection between Doddinghurst Road and Sawyers Hall Lane and new drop off facility for car users.
- Limited impact on highways. As a result of highways / accessibility / connectivity improvements, the net effect of proposals in terms of vehicle movements for 450 dwellings, will be 285 dwellings, as the proposals will effectively remove trips equivalent to 165 units trips. Highways proposals are supported by Essex County Council.

- Suitable and sustainable location for development;
- Development proposals are developable;
- Proposals bring direct and indirect economic benefits to Brentwood town and the wider area;
- Proposals respect character and identity of Brentwood.
- No / limited impact on the overall role and function of the Green Belt and landscape.

Please continue on a separate sheet if necessary

Question 7: If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the Examination in Public (EiP)?

NO, I do not wish to participate in the oral part of the EiP

YES, I wish to participate in the oral part of the EiP

Question 8: If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary.

GL Hearn (on behalf of Tesco) are working on a key site in Brentwood at Hopefield. The site is an important local community asset and therefore a solution for its future should be set out in the plan. We have been making Reps to the Local Plan since 2015. Therefore we expect to be part of the Local Plan examination discussions as we aim to help to produce a sound Local Plan.

Please continue on a separate sheet if necessary.

Please note that the Inspector (not the Council) will determine the most appropriate procedure to hear those who have indicated that they wish to participate in the oral part of the Examination.



**GL Hearn**

Part of Capita Real Estate

# Representations to Brentwood Local Plan

**Tesco Stores Ltd**

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March 2019

## **Prepared by**

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## Quality Standards Control

The signatories below verify that this document has been prepared in accordance with our quality control requirements. These procedures do not affect the content and views expressed by the originator.

This document must only be treated as a draft unless it has been signed by the Originators and approved by a Business or Associate Director.

DATE  
18 March 2019

ORIGINATORS  
Roland Brass  
Associate Director



APPROVED  
Jennie Bean  
Director



### Limitations

This document has been prepared for the stated objective and should not be used for any other purpose without the prior written authority of GL Hearn; we accept no responsibility or liability for the consequences of this document being used for a purpose other than for which it was commissioned.

## EXECUTIVE SUMMARY

These Representations are submitted to Brentwood Borough Council in response to the Brentwood Local Plan – Pre-Submission Document (Regulation 19) ‘Local Plan’ which was published for consultation from 5<sup>th</sup> February to 19<sup>th</sup> March 2019. These Representations have been prepared by GL Hearn, on behalf of Tesco, who has a land interest at Hopefield Animal Sanctuary.

This document provides our comments on the Local Plan policies and supporting evidence base, including sustainability appraisal, and provides an updated masterplan for the Hopefield Site. Our overall objective is to achieve a housing allocation in the Local Plan for the Hopefield Site.

In summary, at present, we do consider that the Local Plan is sound. Additional work is required to revise the Local Plan, including increasing the housing target to 9,260 dwellings to comply with national planning policy. We have other concerns relating to the Local Plan period, stepped trajectory, housing land supply and delivery of development. As a result we recommend that the Hopefield Site is identified as a housing allocation to help address these matters.

The Hopefield Site is able to deliver up to 450 new homes which would contribute significantly towards helping the Council meet its local development needs and preparing a sound Local Plan. Key benefits of our proposals include:

- Significant community benefit by securing the future of Hopefield Animal Sanctuary. Hopefield will be granted long-term freehold for visitor centre. Opportunity to provide a great legacy for the town for recognised important community facility / Asset of Community Value. This approach complies with Local Plan Policy NE13;
- High quality and attractive new residential scheme within landscaped setting;
- New homes (including 35% affordable housing) to meet local needs.
- Significantly improved accessibility and connectivity through new footpath / cycleway connection between Doddinghurst Road and Sawyers Hall Lane and new drop off facility for car users.
- Limited impact on highways. As a result of highways / accessibility / connectivity improvements, the net effect of proposals in terms of vehicle movements for 450 dwellings, will be 285 dwellings, as the proposals will effectively remove trips equivalent to 165 units trips.
- Suitable and sustainable location for development;
- Development proposals are developable;
- Proposals bring direct and indirect economic benefits to Brentwood town and the wider area;
- Proposals respect character and identity of Brentwood.
- No / limited impact on the overall role and function of the Green Belt.
- No / limited landscape impact.

Our representations clearly set out the intention and commitment of the landowner to bring the site forward. This is demonstrated through the positive relationship with Hopefield Animal Sanctuary and the fact that the existing tenants support the proposals.

Moving forward, and as part of the plan-making process, we welcome the opportunity to discuss matters further and engage in constructive and collaborative discussions with Brentwood Borough Council and relevant stakeholders to help bring the Hopefield Site forward as a Housing Allocation and deliver a range of significant benefits to the borough.

## 1 INTRODUCTION

- 1.1 These Representations are submitted to Brentwood Borough Council in response to the Brentwood Local Plan Pre-Submission Document Regulation 19 Consultation which was published on 5<sup>th</sup> February 2019.
- 1.2 These Representations have been prepared by GL Hearn, acting as Planning Consultants, on behalf of Tesco Stores Limited, who have a land interest at Hopefield Animal Sanctuary, Doddinghurst Road / Sawyers Hall Lane, Brentwood 'Hopefield Site'. Supporting technical advice has been provided by Waterman Infrastructure & Environment Ltd (transport and engineering), GL Hearn (landscape, air quality, noise and masterplanning).
- 1.3 These Representations support the preparation of the Brentwood Local Plan and promote the Hopefield site for residential-led development. They build upon our previously submitted representations to the Council and meetings with planning policy officers. Notably the masterplan for the site has been updated in this Statement.
- 1.4 **The objective of these Representations is to support the preparation of a sound Local Plan which includes a Housing-Led Allocation for the Hopefield Site.**
- 1.5 This Statement provides our response to the Pre-Submission Local Plan (2019) and sets out the case for development at the Hopefield site. It is structured as follows:
- Section 2: Comments on Pre-Submission Local Plan (2019)
  - Section 3: Meeting Strategic objectives
  - Section 4: Hopefield Site
  - Section 5: Conclusion and next steps.
    - Appendix A – Site Location Plan
    - Appendix B – Concept Masterplan
    - Appendix C – Accessibility / Connectivity Improvements Map
    - Appendix D – Highways Technical Note (on Proposals)
    - Appendix E – Concept Masterplan Report
    - Appendix F – Landscape Assessment
    - Appendix G – Accessibility / Connectivity Improvements Report.
- 1.6 The first part of these representations (sections 2 and 3) provides our comments to the Local Plan and the second part (section 4) relate to the site opportunity at the Hopefield Site.
- 1.7 **Our key comments on soundness and our recommended changes to the Pre-Submission Local Plan (2019) are set out in bold underlined text.**

- 1.8 **In summary, we do not consider that the Pre-Submission Local Plan (2019) is sound. It fails the NPPF tests of soundness.**
- 1.9 **The 2019 Pre-Submission Local Plan, including supporting evidence base, is not positively prepared, justified, effective or consistent with national policy. This is a serious matter and we recommend that Brentwood Borough Council thoroughly reviews the approach to plan-making in order to prepare a sound Local Plan.**
- 1.10 **Our main recommendations are summarised as follows:**
- **Use 2014-based household projections as basis for the Local Plan. This means local housing needs baseline is 454 dwellings per annum;**
  - **Set a housing requirement in Policy SP02 of 9,265 dwellings (which takes account of a 20% buffer);**
  - **Re-balance the stepped trajectory approach to bring forward more housing in the first five years. This will also help address the five year housing land supply issue;**
  - **Undertake additional work in respect of Duty to Co-operate, Sustainability Appraisal and Habitats Regulation Assessment;**
  - **Undertake updated Green Belt assessment.**
  - **Identify the Hopefield Site as a Housing Allocation in the new Local Plan as part of the revised and sound development strategy.**
- 1.11 Moving forward, and as part of the plan-making process, we welcome the opportunity to discuss matters further and engage in constructive and collaborative discussions with Brentwood Borough Council and relevant stakeholders to help bring the Hopefield Site forward as a Housing Allocation and deliver a range of significant community benefits.

## 2 COMMENTS ON PRE SUBMISSION LOCAL PLAN (2019)

### National Planning Policy Context – Tests for Soundness

2.1 Our response considers the consultation documents in light of the National Planning Policy Framework ‘NPPF’ which was updated in February 2019. The Brentwood Local Plan will be examined against this national policy document.

2.2 The NPPF (2019) Para 35 explains that local plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements, and whether they are sound. Plans are ‘sound’ if they are:

- *“Positively prepared – providing a strategy which, as a minimum, seeks to meet the area’s objectively assessed needs; and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and is consistent with achieving sustainable development;*
- *Justified – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;*
- *Effective – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and*
- *Consistent with national policy – enabling the delivery of sustainable development in accordance with the policies in this Framework”.*

2.3 We provide comments to the following items related to the Pre-Submission Local Plan (2019) in this section:

- Duty-to-Cooperate
- Pre-Submission Local Plan
- Sustainability Appraisal
- Habitats Regulation Assessment
- Green Belt Review.

### Duty to Cooperate

#### Local Plan Reference – LP Para 1.1 – 1.5 and Duty to Cooperate Position Statement (2019)

2.4 The Duty to Co-operate is a legal requirement of the 2004 Act and 2011 Localism Act. The NPPF (2019) Para. 24 states that in terms of maintaining effective cooperation, LPAs are under a Duty to Cooperate with each other, and with other prescribed bodies, on strategic matters that cross administrative boundaries.

2.5 It is positive that the Council has published a Duty to Cooperate Statement however the main issue relates to addressing housing need. We recommend that the housing need is identified as being 454 dwellings per annum ‘dpa’ which is based on the 2014 –based household projections and is in

accordance with the NPPF and NPPG. This figure should be the starting point and should form the basis of the plan-making process. Therefore this figure should be set out in the Duty to Cooperate Statement.

2.6 As referenced in Local Plan Para 1.35 to 1.38, we acknowledge that Brentwood, alongside neighbouring LPAs, is working together on the South Essex Joint Strategic Plan. It will aim to deliver around 90,000 homes and 58,000 jobs. However the joint plan is a separate plan and should not impact on the preparation of the Local Plan. Therefore the Local Plan must address current issues including meeting development needs, particularly unmet needs from neighbouring LPAs in the housing market area, and these should not be deferred to the Joint Strategic Plan. There is no evidence that unmet needs have sought to be addressed.

2.7 **We recommend that further work, relating to conversations with adjoining LPAs, is required to satisfactorily discharge the Duty to Co-operate legal requirement.**

## Local Plan Period

*Local Plan Reference – Introduction (Para 1.1), Policy SP02: Managing Growth*

2.8 The NPPF Para 67 and NPPG (Para 045 Ref ID: 61-045-20180913) states that Local Plans should consider land for the next 15 years (from the point of adoption). One of our main concerns is that the Local Plan is unlikely to be adopted until end of 2020 at the earliest and therefore the plan should run until 2035.

2.9 Currently as drafted the Local Plan period is 2016 to 2033. There is further inconsistency and confusion as the housing requirement in SP02 starts from 2018/19 (Year 3) as set out in the Housing Trajectory (Local Plan, Appendix 1). 2016/17 and 2017/18 (Years 1 and 2) do not appear to be taken into account.

2.10 **The Local Plan is unsound because is not effective or consistent with national policy.**

2.11 **We recommend that the Local Plan is revised to run to at least 2035/36. As a result the Local Plan housing target would increase and additional sites would need to be identified for development. We therefore recommend that the Hopefield Site should be identified as a Housing Allocation.**

## Settlement Hierarchy

*Local Plan Reference – Figure 2.3 Settlement Hierarchy and supporting text*

- 2.12 We support the settlement hierarchy. We agree that Brentwood Urban Area offers “the most scope to develop in accordance with sustainable development principles” (Local Plan, Para 2.12). In this area “urban extensions into Green Belt are proposed in specific locations with clear physical defensible boundaries and accessible to local services and transport links”.
- 2.13 **We recommend that the Hopefield Site is identified as a Housing Allocation. It adjoins Brentwood Urban Area, and is a sustainable location for development. It is also highly accessible to local services and transport links (see Appendix C) and our proposals provide clear physical defensible boundaries (see Appendix B, E and F).**

## Spatial Strategy

*Local Plan Reference – Transit-orientated Growth (Para 3.11)*

- 2.14 We support the approach of the spatial strategy to focus development along the “Central” and “Southern” growth corridors.
- 2.15 **We recommend that the spatial strategy should focus more growth in the Central growth corridor, especially around Brentwood urban area because it has the highest levels of accessibility and services. Therefore we recommend that the Hopefield Site is identified as a Housing Allocation. It lies within the heart of the Central growth corridor, adjoining Brentwood urban area, in close walking distance to a range of service, facilities and public transport and therefore it’s sustainability credentials are not in question.**

## Managing Sustainable Growth

*Local Plan Reference – Policy SP01: Sustainable Development*

- 2.16 We support the approach to sustainable development set out in Policy SP01.
- 2.17 We recommend that the Council acknowledges that the proposals for the Hopefield Site (set out in this statement) are in accordance with the requirements of SP01. The site opportunity and proposals represent sustainable development.
- 2.18 *Local Plan Reference – Policy SP02: Managing Growth*
- 2.19 We do not support Policy SP02.

- 2.20 Policy SP02 makes provision for 7,752 new residential dwellings (net) to be built in the Borough over the Plan period 2016-2033 at 310 dwellings per annum 'dpa' to 2022/23, followed by 584 dpa from 2023/24-2033.
- 2.21 We have a number of concerns in relation to SP02 which are set out below.
- 2.22 In terms of the housing target, we do not consider the Policy SP02 meets local needs. Figure 4.1 of the Local Plan states the starting point is 350 dpa. We recommend that the starting point is 454 dpa which is in accordance with NPPG (Para 005 Ref ID 2a-005-20190220) which confirms that 2014-based household projections should be used within the standard method to provide stability for LPAs and communities, ensure that historic under-delivery and declining affordability are reflected, and to be consistent with the Government's objective of significantly boosting the supply of homes. Adding a 20% buffer increases this figure to 545 dpa, which increases the overall target to 9,265 dwellings. **We recommend that the overall housing target for the Local Plan should be 9,260 dwellings.**
- 2.23 In terms of the stepped trajectory, we do not support the approach proposed in the Local Plan. We acknowledge that national policy allows for stepped trajectories however it is the level of the step which we object to. The step up from 310 dpa to 584 dpa represents a 90% increase which we consider to be an unrealistic increase. Our review of seven recent Local Plan examinations where stepped trajectories were proposed shows steps in other LPAs may vary from 20% to 51%. These LPAs include Birmingham, Cheltenham, East Staffordshire, Mid Sussex, Poole and West Oxfordshire. Brentwood's proposed step up is much greater, and would therefore be more challenging to bring forward.
- 2.24 We are concerned that rather than seeking to meet development needs the Council has prepared the Local Plan based on a stepped trajectory, which appears to be dependent on the Council's perceived supply of sites. In particular, the step up in delivery is heavily reliant on Dunton Hills Garden Village 'DHGV', which is planned to take one third of overall housing provision, and is not expected to start to contribute towards completions until 2022/23 (Year 7). Any delay to this strategic site would have a serious and significant impact on the proposed growth strategy set out in the Local Plan and would push housing delivery further back into the plan period. As it stands, this approach means that local development needs would be not met until much later in the plan period as the proposed delivery rate would not catch up with a rate of 456 dpa until 2026/27 (Year 12).
- 2.25 In terms of supply of housing sites, the Council cannot demonstrate a five year housing land supply as confirmed in Local Plan Para 4.18. **Therefore to address this matter we recommend that additional sites are identified by the Council to come forward in the first five years. We recommend that the Hopefield Site is allocated for this purpose because the site is available**

- for development now.** See Section 4 of these representations for details on delivery timetable for the Hopefield Site.
- 2.26 In terms of plan period, SP02 starts from 2018/19 (Year 3) as set out in the Housing Trajectory (Local Plan, Appendix 1). 2016/17 and 2017/18 (Years 1 and 2) do not appear to be taken into account. We are concerned that the Local Plan is unlikely to be adopted until end of 2020 at the earliest. **Therefore we recommend that the Local Plan period runs to at least 2035/36.**
- 2.27 **We recommend that the stepped trajectory is more evenly balanced to provide additional dwelling in the first five years. We suggest that the 310 dpa target is increased to 400 dpa. This would represent a 25% step up to 494 dpa for the remainder of the plan period. This approach would mean that an additional 450 dwellings must be delivered in the first five years.**
- 2.28 If the overall housing target increases to 9,260 dwellings, the stepped trajectory will need to be revised. We suggest that this matter is address prior to Local Plan submission.
- 2.29 **Policy SP02 is unsound. It is not positively prepared, justified, effective or consistent with national policy.**

## Dunton Hills Garden Village

### Local Plan reference – Policy R01: Dunton Hills Garden Village Strategic Allocation

- 2.30 We support development at Dunton Hills Garden Suburb 'DHGV' however we question the quantum of development, delivery rates and timescales to bring the site forward.
- 2.31 Policy R01 states DHGV will deliver a mix of uses including around 2,700 homes in the plan period (with overall capacity around 4,000 homes) alongside supporting infrastructure.
- 2.32 In terms of the quantum of development, the number of homes has increased (since the Local Plan Regulation 18, 2018) as a result of changes to other sites e.g. the removal of Honeypot Lane. The increased level of development is not explained or justified. This strategic site cannot be a dumping ground for the Council's housing needs. Also as previously stated, based on the current housing target, DHGV would deliver one third of total housing in the borough. This demonstrates over-reliance on a single site to deliver the growth strategy.
- 2.33 In terms of delivery rates, DHGV is proposed to bring forward up to 300 dpa from 2026/27 (Year 11). We recommend that the Council reviews this figure because in general strategic sites only deliver up to 120 dpa (Source: Urban Extensions – Assessment of Delivery Rates, Report to Barratt

Homes, Savills, October 2014). As a result this would mean that significantly less than the proposed quantum of development would come forward during the plan period.

2.34 In terms of timescales to bring the site forward, the housing trajectory states that residential development will commence in 2022/23 (Year 7). We consider this date is ambitious because both outline and reserved matters (detailed) planning consent would need to be required at least one year before to this point in time. The planning decision making process for this strategic site will be complex, challenging and lengthy. Further to this infrastructure works will be required to be implemented prior to commencement of residential development.

2.35 **Policy SP02 is unsound. It is not justified and effective.**

2.36 **We recommend that the Local Plan should provide additional land for housing, especially in the first five years, and this matter is even more serious in case that DHGV is not brought forward as expected. Therefore the Hopefield Site should be identified as a Housing Allocation because is it available for development now.**

## Green Belt

Local Plan reference – Policy NE13: Site Allocations in Green Belt

2.37 NE13 (Part A) states that “sites allocated to meet housing needs in the Green Belt will be expected to provide significant community benefits, both for surrounding existing communities and those moving into new homes on site.”

2.38 NE13 (Part B) states that “these sites will be de-allocated from the Green Belt to allow development to take place and provide new defensible boundaries to protect the open countryside for future generations.”

2.39 **For the reasons set out above in response to SP02 and R01, we recommend that the Hopefield Site is identified as a Housing Allocation. Our response to NE13 below reinforces this recommendation. Overall the benefits of the proposals represent “exceptional circumstances” in accordance with the NPPF (2019) – regardless of any increase in housing provision – which would allow for the site to be released from the Green Belt for housing.**

2.40 In response to NE13 (Part A), the Hopefield Site is able to delivery significant community benefits especially relating to: i) securing the long term future of Hopefield Animal Sanctuary which is identified as an Asset of Community Value, as well as, ii) meeting local housing needs and, iii) improving local accessibility and connectivity.

- 2.41 In terms of Hopefield Animal Sanctuary, the relationship between Tesco (the landowner) and the Hopefield (the tenant) remains positive. Tesco has secured a grazing site for the animal sanctuary within close proximity to the existing site, and is currently working on detailed plans for the re-provision of the visitor centre on the Hopefield Site. This clearly demonstrates that the site proposals are deliverable and most importantly the proposals provide an opportunity to create a great legacy for Hopefield Animal Sanctuary so that this community asset (designated Asset of Community Value) can be protected and enjoyed for many years.
- 2.42 In terms of meeting local housing needs, the proposals bring forward high quality residential development including private units and affordable housing (at Local Plan policy compliant level of 35%). In accordance with HP01, we would provide a mix of 1, 2, 3 and 4 bed properties including a mix of apartments and family units. Notably the site is available for development in the first five year so local needs can be met in the short term.
- 2.43 In terms of improving local accessibility and connectivity (especially to schools along Sawyers Hall Lane), the proposals introduce a new connection between Doddinghurst Road and Sawyers Hall Lane. This significantly increases accessibility to a number of schools and other services, particularly from the north / Pilgrims Hatch area. Therefore a number of school trips will be diverted and / or less likely to be taken in private cars. The accessibility improvements, shown as walking distances / times are set out at Appendix C. Other transport proposals include providing a signalised junction at Doddinghurst Road / Ongar Road and parking restrictions along Doddinghurst Road. As a result of these improvements, the net effect of proposals in terms of vehicle movements for 450 dwellings, will be 285 dwellings, as the proposals will effectively remove trips equivalent to 165 units trips.
- 2.44 In response to this matter, we urge the Council to fully consider the proposals for the site including new footpath / cycleway connection and drop off point and other improvements which will significantly enhance local levels of accessibility and connectivity. We recognise that this part of Brentwood urban area, in particular Sawyers Hall Lane, does have traffic and safety issues and therefore we have sought to improve these conditions through the development of the Hopefield Site.
- 2.45 In response to NE13 (Part B), the Hopefield Site is able to provide defensible boundaries to protect the open countryside. The site exhibits two existing strong and defensible boundaries to the west (Brentwood urban area) and north (A12). As shown at Appendix B existing mature planting along the eastern and southern edges will be enhanced. Further to this, the new Hopefield visitor centre will be located to the east of the site to prevent any future encroachment and an existing ditch runs along the south of the site.

2.46 As set out in our previous Representations, we have concerns with the Council’s Green Belt Review. Our main comments are summarised below. Overall the Green Belt assessment work undertaken to date is spread over a range of documents and there is no an overall narrative to explain the approach. Our key comments on the documents are set out below.

- The Hopefield Site is assessed as two separate land parcels (024a and 024b). **We object to this approach and recommend that the two parcels are combined so that a true site assessment can be undertaken.** The revised assessment would conclude a lower level of impact on the Green Belt.
- In terms of the assessment of Land Parcel 024B, we challenge the perceived level of containment, the degree to which the site is considered to be countryside and the level of perception of the gap.
- Incorrect location plan is used for Parcel 42. The Hopefield Site is located within Parcel 42 and the assessment makes no reference of this existing land use.

## Sustainability Appraisal

2.47 NPPF (2019) states that Local Plans should be “informed throughout their preparation by a sustainability appraisal that meets the relevant legal requirements (e.g. SEA). This should demonstrate how relevant economic, social and environmental objectives (including opportunities for net gains) have been addressed and how significant adverse impacts on these objectives should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued. Where significant adverse impacts are unavoidable, suitable mitigation measures should be proposed (or, where this is not possible, compensatory measures should be considered)”.

2.48 In general we do not consider the Sustainability Appraisal ‘SA’ (as currently drafted) meets the requirements of national policy for the following reasons.

- The SA is not a complete document as it makes reference to other studies which have been prepared over the last few years. Document relate to the full SA, strategic options and DHGV. All of these inputs represent the SA and therefore should be set out in a single document to justify the Local Plan approach.
- The SA is drafted as a narrative. It is poorly written and unclear. Analysis to justify the Local Plan approach is not sufficient.
- The housing requirement, under “quantum” (SA, pg. 12-13) is not considered to be correct. See comments in response to SP02 of this Representations Statement for more details. In summary 2014-based household projections should be used. The housing requirement should be consistent across all Local Plan documentation.
- SA Table 5.1 is insufficient and only provides a high level and out of date summary of neighbouring LPAs. The strategy for meeting any unmet needs is not sufficient (SA, pg.42).
- The SA (Section 5.6) fails to sufficiently analyse all of the alternatives in a clear and logical manner. Para 5.6.3 explains that in terms of omission sites only two scenarios are assessed e.g. 1 site or 4 sites. Our concern is that this approach does not cover all of the potential options.
- The SA (Section 6) is flawed. Of note, Table 6.1 does not consider transport or accessibility. DHGV appears to perform well because it is more of an isolated development.

- The Hopefield Site is identified in the SA (Table 5.2) as an omission site. It is referred to as providing 450 units when in fact the site has been promoted for “up to 450 units”. This flexibility in the site capacity has not been considered by the SA. This is important as different site capacities have different impacts and implications on the Local Plan.
- SA (Section 7) is considered to be insufficient. It provides high level analysis and conclusions only.

2.49 The main reason outlined in the SA not to pursue the Options including the Hopefield Site relates to traffic impact at Brentwood Urban Area. In response to this matter, we urge the Council to fully consider the proposals for the site including drop off point and other improvements to significantly enhance local levels of accessibility and connectivity.

2.50 Moving forward, we recommend that the Council should amend the SA prior to Local Plan submission and / or as part of the Local Plan Examination process.

### Habitats Regulation Assessment

2.51 We have concerns relating to Section 6 of the HRA. In particular, on the appropriate assessment the latest advice from Natural England is dated 2017 and this should be updated, and the waste water conclusion is not finalised. **We recommend that additional work on the HRA is required to be undertaken immediately to avoid legal non-compliance as this might further delay the plan-making process.**

### Other Policies

2.52 In general we support other policies set out in the Local Plan. In relation to the resilient built environment (Chapter 5), housing provision (Chapter 6), prosperous communities (Chapter 7) and natural environment (Chapter 8) the proposals for the Hopefield Site (set out in Section 4 of these Representations) aim to meet the requirements set out by the Council.

### 3 MEETING STRATEGIC OBJECTIVES

3.1 We support the vision and strategic objectives for Brentwood set out in the Local Plan Chapter 3. Development at the Hopefield Site will help support the Local Plan vision and strategic objectives.

3.2 In response to the vision, the Hopefield Site will help meet the Council's housing needs, and safeguard and enhance built and natural assets, principally by securing the long-term future of Hopefield Animal Sanctuary.

3.2 The Hopefield site also contributes towards all of the strategic objectives as demonstrated in below.

**Table 1: Contribution of Hopefield Site to BBC's Strategic Objectives**

Strategic Objective	Hopefield Site Contribution
SO1: Managing Growth Sustainably	<p>The sustainability credentials of the Hopefield Site are not in question. It is located within the Central growth corridor and adjoins Brentwood urban area. It is close to existing services and facilities and public transport. Development at the site represents a sustainable pattern of development.</p> <p>The proposals will provide a strong sense of place in terms of high quality residential led development and securing the future of Hopefield Animal Sanctuary.</p> <p>Our proposals for the site provide an opportunity to leave a great legacy in the heart of Brentwood.</p>
SO2: Deliver a Healthy and Resilient Built Environment	<p>The proposals for the Hopefield Site promote healthy lifestyles and will create a resilient built environment.</p> <p>The site provides a sustainable location and is close to a range of services and facilities in Brentwood urban area and therefore sustainable travel will be promoted. This will also be achieved by new footways and cycle paths, including new connection between Doddinghurst Road and Sawyers Hall Lane which enhances local accessibility and connectivity.</p> <p>The proposals also secure the future of Hopefield Animal Sanctuary and will bring forward a new visitor centre. In combination the proposals for the will encourage activity and social interaction.</p> <p>The proposals will be built to achieve high environmental standards to create an adaptable and resilient new residential development.</p>
SO3: Deliver Sustainable Communities with Diverse Economic & Social-cultural Opportunities for all	<p>The proposals will help to support local economic development and opportunities in Brentwood. High quality development will attract a skilled workforce, and create direct and indirect opportunities and proximity to the town centre will lead to an increase in local spending. The mix of uses including housing and Hopefield Animals Sanctuary will create an attractive and vibrant new area in Brentwood,</p>
SO4: Deliver Beautiful, Biodiverse, Clean and a Functional Natural Environment	<p>The Proposals are able to connect to existing blue and green infrastructure and protect and support the recreational value of the site, especially by securing the future of Hopefield Animal Sanctuary.</p>

## 4 HOPEFIELD SITE HOUSING ALLOCATION OPPORTUNITY

- 4.1 We recommend that the Hopefield Site is identified in the new Local Plan as a Housing Allocation to help the Council bring forward a sound Local Plan. This section provides a summary of the opportunity at the Hopefield Site.
- 4.2 The masterplan for the Hopefield Site has been updated over the last year and therefore information contained in these representations is different from our previous submissions.
- 4.3 The Concept Masterplan set out at Appendix B provides high level proposals for the site, demonstrating that the site can deliver up to 450 new homes and re-provide Hopefield Animal Sanctuary visitor centre on the site.

### Concept Masterplan

- 4.4 The Concept Masterplan for the Hopefield Site has evolved over a number of years and has been based on current and emerging planning policy, discussions with stakeholders and up to date supporting technical studies relating to landscape, air quality, noise, drainage and highways.
- 4.5 The objective of the masterplan is to demonstrate how the site can accommodate up to 450 new homes (to meet local needs) within an attractive and robust landscape setting, which respects the surrounding area, whilst minimising highways impact and retaining the Hopefield Animal Sanctuary visitor centre on the site.
- 4.6 The site Masterplan Report (set out at Appendix E) includes a series of illustrative material including Site Plan, Landscape Context Plan, Topography Plan, Wider Site Aerial Photograph, Local Site Aerial Photograph, Photographic Viewpoint Location Plan, Site Record Photographs, Opportunities and Constraints Plan and Concept Masterplan.
- 4.7 The main components of the proposals for the Hopefield Site are set out below:
- The existing Hopefield Animal Sanctuary will be relocated to the eastern part of the site, in an 3 hectare / 8 acre setting, where it presents an open green field aspect to the adjacent Green Belt and countryside. This important community and recreational facility would therefore remain an existing part of the landscape character of the site and the visitor centre would be improved. This land use is considered to be appropriate development in the Green Belt.
  - Up to 450 residential units are set within a robust blue and green infrastructure framework which reflects the grain of the surrounding landscape and accords with the Local Landscape Character of the Doddinghurst Wooded Farmland, characterised by woodlands, tree belts, hedges and drainage systems.
  - The Masterplan provides strong landscape buffers on all sides of the site, created by existing vegetation and proposed vegetation, including the A12 to the north and the urban edge of Brentwood to the west. These buffers will create defensible boundaries to the Green Belt, as well as providing additional screening to the site from surrounding areas. This would be assisted by

setting the developable area within the central part of the site, and adjoining Brentwood Urban Area.

- The blue and green infrastructure framework will provide the development with multi-functional spaces, including tree-lined / vegetation corridors, footpaths / cycle ways, biodiversity corridors, play facilities, the existing moat and SUDs. This framework will assist in softening and enclosing the developable areas and provide corridors for Countryside Access from adjacent urban areas and the Merrymede Country Park.
- The existing ground levels on the site will be respected, with the minimum of topographical disturbance to accommodate the development, along with localised vegetation on the site which would be retained within the developable areas.
- An acoustic fence will be introduced, in a wooded setting, on the northern boundary of the site to reduce noise intrusion to the existing and proposed housing. This would ensure suitable mitigation is in place in light of residential development.
- New pedestrian / cycle route directly connecting Doddinghurst Road to Sawyers Hall Lane via the current Hopefield Animal Sanctuary site entrance to the south.
- The road access arrangements will consist of a simple network of primary and secondary routes, contained within the blue and green infrastructure corridors. The main vehicular access to the site would be from the north west corner, with emergency vehicle access from the south west
- New pick-up and drop-off and parking facilities (connecting Doddinghurst Road to Sawyers Hall Lane) to provide better access to local schools. This means that less pick up / drop off will take place along Sawyers Hall Lane.
- The proposed residential development mix would accord with the requirements of the Local Plan to meet local needs including 35% affordable housing.
- Other highways proposals include improvements to Doddinghurst Road (including parking restrictions and potentially implementing a signalised junction at Doddinghurst Road / Ongar Road. Further details are set out in Appendix D. The highways proposals are supported by Essex County Council.

4.8 The Concept Masterplan accords with many of the relevant Draft Local Plan policies, including the following: Green and Blue Infrastructure Policies BE18, BE19, BE21 and BE22; Design and Place-Making Policies HP13, HP14, HP15 and HP18; and Natural Environment Policies NE01 and NE03. As set out in Section 3 is also contributes towards meeting the Local Plan vision and strategic objectives.

4.9 In terms of development capacity the site is able to accommodate up to 450 dwellings. This means that a lower less of development is possible and we would welcome the opportunity to further discuss this scenario with the Council.

## Highways Impact

4.10 Significantly, the proposals seek to provide an opportunity to alleviate highway issues/congestion resulting from traffic visiting the schools in Sawyers Hall Lane. It is expected that through the provision of this pick-up and drop-off facility, a number of vehicle trips, currently undertaken during the periods when school starts and finishes, will be removed from the Doddinghurst Road/Ongar Road mini-roundabout junction and Ongar Road junctions with Highland Avenue and Burland Road,

having been diverted into the proposed Hopefield, Doddinghurst Road site to take advantage of the facilities present. It is anticipated that up to 100 vehicles are predicted to use this facility and as a result will be removed from the aforementioned junctions. It has been calculated that the expected 100 vehicles to be removed is the equivalent of the trips generated by approximately 165 dwellings based on PM Peak two-way trip rates obtained from the TRICS database used to establish the proposed trip generation within the Junction Assessment and Analysis document (see Appendix D for more details).

## Landscape Considerations and Impact

- 4.11 We have updated the Landscape Visual Assessment 'LVA', which was initially undertaken in 2015 and which was previously submitted as part of our Representations to the Local Plan. The LVA (2019) is set out at Appendix F.
- 4.12 The main changes, which impact on the Concept Masterplan and LVA for the site are summarised below.
- Public Right of Way 'PROW' to the east of the site no longer exists on the ground.
  - County Wildlife Site 'CWS' to the south and east of the site has been extended to the east as a Local Wildlife Site 'LoWS'.
- 4.13 The LVA (2019) has also undertaken additional Landscape Baseline Studies and has concluded that the Landscape Sensitivity of the Hopefield site is low / poor, due to its animal sanctuary use and in the absence of any landscape designations, the landscape value of the site is also considered to be low. In addition, the open landscape character of the site provides it with a medium landscape sensitivity to change and it provides a moderate contribution to the countryside. Its landscape capacity to accommodate development is moderate, due to its generally flat topography, absence of vegetation and visual enclosure. The topography of the site is generally flat and contains few trees, other than on its boundaries. As a result, its sensitivity to change, in these respects, is considered to be low. The site also has a Low tranquillity value arising from its proximity to the A12.
- 4.14 In terms of visual baseline, the site is visually well enclosed, even during the winter months, with maximum visibility. The main exception is that the nearest PROW to the east of the site no longer exists on the ground. The Zone of Visual Influence 'ZVI' of the site is less than 1 km and as a result the visual sensitivity of the site is low, due to its low-lying nature, visual containment by existing boundary vegetation and limited high sensitivity receptors, such as residential areas and PROWs.
- 4.15 Therefore the landscape impact of the proposed Concept Masterplan is considered to be moderate to slight.

## Green Belt Impact

4.16 It is important for the Council to acknowledge that the net developable area of the site is only around 60%, and excludes the re-provision of Hopefield Animal Sanctuary visitor centre, which is considered to be an appropriate use in the Green Belt in accordance with the NPPF. This means that that area of land which would need to be released from the Green Belt is considerably smaller than the whole site. As a result the proposals have no impact on the green wedge between Brentwood and Shenfield urban areas which has been referenced in the Local Plan. Overall the benefits of the proposals represent “exceptional circumstances” in accordance with the NPPF (2019) which would allow for the site to be released from the Green Belt for housing.

## Deliverability

4.17 In respect of the NPPF (2019) the Hopefield Site is developable because it has not been consented or allocated for development.

4.18 The site is located in a suitable location, it is available for development now and development is viable. Each factor is discussed below.

- Suitable location – the site is located with the Central growth corridor and adjoins Brentwood urban area. It would therefore contribute towards sustainable patterns of development.
- Available for development – the site is under full ownership of Tesco and the proposals are supported by Hopefield Animal Sanctuary. Access land is also available and is adopted by Highways England. Development on site is able to commence within the first five years of the adopted Local Plan.
- Development is viable – our design team has undertaken sensitivity testing of development options and development on the site is viable.

4.19 In relation to all of the above matters, Tesco have also purchased an off-site land parcel (approximately 20 hectares / 50 acres) in close proximity to the Hopefield Site which will be used by the animal sanctuary for grazing purposes. This further demonstrates the fact that development can come forward in the first five years as well as the commitment of the land owner to bring the site forward and protect the animal sanctuary.

4.20 In terms of timescale for development, the Hopefield Site could come forward as set out below.

**Table 2: Hopefield Site Delivery Timetable**

Date	Action
2019	Submit Local Plan representations / attend Examination
2020	Prepare planning application
2021	Submit planning application
2022	Achieve consent and discharge conditions
2023 to 2025	Commencement of development to completion

## Consultation

- 4.21 A number of meetings have been held with local key stakeholders to help Tesco and the design team to better understand the local area and set out proposals which seek to address key local issues to deliver benefits to the community.
- 4.22 A summary of meetings to date is set out in Table 3 below. Overall all meetings have been constructive.

**Table 3: Summary of Stakeholder Meetings / Engagement**

Date	Stakeholders in attendance
<i>2018</i>	
11 January	St Thomas' Juniors and Infant Schools, St Helen's Juniors and Infant Schools
17 January	Becket Keys School
31 January	Grove House School
20 February	Great Danes Football Club
5 March	St Thomas' Junior and Infant Schools, Becket Keys School
6 March	Sawyers Hall Lane Community Sports Trust
14 March	St Helen's Catholic Junior and Infant Schools
14 May	Cllr Melissa Slade / Catholic Diocese
<i>2019</i>	
28 January	Cllr Philip Mynott, Cllr John Kerslake
19 February	Cllr Melissa Slade
28 February	Cllr Alison Fulcher

## Benefits of Development

- 4.23 The main benefits of development at the Hopefield Site are summarised below. These represent the exceptional circumstances to release the site for development:
- Significant community benefit by securing the future of Hopefield Animal Sanctuary. Hopefield will be granted long-term freehold for visitor centre.
  - Opportunity to provide a great legacy for the town for recognised important community facility / Asset of Community Value;
  - High quality and attractive new residential scheme within landscaped setting;
  - New homes (including 35% affordable housing) to meet local needs.
  - Significantly improved accessibility and connectivity through new footpath / cycleway connection between Doddinghurst Road and Sawyers Hall Lane and new drop off facility for car users.
  - Limited impact on highways. As a result of highways / accessibility / connectivity improvements, the net effect of proposals in terms of vehicle movements for 450 dwellings, will be 285 dwellings, as the proposals will effectively remove trips equivalent to 165 units trips. Highways proposals are supported by Essex County Council.
  - Suitable and sustainable location for development;
  - Development proposals are developable;
  - Proposals bring direct and indirect economic benefits to Brentwood town and the wider area;
  - Proposals respect character and identity of Brentwood.
  - No / limited impact on the overall role and function of the Green Belt and landscape.

## 5 CONCLUSION AND NEXT STEPS

5.1 The preparation of Brentwood Local Plan is supported and our comments aim to help it pass the NPPF (2019) test for soundness.

5.2 At present, we consider that the Local Plan is unsound and additional work is required to revise the Local Plan. Specifically it is:

- not positively prepared.
- not justified.
- not effective
- not consistent with national policy.

5.3 This is a serious matter and we recommend that Brentwood Borough Council thoroughly reviews the approach to plan-making in order to prepare a sound Local Plan.

5.4 Our main recommendations are summarised as follows:

- Use 2014-based household projections as basis for the Local Plan. This means local housing needs baseline is 454 dwellings per annum;
- Set a housing requirement in Policy SP02 of 9,265 dwellings (which takes account of a 20% buffer);
- Re-balance the stepped trajectory approach to bring forward more housing in the first five years. This will also help address the five year housing land supply issue;
- Undertake additional work in respect of Duty to Co-operate, Sustainability Appraisal and Habitats Regulation Assessment;
- Undertake updated Green Belt assessment;
- Identify the Hopefield Site as a Housing Allocation in the new Local Plan as part of the revised and sound development strategy.

5.5 In relation to the Hopefield Site, these representations clearly set out the intention and commitment of the landowner to bring the site forward. This is demonstrated through the positive relationship with Hopefield Animal Sanctuary and the fact that the existing tenants support the proposals.

5.6 Notably, the proposals for the site help support the Local Plan vision and strategic objectives and in particular support specific policy including Policy NE13 which requires housing allocations to bring forward community benefits. Overall the benefits of the proposals represent “exceptional circumstances” in accordance with the NPPF (2019) which would allow for the site to be released from the Green Belt for housing.

5.7 Moving forward, and as part of the plan-making process, we welcome the opportunity to discuss matters further and engage in constructive and collaborative discussions with Brentwood Borough Council and relevant stakeholders to help bring the Hopefield Site forward as a Housing Allocation and deliver a range of significant benefits to the borough.

**APPENDIX A:** Site Location Plan

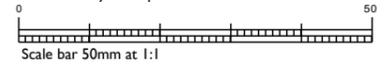
SEE OVERLEAF



NOTES



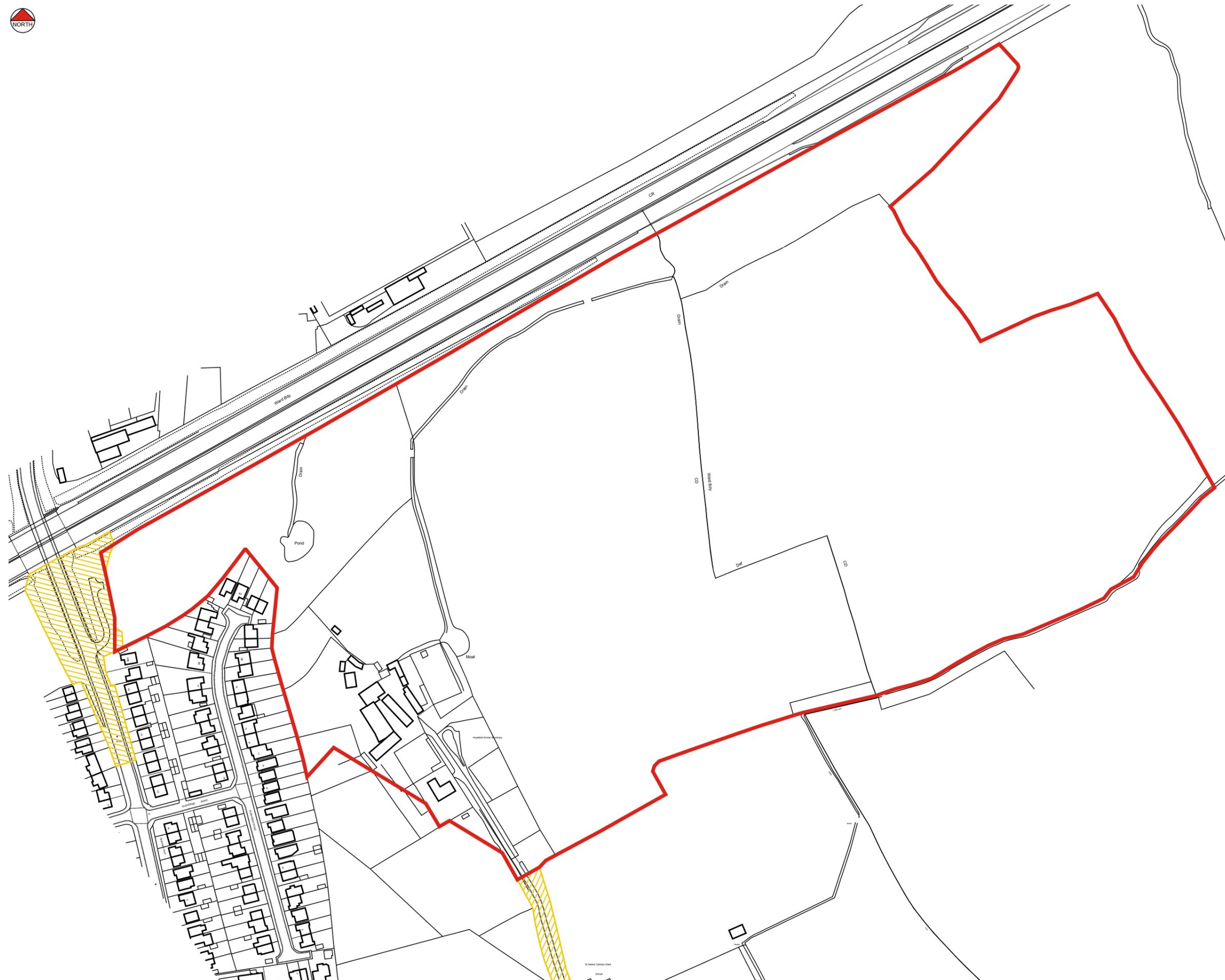
This drawing to be read in accordance with the specification/Bills of Quantities and related drawings. No Dimensions to be scaled from this drawing. All stated dimensions to be verified on site and the Architect notified of any discrepancies.



THIS DRAWING IS OUR INTERPRETATION OF INFORMATION PROVIDED BY OTHERS  
STOPPING UP ORDERS AND HIGHWAY ISSUES TO BE CONFIRMED BY THE HIGHWAY ENGINEERS BEFORE PROCEEDING TO CONTRACT  
EXTENT OF TITLE SITE BOUNDARY TO BE AGREED BETWEEN ALL PARTIES. LEGAL CONFIRMATION REQUIRED BEFORE PROCEEDING TO CONTRACT  
THIS DRAWING IS SUBJECT TO A FULL TOPOLOGICAL SURVEY AGREEMENT BETWEEN ALL PARTIES REGARDING THE SETTING OUT OF ARBITRARY BOUNDARIES AND IS BASED ON INFORMATION PROVIDED BY OTHERS  
PLEASE ALSO REFER TO SOLICITORS LEGAL REPORT REGARDING ANY RIGHTS OF WAY, RIGHTS OF LIGHT, EASEMENTS, COVENANTS AND LEGAL RESTRICTIONS.

**KEY**

-  SITE BOUNDARY
-  EXTENT OF ADOPTED HIGHWAYS



REV	DATE	NOTE	BY
A	09.06.15	AMENDED WITH ADDITION OF SAWYERS HALL LANE	KB

Project  
**PROPOSED RESIDENTIAL DEVELOPMENT  
SAWYERS HALL FARM  
BRENTWOOD**

Title  
**LAND OWNERSHIP PLAN**

Scale	Date
1:2500 @A3	MAY 2015
Drawn	Checked
KB	MB
Drawing Number	Revision
<b>7375/LP01</b>	<b>A</b>

Saunders Partnership Architects  
ARCHITECTURE | URBAN DESIGN | MASTER PLANNING

RIBA 





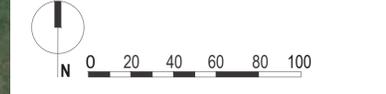
Weylyn Garden City | Bristol | Manchester | London

**APPENDIX B:** Concept Masterplan

SEE OVERLEAF



- Site 24A/ 24B boundary
- - - Existing ditches/ water courses retained
- - - Existing public rights of way (PROWS)
- Existing moat retained
- Existing vegetation structure retained
- Proposed development areas and finish floor levels (FFL'S)
- Proposed vegetation corridors, green infrastructure and footpaths / cycleways play facilities/ sustainable drainage systems (SUDS)
- - - Proposed ditches/ water courses
- Potential seasonal wetland areas
- Proposed timber acoustic noise fence
- Potential main street
- Potential secondary streets
- Potential tertiary streets
- ⊗ Site access



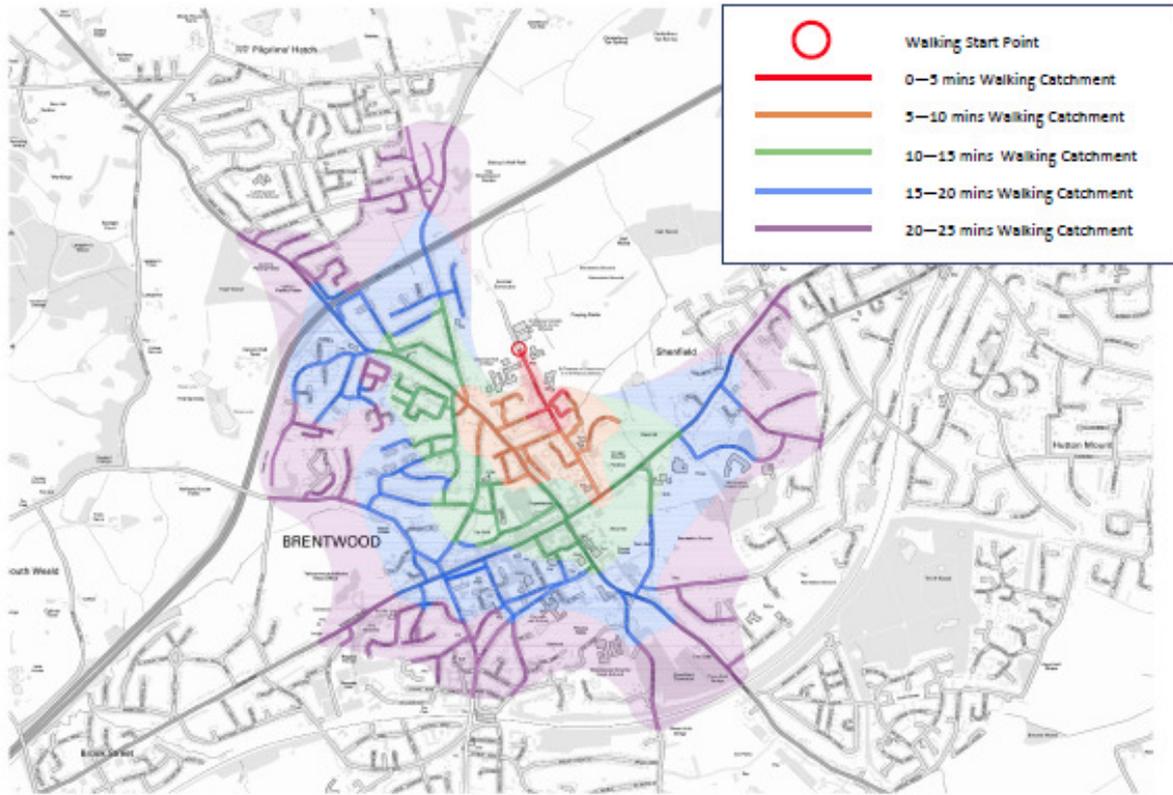
Rev	Drawn	Checked	Approved	Description	Date
Purpose of Issue					
For Illustrative Purposes Only					
Classification					
Commercial in Confidence					
Client					
Tesco Stores Limited					
Project					
Hopefield Brentwood					
Drawing					
Concept Masterplan					
Scale @ A1					
NTS	Drawn LP	Checked SC	Approved RMK		
Project No.				Date	
CS097600				February 2019	
Drawing Identifier					
Project - Originator - Zone - Level - File Type - Role - Number					
097600-L-114					

**GL Hearn**  
 Part of Capita plc  
**LANDSCAPE ARCHITECTURE**  
 65 Gresham Street, London, EC2V 7NQ  
 020 7709 4500

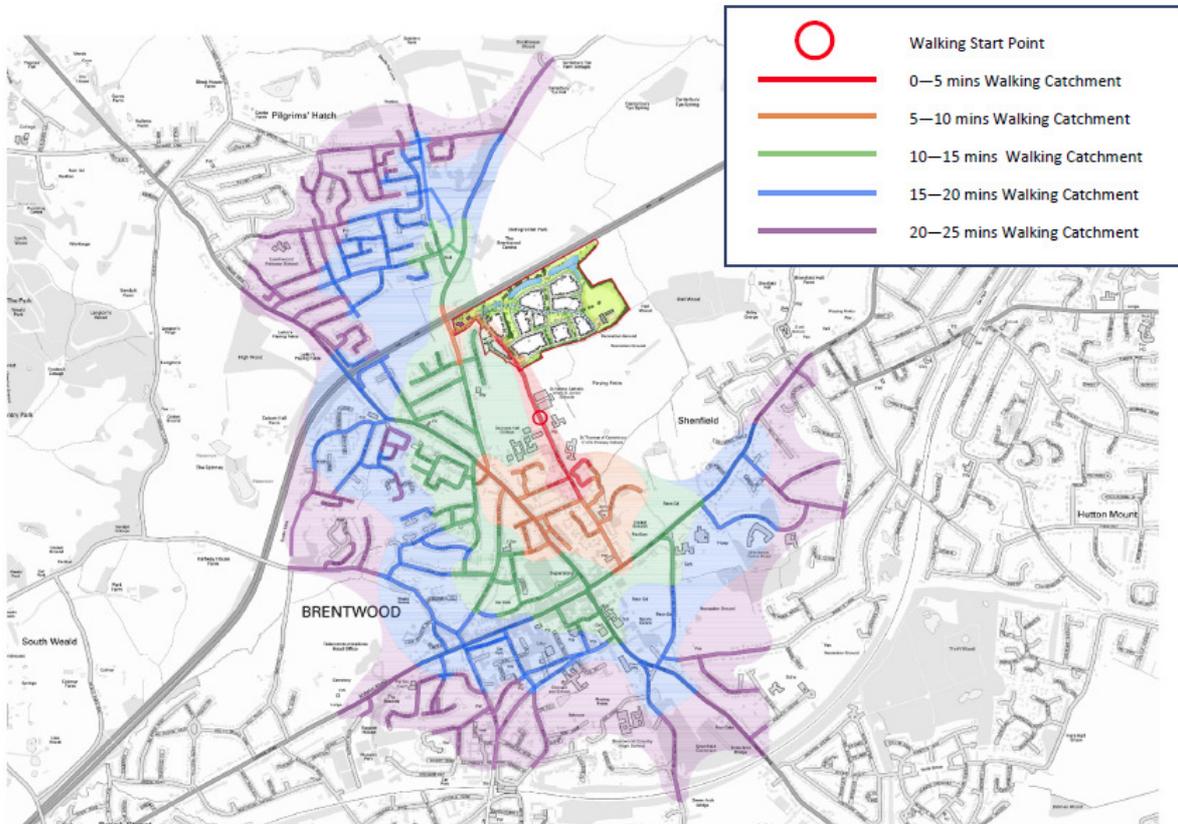
**APPENDIX C: Accessibility / Connectivity Improvements Map**

SEE OVERLEAF

**EXISTING 2KM/25 MINUTE WALK-TIME PLAN:**



**2KM/25 MINUTE WALK-TIME PLAN IF THROUGH ROUTE IS PROVIDED:**



**APPENDIX D:** Highways Technical Note (on Proposals)

SEE OVERLEAF

# Hopefield, Doddinghurst Road

## Technical Note Highways & Transport Information

**Date:** March 2019  
**Client Name:** Tesco Stores Ltd  
**Document Reference:** CIV16973-100-R-3-2-1-TN

This document has been prepared and checked in accordance with Waterman Group's IMS (BS EN ISO 9001: 2015, BS EN ISO 14001: 2015 and BS OHSAS 18001:2007)

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Issue	Prepared by	Checked & Approved by
3-2-1	Dave Martin Senior Engineer	Andy McDonald Regional Director

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### 1. Introduction

Waterman Infrastructure & Environment Limited (WIE) has been instructed by Tesco Stores Ltd to provide support in terms of highways and transportation for the Hopefield, Doddinghurst Road site to the northeast of Brentwood for a residential development consisting of approximately 450 residential units.

This Technical Note has been prepared to provide further information and clarification to the previously submitted Junction Assessment and Analysis document (March 2018) and highways input into the Representations to Brentwood Draft Local Plan Preferred Site Allocations document (March 2018).

### 2. Proposed Doddinghurst Road / Ongar Road Signalised Junction

Given the potential level of capacity and queuing calculated at the existing Ongar Road / Doddinghurst Road mini-roundabout junction, the potential implementation of a signalised junction at this location has been investigated.

The analysis of the existing mini-roundabout, undertaken within the Junction Assessment and Analysis document indicates that the existing mini-roundabout junction would operate at a high level of, or over, capacity in both the AM and PM peak hour periods, this is partly attributed to the extremely high traffic levels experienced during this period within the immediate highway network.

The potential signalised junction arrangement would offer a significant improvement to the level of queuing during the AM peak compared to the existing mini-roundabout. The level of queuing expected to be experienced at the potential signalised junction would also offer a slight improvement over the level of queuing to be experienced at the mini-roundabout during the PM peak hour period.

It is considered that the potential signalised junction would offer a betterment to the local highway network than the existing mini-roundabout arrangement. A plan demonstrating the proposed signalised junction layout is appended to this note at **Appendix A**.

### 3. Doddinghurst Road Improvements

Improvements to Doddinghurst Road have been proposed in association with the introduction of the proposed vehicle access. The plan included at **Appendix B** highlights proposals to introduce parking restrictions along a section of Doddinghurst Road between the A12 bridge and Robin Hood Road (approx. 500m), whilst providing formal layby parking for 9 cars/vehicles.

### 4. Proposed Doddinghurst Road Site Access

A plan providing details of the proposed site access arrangement on Doddinghurst Road is included at **Appendix C** of this note.

Visibility splays and the extent of highway land in relation to the site boundary have been identified on the proposed site access plan.

### 5. Proposed Internal Pedestrian and Cycle Route

A pedestrian and cycle route through the site has been proposed to allow direct pedestrian and cycle access between Doddinghurst Road and Sawyers Hall Lane.

This is expected to influence a modal shift brought about by provision of a shorter, safer and more pleasant walking and cycling route resulting in fewer car borne trips.

A plan identifying the proposed route is included at **Appendix D**.

### 6. Proposed Trip Generation

The proposals for the Hopefield development consist of 450 residential dwellings plus relocated Hopefield Animal Sanctuary visitor centre and some community space.

The proposed trips rates associated with the Hopefield, Doddinghurst Road site have been established using the TRICS database.

The TRICS database has been interrogated to establish the potential trips generated in the AM and PM peak periods by the proposed development. The TRICS data obtained is based upon survey sites comparable to the proposed development, in terms of size, location and access to public transport.

The traditional network AM and PM peak hour trip rates and predicted traffic generation are summarised in the following table.

Table 1: Vehicle Trip Rates and Potential Generated Trips for Residential Development (450 units)

Time Period	Arrivals		Departures		Two-Way	
	Trip Rate	Trips	Trip Rate	Trips	Trip Rate	Trips
AM Peak	0.140	63	0.408	184	0.548	247
PM Peak	0.383	172	0.226	102	0.608	274

Note: 1. AM and PM Peak Hours (0800 – 0900 and 1700 – 1800)

2. Trip Rates per Dwelling

A proposed development consisting of 450 residential dwellings (plus uses identified above) will have the potential to generate 63 arrivals and 184 departures in the AM peak hour, whilst generating 172 arrivals and 102 departures in the PM peak hour. It is considered that the Option 1

site would be expected to produce around 247 two-way vehicle trips in the AM peak and 274 two-way vehicle trips in the PM peak hour periods.

## 7. Diverted School Vehicle Trips

The proposed Hopefield, Doddinghurst Road development seeks to provide an opportunity to alleviate highway issues/congestion resulting from traffic visiting the schools in Sawyers Hall Lane.

It is expected that through the provision of this pick-up and drop-off facility, a number of vehicle trips, currently undertaken during the periods when school starts and finishes, will be removed from the Doddinghurst Road/Ongar Road mini-roundabout junction and Ongar Road junctions with Highland Avenue and Burland Road, having been diverted into the proposed Hopefield, Doddinghurst Road site to take advantage of the facilities present.

It is anticipated that up to 100 vehicles are predicted to use this facility and as a result will be removed from the aforementioned junctions.

It has been calculated that the expected 100 vehicles to be removed is the equivalent of the trips generated by approximately 165 dwellings based on PM Peak two-way trip rates obtained from the TRICS database used to establish the proposed trip generation within the Junction Assessment and Analysis document (identified in Table 1 above).

## 8. Essex County Council Highways Correspondance

Discussions have been held with Essex County Council (ECC) Highways Department with regards to the proposed development and associated accessibility and junction improvements. Brendan Johnston of ECC Highways was generally positive about the scheme and supportive of the proposals, providing comments including:

*“Pedestrian / cycle link with Sawyers Hall Lane is considered essential to encourage modal shift – the variety of initiatives are supported in principle by the Highway Authority;”*

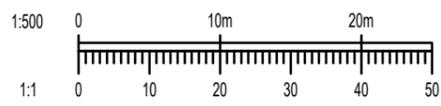
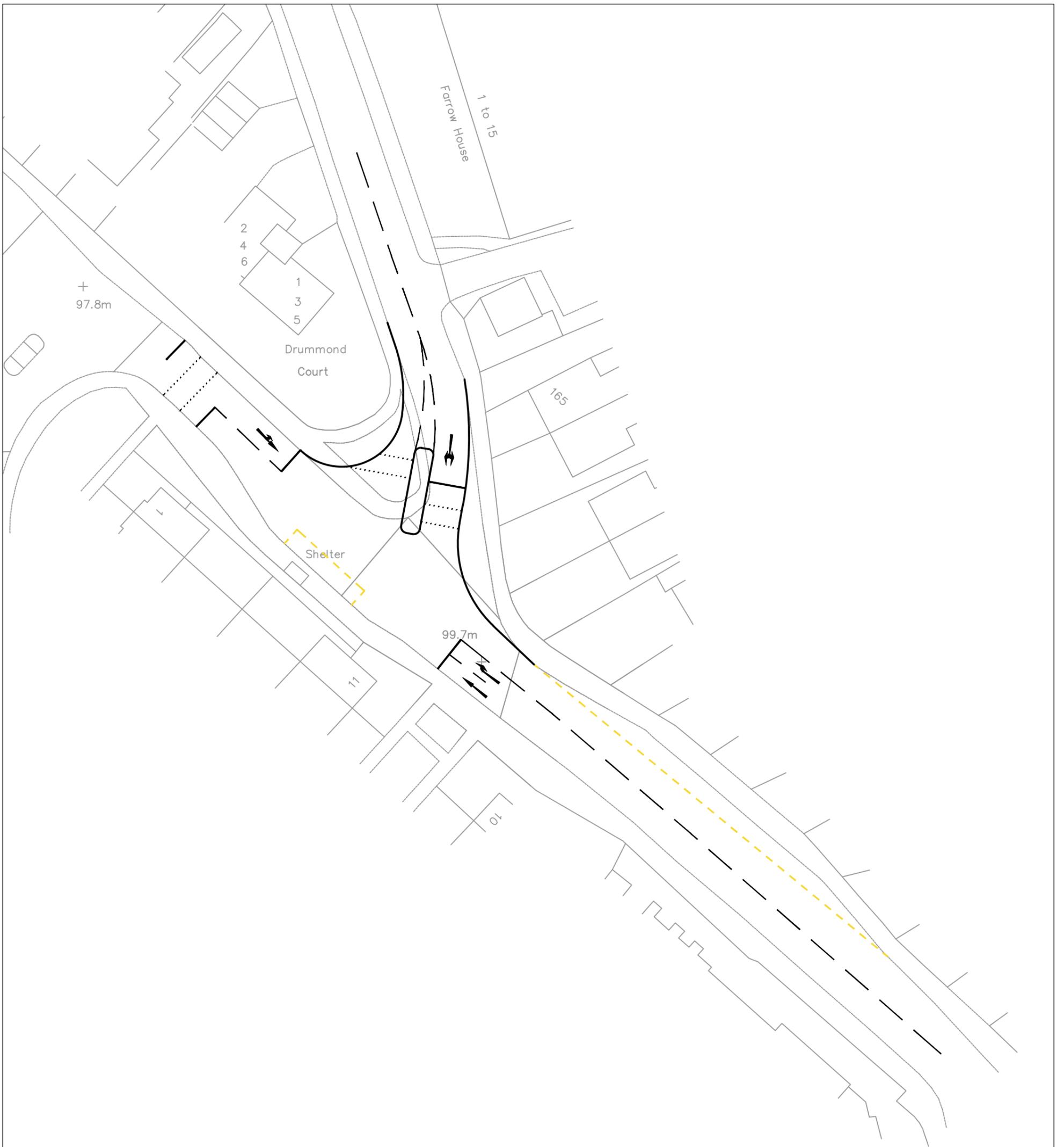
*“The Highway Authority has no objection to the principle of signalling the Ongar Road / Doddinghurst Road junction if it is shown to provide improved network performance;”*

*“The plan for off-street parking on Doddinghurst Road to provide a clearer highway is supported in principle;”*

A copy of the full ECC comments are included at **Appendix E** of this note.

## **APPENDICES**

### **A. Proposed Doddinghurst Road / Ongar Road Signalised Junction**



Rev	Date	Description	By
A01	06.02.19	ISSUED	DM
Amendments			



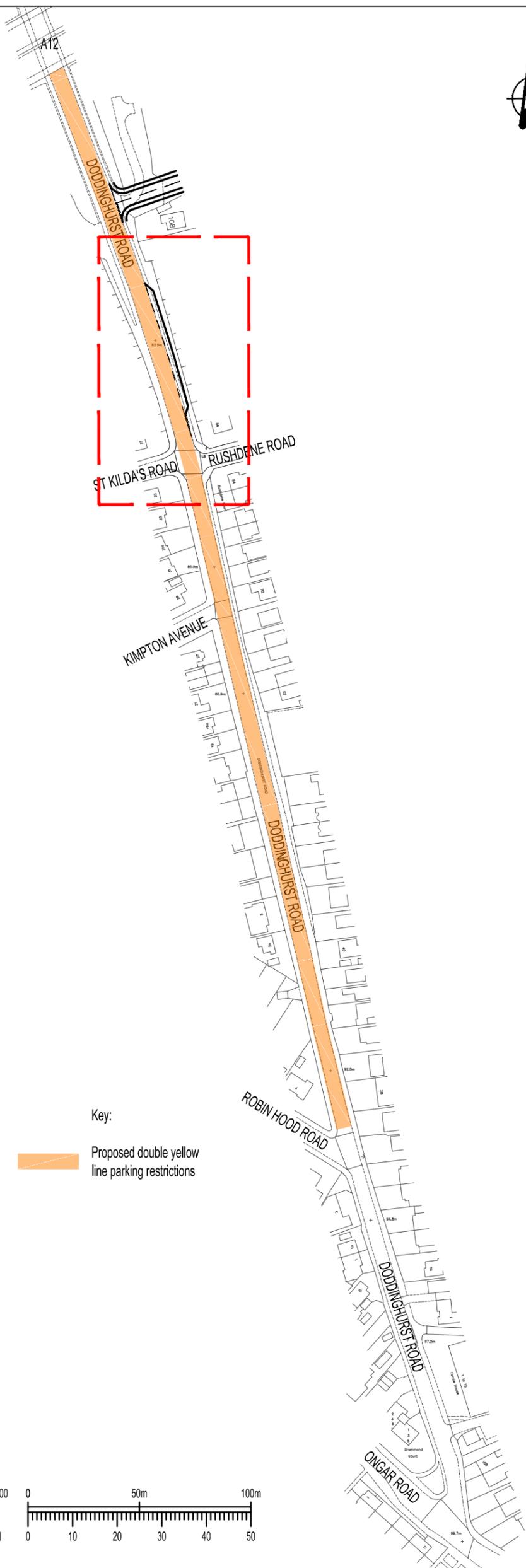
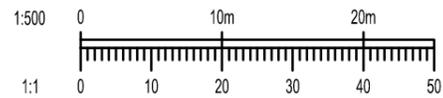
Pickfords Wharf Clink Street London SE1 9DG  
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 mail@watermangroup.com www.watermangroup.com

Project **Hopefield, Doddinghurst Road**  
 Title **Proposed Signalised Junction  
 Doddinghurst Road / Ongar Road  
 Indicative Layout**  
 Client **Tesco Stores Ltd**

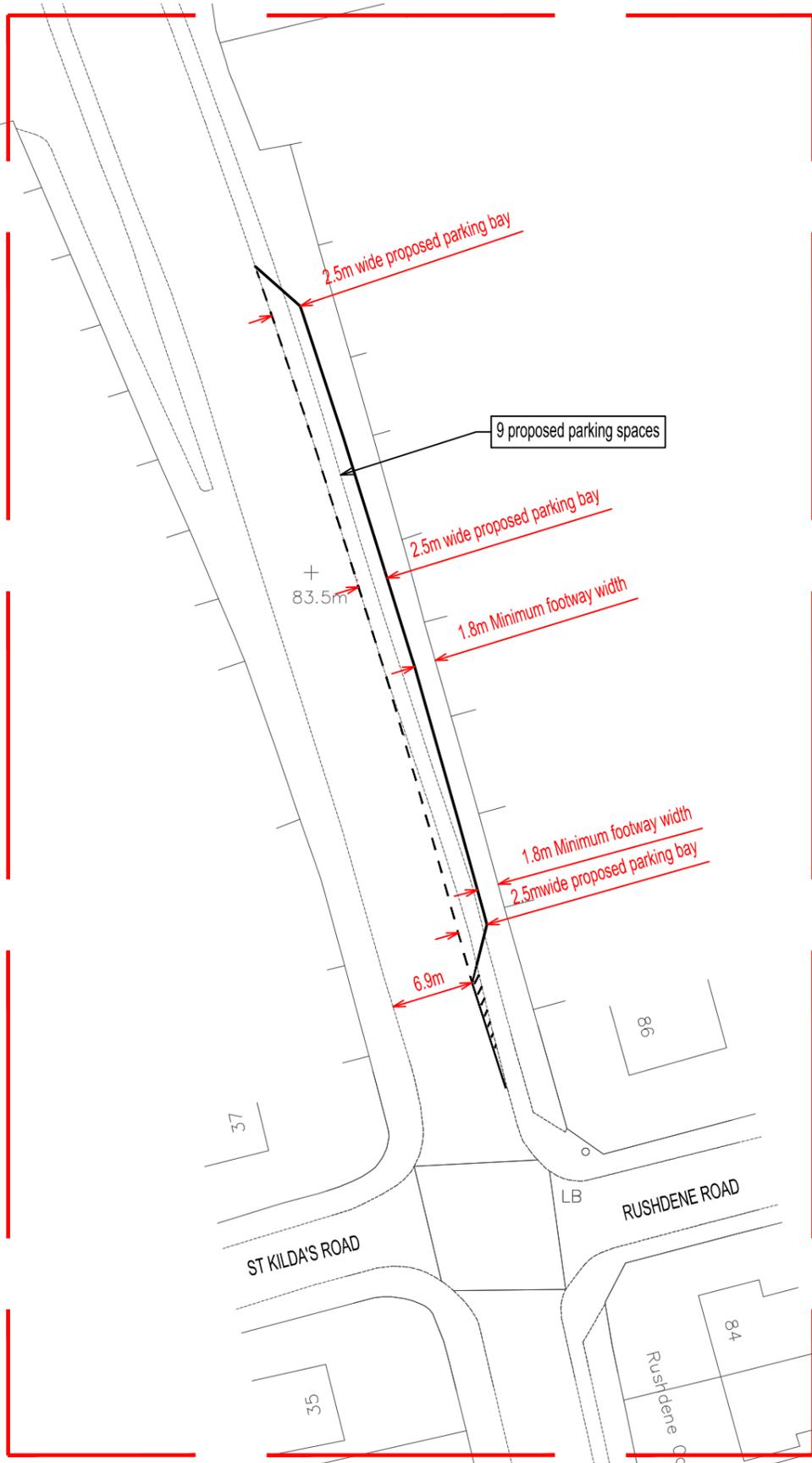
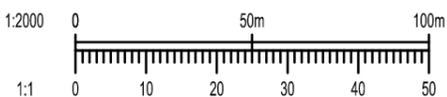
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Designed by	AMcD	Checked by	AMcD	Project No
Drawn by	DM	Date	February 2019	<b>CIV16973</b>
Scales @ A3 work to figured dimensions only			1:500	Computer File No CIV-16973-SA-95-0024-A01.dwg
Publisher	Zone	Category	Number	Revision
<b>CIV</b>	<b>SA</b>	<b>95</b>	<b>0024</b>	<b>A01</b>

## **B. Proposed Doddinghurst Road Improvements**

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Key:  
 Proposed double yellow line parking restrictions



Rev	Date	Description	By
A01	27.04.15	FIRST ISSUE	AJ

Amendments

Drawing Status  
**PRELIMINARY**

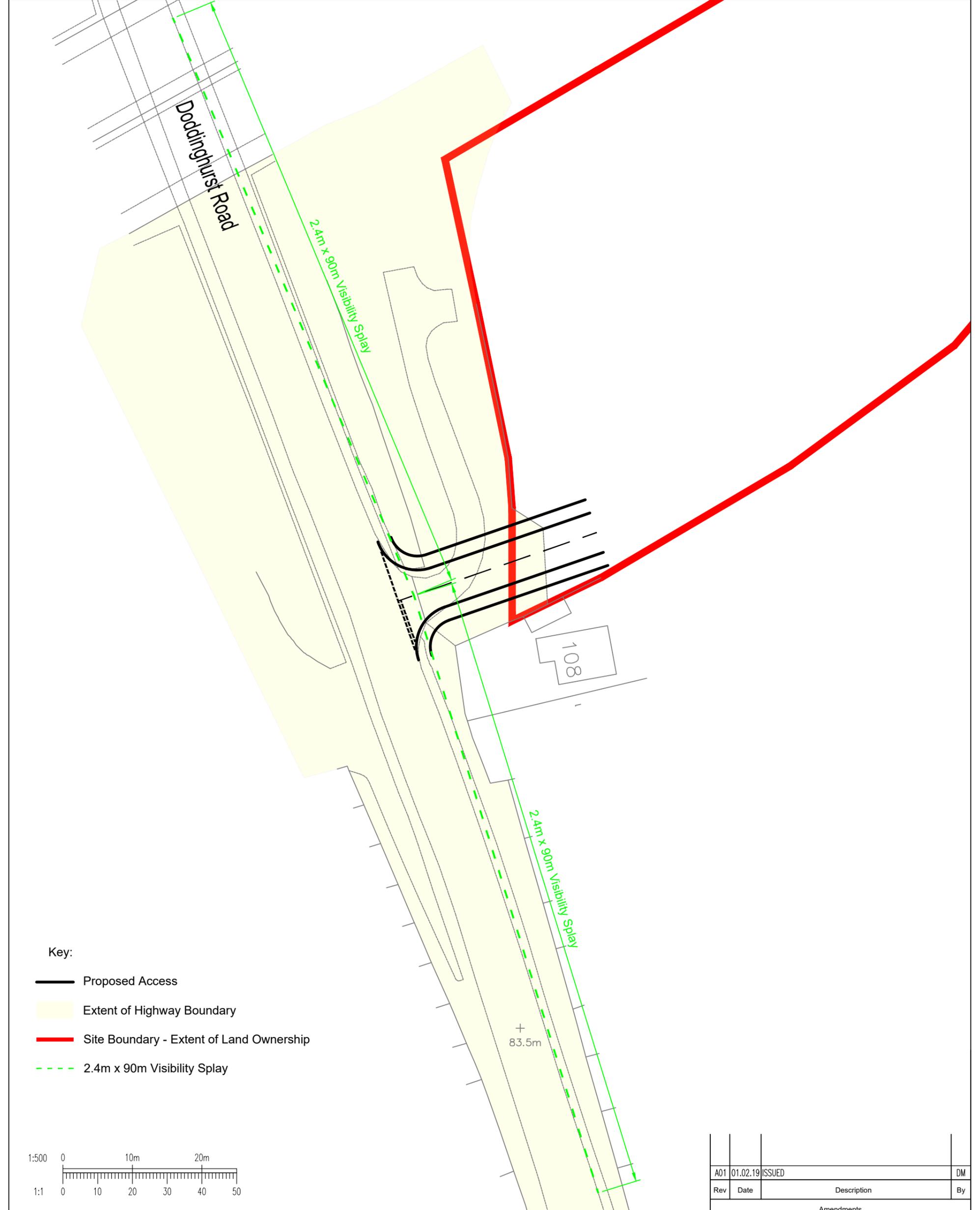
Designed by	Checked by	Project No		
Drawn by	Date	CIV16973		
Scalcs @ A3 work to figured dimensions only	1:2000 / 1:500	Computer File No CIV-16973-SA-95-0003-A01.dwg		
Publisher	Zone	Category	Number	Revision
CIV	SA	95	0003	A01



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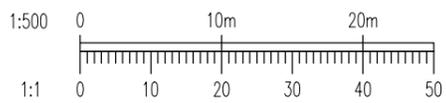
Project: **Sawyers Hall Farm**  
 Title: **Proposed Parking Layby and Parking Restrictions on Doddinghurst Road**  
 Client: **TESCO**

## **C. Proposed Site Access Arrangement**



**Key:**

- Proposed Access
- Extent of Highway Boundary
- Site Boundary - Extent of Land Ownership
- 2.4m x 90m Visibility Splay



A01	01.02.19	ISSUED	DM
Rev	Date	Description	By
Amendments			



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**Project**  
Land at Hopefield, Doddinghurst Road

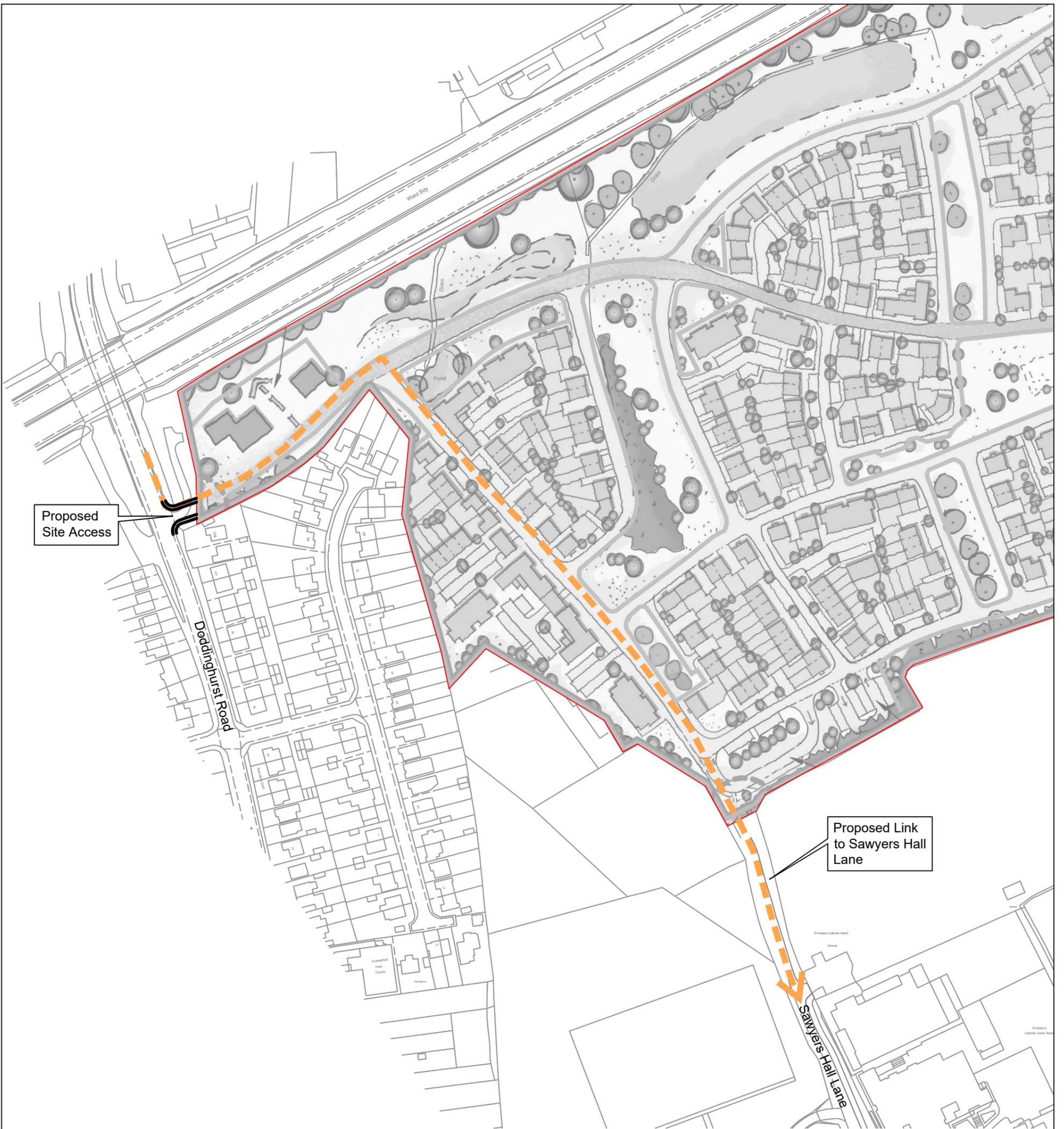
**Title**  
Doddinghurst Road  
Access Road Proposal  
Land Ownership Plan

**Client**  
Tesco

PRELIMINARY

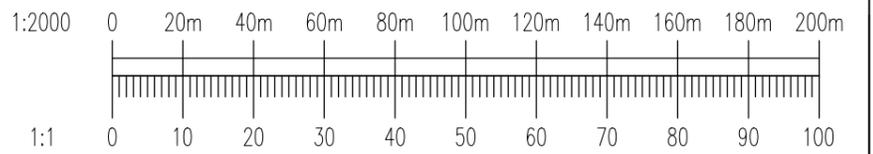
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Drawn by	DM	Date	February 2019	Computer File No	
Scales @ A3		1:500		CIV-16973-SA-95-0023-A01.dwg	
Publisher	Zone	Category	Number	Revision	
CIV	SA	95	0023	A01	

## **D. Proposed Pedestrian & Cycle Link**



Proposed Site Access

Proposed Link to Sawyers Hall Lane



Rev	Date	Description	By
A01	06.02.19	ISSUED	DM

Amendments				
Drawing Status				
<b>PRELIMINARY</b>				
Designed by	DM	Checked by	AMcD	Project No
Drawn by	DM	Date	February 2019	CIV16973
Scales @ A3		1:2000		
work to figured dimensions only		Computer File No		
		CIV-16973-SA-95-0025-A01.dwg		
Publisher	Zone	Category	Number	Revision
CIV	SA	95	0025	A01



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Project **Hopefield, Doddinghurst Road**

Title **Proposed Internal Pedestrian & Cycle Link Doddinghurst Road to Sawyers Hall Lane**

Client **Tesco Stores Ltd**

## **E. Essex County Council Highways Comments**

## Dave Martin

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**From:** Brendan Johnston, Strategic Development Engineer <Brendan.Johnston2@essex.gov.uk>  
**Sent:** 11 May 2018 14:48  
**To:** Andrew McDonald; Louise.ford@tesco.com; Jennie.bean@glhearn.com  
**Subject:** Hopefield, Doddinghurst Road, Brentwood

Andy / Louise / Jennie,

Nice to meet you last week and apologies for the slight delay in coming back to you with my notes from the meeting – due in part to awaiting feedback from highways colleagues.

I think it's easier if I provide a bullet point list of my comments which are obviously based on the submitted documents, what was discussed and other highways departments' comments. If you are unclear about any of them, feel free to ask;

- The main site access road should be 6.75m wide (not 6.0m) if it is to be served by buses with footways on each side – one should be 3.5m (to accommodate pedestrians and cycles) and one of a standard 2m;
- Given this is a new estate road, Highways would seek DMRB standards for visibility at site access on Doddinghurst Road, i.e. 4.5m x 90m (N.B. as discussed, it is my view that this should not cause a problem, but if it does, we may be able to consider a compromise);
- Indicative Masterplan has many crossroads-type junctions. This causes unnecessary points of conflict. Our preference would be for junctions to be more staggered;
- Road widths can vary within site, but should comply with updated Essex Design Guide street type table – March 2016;
- Public transport – need to provide infrastructure, i.e. bus stop facilities, to serve development;
- Pedestrian / cycle link with Sawyers Hall Lane is considered essential to encourage modal shift – the variety of initiatives are supported in principle by the Highway Authority;
- Improvements to Public Footpath 25 may be considered appropriate as it is a well-used route, especially by school children. This can be assessed as and when any firmer proposals are put forward;
- It needs to be demonstrated that the pick up / drop off plans within site won't compromise capacity of the site access junction;
- A full Transport Assessment will be required; the study area and capacity assessments should include Doddinghurst Road, Ongar Road, Wilsons Corner, Western Road, Weald Road & High Street. The TA will need to detail how the proposed development will not exacerbate current congestion issues, especially on Ongar Road;
- The Highway Authority has no objection to the principle of signalling the Ongar Road / Doddinghurst Road junction if it is shown to provide improved network performance;

- Parking – vehicle and cycle parking must comply with EPOA standards within the site (N.B. waiting restrictions will be necessary at pick-up / drop off point to ensure the area is not used by commuters);
- The plan for off-street parking on Doddinghurst Road to provide a clearer highway is supported in principle;
- A Green Travel Plan will be required as part of any planning application;
- Residential Travel Packs will be required for each dwelling.

Lastly, I should say that I am still trying to ascertain the source of the Sawyers Hall Lane traffic study that was mentioned in the meeting. I was under the impression that it may have been our Strategy and Engagement team, but am assured it wasn't them. I will continue to investigate and come back to you when I have further information.

I hope this has been helpful. As I mentioned, please come back to me if you need any clarification.

Kind regards,

Brendan

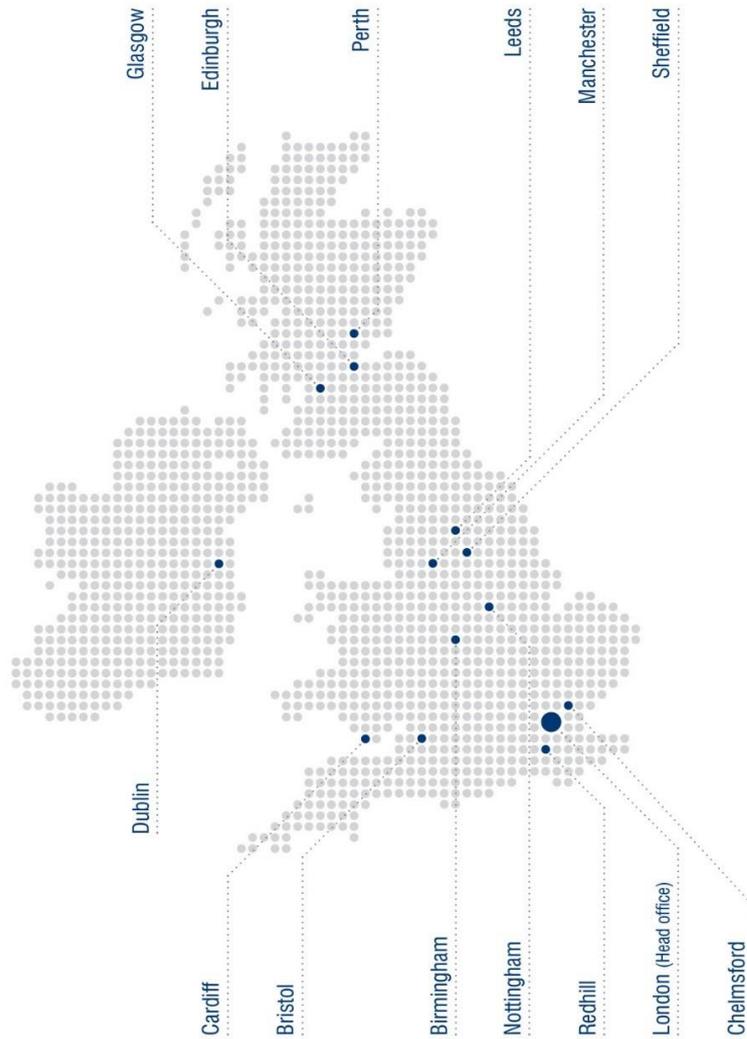
**Brendan Johnston**  
**Strategic Development Engineer**  
Transportation, Planning and Development  
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# UK and Ireland Office Locations



**APPENDIX E:** Concept Masterplan Report

SEE SEPARATE DOCUMENT

**APPENDIX F:** Landscape Assessment

SEE SEPARATE DOCUMENT

**APPENDIX G:** Accessibility / Connectivity Improvements Report

SEE SEPARATE DOCUMENT