



Brentwood Local Plan

Response to Schedule of Potential Main Modifications

Prepared on behalf of Countryside Properties (Respondent ID 250)

November 2021

1. Introduction

- 1.1. This representation on the Brentwood Local Plan (BLP) Schedule of Potential Main Modifications (SoPMM) is submitted by Strutt & Parker on behalf of Countryside Properties ('Countryside'; Respondent ID 250).
- 1.2. Countryside have engaged with the examination process throughout the plan preparation and the Hearing sessions. They have represented their interests in relation to sites at Doddinghurst Road (Allocation R16) and land north of Shenfield (Allocation R03).
- 1.3. For allocation R03, representations have also been prepared on behalf of the *Developer Group* for the site, for which a joint representation to the Main Modifications has been prepared by Barton Wilmore and which Countryside fully endorse those representations as a party to them. We encourage Officers to review those representations carefully in relation to the matters raised, which support the Modifications with some clarification and potential amendments with regards to highway (and other) infrastructure.
- 1.4. These representations concerns specific considerations on behalf of Countryside Properties in relation to their interests in the Brentwood Local Plan.
- 1.5. In summary, the Modifications are generally supported and we are keen for the Plan to be able to be adopted in order for the development demands of the Borough to begin to be met. In addition to the comments provided through the Joint Representation, we have specific concerns for policies R03 and R16 that we consider are capable of being resolved with alternative wording and seek to agree these with the Inspector through the Main Modifications.

2. Main Modification MM99 – Policy R16 Land off Doddinghurst Road

- 2.1. Modification 99 amends the allocation policy to refer only to R16 and not R17, combining them into a single allocation. This is supported and clarifies the extent of the allocation.
- 2.2. We partly support the amended wording for the Policy in relation to the expectations for the site, now listed under *‘Proposals Should’*. The amendments generally provide greater consistency with the approach to allocations throughout the BLP and greater clarity to a decision maker on the expectations from the development.
- 2.3. However, we highlight the concerns below.
- 2.4. Firstly, we are concerned that the amendments to Policy R16; 1(a) do not fully reflect the concerns raised and discussed in some detail through the examination sessions in respect of the access to the Site.
- 2.5. MM99 is proposed to be Modified to state that:
- ‘Proposals Should*
- a. *Provide vehicular access via Doddinghurst Road;*
- 2.6. Through the examination process Countryside have provided detailed comments on the need for greater flexibility on the access options for the site in order to ensure deliverability. Countryside’s preference is for vehicle access to be taken from Doddinghurst Road. However, there is no justification for a requirement to take access from that road, which would prohibit the use of alternative or additional accesses from Karen Close and/or Russell Close. Access from Doddinghurst Road may require levelling works and/or land movement that may impact on the effective development of the site. Other routes have been previously agreed with Essex County Council, as discussed at examination.
- 2.7. Given the need for the policy to be effective and to contain a degree of flexibility (as there are no policy or technical reasons to require access solely from Doddinghurst Road), alternative wording is recommended.
- 2.8. MM99 states that access ‘should’ be taken from Doddinghurst Road. We consider that the examination process highlighted the need for greater flexibility in the wording of this requirement and that ‘should’ could be read as ‘must’. We therefore recommend the following amendment:

Proposals should

a. *Provide vehicular access via Doddinghurst Road, Karen Close or Russell Close;*

- 2.9. Secondly, we would highlight our concerns regarding National Highways and infrastructure, as set out in the joint representations by the Developer Group. It is important that the Policy allows for a favourable determination of an application in good time, prior to the need for the proposed Local Plan Review to be concluded. We strongly recommend that this can be achieved through the proposed wording in the Development Group representations prepared by Barton Wilmore.
- 2.10. The Modifications to the policy are generally supported with the minor changes identified above in order to ensure prompt delivery of the site in accordance with the Plan.

3. Main Modification MM87 - Policy R03 Land North of Shenfield

- 3.1. Countryside have considered the proposed Modifications to Policy R03 and as set out in the Developer Group representations, showing general support for the policy but highlighting some minor concerns.
- 3.2. In addition to concerns raised as part of the joint response, Countryside have concerns regarding the provision of land for employment purposes within the allocation.
- 3.3. As presented in earlier representations and discussed at examination, we support the additional flexibility provided in terms of the quantum of land required within the allocation. However, we remain concerned that the restriction of Uses identified at R03, 1(d) is not justified.
- 3.4. The restriction to “light industrial, research and development (within Class E) or other sui generis employment uses which are compatible with the residential development”, could limit opportunities for other employment-generating uses suitable for this location. Further, it was presented that it would be illogical to suggest that sui generis employment generating uses are acceptable, but that employment-generating uses that fall into other categories are inherently unacceptable and should be restricted.
- 3.5. To resolve this, it is our suggestion that the term “sui generis” is removed from the policy. This would result in part e) of the policy reading as follows:
- d. around 2ha of land for employment purposes which may include light industrial, offices, research and development (within class E) or other employment uses which are compatible with the residential development*
- 3.6. We trust the above comments are helpful to the Inspector and we look forward to seeing the Plan progress to adoption.