

# **Brentwood Proposed Submission Local Plan (Regulation 19)**

**Representations made on behalf of Countryside Properties**

**Land at Doddinghurst Road (North & South of A12)**

**Site Reference: R16 & R17**

**March 2019**



Site Name:	Land at Doddinghurst Road
Client Name:	Countryside Properties
Type of Report:	Local Plan Representation
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## **1. Introduction**

- 1.1 These representations are submitted by Strutt & Parker on behalf of Countryside Properties (UK) Ltd in relation to the Brentwood Borough Council Proposed Submission Local Plan (Regulation 19) (PSLP), and in particular with regards to our clients land at Doddinghurst Road (North & South of the A12), which has been allocated under Policy R16 & 17 of the PSLP. A plan showing the site is provided as Appendix A to this representation.
- 1.2 Countryside was founded in Essex 60 years ago by Alan Cherry and has since established a reputation for delivering high quality developments. With the ethos 'creating places people love', Countryside's achievements are exemplified through having won more Housing Design Awards than any other house builder.
- 1.3 Countryside is a major development and place-maker, having secured planning permission and building out developments in varying scales: from smaller 30 dwelling schemes on the edge of village's through to large urban extensions of 3,500 new homes plus associated community facilities. Countryside has a proven track record of delivery. The company is headquartered in Brentwood and has a proud legacy of local sites such as Clements Park and the Square on Hart Street.
- 1.4 The representations set out Countryside's position in relation to the residential site allocation of R16 and R17, both parcels of which fall within their control. The proposed allocation provides for around 200 dwellings and is an important contribution towards BBC's land supply for Brentwood Borough's Draft Plan. The representations provide comments on the relevant policies relating to those interests in the Draft Plan.
- 1.5 As the Council will be aware, representations have previously been made on behalf of Countryside Properties and in respect of the two parcels of land, towards the Preferred Options Consultation in October 2013 and the Strategic Growth Options Consultation February 2015, and the Regulation 18 Local Plan in March 2018. As a result of these representations, and the discussions that have been held with officers at Brentwood Borough Council alongside the Local Plan process, the two parcels either side of the A12 at Doddinghurst Road have been proposed as a housing allocation within PSLP. From here, the two parcels of land are referred to as "the site", in respect of their joint allocation and policy.
- 1.6 Countryside's overall position is one of firm support for the PSLP and this is expressed where relevant in these representations, albeit with some overarching concerns, notably in relation to the elements of the Housing and Development Management Policies and the housing trajectory relating to the delivery of Policy R16 and R17 during the Plan period.
- 1.7 Where such concerns are raised, specific changes to the relevant polices are sought and these are indicated in the following representations in order to assist the Council to make the Plan more robust and improving its soundness in terms of being positively prepared, effective, justified and consistent with national policy.

- 1.8 Site 023A measures at approximately 5.99ha and Site 023B measures at approximately 2.2ha. The Council have defined the total net developable area of the two sites as 6.14ha. The site is currently designated as Green Belt in the adopted development plan.
- 1.9 The PSLP has recognised the sustainability of the site and enclosed character, and have therefore proposed it for removal from the Green Belt and for its allocation to provide housing. We support this allocation but do however have some concerns over other policies in the PSLP that may have implications for the efficient and timely delivery of this site.

## 2. Brentwood Local Plan Regulation 19 Consultation

### Housing Need

- 2.1. Paragraph 4.13 of the PSLP states that the Borough's housing requirement is 350 dwellings per annum. Paragraph 4.12 confirms that this figure is calculated using the Standard Method (as per the NPPF and respective Planning Practice Guidance(PPG)). We note that the PPG now confirms that the 2014-based subnational household projection should be used to calculate housing requirements using the Standard Method (Paragraph: 004 Reference ID: 2a-004-20190220).
- 2.2. On this basis, the relevant subnational population projections indicate an average annual increase of 293.2 households in the Borough between 2019 and 2029. The latest (2017) ratio of median house price to median gross annual workplace-based earnings for the Borough published by the ONS is 11.23. Once the Standard Method is applied using these figures this results in a requirement of 452 dwellings per annum.
- 2.3. The NPPF requires Local Plans to meet this need as a minimum, whilst also allowing sufficient flexibility to be able to respond to rapid change.
- 2.4. At paragraph 4.16 the PSLP considers it appropriate to apply a 20% uplift to the identified housing target of 350 dwellings per annum, resulting in a proposed target of 456 dwellings per annum. The rationale for this buffer is unclear with separate references to the buffer advising that it allows for an additional housing land supply to maintained, but also that it serves to safeguard against any potential uplift to the standard methodology for calculating housing need, pending the outcome of the Government's 'Technical consultation on updates to national planning policy and guidance'.
- 2.5. Despite the outcome of the technical consultation now having been confirmed, the proposed annual housing target of the PSLP only fractionally exceeds the minimum housing requirement derived from the Standard Method, and therefore does not provide any flexibility or Green Belt protection. Moreover, the figure does not allow provision for unmet need from neighbouring authorities in addition to the minimum requirement.
- 2.6. At 4.18 the PSLP confirms the Council have not been able to identify a five-year housing land supply to deliver the annualised requirement. Further to this, at 4.19 the PSLP confirms that there is a high proportion of designated Green Belt within the Borough, making it extremely difficult to achieve a five-year supply due to the fact that sites on the edge of settlements, currently within the Green Belt are not available for development purposes until the adoption of the Plan.
- 2.7. The Borough has a limited amount of previously developed land within its authority to provide for short term delivery, as such Green Belt release is required in order to meet the Authorities housing need and deliver within the short, medium and long term, as stated at paragraph 2.54 of the PSLP. The approach to amend the Green Belt boundaries is therefore supported.

- 2.8. Despite the outcome of the technical consultation now having been confirmed, the proposed annual housing target of the PSLP only fractionally exceeds the minimum housing requirement derived from the Standard Method, and therefore does not provide any flexibility, Green Belt protection or unmet need from neighbouring authorities in addition to the minimum requirement.
- 2.9. In respect of the above, whilst the current PSLP and associated housing allocations seek to go some way in delivering housing that will support the recognised needs of the Borough over the next 15 years, there is clearly a need to increase this provision. Whilst this could be helped through the identification of additional sites, ensuring the delivery and efficient use of the sites that are allocated for housing will also provide a degree of buffer. Further commentary and recommendations in this regard are provided later within this representation.

### Five-year Housing Land Supply and Housing Trajectory

- 2.10. The Council is required to demonstrate a five-year housing land supply at any point in the plan period (Paragraph: 038 Reference ID: 3-038-20180913).
- 2.11. The NPPF (Paragraph 73) confirms that a 20% buffer should be applied to the initial calculation for a five-year housing land supply requirement, in the event that the results of the Housing Delivery Test show that there has been significant under delivery of housing over the previous three years, to improve the prospect of achieving the planned supply. From November 2018, significant under delivery indicates that delivery was below 85% of the requirement for the Borough. The PPG (Paragraph: 037 Reference ID: 3-037-20180913) also confirms that the requirement for a 20% buffer also applies where a Local Planning Authority are seeking to confirm their five-year housing land supply through a recently adopted Local Plan.
- 2.12. The results of the 2018 Housing Delivery Test confirmed that Brentwood have delivered just 50% of the housing requirement over the last three years and this is therefore well below the threshold for the 20% buffer requirement.
- 2.13. The Borough's most recent reported five-year housing land supply (Five Year Housing Land Supply Statement as at 31 March 2018 (November 2018) ('HLSS') is 4.1 years. This is predicated on a requirement which, when considered in relation to the latest guidance, understates need; and a supply which, again when considered in relation to latest guidance, overstates supply. As such, the actual housing land supply is noticeably less.
- 2.14. Looking at this in detail, the HLSS considers an annual need of 343 dwellings, resulting in a total requirement once the 20% has been applied of 2,058 dwellings. However, applying the latest guidance and the Standard Method, the Borough's housing requirement is 452 dwellings per annum. Applying the 20% buffer, this results in a five-year requirement of 2,712 dwellings.
- 2.15. In terms of supply, the HLSS includes sites without detailed planning permission and without evidence such sites will be delivered within five years. As per the Glossary contained within Annex 2 of the NPPF, such sites cannot be considerable deliverable for the purposes of the

five-year housing land supply. Table 1 of the HLSS suggests that *at least* 1,042 dwellings in the reported supply did not have planning permission. Once these are removed from the supply calculation, the five-year supply comprises 653 dwellings. It is unclear if and how many of the dwellings categorised as having extant planning permission are on major sites which only benefit from outline permission. Such sites would also have to be discounted. As such, the figure of 653 dwellings may overstate housing supply.

- 2.16. A five-year supply of 653 dwellings compared to a requirement of 2,712 represents a 1.2-year housing land supply. This acute housing land supply shortage demonstrates the importance of allocating sites through the Local Plan which can deliver early in the plan period, and support the existing supply of housing. It also emphasises the need to avoid over-reliance on large strategic sites which inevitably take longer to deliver.
- 2.17. The housing trajectory provided as Appendix 1 to the PSLP projects that it will enable completion of 2,305 dwellings between 2019/20 and 2023/24.
- 2.18. Having regard to the Standard Method and the need to apply a 20% buffer to the housing requirement, the total five-year requirement for the Borough is 2,712 dwellings. Therefore, even before critical review of the supply, the PSLP will not provide a five-year supply of housing.
- 2.19. Furthermore, and in respect of the projected supply, we are concerned to note that Dunton Hills Garden Village is anticipated to deliver housing completions from 2022/23, falling within the first five years of the plan.
- 2.20. Dunton Hills Garden Village is a proposed major strategic development, intended to provide a new settlement supported by a range of facilities and infrastructure. Delivery will require the coordination and input of multiple landowners, developers, infrastructure providers and other stakeholders. Once allocated, the PSLP proposes a masterplan and design guidance will be required to be prepared to ensure that a cohesive approach is taken to the development of the Garden Village.
- 2.21. As such, it is a concern that 100 homes will be completed at Dunton Hills Garden Village as early as 2022/23. This does not in itself mean that Dunton Hills Garden Village proposals cannot form part of a sound Local Plan, but it does again demonstrate an inability to rely on large strategic sites for short term housing delivery, and emphasises the need for smaller sites to be supported by policies which will allow their short term delivery to ensure the Local Plan is sound.

#### **Policy R16 & R17: Land off Doddinghurst Road**

- 2.22. Policy R16 & R17 proposes the release of the site from the Green Belt and allocation for around 200 new homes. This approach is supported as an achievable and deliverable solution to contributing towards the Borough's housing land supply to meet the housing need requirement.



- 2.23. Having regard to the PSLP's housing trajectory, paragraph 9.160 the PSLP states the dwellings are anticipated to be delivered between 2023/24 and 2026/27. We do not support this assumption and object to the timing of the delivery of this site, as set out in the above mentioned paragraph and Appendix 1 of the PSLP. As the Council will be aware, representations have been made to earlier iterations of the emerging Local Plan to confirm the site is available, deliverable and achievable within the first five years of the plan period.
- 2.24. As currently proposed the trajectory is unsound in relation to this site, and as such is not justified. This is because the site can be delivered earlier than the stated timescales in Appendix 1 of the PSLP. In order to make the housing trajectory sound, amendments to the trajectory must be made to reflect the earlier delivery of the site in the plan period. The proposed amendments would result in a justified approach and a sound policy.
- 2.25. In addition to amending the housing trajectory to reflect the realistic and earlier delivery of the site, as proposed by a developer with an option on the land, the inclusion of the site within the first five years on the plan period will assist BBC with their five-year housing land supply position, not only assisting in housing delivery of the PSLP is effective and can be found sound at Examination.

#### Unit Numbers

- 2.26. Whilst we are supportive of the allocation, we raise concerns in relation to the wording of allocation policies such as Policy R16 & R17 should take this requirement for flexibility into account and worded as such to provide "at least 200 homes", as opposed to "around 200 homes". We consider that this would provide greater certainty on the number of homes to be delivered as part of each allocation for Brentwood Borough Council, and also allows for the delivery of additional units where appropriate opportunities may arise.
- 2.27. For sites R16 and R17, a significant amount of feasibility work has been undertaken to establish any site constraints, and as a result of this, Countryside are confident in the ability for the site to provide at least 250 homes. We have concerns that the respective policy's current format may be interpreted to confirm the optimum use of the site, rather than a lower limit. In fact, the 200-unit figure has been produced by Brentwood Borough Council with far less rationale and technical justification than has been undertaken by Countryside Properties and may lessen the ability of this site and other policies with similar wording to support Brentwood's need for a buffer and flexibility in their housing land supply.

#### Access

- 2.28. It is noted that there has been a change in wording of Part B (b) of Policy R16 & R17 from the November 2018 Proposed Submission Local Plan presented to Committee, and that now being consulted on (February 2019), with no explanation. The previous iteration of the policy required vehicular access to be provided from "Doddinghurst Road for both site and/or Karen Close and Russell Close". The current policy is worded to allow for vehicular access from Doddinghurst Road only.

- 2.29. Whilst access from Doddinghurst Road is accepted as the preferred strategy for all parties, initial appraisal work in this respect has recognised a potential requirement for significant levelling and land movement which could have implications on the viability of housing delivery on the site. It is therefore requested that the policy retains flexibility for the use of the other accesses from Karen Close and Russell Close as a worst case scenario, in the interests of protecting the deliverability of the southern parcel of the site, particularly as these routes of access have been previously agreed with Essex County Council Highways.

### Policy SP03 Health Impact Assessments

- 2.30. The Policy requires planning applications for developments of 50 or more to be dwellings, non-residential development of 1,000sqm or more or schemes for C2 class developments to be supported by HIAs. The HBF response to this policy is unsupportive and they consider the policy to be unsound as it is not consistent with national policy and is ineffective.
- 2.31. We are in agreement with the HBF's response, dated 17th March 2019, in relation to the requirement for HIAs to be provided for 50 or more dwellings and consider the requirement to be unnecessary and an additional burden on applicants. Referring to the PPG we note that HIAs may be useful tools, however the PPG also expresses the importance of the local plan needing to consider the wider health issues in an area and ensuring the policies respond to these concerns. The guidance is provided below for completeness.
- 2.32. Paragraph: 002 Reference ID: 53-002-20140306 confirms that provision of the required health infrastructure should be supported and taken into account at local and neighbourhood plan making, and when determining planning applications.
- 2.33. Referring to National policy, paragraph 20 states that Strategic Policies should set out an overall strategy for the pattern, scale and quality of development, this includes infrastructure and community facilities.
- 2.34. In order for the local plan to be consistent with national policy, the Local Plan should already consider the impact of development on the health and wellbeing of the communities and any identified infrastructure should be addressed in policy. Therefore, whilst Countryside support the important consideration of health and wellbeing of communities where development is in line with the policies contained within the development plan a HIA should not be necessary. The requirement for a HIA should only be triggered where there is a departure from the plan, enabling the Council to assess any impacts on the health and wellbeing of the community as a result of said proposals.

### Policy SP05 Construction Management

- 2.35. The Policy expects all major development schemes/developers to sign up to the Considerate Constructors Scheme, or equivalent. The scheme is a non-profit making, independent organisation which monitors construction sites signed up to the scheme, with the aim of managing and mitigating impacts arising from construction. This requirement is considered unjustified and inconsistent with national policy.

- 2.36. Whilst we recognise the importance of managing the potential impacts on construction sites, we consider this policy to be unsound because it is unjustified and not consistent with national policy. We would suggest that consideration for the scheme is best dealt with through planning applications and development management without it being written into formal planning policy.
- 2.37. We are not aware of any other adopted or emerging Local Plan which requires applicants and developers of major sites to enter into a specified construction management scheme and therefore question the reasonableness of this policy. The matter of construction management should be assessed on a case by case basis and should not be a matter for a strategic policy to prescribe. How a construction scheme is managed and mitigated should be an item for consideration by the decision taker and assessed on a case by case basis.
- 2.38. The imposition of Policy SP05 requires all major developments to be signed up to the Considerate Constructors Scheme regardless of the site or proposal details. It is recommended that this policy is removed.

#### Policy BE02 Sustainable Construction and Resource Efficiency

- 2.39. We consider the policy to be unsound as it is inconsistent with national policy. Part (f) of Policy BE02 requires the inclusion of renewable and decentralised energy as part of a new development, this is not consistent with national policy. Whilst Countryside recognise the importance of sustainable construction, a policy approach to such requirements does not allow for the appropriate flexibility in this regard, as recognised in the NPPF.
- 2.40. Paragraph 153 of the NPPF states that local plans can expect development to meet such provisions, however the NPPF also states that they are only required to comply with such policies where it is either feasible or viable. To ensure consistency with national policy part (f) of Policy BE02 should be amended to reflect this position.

#### Policy BE03 Carbon Reduction, Renewable Energy and Water Efficiency

- 2.41. It is Government policy to seek to deliver improvements to emissions from buildings through the building regulations regime. As such we do not consider it necessary to include the table at part (a) of this policy. Should a national zero carbon policy be introduced it will be achieved and applied through building regulations, as noted at paragraph 5.33.
- 2.42. We therefore echo those comments of the HBF's consultation response, dated 17th March 2019, and suggest that if the building regulations are updated then the Council should revisit the policy through a local plan review at that stage, but that such matters are dealt with through building regulations in the meantime to prevent unnecessary duplicate consideration of such matters through both planning and construction stages.

#### Policy BE04 Establishing Low Carbon and Renewable Energy Infrastructure Network

- 2.43. It is acknowledged that the Government support the transition to a low carbon future in a changing climate, including support towards renewable and low carbon energy and associated infrastructure. Countryside support these intentions.
- 2.44. Part (b) of Policy BE04 expects sites of over 500 dwellings, including where there are clusters of neighbouring sites that total over 500 units, shall incorporate decentralised energy infrastructure in line with a hierarchy however.
- 2.45. We raise concerns in relation to the deliverability of part (b) of the policy in relation to sites within a cluster of 500 or more dwellings given that neighbouring sites will not necessary come forward by multiple landowners and developers at similar times. The coordinating and implementation of a heat network to serve smaller scale sites as separate applications but adjacent to other similar sized sites in the locality, is unreasonable and unjustified and could result in a delay in delivery of new homes, resulting in an ineffective local plan.
- 2.46. It is recommended that the requirement for new development located where 'clusters' of neighbouring sites totals over 500 units should be removed from the policy in order to make the policy effective.

#### Policy BE10 Connecting New Developments to Digital Infrastructure

- 2.47. It is Government policy to support the expansion of electronic communications networks. However, we would draw the Council's attention to the Written Ministerial Statement, 25th March 2015, which announced that local planning authorities preparing Local Plans, "should not set any additional standards or requirements relating to the construction, internal layout or performance of new dwellings."
- 2.48. The Local Planning Authority are only allowed to adopt the three optional technical standards, in relation to construction, internal layout and performance, subject to evidenced need and viability. As such, the Council should not seek higher standards than Building Regulations, as already referred to in our response to Policy BE03. Therefore, Policy BE10 is considered unsound because it is unjustified and contrary to national policy.
- 2.49. We are also unaware of National Policy requiring benches and bins to be connected to mobile digital infrastructure. As such the policy is unjustified and contrary to national policy.
- 2.50. Countryside are committed to ensuring that all developments go as far as is practical to meet national intentions to ensure the quality, practicality and future-proofing of new housing developments. We have concerns however that by introducing a wealth of additional planning policies in these areas, there will be unnecessary duplication to building regulations, and potentially delays to planning applications which will in turn impact on the timely delivery of new homes.

### **3. Site Deliverability**

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

#### **Density Study**

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

#### **Air Quality**

- 3.9. An Air Quality Assessment was undertaken by Ardent Consulting Engineers in February 2017. The assessment reviews air quality constraints affecting the site.
- 3.10. The assessment concludes that it is unlikely that the proposed development will be considered high risk in terms of construction impacts. It also suggests that there has been a general improvement in local air quality over recent years which is evidenced by the monitored concentrations which are detailed within the report. Nevertheless, the assessment recommends that mitigation measures may need to be adopted as part of the development and be further considered in due course.
- 3.11. The assessment recommends that the impact of any potential increase in traffic flow on the local road network should be determined by way of a detailed air quality assessment.

3.12. Given the proximity of the A12, there is the potential for the introduction of a new exposure adjacent to the A12. This is dependent on the distance between individual units and the A12 which is to be addressed through careful design by the Architects.

### **Archaeology**

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

### **Desktop Noise Report**

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

### **Drainage Strategy**

- 3.21. A Drainage Strategy Technical Note was produced by Ardent Consulting Engineers in 2016. The note confirms that existing foul and surface water sewers navigate the site, together with a number of watercourses which will continue to serve the site, post development.

3.22. The report also confirms that the site is within Flood Zone 1 and is therefore suitable for residential development. The note suggests that subject to further investigation and detailed design, a Flood Risk Assessment and Detailed Drainage Strategy can be prepared to support a successful planning application for the development.

### **Phase 1 Habitat Survey**

3.23. A Phase 1 Habitat Survey was produced by SES in 2014. The survey concluded that the habitats on site have the potential to be of value to protected species, as well as being of general biodiversity value themselves. As a result, the Phase 1 Habitat Survey recommends that the following works are undertaken;

- Reptiles (presence/likely absence survey – northern site only);
- Badgers (monitoring of setts on site);
- Bats (tree inspection surveys, activity surveys);
- Breeding Bird (walkover survey during breeding bird season, generally March to August); and
- Invertebrates (walkover survey to establish value for rare and vulnerable beetles).

3.24. It is considered within the survey that any potential adverse impacts from the proposed development upon specific protected species will be able to be wholly mitigated for with careful design.

### **Social Infrastructure Review**

3.25. A Social Infrastructure Review was produced by Quod in February 2017. The review looked to provide an assessment of the likely impact of the development of the site on the demand for school places and healthcare provision.

3.26. The review confirms that based on average household sizes for the area, it is anticipated that the site could accommodate a resident population of approximately 600 people and generate demand for 68 primary school places and 45 secondary school places.

3.27. In line with this estimated growth, the review provides a summary of the education and healthcare provision within Brentwood.

3.28. The review states that although a number of existing primary schools in the Brentwood urban area are being expanded or are due to be expanded, Essex County Council is still expecting to be facing a deficit of places by 2020/21, with the Preferred Site Allocations Document stating that there is an estimated deficit of 541 places by 2021/2022 for Primary Schools. In terms of Secondary School Provision, the Preferred Site Allocations document states that there will be an estimated deficit of 9 places by 2021/22.

3.29. In terms of healthcare provision, the report confirms that the capacity to absorb additional demand arising from developments in the Brentwood Urban Area is limited. The Preferred

Site Allocations document confirms this and states that there is likely to be significant pressures on GP Surgeries due to housing growth in the Borough throughout the lifetime of the plan.

## **Transport**

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



## **4. Summary**

- 4.1. Countryside Properties generally support the plan, however alterations to the PSLP can enforce the soundness of the Plan ensuring it has been positively prepared, justified, effective and is consistent with national policy. The proposed allocation of land at Doddinghurst Road within the PSLP is supported. Countryside Properties do however raise concerns about the soundness of the Plan in relation to the approach taken to development management policies and timing of delivery of the sites proposed for allocation.
- 4.2. Policies mentioned above appear to be based on an idealistic approach which does account for different site constraints and flexibility in development management which would protect the Council's supply of housing and robustness of the PSLP.
- 4.3. The proposed amendment to the Appendix 1 of the PSLP in relation to the timing of delivery of the site allocated as Policy R16 and R17, and paragraph 9.160 will make the approach taken justified and consistent with National Policy. In addition to the housing trajectory the proposed alterations to the wording of Policy R16 & R17 will help to ensure that this policy is positively prepared and a justified approach for the site taking into account its recognised constraints ensuring development on the site is delivered and that Brentwood can therefore meet housing needs as planned. The proposed amendments will also allow for flexibility over unit numbers in the event that the site can support the recognised need for a greater buffer and flexibility towards housing delivery over the Plan period.

