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**From:** Mackay, Alison [REDACTED]  
**Sent:** 17 February 2015 14:17  
**To:** Planning Policy  
**Subject:** Representations on behalf of Countryside Properties to Strategic Growth Consultation  
**Attachments:** Representation on behalf of Countryside Properties to Strategic Growth Options 160215.pdf; Countryside Properties Completed Proforma.pdf

**Follow Up Flag:** Follow up  
**Flag Status:** Flagged

Dear Sir/Madam,

On behalf of our client, Countryside Properties, please find attached representations to the Brentwood Borough Local Plan Strategic Growth Options Consultation document.

I would be grateful if you could acknowledge receipt of this email and attachments in the first instance and continue to keep me up to date with the preparation of the plan.

Kind regards,

Alison

Alison Mackay BA (Hons) MSc MRTPI  
Senior Planner | Planning

[REDACTED]



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Comment No.	
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## Brentwood Borough Local Plan

# Strategic Growth Options Consultation

January 2015

### Consultation questionnaire

This consultation questionnaire relates to the Brentwood Local Plan Strategic Growth Options Consultation and is provided for you to make comments. Please take the opportunity to read the consultation document before filling in this form and returning to:

**Planning Policy Team, Brentwood Borough Council Town Hall, Brentwood, Essex, CM15 8AY**  
or by email to **planning.policy@brentwood.gov.uk**

Comments need to be received by 5pm on Tuesday 17 February 2015

If you need any help completing this form please contact the Planning Policy Team using the contact details given above or by telephoning 01277 312620.

### Personal Details

Title: <b>Ms</b>	First Name: <b>Alison</b>	Last Name: <b>Mackay</b>
Organisation (if applicable): <b>Colliers International</b>		
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### Questions

The Council is seeking responses on key issues. Focused questions appear in bold boxes throughout the Strategic Growth Options document. These questions are summarised in this consultation questionnaire. More information can be found at **[www.brentwood.gov.uk/localplan](http://www.brentwood.gov.uk/localplan)**.

Please use an additional sheet if necessary. Please note that all responses will be published online.



Q1: Do you agree with the broad areas, for the purpose of considering approaches to growth?

Yes  No

**Please refer to submission document**



Q2: Do you agree with the issues raised within each of these areas?

Yes  No

**Please refer to submission document**



Q3: Do you have any comments on the appropriateness of particular sites? Yes  No

**Please refer to submission document**



Q4: Given the greater capacity for growth along the A127 corridor, which of the sites put forward do you think is the best location for growth?

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Q5: Should the A12 corridor accommodate growth by releasing sites on the edge of urban areas?

Yes  No

**Please refer to submission document**



Q6: In order to provide for local need is it preferable for Greenfield sites on the edge of villages to be released, or to develop brownfield sites (both within the Green Belt)?

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Q7: To enable future employment need to be met do you agree that the most sustainable approach is to allocate new sites close to the strategic highway network?

Yes  No

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Q8: In order to ensure that the Town Centre remains economically sustainable, do you agree that a "Town Centre First" approach should be taken to retail development?

Yes  No

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Q9: Are there opportunities for more open space provision in the area where you live?

Yes  No



Q10: Please rate the level to which you value the landscape near where you live (on a scale of 1 to 5), as compared to other areas within Brentwood Borough, for the following aspects:

Aspect:	Very Low	Low	Average	High	Very High
Scenic Beauty / Attractiveness	1	2	3	4	5
Outdoor Recreation / Leisure Use	1	2	3	4	5
Wildlife Interest	1	2	3	4	5
Historic Interest	1	2	3	4	5
Tranquility	1	2	3	4	5
Other – please specify: .....	1	2	3	4	5



Q11: To what extent do you think the following are present in the landscape near where you live (on a scale of 1 to 4):

Aspect:	Absent	Occasional	Frequent	Predominant
Houses	1	2	3	4
Commercial / Industrial buildings	1	2	3	4
Nature Reserves / Wildlife	1	2	3	4
Farmland	1	2	3	4
Woodland	1	2	3	4
Degraded / Derelict / Waste land	1	2	3	4
Infrastructure (Road / Rail / Pylons etc.)	1	2	3	4
Leisure / Recreation Facilities	1	2	3	4
Other – please specify: .....	1	2	3	4



Q12: Have we considered the main infrastructure issues? Are there other important issues to consider?      Yes       No

**Please refer to submission document**



Q13: What do you think the priorities for infrastructure spending should be?

**Please refer to submission document**

**Thank you for taking the time to complete this questionnaire**

Please ensure that you return comments to the Council by 5pm on Tuesday 17 February 2015  
(see page 1 for details)

**BRENTWOOD LOCAL PLAN 2015-2030 STRATEGIC GROWTH OPTIONS CONSULTATION  
(JANUARY 2015)**

**REPRESENTATIONS SUBMITTED ON BEHALF OF COUNTRYSIDE PROPERTIES (UK) LTD  
IN RELATION TO LAND AT DODDINGHURST ROAD, BRENTWOOD**

**Introduction and Background to Representations**

Countryside Properties feels there are a number of issues surrounding the overarching approach to growth which need to be addressed. Countryside wishes to continue to engage with the Council as the Local Development Plan develops.

Land at Doddinghurst Road (either side of A12), Brentwood has been promoted for development by Countryside and the landowner throughout the preparation of the Plan and the site has been recognised within the Council's Strategic Housing Land Availability Assessment as being suitable, available and achievable for development. The Council's SHLAA assessment notes that the site is located adjacent the existing settlement boundary, within close proximity to a number of services and facilities and would present a good infill development capable of accommodating 216 dwellings, with the Draft Site Assessment indicating it has capacity for 288 dwellings. The SHLAA also identifies that the site is within a single ownership with no identified abnormal build costs and the detailed design of the scheme could accommodate any screening/buffer in relation to the A12 which crosses the site.

Countryside has undertaken considerable technical work on the site and can demonstrate that the site continues to be a suitable location for development with no constraints to bringing forward development. In particular Countryside can demonstrate that the site no longer serves a Green Belt function and that noise and air quality issues can be overcome. Countryside therefore considers that land at Doddinghurst Road can provide a medium scale development opportunity that can contribute to housing supply within the early part of the plan.

Notwithstanding the above, Countryside does have some concerns in respect of the consultation. A key issue is that the plan is not supported by a robust, up to date evidence base as required by the National Planning Policy Framework and that the plan is advancing in advance of the evidence base. The consultation document refers to a number of technical studies that are predominantly described as 'forthcoming'. These include evidence on the following key matters: economic, housing, environmental, transport, leisure and facilities, and renewable energy. For instance, the publication of the Objectively Assessed Housing Needs for Brentwood – Moving towards a Housing Target, less than a week before the end of the consultation period, has meant that there has been insufficient time to comment on an important element in producing a 'sound' plan and as such Countryside reserves the right to respond to this in due course particularly given the shortcomings of the paper.

### Overall level of growth proposed

The National Planning Policy Framework and supporting Planning Practice Guidance requires local planning authorities to boost significantly the supply of housing and in doing so use their evidence to ensure that their Local Plan meets the full, objectively assessed needs (OAN) for market and affordable housing in the housing market area including identifying key sites which are critical to the delivery of the housing strategy over the plan period. We consider that the evidence base remains incomplete and out of date in certain respects which raises questions over whether the level of growth proposed is compliant with the NPPF. Key omissions include the absence of an up to date SHMA and the reliance on population projections contained in the now superseded version of the Greater Essex Demographic Forecasts Study (Phase 6) published in September 2014. Another key issue is the lack of reference to the implications of Crossrail on housing need in Brentwood.

### Five year housing supply

The Council is unable to demonstrate a 5 year supply of deliverable sites. This will need to be addressed as soon as practicable and Countryside believes that land at Doddinghurst Road would complement the release of land for strategic development, preferably through an extension to the east of West Horndon.

## **Chapter 1: Introduction**

As outlined above Countryside has a number of concerns regarding the Council's view that 5,500 units over the plan period, approximately 366 per annum, is the true OAN for Brentwood. Countryside notes the publication of the Council's OAN paper was delayed until 3 days before the closure of the current consultation. There has been insufficient time to comment on this and as such Countryside reserves the right to respond to this in due course particularly given the shortcomings of the paper.

In addition, Countryside does not consider this figure to represent the true OAN as it not based on an up to date assessment of housing need. Of particular note is the absence of an up to date SHMA and that the population projections are not based on the most recent projections set out in the Greater Essex Demographic Study. Furthermore, the proposed housing figure has not been adjusted to take into account other market considerations, such as affordability. The approach taken is not currently justified, effective or consistent with the NPPF, undertaking consultation exercises without making available key technical studies is against the direction of national planning policy (Para 158 of the NPPF) and guidance (Para 014 of the NPPG).



The plan period will see the construction and opening of Crossrail which will improve access to London. The omission of any evidence base studies that takes into account the impact that Crossrail will have on the Borough is a significant flaw in the approach taken to prepare the Plan. The introduction of Crossrail means that much of the urban area of the Borough will be in the direct travel to work range for central London and the OAN needs to demonstrate that the effects of this significant change have been taken into account.

The Planning Practice Guidance makes it clear that population projections are a starting point only and sets out the housing figures need to take into account other measures of need. The Council needs to adjust the housing figures to address the need for affordable housing, other market factors and the need to reflect economic projections and the implications of Crossrail. Finally, the Council needs to take into account any unmet needs from adjoining authorities.

The Inspector's Report relating to the Further Alterations to the London Plan (18 November 2014) examination also makes it clear that whilst there are evident reasons as to why the GLA may be unable to meet its growing needs within its own boundary, it should look to neighbouring local authorities, such as Brentwood, to help meet this shortfall through the duty to cooperate. There is no evidence that the OAN has looked at the effects of meeting this need, but given the date of the report it is considered unlikely.

It is acknowledged that the Council recognises the need to use Green Belt land in order meet the future planned housing growth levels and it is our view that this can only be undertaken through a borough-wide review of the Green Belt to allow for the release of land. This would allow for sites located in sustainable locations adjacent to existing settlement boundaries, which no longer have a Green Belt function, to be released in a plan-led way. There is also a clear need to fully review and provide realistic development densities for those currently identified brownfield sites, as figures could be further reduced by issues of individual site deliverability, in order for the conclusions to be factored into the newly defined Green Belt boundary and as per the requirements of Paragraph 85 of the NPPF.

In order to meet the required growth levels and deliver the strategic objectives of the Plan, Brentwood should provide a location for development of appropriate scale in those locations where it can be demonstrated that the area no longer provides a strong Green Belt function. This reflects the role of Brentwood as a sustainable location for growth given its existing transport links, social infrastructure, access to jobs and service, together with the introduction of Crossrail in 2018. This approach requires the allocation of greenfield sites, currently designated as Green Belt land, in the form of small scale urban extensions.

## **Chapter 2: Managing Growth**

Q1: Do you agree with the three broad areas, for the purpose of considering approaches to growth?

Q2: Do you agree with the issues raised for each of these three areas?

The area defined as the 'North of the Borough' comprises a number of small villages which although could accommodate a limited degree of growth, through smaller scale extensions to existing villages, Countryside considers that this option could be dismissed as it is unable to provide for the level of growth set out in the consultation document. There does not appear to be sufficient sites in this area to be a credible option for the plan.

The NPPF requires the Council to maintain a five year supply of specific deliverable housing sites on a rolling basis. In order to accommodate the level of required growth, the Strategic Growth Options document seeks a site for large scale growth, however, it will also be important to ensure that a sufficient range of smaller urban extension sites are allocated in addition to the strategic allocation. The reason for this is that larger sites can take longer to come forward and once started can only support the delivery of a limited number of dwellings per year. The allocations of a range of smaller sites will help to ensure that this does not pose a threat to the Council's rolling five year land supply.

## **Chapter 3: Sustainable Communities**

Q3: Do you have any comments on the appropriateness of particular sites?

Q5: Should the A12 Corridor accommodate growth by releasing sites on the edge of urban areas?

It is our view that the A12 Corridor provides a sustainable location to deliver housing development over the plan period. However, it is recognised that strategic scale housing release is best provided through an urban extension to the east of West Horndon . Development along the A12 corridor should be focused on those locations that no longer perform a strong Green Belt function such as the land at Doddinghurst Road and Bayleys Mead.

Land at Doddinghurst Road (either side of A12), reference site 023, is capable of fulfilling the role of a smaller scale urban expansion to Brentwood, one that would be a logical extension to the existing urban area without encroaching into the countryside beyond well-defined and defensible boundaries. The combined site comprises approximately 7.2 ha of land adjacent to the settlement boundary of Brentwood (as shown in Figure 1) and offers the ability to deliver 230-250 dwellings together with associated amenity and open space. It is bounded on all sides either by residential development (north, south, west and south east) with commercial leisure to the north east. The site is therefore divorced from the open countryside and is also bisected by the A12.

Importantly it is within a single ownership with no known constraints to its deliverability and is developable within the first 5 years of the plan period.

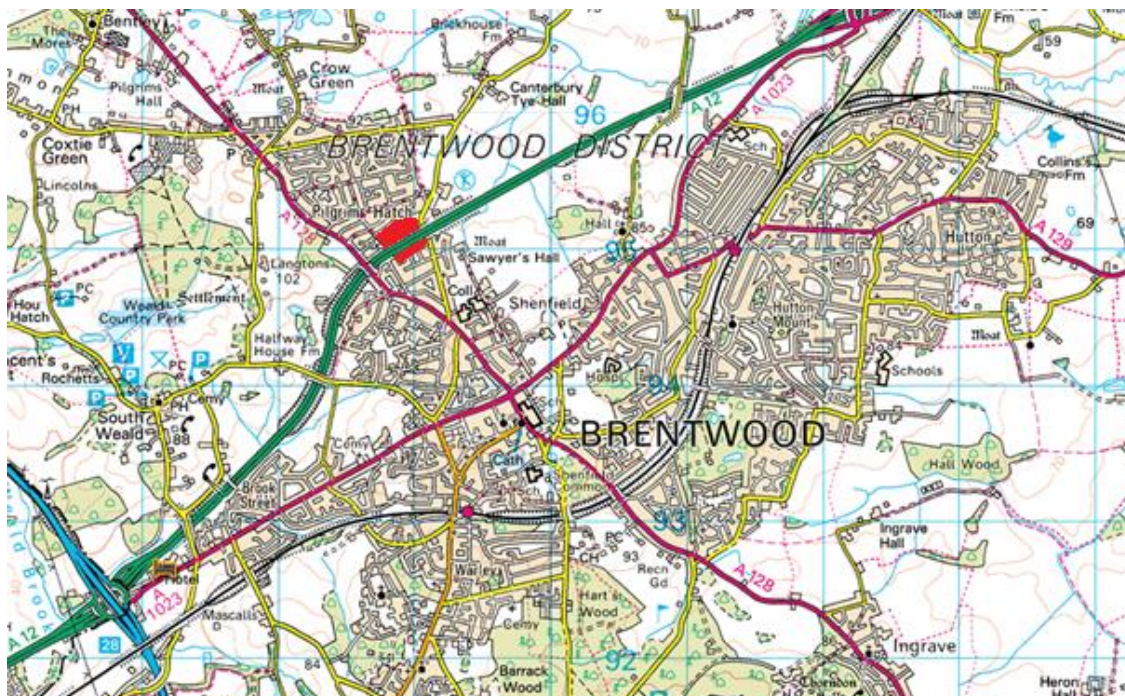


Figure 1: Location Plan of land at Doddinghurst Road (either side of A12), Brentwood

The site has been included and assessed in the SHLAA (October 2011) as suitable, available and achievable, determining that the site is deliverable in the first 5 years of the plan period. The SHLAA assessment notes that the site is located adjacent the existing settlement boundary, within close proximity to a number of services and facilities and would present a good infill development capable of accommodating 216 dwellings. The site is within a single ownership with no identified abnormal build costs and the detailed design of the scheme could accommodate any screening/buffer in relation to the A12 which crosses the site.

Countryside has undertaken detailed assessments of the site to demonstrate its suitability, deliverability and appropriateness for development; the results of which are summarised below:

#### Green Belt Function Assessment

Countryside has commissioned the Landscape Partnership to undertake a Landscape and Green Belt Appraisal of the site to ascertain the role that this land has in meeting the five purposes of the Green Belt. The assessment made the following conclusions:

*Function 1: To check the unrestricted sprawl of large built-up areas*

Very Minor role - The site plays no role in preventing sprawl from London and a very minor role in preventing sprawl from Brentwood. It is contained on three sides by the existing built edge of Brentwood and on the fourth side by the Doddinghurst Road. It is not connected to an existing area of ribbon development and development of the site would not lead to sprawl or new ribbon development. The current boundary between the existing urban edge and the Green Belt is not marked by a significant natural or physical boundary but Doddinghurst Road would provide a new permanent and well-defined boundary to the Green Belt.

*Function 2: To prevent neighbouring towns from merging into one another*

Insignificant role - The existing relationship between Brentwood and the neighbouring towns would not be affected if the site were developed as the site does not provide, or form part of, a significant gap or space between Brentwood and these towns and development of the site would not compromise the separation of these settlements in physical or visual terms.

*Function 3: To assist in safeguarding the countryside from encroachment*

Minor role - Although the site could currently be considered as countryside as each part of the site is currently undeveloped and 'open' the site is overlooked by existing urban development and the site as a whole is bisected by the A12. The existing land uses of horse grazing on the northern parcel and recently cleared unused scrublands on the southern parcel, are typically urban fringe uses.

The site is included within the local landscape character area assessment (Doddinghurst Wooded Farmland) but displays few of the characteristics of the local character area. It is considered that the site does not have a strong rural or countryside character and therefore does not play a significant role in safeguarding the countryside from encroachment.

*Function 4: To preserve the setting and special character of historic towns*

Insignificant role - The nearest historic towns (identified as Conservation Areas) to the site is Brentwood town centre 1.25km to the south but there is no physical or visual relationship between the site and these historic areas and the site does not play a significant role in the setting of these areas.

*Function 5: To assist in urban regeneration, by encouraging the recycling of derelict and other urban land*

Insignificant role - The Council's SHLAA identifies brownfield land within Brentwood with development potential. All the sites within or close to Brentwood town are significantly smaller than the Doddinghurst Road site and would only be capable of delivering small scale development

opportunities. Even if all brownfield sites with development potential were to come forward for development, then this would be insufficient to meet the local housing needs. It is therefore considered that the current and future use of the site would not affect the ability and likelihood of the recycling of derelict and other brownfield land.

Therefore, the site makes a very minor contribution to the functioning of the Green Belt in the Borough due to its very minor role in contributing to function 1, 2 and 3 above. As noted above in function 3 it is considered that the site does not have a strong countryside character. In addition, Doddinghurst Road, running along the eastern site boundary would provide for a clear long term defensible Green Belt boundary for Brentwood. It is considered that the site as a whole does not make a significant contribution to the performing the Green Belt functions as set out in the NPPF and the local function as set out in the adopted Local Plan; Development of the site could be accommodated without significantly adversely affecting the future performance of the Green Belt in the area.

#### Landscape and visual impact

The Landscape Character Assessment (2006) includes the site within 'F8 Doddinghurst Wooded Farmland' which identifies that the presence of the A12 disrupts the landscapes key characteristic of tranquillity, becoming less rural in nature in this location.

#### Accessibility and Infrastructure

The site is well located to the existing urban area and benefits from good access to public transport; approximately 1.4m from a train station and 3 no. bus services (routes 73, 73A, 261 and 657) along Doddinghurst Road to the east of the site.

The site is also located close to established services and community facilities, with the nearest shopping parade positioned on Ongar Road (0.5m), nearest GP (0.6m), together with a number of Primary Schools and a Secondary School. The nearest employment site is located approximately 0.6m from the site, with Brentwood Town Centre approximately 1m to the south of the site.

#### Transport and Access

Countryside have commissioned Odyssey Markides to advise on transportation and access related matters for the site. The technical assessment demonstrates that a safe and suitable access for the northern parcel development can be provided along Doddinghurst Road, further access points are also available from two points on Viking Way. It follows on to state that there is sufficient frontage to accommodate the necessary junction and associated visibility splays to serve the development. The technical note also demonstrates that even with future year scenarios the junctions in the nearby area continue to operate well within capacity.

The assessment concludes that secondary access can be taken from Russell Close and Karen Close to serve the development to the south. Russell Close and Karen Close can accommodate the additional traffic flow, even with on-street car parking, and the existing Doddinghurst Road/St Kilda's Road junction would also continue to operate within capacity.

In addition, the impact of the construction phase on residents of the roads linking with the development has also been taken into consideration and a construction traffic management plan, including routing strategy, will be included to minimise any impact.

### Ecology

Countryside commissioned Southern Ecological Services Solutions to prepare an Extended Phase 1 Habitat Survey of the site. This provided an initial assessment of the site and further detailed work is required, however, it concluded that there is no ecological reason not to develop the site.

### Archaeological Assessment

CgMs Limited were commissioned by Countryside to undertake a detailed Archaeological Desk Based Assessment of the land parcels. This established that the site does not lie within an area of archaeological priority as designated by Brentwood Borough Council and that the site can be considered to have only a modest potential for the later prehistoric.

### Noise

Countryside instructed Ardent Engineering Limited to undertake a Noise Assessment of the site, in light of its close proximity to the A12. The assessment concluded that there are no noise constraints of such significance that would restrict development of the site and a number of suitable mitigate measures can be incorporated into a residential proposal.

### Air Quality

Ardent Engineering Limited was also commissioned by Countryside to advise on air quality matters. The findings of initial assessment show that there are no air quality constraints of such significance that would prevent development of the site. The site falls outside of any Air Quality Management Areas (AQMA), although it is recognised that two AQMAs have been declared within close proximity and are located along the A12. Therefore, further monitoring of the air quality will be undertaken and taken into consideration during the scheme preparation and suitable mitigation measures exist to overcome any impact that may exist.

The extensive technical work undertaken by Countryside establishes that land at Doddinghurst Road (either side of A12) is suitable for development and is a sustainable location for Green Belt release to accommodate medium scale housing development..

### About the Proposal

A preliminary masterplan has been prepared (Figure 1) which takes into consideration the site's opportunities and constraints, as advised by the conclusions of baseline studies. It is proposed to provide residential development on both the northern and southern parcels of land. The northern parcel can accommodate a higher proportion than the southern and development will be landscaped so as to be sensitive to its wider Green Belt surroundings. It is proposed to deliver traditional style units, designed to Countryside's high standard, with a mix of type and tenure. The allocation of this greenfield site for residential development would also allow for the delivery of on-site affordable housing.

The site is deliverable within the beginning of the plan period. The site should be defined as a housing allocation in the Local Plan for 230-250 dwellings. The failure of the Local Plan to reflect the Site Assessment and SHLAA assessments with an allocation of the site will reduce the provision of housing in the borough in the short, medium and long term.



Figure 2: Indicative layout of site at Doddinghurst Road (either side of A12), Brentwood

Countryside has provide the above for illustrative purposes only and welcomes the opportunity to discuss this with the Council to ensure that a shared vision for the site is developed and delivered.

## **Chapter 6: Quality of Life and Community Infrastructure**

Q12: Have we considered the main infrastructure issues? Are there other important issues to consider?

Q13: What do you think the priorities for infrastructure spending should be?

There is a clear need for the housing strategy to both ensure that it meets the OAN and for the provision strategy to acknowledge and respect the changes to the local housing market which will follow the opening of Crossrail. Infrastructure spending needs to ensure that the stations at Brentwood and Shenfield can adequately serve the increased accessibility created by the investment in the provision of that infrastructure.

## **Conclusion**

In order to meet the OAN for the plan period (2015-2030), it is appropriate for growth to be directed to Brentwood. A review of the Green Belt boundary with the aim to release greenfield sites that abut the town of Brentwood should be undertaken, in order to accommodate the full OAN for housing. Our client's land at Doddinghurst Road (either side of A12), capable of accommodating 230-250 dwellings, provides the opportunity to deliver market and affordable housing in the short term.

The site is located within a highly sustainable location, providing the ability to accommodate a small scale urban expansion and the land is within a single ownership with no known constraints to its deliverability. It is developable within the first 5 years of the plan period and should be defined as a strategic housing use allocation in the Local Plan for approximately 230-250 dwellings.

As mentioned previously Countryside notes the publication of the Council's OAN paper was delayed until 3 days before the closure of the current consultation. There has been insufficient time to comment on this and as such Countryside reserves the right to respond to this in due course particularly given the shortcomings of the paper.