

**SITE PLAN ATTACHED**

**1-2 SEVEN ARCHES ROAD BRENTWOOD ESSEX CM14 4JG**

**DEMOLITION OF EXISTING BUILDING AND REDEVELOPMENT TO PROVIDE 11 RESIDENTIAL FLATS (CLASS C3) ANCILLARY RESIDENTIAL AMENITY, CAR & CYCLE PARKING AND ASSOCIATED INFRASTRUCTURE.**

**APPLICATION NO: 20/01802/FUL**

<b>WARD</b>	Brentwood South	<b>8/13 WEEK DATE</b>	8 March 2021
<b>PARISH</b>		<b>POLICIES</b>	
<b>CASE OFFICER</b>	Ms Tessa Outram	01277 312500	
<b>Drawing no(s) relevant to this decision:</b>	153762-STL-P-101; 153762-STL-P-105A; 53762-STL-P-110B; 53762-STL-P-115C; 153762-STL-P-120C; 53762-STL-P-121C; 153762-STL-P-130C; 153762-STL-P-140C; 53762-STL-P-150C; CONTAMINATION REPORT BY ENZYGO GEOENVIRONMENTAL LTD;		

**1. Proposals**

Planning permission is sought for the demolition of a part two storey part single storey range of buildings at 1-2 Seven Arches formally used as a registry office and temporary council offices during the Town Hall redevelopment. Following the completion of the Town Hall redevelopment, the building is now redundant and remains vacant. This proposal seeks to redevelop the site to include the construction of a replacement three storey building comprising a mix of 11 one and two bed residential units (9 x 2 bed and 2 x 1 bed), together with associated vehicle and cycle parking, amenity provision, landscaping and refuse storage.

The application site is located within a prominent location fronting the junction of Seven Arches / Ingrave Road (A218), directly adjacent to Brentwood Town Hall and shares the same access via Seven Arches Road. The site extends to approximately 0.1 hectares, the existing substation to the rear is outside of the site boundary and is to be retained.

The application site is located within close proximity of Brentwood Town Centre on the edge of the geographic scope of the recently adopted Town Centre Design Guide (TCDG), which is an SPD document that supports the Local Development Plan. It is

outside of the Town Centre Conservation Area and not within proximity of any listed buildings.

The application is submitted to Brentwood Borough Council on behalf of Brentwood Development Partnership (the applicant) which is a joint venture between Morgan Sindall Investments Limited (MSIL) and Seven Arches Investment Limited (SAIL). A linked application has been submitted at Maple Close (application ref: 20/01809/FUL) for the construction of 9 residential units and a replacement community hall. The Maple Close development will act as the affordable housing donor site for the 1-2 Seven Arches Road development, which will be detailed further in the report below. The applications should therefore be considered in tandem, since they are independent on meeting compliance for affordable housing requirements.

## **2. Policy Context**

Brentwood Replacement Local Plan 2005

Policy CP1 General Development Criteria

Policy C5 Retention and Provision of Landscaping and Natural Features

Policy H6 Small Unit Accommodation

Policy H9 Affordable Housing

Policy H14 Density

Policy PC4 Noise

Policy IR5 Energy and Water Conservation and the Use of Renewable Sources of Energy in New Development

Policy LT4 Provision of Open Space in New Development

Policy LT8 Use of Redundant Institutional, Recreational and Community Buildings

Policy T2 New Development and Highway Considerations

Policy T5 Parking

Emerging Local Development Plan (LDP) to 2033:

The Brentwood Replacement Local Plan 2005 remains the Development Plan and its policies should not be considered out-of-date simply because they were adopted or made prior to the publication of the National Planning Policy Framework

(NPPF). Due weight should be given to them, according to their degree of consistency with the NPPF - the closer the policies in the plan to the policies in the NPPF, the greater the weight that may be given.

The emerging Local Development Plan went through Pre-Submission (Publication Draft) Stage (Regulation 19) consultation early in 2019 with a further focused consultation, following revisions to the detailed wording of some of the proposed housing allocations, later in the year. The plan was submitted to the Planning Inspectorate in February 2020. The Examination in Public hearing sessions opened in December 2020, concentrating on strategic matters, with hearings on more detailed matter held at the beginning of February 2021, as set out in draft timetabling by the Secretary of State. Provided the Inspector finds the plan to be sound, it is projected that it could be adopted by the Council later in 2021.

As the emerging plan advances and objections become resolved, more weight can be applied to the policies within it. At this stage there are outstanding objections to be resolved, nevertheless, the Plan provides a good indication of the direction of travel in terms of aspirations for growth in the Borough and where development is likely to come forward through draft housing and employment allocations. While submission of the Local Plan is a further step in progress towards adoption, as the plan has yet to complete its progress through an Examination in Public it is still considered that it currently has limited weight in the decision making process.

#### National Policy

- National Planning Policy Framework (NPPF)
- National Planning Policy Guidance (NPPG)

### **3. Relevant History**

- 17/00643/FUL: Redevelopment of site to provide a community hub (sui generis use) at ground floor, offices (Use Class B1) within part of the basement and ground floor and the entirety of the first floor and 19 flats (4 x 1 bed and 15 x 2 bed) at second and third floor level, incorporating elevational alterations, roof extensions, a single storey colonnade extension to east facing elevation and associated improvements to curtilage including new vehicular and cycle parking and landscaping -Application Permitted
- 20/01809/FUL: Demolition of all existing buildings and redevelopment to provide a community hall (Class D1), 9 no. residential units (Class C3) landscaping, car & cycle parking and associated infrastructure. – PENDING DECISION

### **4. Neighbour Responses**

Where applications are subject to public consultation those comments are summarised below. The full version of each neighbour response can be viewed on the Council's website via Public Access at the following link:

<http://publicaccess.brentwood.gov.uk/online-applications/>

No formal representation letters were received, however some informal comments were sent to the local authority which did not object to the development but made comments relating to the visual impact of the development and the use of red bricks as opposed to London Stock.

## 5. **Consultation Responses**

- **Operational Services Manager:** I refer to the proposed plans referenced above, my points are purely from an operational point of view for the collection of waste and recycling from the communal bin shed. Having viewed the block plan the usual requirements, as attached, are relevant but I have concerns with the proposed bin shed location. The only way to access the bin shed in a 26tonne refuse collection vehicle (RCV) would be to reverse off the Ingrave Road 80m along the front of the Town Hall to the waste collection point, this would be the cause for up to 5 RCV's on collection day. This will create a danger to both Town Hall staff and visitors (both on foot or in their vehicle) accessing the visitors car park and the south car park. Consideration is also needed to the police leaving the Town Hall on an emergency call using the same route. My opinion is that the bin shed should be resighting to the other side of the site so that the waste collection point is in Seven Arches Road.
- **Open Space Supervisor:** In terms of the overall style of the development this is outside of my field of remit and so I have no comments to make on this. Looking at the site itself an attempt has been made to provide some private formal open space in the form of a private communal lawned area to the rear of the property and communal open space for the flats but due to the scale of the property against land mass available on site this is a limited offering when considering the needs of families. This is likely to result in the garden having limited beneficial use for 'families' who are more likely to rely on the open space network in the Borough.

I also note that the development consists of 11 individual dwellings and although is under a hectare in site the scheme will trigger a contribution of funds via a Section 106 agreement to existing open space provision under current local planning obligations. Under the current Replacement Local Plan it stipulated that:

*Developers of residential sites of less than 0.4 ha. (or 20 units) will normally be required to make a financial contribution towards the provision of a Local Area of Play (LAP), a Local Equipped Area of Play (LEAP) and a Neighbourhood Equipped Area of Play (NEAP)*

With regards to the financial contribution, due to the intended design of the scheme it is not going to be possible to integrate a play area on the development and there are already play facilities located a short distance away in King George's Playing Fields. Also, the Council is undergoing a review of its play provision and as such is not commissioning the installation of any new play facilities for the short term. In light of this decision any financial contribution will be used to improve existing open space and outdoor sports provision firstly in and around the development area at King George's Playing Fields and Hartswood.

In terms of the value of the contribution, this is placed at £11,000 [equating to £1,000 a property] which is in line with contributions recently agreed on developments elsewhere in the Borough.

At this stage there is no initial objection from an open space's perspective.

- **Housing Services Manager:** Further to my previous note dated 21 December 2020 please find enclosed a short update note based both upon the latest discussion between the Council's planning team and Brentwood Development Partnership (the applicant) and what I understand is the final position on the affordable housing provision.

As of my last two notes, the development across the two sites was deficient in affordable housing policy terms by 2 (two) homes. The applicant has since agreed to the following. That 9 affordable rented homes are provided at Maple Close within the applicant's proposal, and the Housing Department engages with the developer on the transfer cost of these homes into the Council's HRA.

This value is under discussion, but the final Section 106 Agreement should be conditioned that the agreement of the transfer value of the 9 Maple Close homes is concluded, and an agreement entered into, prior to the applicant's start on site on either Maple Close or Seven Arches Road.

In addition, the applicant has accepted the payment of a commuted sum in lieu of 2 homes on the Seven Arches site to meet policy compliance across both sites. The applicant has commissioned Mass & Co, valuers to undertake an RICS Red Book valuation of Plots T03 and T04 at the Seven Arches site. I have had sight of this valuation and each has been valued at £300,000. On that basis, at a 35% contribution rate, the developer will be required to contribute 2 x £105,000, a total commuted sum payable of £210,000. This should also be included in the Section 106 Agreement.

This, I think successfully concludes policy compliance for affordable housing.

- **Designing Out Crime:** Essex Police has a number of security related observations as follows:

- Further detail is required about postal arrangements. 'Through the wall' mailboxes or mailing arrangements in a secure lobby are recommended. Trades buttons are strongly discouraged.
- It is noted that it is proposed to locate bin and cycle stores within the building on the ground floor. Further detail would be welcomed about the security arrangements for the cycle and refuse storage facilities.
- It is noted that entrances to the flats are at both the side and rear of the property. Access control is essential to maintain security of the development. We would require the finer detail of the access control proposals and details of lighting arrangements, particularly to the rear entrance and parking area.
- Physical security measures of the doors and windows would be appreciated.

Essex Police, provide a free, impartial advice service to applicants who require advice on Crime Prevention Through Environmental Design and Secured by Design and we would welcome the opportunity to meet with the applicant to discuss the security design aspects of the application to ensure provision of a safe and secure environment for potential residents Contact with Essex Police Designing Out Crime team is via [designingoutcrime@essex.pnn.police.uk](mailto:designingoutcrime@essex.pnn.police.uk)

- **Historic Buildings And Conservation Officer:** The proposals pertain residential development at the site which presently consists of the former registrar and Council building at Seven Arches Road, this is a contiguous site with Brentwood Borough Council Town Hall. The site is positioned at the southern gateway to the Brentwood Town Centre Conservation Area and within the geographic scope of the Town Centre Design Plan and Design Guide; this location offers an opportunity to visually link Civic Brentwood, e.g., Brentwood School, Town Hall and Cathedral, and offer a characterful transitioning architecture.

Background: Preapplication has been undertaken, during these sessions design development and studies testing the relationship of the new architecture within its context were carried out. My most recent preapplication comments summarised as follows. 'An area which remains outstanding, is the lack of articulation in response to the ridge line and bulk at roof level (see section B). This is a highly visible elevation across open space and will be read in conjunction with the Town Hall; the volume of space in the roof can be used for M&E however it is extensive, and I have before me no reasoning behind its continuous line; I advise it should be broken up, as this remains as a four-storey building which is not considered appropriate or informed by context with regards to massing. In terms of detail intent, there remains opportunity to integrate private amenity spaces within the apex. I also noted at the session any AOVs/plant/ rainwater goods etc should be clearly drawn and labelled...Long views of the proposals to include from the common land to the east of the site was advised previously and remains outstanding'. At preapplication the emerging scheme was also subject to Essex Quality Review Panel. Assessment: In terms of the impact upon the Historic Environment given the setting of the Brentwood Town Centre Conservation Area, the submission is accompanied by a Heritage Assessment.

Section 3.3 states 'The Site is not considered to be subject to any notable heritage constraints and the existing building on the Site is of modest proportions and quality. Its removal from the Site is considered appropriate and presents an opportunity for enhancement within the wider setting of the Brentwood Town Centre Conservation Area and wider townscape characteristics of Brentwood'. I have no reason to disagree with the submitted assessment and concur with the statement quoted.

This location presents an opportunity to produce a unique architecture which transitions the residential edge of the Town Centre to the more civic buildings within the immediate context. The siting of the proposed building is aligned with the neighbouring building line, which is accepted as a principle, however this results in the green boundary at the frontage which is key to retain in the interests of the streetscape being left marginalised, also this renders the ground floor private amenity areas compromised with such close proximity to public pathway. A retraction of the building albeit slight is advised; a comparison between the submitted topographical and the proposed landscape plan illustrates this point. The main entrance to the new building is located to face the north and visually links with a small quantum of public realm being proposed for the occupiers, I find this main entrance as a singular door with little detail is a missed opportunity, more can be made of this area as entrances are key features of standalone residential blocks, this somewhat narrow opening without feature and should be enhanced through design, either within the determination period or as a Condition with larger scale drawings provided. The rear of the building in site layout terms is deficient by not providing any buffering from the parking spaces which should be amended (see spaces 6-10) at the very least this warrants a low hedging/knee rail to delineate the end of parking bays to pathway and then to building line, a consequence of no laying conveys an identifiable conflict with the amenity of Unit 3, and safe pedestrian access to the refuse area and the rear entrance (cycle store). In terms of the shape of form and architectural intent, the scheme has progressed since preapplication; the shouldered gables are featureful and refer to the Brentwood vernacular with modern interpretation evident at Brentwood School. The detailing of and quality of construction particularly brickwork, are key to deliver this intent. Sample panels with brick pattern should be erected on site by Condition; reveals should be no less than 75mm for fenestration and profiles without visible trickle vents. I find the red brick (the true brick of the Borough) correct, however the grey brick selected (shown on the CGIs) I find somewhat of an anomaly, this should be altered to London Stock as apparent on the Villas to the south of the site if the intent is indeed to drawn upon local reference as indicated within the contextual studies of the Design & Access Statement.

In terms of renewables the submitted Sustainability Report refers to air source heat pumps and PV installations, the Design & Access Statement states 'note the PV shown on the drawings is for indicative purposes and is subject to the energy strategy'. As a consequence, I have no definitive detail as to the locations of

these proposed items, their size and their impact upon the architecture being proposed from the submitted drawings. Summary: The scheme has developed positively through the preapplication process, as set out above minor revisions and additional detail is requested, Conditions are also required. Please reconsult should this information be submitted or a final response is required from this assessment. I trust this advice is of assistance.

**Additional Comments:** I advise the building has not been retracted from the frontage by the architect as advised, as I have previously highlighted through the development of this scheme, there is minimal relief at the frontage; the scale of the proposed building is greater than its neighbour in context, therefore the impression of bulk in the streetscape will be accentuated by not accommodating this retraction. As advised in my initial letter, this also renders the ground floor private amenity areas being compromised given the close proximity to public pathway. I maintain a retraction of the building albeit slight is best practice.

The main entrance to the new building has improved by way of a brickwork detail which is somewhat obscured on the revised elevation CGI; the intent is however accepted further technical detail on the entry area should be submitted by way of Condition.

The rear of the building in site layout terms was highlighted as deficient in not providing any buffering from the parking spaces, I appreciate there has been a relocation of a window opening and a low knee rail incorporated (annotated on the landscape plan) no meaningful buffer area is at the rear perimeter.

As previously advised, the detailing and quality of construction particularly the brickwork is key to delivering this intent. Sample panels with brick pattern should be erected on site by way of Condition; reveals should be no less than 75mm for fenestration, the grey brick selected in the first iteration of the submission was quite out of context and this is now amended to reflect London Stock. All external materials should be subject to Condition, including balustrading and perimeter fencing.

The Sustainability Report refers to air source heat pumps and PV installations, the Design & Access Statement states '*note the PV shown on the drawings is for indicative purposes and is subject to the energy strategy*'. As a consequence, I remain having no definitive detail as to the locations of these proposed items, their size and location may impact upon the architecture being proposed.

The scheme developed positively through the preapplication process, however the main area I advised requiring detail and revision is not clearly addressed in this reconsult. The siting of the building and the defensible space around it may be hindered by the parking provision. Given this is a highly sustainable location within a walkable Town Centre the primary focus should be on the quality of the architecture, it being context led and importantly the quality of life for future

occupants. It is a matter for the LPA to afford the weighting here, if it is a balance of parking provision versus quality of Place and design.

- **Arboriculturalist:** The scheme has been subject to pre-application discussions to help inform its design and public realm measures. A tree survey has been undertaken. This confirms that other than one pillar apple close to Seven Arches Road, which was identified as a Category B specimen, most of the remaining trees requiring removal are small specimens of limited amenity value. Detailed protection measures have been provided. These should be incorporated into the CEMP to ensure that contractors are aware of these measures. The landscape proposals are considered appropriate for the location. The details can be dealt with by condition. There are no objections to the scheme on landscape or ecology grounds subject to the conditions recommended above being discharged.
- **Ecologist:** An ecology report has been provided which summarises the results of the surveys that were undertaken. These confirm that the site has no specific ecological value; however it recommends that suitable best practice measures are adopted during construction to ensure that any badgers that may be within the local area are not harmed. Such measures should be included in a Construction Environment Management Plan which can be conditioned. The proposed integrated swift boxes identified as part of the biodiversity enhancements should be provided.
- **Highway Authority:** The information that was submitted in association with the application has been fully considered by the Highway Authority. The proposal will take access from a private road and a reduced car parking standard has been applied. Brentwood Borough Council's adopted parking standards state that "for main urban areas a reduction to the vehicle parking standard may be considered, particularly for residential development." The local highway network is protected by parking restrictions and in transport terms the site is considered to be in a sustainable location with good access to frequent and extensive public transport, as well as Brentwood's facilities, therefore: From a highway and transportation perspective the impact of the proposal is acceptable to the Highway Authority subject conditions for a construction method statement, vehicle and cycle parking provision before occupation and residential travel packs.
- **Environmental Health & Enforcement Manager:** I have reviewed the above application and can confirm that I am satisfied with the reports submitted with regard to noise and land contamination for the proposed development.

I agree with the conclusion of the noise assessment that the development is suitable for residential use with provision of suitable glazing and ventilation to areas of the buildings adjacent to Ingrave Road. It is not considered necessary for the balconies on this frontage to be of solid construction in order to reduce

noise levels as the usage of the balconies is likely to be for limited periods and it is likely that vehicular noise will not be intrusive to a degree that requires further attenuation.

The applicant will need to produce a scheme for noise insulation including suitable glazing and ventilation to meet the target levels set out in BS8233:2014, e.g. 30dB LAeq, 1hour night time and 35dB LAeq, 16 hour daytime - see p.13 of the attached guidance

If this could be required by condition it would be acceptable, the conclusion of the survey report is that the recommended internal levels can be met by provision of standard thermal glazing with trickle ventilators - the applicant should be required to submit a scheme for noise insulation to include a specification for the windows and indicating whether different specification windows need to be fitted in other locations away from Ingrave Road. This should also be supplemented with a document demonstrating that the windows to the required specification have been installed during the construction phase to be discharged prior to completion of works if possible.

With regard to contamination on this site the report indicates an elevated lead level in one sample, and it is proposed to remove the made ground in this area and provide a validation report. In these circumstances there is no need for a full remediation strategy to be submitted, but simply to proceed on the basis outlined in the report to remove the made ground, test the sides and base of the borehole excavation and provide a verification report to confirm that this has been completed for approval.

- **ECC SUDS:** Thank you for your email received on 09/12/2020 which provides this Council with the opportunity to assess and advise on the proposed surface water drainage strategy for the above mentioned planning application. Having reviewed the Flood Risk Assessment and the associated documents which accompanied the planning application, we wish to issue a holding objection to the granting of planning permission based on the following:  
Discharge rates - Surface water discharge rates should be limited to as close as feasibility possible to 1 year greenfield rates or 50% betterment of 1 year brownfield rates. Please note there are now vortex flow control devices which can be designed to a discharge at 1.0l/s, with 600mm shallow design head and still provide a more than 50mm orifice diameter. It is considered that Thames water has accepted proposed discharge rate at 2l/s from the site however it can be lower than 2l/s. We would like to see if Thames water has specific concerns accepting discharge lower than 2l/s from the site.

**Additional Comments 26/01/21:** Having reviewed the Flood Risk Assessment and the associated documents which accompanied the planning application, we do not object to the granting of planning permission based on the following:

### Condition 1

No works except demolition shall take place until a detailed surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydro geological context of the development, has been submitted to and approved in writing by the local planning authority. The scheme should include but not be limited to:

- The required allowance of urban creep (additional 10% of roof area) should be included in storage calculation.
- Provide sufficient storage to ensure no off site flooding as a result of the development during all storm events up to and including the 1 in 100 year plus 40% climate change event.
- Demonstrate that all storage features can half empty within 24 hours for the 1 in 30 plus 40% climate change critical storm event.
- Detailed engineering drawings of each component of the drainage scheme.
- A final drainage plan which details exceedance and conveyance routes, FFL and ground levels, and location and sizing of any drainage features.

Reason/s: To prevent flooding by ensuring the satisfactory storage of/disposal of surface water from the site. To ensure the effective operation of SuDS features over the lifetime of the development. To provide mitigation of any environmental harm which may be caused to the local water environment. Failure to provide the above required information before commencement of works may result in a system being installed that is not sufficient to deal with surface water occurring during rainfall events and may lead to increased flood risk and pollution hazard from the site.

- **Bats - Mrs S Jiggins:** No comments received at the time of writing this report.
- **Essex Wildlife Trust:** No comments received at the time of writing this report.
- **Essex Badger Protection Group:** We have no objection to the proposal as outlined subject to the following conditionality in order to protect transient badgers foraging through the area:
  - o Retention & protection of tree line in accordance with BS5837 with use of high-visibility/Heras fencing where necessary, including no obstruction of suitable commuting corridor with construction materials etc. Any new fencing to incorporate sufficient gaps at base to allow continued access across site by Badger. (as recommended within the Environmental Impact Assessment)
  - o Any trenches or deep pits that are to be left open overnight should be provided with a means of escape should a badger enter. This could simply be in the form of a roughened plank of wood in the trench as a ramp to the surface.

- o Any trenches/pits should be inspected each morning before work commences to ensure no badgers have become trapped overnight. Should a badger be found then formal ecological advice must be sought before work commences for the day.
- o The storage of topsoil or other 'soft' building materials within the site should be given careful consideration. Badgers will readily adopt such mounds as setts, which would then be afforded the same protection as established setts. So as to avoid the adoption of any mounds, they should be subject to daily inspections before work commences.
- o During the work, the storage of any chemicals should be contained in such a way that they cannot be accessed or knocked over by any roaming badgers.
- o Open pipework with a diameter of more than 120mm should be properly covered at the end of the work day to prevent badgers entering and becoming trapped. Again, should a badger trap itself then formal ecological advice must be sought before work commences for the day.

We thank you again for allowing us to review this application.

- **Thames Water Development Planning: SURFACE WATER:**, Thames Water would advise that if the developer follows the sequential approach to the disposal of surface water we would have no objection. Where the developer proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required.  
Should the Local Planning Authority be minded to approve the planning application, Thames Water would like a standard Groundwater Risk Management Permit informative added, directing the applicant to the appropriate team.

## 6. Summary of Issues

### Principle of Development and Change of Use

The site is allocated within the adopted local plan as a community use. It is a brownfield site that is currently occupied by a Council office building which is no longer in use. Local policy LT8 states that permission for the change of use or redevelopment of community facilities shall only be granted where the proposed use addresses local community needs and, where these needs are met or where the existing community use can be suitably relocated on an appropriate alternative site.

Following the Town Hall re-development the former registry office is no longer required as this service has been relocated into the Town Hall, as a result there would be no adverse impact on the local community in accordance with policy LT8. In terms of the reusing the site for residential purposes, one of the core planning principles in the NPPF is to; encourage the effective use of land by reusing land that has been previously developed. Paragraph 117 encourages the use of brownfield land and in meeting the

need for homes and other uses and that the effective use of such land should be encouraged. This is consistent with the strategic aims of the adopted local plan which seeks to make the best use of previously developed land within urban areas and the applicant sets out that the Council's strategic desire is to see the site developed for residential purposes. Furthermore, the NPPF actively encourages the re-use of redundant, previously developed urban sites and the provision of housing would be a significant benefit to the borough. The principle of developing this site for residential purposes is therefore accepted.

## Housing Policies

Local Plan Policy H14 states that the Council will expect any proposal for residential development to be of an appropriate density that makes efficient use of land with densities to be no less than 30 dwellings per hectare and 64 dwellings per hectare in central areas or those with good levels of accessibility. In terms of density it is important to ensure previously developed, brownfield sites in sustainable areas of this nature are used as effectively as possible, as advocated by the NPPF and to relieve pressure on the Green Belt within Brentwood.

However, it is also necessary to ensure that the density is appropriate to the site's context and the existing character of the area. The proposal will provide 11 units on a small site and therefore has a high density of 110 dwellings per hectare (dph). However, this is not uncommon with small scale accommodation in urban areas and would be comparable to the density of the adjacent apartment block known as The Green which has a density of 116dph.

Density should also be influenced by design; new buildings should have a positive impact in terms of their siting, scale and massing and successfully integrate functional needs such as storage, refuse and parking as part of the development. As such the high density of the development is acceptable subject to the development being of a design, appearance and scale that is appropriate to context, which is discussed within the design section of the report below.

## Dwelling Mix

In terms of housing mix, the proposal seeks to provide 9 x2 bed units and 2 x 1 bed units. Policy H6 of the Local Plan states that for developments of this size a minimum of 50 percent of the units should be 1 or 2 bed units. In this instance 100 percent of the units proposed are 1 or 2 bed in accordance with this Local Plan Policy.

As the requirements of policy H6 have been superseded by the Council's more up to date Strategic Housing Market Assessment (SHMA), undertaken as part of the evidence base for the emerging local plan, which evidences that 2 bed market housing units are most required in the borough, followed by larger 3 and 4 bed units, with less requirement for 1 bed units. The development accords with the SHMA in providing a larger number of 2 bed units in line with the boroughs projected need, but does not provide any larger family homes on the site. However, given the size and nature of the

development within a Town Centre location, it is considered the development is better suited to small sized units, as larger garden areas would be required for family sized homes that cannot be accommodated on a site of this size. Furthermore, the Council's Strategic Housing Consultant has raised no objection to the proposed mix. No objections are therefore raised in this regard and the mix is considered suitable for the site.

## Affordable Housing

In terms of affordable housing, Policy H9 of the Local plan sets out that on suitable sites for housing development of 20 units and above, the Council should seek a proportion of 35% of the number of dwelling units to provide for affordable housing. Part b) of the policy requires contributions to be drawn on sites which fall below the threshold, where the residential development site is contiguous with 'one or more potential residential development' sites. In this instance 1-2 Seven Arches Road is considered to constitute a contiguous site with the Town Hall, as was outlined in the officer report presented to committee as part of the application 17/00643/FUL for the redevelopment of the Town Hall which comprised 19 residential units.

Therefore, in line with Policy H9, when considered in parallel with the Town Hall development an affordable housing provision of 10.5 units (rounded up to 11) would be required (35%). Policy H9 details the affordable housing should be provided on site as part of the development, but where this would not be appropriate or possible the Council may accept the affordable housing to be provided either in part or in whole on another site.

The scheme proposes that all housing on the 1-2 Seven Arches Road is private market housing and affordable housing will be provided off site, in the vicinity, at Maple Close. A separate linked application has been submitted for the development of the site for a replacement community hall and 9 dwellings (application ref: 20/01809/FUL). It is proposed that all of the residential units delivered on the Maple Close site will be provided as affordable rent units, to be managed by the Council, in line with the SHMA which has a tenure split of 86% social/affordable rent and 14% intermediate affordable housing. In addition, the applicant has proposed a commuted sum in lieu of 2 homes on the Seven Arches site to meet the 35% policy compliance across both sites (11 units). The applicant has commissioned Mass & Co, valuers to undertake an RICS Red Book valuation of Plots T03 and T04 at the Seven Arches site to generate an appropriate value and commuted sum proportionate to affordable housing requirement.

In policy terms the councils starting point is for affordable housing to be delivered on-site, unless it can be demonstrated that this is not achievable. The constrained nature of the Seven Arches site precludes delivery of a mixed tenure development, particularly the delivery of affordable rented units. In design terms delivery of affordable rented accommodation on site would necessitate provision of separate access and servicing arrangements and management and ground rents associated with flatted development can often amount to costs that are unaffordable. The Strategic Housing Consultant has advised within their consultation response that the provision of off-site

units at Maple Close is acceptable in this instance and given the likely management costs to the Council of two homes in flatted accommodation at 1-2 Seven Arches Road, that on this occasion a commuted sum in lieu of the 2 homes on the Seven Arches site is acceptable and can be utilised by the housing department in the acquisition and transfer of the site to the HRA, as part of the s106 agreement.

Therefore, subject to a S106 legal agreement and the approval of a suitable scheme of 9 houses on the Maple Close development (subject to a separate grant of planning permission) the proposed affordable housing offer is considered to meet the requirements of local policy H9 and national policy requirements.

### Design, Character and Appearance

The site occupies a prominent location fronting the junction of Seven Arches/Ingrave Road and acts as a nodal point providing a transition in scale from commercial buildings to the north and a residential context to the south. The scheme has been subject to preapplication with the LPA and was presented to the Essex Quality Review Panel in November 2020. The fundamental principles and design of the scheme were supported by the Panel with minor amendments recommended to the balcony design, entrances and internal layouts.

The proposed scheme consists of a 3-storey building of a transitional scale with two front facing gables of varying heights resulting in a characterful and interesting roofscape on a prominent site. In response to officer comment on bulk, the scheme has been refined and the shouldered gables work well in reducing the height and bulk of the building as well as being featureful and well related to the Brentwood vernacular. The internal layout comprises a central entrance core and allows for integral balconies, with partial undercroft parking to the rear.

The main entrance to the building is located to the north and is defined by a gable feature of an alternative brickwork. The colour of the brickwork has been revised during the application and introduces a London Stock to identify with the adjacent villas and residential character to the south. Therefore, in terms of appearance and scale it is considered the proposed development would accord with local policy CP1 (i) and enhance the character and appearance of the area.

In terms of the position of the building, the building is slightly offset and steps back from the public footway of Seven Arches Road as it extends to the north. However, the southern corner of the building, whilst not extending beyond the established building line is within 0.8m of the edge of the site. A betterment would involve moving the footprint of the building away from the footpath, to reduce any perceived bulk in streetscene, but the applicant has advised that underground cables prevent this slight revision. Whilst this is accepted, the alternative option to reduce the footprint at the frontage, even marginally has not been explored. It is considered some reduction could be achieved without compromising the internal space standards of the units at the front of the building. As a result, there is identified level of harm by way of the buildings siting

that is inconsistent with the requirements of policy CP1(iii) which will be weighted in the planning balance at the end of this report.

## Sustainability

Local policy IR5 seeks to incorporate the principles of energy conservation and efficiency to achieve sustainable forms of development through the design and layout of development. Due to the sites small size and surrounding context, the design of scheme and layout is restricted to a degree. The applicants planning statement details that the design integrates natural / passive design features which improve the thermal performance of the building, thereby minimising reliance on artificial cooling systems, however the benefits of such a design have not been evidenced further within the sustainability appraisal or supporting documents. The proposed development does seek to incorporate renewable energy gains through the use of PV panels on the south facing roof slope contributing to the energy requirements for the building. The development also seeks to make environmental improvements through biodiversity net gains that are detailed further within the ecology section of the report. In summary the development broadly conforms with the requirements of policy IR5 of the local plan and contributes to sustainable development through the proposed renewable energy features.

## Impact on Neighbour Amenity

The surrounding occupiers most affected by the proposed development would be those in the adjacent residential apartment block known as 'The Green' located to the south of the development and the residential flats within the upper storeys of the Town Hall, to the north west.

A daylight sunlight assessment has been undertaken and submitted as part of the application to ascertain possible impact to neighbouring receptors. The report identifies that there would be no material impact on daylight and sunlight conditions experienced within habitable spaces within existing neighbouring properties, in line with the BRE methodology.

'The Green' is positioned between 6 and 8.2 metres away and a mature row of existing trees separates the two sites. Whilst the rear of the proposed building would be 6 metres beyond The Green, it is adequately distanced and would not be within 45 degrees of the nearest neighbouring windows. Therefore, it is not considered the proposed building would amount to any overbearing impact or loss of outlook given the position and separation distance between the two buildings. In terms of overlooking, the side elevation of The Green has three windows, serving secondary rooms and a bedroom. The proposed development has been revised during the application submission to remove a number of duplicate windows along the south elevation of the development and four of the bedroom windows of the proposed units have been replaced with angled oriel windows, which would direct any potential overlooking away from the adjoining occupiers and mitigate any inter-overlooking and loss of privacy between the two blocks.

In terms of the Town hall units, there would be no material inter-overlooking or loss of privacy between the two buildings, as a result of the position and orientation of the buildings, in which no facades directly face each other. Furthermore, the separation distance between the two buildings would not result in any material overbearing impact, loss of light or outlook.

In summary the proposed development would not result in detrimental harm to the amenity of neighbouring occupiers in accordance with local core policy CP1 (ii) and paragraph 127(f) of the NPPF.

#### Living Conditions of Future Occupiers

All units comply with the minimum sizes outlined within the Government's technical housing standards and all except unit T03 would be dual aspect. The ground floor window of T03 was removed during the application process making it single aspect as issues were raised around disturbance from car headlights opposite the parking area. The removal of the window is considered to overcome this issue, the unit remains provided with adequate light, outlook and ventilation to all habitable rooms and is therefore still considered to provide good quality accommodation for future occupiers. All habitable rooms in the rest of the units are provided with adequate light, outlook and ventilation and a communal refuse and cycle store is provided internally within the building.

In response to the comments raised by operational services a refuse collection point has been added during the application process, to ensure refuse can be collected from Seven Arches Road. It is considered this arrangement is acceptable and would meet the requirements of operation services but further details of a refuse management plan are required, which can be agreed via condition.

In terms of amenity, each dwelling is provided with a private outdoor amenity space in the form of a balcony or terrace in excess of 5sq.m, in accordance with the residential guidance in the appendices of the local plan. The comments raised by the Design Officer in relation to the privacy of the ground floor balcony of plot T05 are noted, however a degree of defensible space provided through hedging is proposed and it is considered the balcony is still usable and would provide an adequate external amenity area for the occupiers. Furthermore, the site is within a highly sustainable location and in close proximity of Shenfield Common and walking distance of King Georges Public Park that would off-set any downfall in amenity provision for small flatted accommodation.

In regard to noise impacts, the Councils Environmental Health Officer has advised the recommendations within the applicant's noise assessment are accepted and suggests suitable glazing and ventilation to areas of the buildings adjacent to Ingrave Road would be required to ensure future occupiers are not subjected to adverse noise, details of which can be provided via condition.

In summary, the proposed development would provide good living conditions for the future occupiers of the proposed development, subject to conditions.

### Parking and Highway Considerations

The proposal would be accessed from Seven Arches Road, utilising the shared access with the Town Hall. The scheme provides 11 no. allocated parking spaces to the rear of the site, including 1 no. disabled access bay and a 1:1 provision of cycle parking that is located integrally within the ground floor of the building. The site is located in a highly sustainable town centre location with a good level of connectivity to public transport. Brentwood Borough Council's adopted parking standards state that *"for main urban areas a reduction to the vehicle parking standard may be considered, particularly for residential development"*. The Highway Authority have commented that the local highway network is protected by parking restrictions and in transport terms the site is considered to be in a sustainable location with good access to frequent and extensive public transport, as well as Brentwood's facilities and on that basis have raised no objection to the development or provision of parking, subject to conditions.

The proposal is therefore considered to accord with policy T2 and T5 of the local plan and the adopted parking standards, subject to the conditions detailed above.

### Landscaping and trees

A tree survey has been undertaken and submitted as part of this application and detailed protection measures have been provided. The development would require the removal of 4 trees, including one category B specimen close to Seven Arches Road, the remaining trees requiring removal are small specimens of limited amenity value. However, the group of mature trees in-between the proposed development and residential apartment block 'The Green' are to be retained and protected and a number of small replacement trees are proposed as part of the landscaping of the site. The Council's Arboriculturalist has raised no objection to the development, subject to the tree protection measures being incorporated and detailed into a Construction Environmental Management Plan (CEMP) to ensure that contractors are aware of these protection measures and a soft landscape and planting scheme is provided, which can be dealt with via condition. On this basis the proposal complies with the requirements of local policy C5.

### Ecology

An ecology report has been submitted as part of the application which summarises the results of the surveys that were undertaken and confirms that the site has no specific ecological value; however, it recommends that suitable best practice measures are adopted during construction to ensure that any badgers that may be within the local area are not harmed. The Essex Badger Protection Group has also recommended conditions to this effect to ensure no transient badgers are harmed or disturbed during the construction process. The local Ecologist has advised these conditions can be detailed within a Construction Environmental Management Plan (CEMP) to be

submitted prior to any demolition or construction works on site. The recommendations of the applicant's ecology report consider swift boxes (or similar) be provided as part of the development to provide a biodiversity enhancement within an urban environment along with native plant species integrated into the landscape, which is supported by the local ecologist. Details of which can be secured and provided via condition.

In summary the proposal would not result in detrimental harm to protected species and seeks to provide a small biodiversity net gain, in compliance with local policy C5 which states development schemes should also consider opportunities for additional habitat creation in any proposals.

### Contamination

A Geo-environmental report has been undertaken by Enzygo Geoenvironmental Ltd in September 2020 and submitted as part of this application submission. The report indicates an elevated lead level in one sample, and it is proposed to remove the made ground in this area and provide a validation report. The Council's Environmental Health Officer has advised that in these circumstances there is no need for a full remediation strategy to be submitted, but simply to proceed on the basis outlined in the report to remove the made ground, test the sides and base of the borehole excavation and provide a verification report to confirm that this has been completed for approval. Based on the comments of the EHO, a condition for a contamination validation report to be submitted prior to the occupation of development is considered acceptable.

### Flood Risk and Drainage

The application site is within flood zone 1 and is at a very low risk of both fluvial and surface water flooding. A drainage strategy report has been submitted as part of the application submission and has been revised following the Lead Local Flood Authorities (LLFA) initial comments concerning the limitation of proposed discharge rates. Following the revision, the LLFA have raised no objection to the drainage strategy subject to a condition for a detailed surface water drainage scheme.

### Open Space

Local policy LT4 states that Developers of residential sites of less than 0.4 ha. (or 20 units) will normally be required to make a financial contribution towards the provision of a Local Area of Play (LAP), a Local Equipped Area of Play (LEAP) and a Neighbourhood Equipped Area of Play (NEAP).

The site is small and provision for open space is very limited, only a small area of external seating is provided opposite the entrance of the site, however each unit is provided with its own private balcony and public open space is within the immediate vicinity. The development does not provide any family sized units (3 beds), therefore it is not anticipated the proposal would amount to any significant increased demand on

surrounding play spaces, but the use of surrounding public open space may be heightened due to the limit open space provided on this site.

The Open Space Supervisor (OSS) has recognised the nature of the scheme and has identified there are already play facilities located a short distance away in King George's Playing Fields. In light of this and in combination with the lack of family sized units a financial contribution in line with the requirements of local policy LT4 will be used to improve existing open space and outdoor sports provision firstly in and around the development area at King George's Playing Fields and Hartswood. Therefore, subject to evidence of costings the applicant has confirmed they are prepared to make a financial provision towards open space by way of a S106, the final figure to be agreed with officers.

#### S106 planning obligations

A S106 is required for the provision of 9 affordable housing units to be provided at Maple Close in conjunction with a financial contribution of £210,000 and that the agreement of the transfer value of the 9 Maple Close homes is concluded, and an agreement entered into, prior to the applicant's start on site on either Maple Close or Seven Arches Road. A financial contribution towards open space is also required, the figure to be finalised and agreed as part of the s106 agreement.

#### Conclusion and Planning Balance

A degree of harm has been identified by way of the buildings siting that is within 0.8metres of the public footway at its southern corner that would amount to a level of prominence and bulk within the streetscape. The NPPF states that good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people, which is reflected within the local design polices and the Town Centre Design Guide. In this instance the proposed development would make a good contribution to the character and appearance of the area and lead to an enhancement of the site, revision has been sought by the LPA to further improve the design of the scheme, through a minor revision to its siting but this has been resisted (because of existing infrastructure), as a result this application must be assessed on its merits and weighted within the planning balance.

Brentwood Borough Council does not have an up to date adopted Local Plan and is not able to demonstrate a deliverable 5 year housing land supply, in that regard in line with Para 11 (D) of the NPPF it is determined that a tilted balance applies when determining applications for residential development in that there is a presumption in favour of new residential development. This proposal will result in the redevelopment of a brownfield site in a sustainable area in accordance with the adopted local plan, the Council's emerging local plan and National Planning Policy. The provision of 11 residential units on the site, which would include a provision of 9 offsite affordable housing units situated at Maple Close (subject to application 20/01809/FUL) combined with a financial contribution for two affordable units, will help to boost the supply of market and affordable housing in the Borough.

As a result of this titled balance, it is not considered that the harm generated from the siting of the building and the minor revision that would be sought to improve the impact, would outweigh the benefits of redeveloping a brownfield site for much needed market and affordable housing within the borough. The development, on balance is therefore considered to comply with local and national planning policy and is recommended for approval, in accordance with the NPPF's presumption in favour of sustainable development, subject to conditions and a S106 legal agreement, to ensure both developments are delivered simultaneously.

## **7. Recommendation**

The Application be APPROVED subject to completion of a Section 106 Agreement and to the following conditions:-

### **1 TIM01 Standard Time - Full**

The development hereby permitted shall be begun before the expiration of three years from the date of this permission.

Reason: To comply with Section 91 of the Town and Country Planning Act 1990, as amended by Section 51 of the Planning and Compulsory Purchase Act 2004.

### **2 DRA01A Development in accordance with drawings**

The development hereby permitted shall not be carried out except in complete accordance with the approved drawing(s) listed above and specifications.

Reason: To ensure that the development is as permitted by the local planning authority and for the avoidance of doubt.

### **3 Materials**

No development above ground level shall take place until details of the materials to be used in the construction of the external surfaces of the building hereby permitted have been submitted to and approved in writing by the local planning authority. Development shall be carried out in accordance with the approved details.

Reason: In Order to safeguard the character and appearance of the area

### **4 Brickwork Sample Panels and Entrance Details**

No development above ground level shall take place until further details of the brickwork, including brick patterns; to be used in the development has been submitted to and approved in writing by the local planning authority. The details shall include: sample panels of the proposed brickwork to include mortar colour and

pointing, and details of elevational treatment of entrance gable. Development shall be carried out in accordance with the approved details.

Reason: In order to safeguard the character and appearance of the area.

#### 5 Architectural Details

Additional drawings that show details of proposed new windows, oriel windows, doors, eaves, verges, cills and balconies, to be used by section and elevation at scales between 1:20 and 1:1 as appropriate, shall be submitted to and approved by the Local Planning Authority in writing prior to any development above ground level. Fenestration reveals should be no less than 75mm. The development shall be carried out in strict accordance with the approved details.

Reason: In order to safeguard the character and appearance of the area.

#### 6 SIT01 Site levels - to be submitted

Details of existing and proposed site levels and the finished floor levels of the proposed buildings shall be submitted to and approved in writing by the Local Planning Authority prior to the commencement of the development hereby permitted, excluding demolition. Construction shall be in strict accordance with the approved details.

Reason: To safeguard the character and appearance of the area and the living conditions of nearby residents.

#### 7 Landscaping

Prior to the occupation of the development hereby permitted a scheme of hard and soft landscaping shall be submitted to and approved in writing by the local planning authority. The submitted scheme shall indicate the existing trees shrubs and hedgerows to be retained, the location, species and size of all new trees, shrubs and hedgerows to be planted or transplanted, those areas to be grassed and/or paved. The landscaping scheme shall also include details of all surfacing materials. The landscaping scheme shall be completed during the first planting season after the date on which any part of the development is commenced or in accordance with a programme to be agreed in writing by the local planning authority. Any newly planted tree, shrub or hedgerow or any existing tree, shrub or hedgerow to be retained, that dies, or is uprooted, severely damaged or seriously diseased, within five years of the completion of the development, shall be replaced within the next planting season with another of the same species and of a similar size, unless the local planning authority gives prior written consent to any variation.

Reason: In order to safeguard and enhance the character and appearance of the area.

#### 8 Construction Environment Management Plan (CEMP)

No development shall commence, including works of demolition until a Construction Environment Management Plan (CEMP) has been submitted to and approved in writing by the local planning authority. The CEMP should define best practice measures for ecological protection (in particular badgers) as well as protection methods of retained trees. The demolition and construction works shall be completed in accordance with the information agreed within the CEMP by the Local Planning Authority.

Reason: to ensure that appropriate measures are undertaken to ensure any disturbance to protected species is mitigated and to ensure trees are not harmed in the interests of visual amenity.

#### 9 Bird Boxes

The provision of 2x Swift Boxes and/or Sparrow Terrace (or similar product) shall be incorporated into/onto walls of the proposed building to provide additional nesting opportunities, details of which shall be submitted to and approved by the Local Planning Authority in writing prior to occupation of the development. The proposed boxes shall be located away from human/lighting disturbance and at least 1.8m from ground on east or north facing aspects, prior to the occupation of the development. The boxes shall be maintained and retained in perpetuity.

Reason: In order to provide a biodiversity net-gain in the interests of sustainable development.

#### 10 Boundary Treatments and Lighting

The development shall not be occupied until details of external lighting and the treatment of all boundaries (including existing boundary treatments); to include drawings of any gates, fences, walls or other means of enclosure have been submitted to and approved in writing by the local planning authority. The approved boundary treatments and lighting shall be completed prior to the first occupation of the development and shall thereafter be permanently retained and maintained.

Reason: In the interests of safeguarding the character and appearance of the area and living conditions of adjacent occupiers.

#### 11 Noise Insulation

No development above ground level shall commence until a scheme for noise insulation including a specification for suitable glazing and ventilation to meet the target levels set out in BS8233:2014, [e.g. 30dB LAeq, 1hour night time and 35dB LAeq, 16 hour daytime] has been submitted to and approved in writing by the local planning authority.

Reason: In order to safeguard the living conditions of future occupiers of the development.

#### 12 Compliance with Window Spec

Prior to occupation of the development a document demonstrating that the windows to the agreed specification of condition 11 have been installed shall be submitted to and approved in writing by the local planning authority. The approved windows shall be retained in perpetuity and not be altered in any way unless agreed in writing by the local planning authority.

Reason: In order to safeguard the living conditions of future occupiers of the development.

### 13 Contamination Validation Report

Prior to the occupation of the development a validation report shall be submitted to the local planning authority and approved in writing to confirm that the required contamination remediation as identified in the approved contamination assessment: Ref: CRM.1833.001.GE.R.003.A by Enzygo Geoenvironmental Ltd; has been carried out.

Reason: To ensure that any potential contamination and any risks arising are properly assessed and that the development incorporates any necessary remediation and subsequent management measures to satisfactorily deal with contamination.

### 14 Secure by Design

Prior to the occupation of the development further details of access and security shall be submitted to and approved in writing by the local planning authority. Details shall include but not be limited to: postal arrangements and mailboxes, security arrangements for the cycle and refuse storage facilities and residential access control of communal doors.

Reason: In the interests of secure by design and providing a safe and secure development for future occupiers.

### 15 Refuse Strategy and Management Plan

Prior to the occupation of the development details of a refuse strategy and management plan shall be submitted to and approved in writing by the local planning authority. The development shall be completed in accordance with approved details and shall not be amended unless agreed in writing by the local planning authority.

Reason: To ensure that adequate provision is made in interests of future occupiers of development and to safeguard the character and appearance of the area.

### 16CMS

No development shall take place, including any works of demolition, until a Construction Method Statement has been submitted to, and approved in writing by, the local planning authority. The approved Statement shall be adhered to throughout the construction period. The Statement shall provide for:

- i. the parking of vehicles of site operatives and visitors
- ii. loading and unloading of plant and materials
- iii. storage of plant and materials used in constructing the development
- iv. the erection and maintenance of security hoarding including decorative displays and facilities for public viewing, where appropriate
- v. wheel washing facilities
- vi. measures to control the emission of dust and dirt during construction
- vii. a scheme for recycling/disposing of waste resulting from demolition and construction works
- viii. hours of working and hours during which deliveries may be taken at the site

Reason: In the interests of highway safety, visual and neighbour amenity.

#### 17 Vehicular Parking

The proposed development shall not be occupied until such time as the vehicle parking areas indicated on planning drawing 153762-STL-P\_110/B, including any parking spaces for the mobility impaired, have been hard surfaced, sealed and marked out in parking bays and provision shall be made for EV charge points, details of which shall be submitted to and approved in writing by the local planning authority. The vehicle parking area and associated turning area shall be retained in this form at all times. The vehicle parking shall not be used for any purpose other than the parking of vehicles that are related to the use of the development unless otherwise agreed with the Local Planning Authority.

Reason: To ensure that on street parking of vehicles in the adjoining streets does not occur in the interests of highway safety and that appropriate parking is provided.

#### 18 Cycle Parking

Prior to the occupation of the development, the cycle parking as shown on drawing 153762-STL-P\_110/B; shall be provided in accordance with the EPOA Parking Standards. The approved facility shall be secure, convenient, covered and retained at all times.

Reason: To ensure appropriate cycle parking is provided in the interest of highway safety and amenity.

#### 19 Residential Travel Packs

Prior to first occupation of the proposed development, the Developer shall be responsible for the provision, implementation and distribution of a Residential Travel Information Pack for sustainable transport, approved by Essex County Council, to include six one day travel vouchers for use with the relevant local public transport operator. These packs (including tickets) are to be provided by the Developer to each dwelling free of charge.

Reason: In the interests of reducing the need to travel by car and promoting sustainable development and transport.

## 20 Surface water drainage scheme

No works except demolition shall take place until a detailed surface water drainage scheme for the site, based on sustainable drainage principles and an assessment of the hydrological and hydro geological context of the development, has been submitted to and approved in writing by the local planning authority. The scheme should include but not be limited to:

- The required allowance of urban creep (additional 10% of roof area) should be included in storage calculation.
- Provide sufficient storage to ensure no off site flooding as a result of the development during all storm events up to and including the 1 in 100 year plus 40% climate change event.
- Demonstrate that all storage features can half empty within 24 hours for the 1 in 30 plus 40% climate change critical storm event.
- Detailed engineering drawings of each component of the drainage scheme.
- A final drainage plan which details exceedance and conveyance routes, FFL and ground levels, and location and sizing of any drainage features.

Reason/s: To prevent flooding by ensuring the satisfactory storage of/disposal of surface water from the site. To ensure the effective operation of SuDS features over the lifetime of the development. To provide mitigation of any environmental harm which may be caused to the local water environment. Failure to provide the above required information before commencement of works may result in a system being installed that is not sufficient to deal with surface water occurring during rainfall events and may lead to increased flood risk and pollution hazard from the site.

## 21 Renewable Energy

Prior to any works above ground level, a sustainability and energy strategy to include further details of the number and location of renewable energy features, such as PV panels and a technical specification of the proposed heating system to be used shall be submitted to and approved in writing by the local planning authority. The development shall be carried out strictly in accordance with the approved details.

Reason: In order to maximise renewable energy and efficiency in the interests of sustainable development.

## Informative(s)

### 1 INF01

Reason for approval: The proposal would accord with the relevant policies of the development plan as set out below.

### 2 INF04

The permitted development must be carried out in accordance with the approved drawings and specification. If you wish to amend your proposal you will need formal permission from the Council. The method of obtaining permission depends on the nature of the amendment and you are advised to refer to the Council's web site or take professional advice before making your application.

### 3 INF05

The following development plan policies contained in the Brentwood Replacement Local Plan 2005 are relevant to this decision: CP1, C5, T2, T5, H9, H6, H14, LT4, LT8, PC4, IR5, National Planning Policy Framework (NPPF) 2019 and NPPG 2014.

### 4 INF22

The Local Planning Authority has acted positively and proactively in determining this application by identifying matters of concern within the application (as originally submitted) and negotiating, with the Applicant, acceptable amendments to the proposal to address those concerns. As a result, the Local Planning Authority has been able to grant planning permission for an acceptable proposal, in accordance with the presumption in favour of sustainable development, as set out within the National Planning Policy Framework.

### 5 Thames Water

The applicant is advised that if the development proposes to discharge to a public sewer, prior approval from Thames Water Developer Services will be required. Should you require further information please refer to our website.

<https://developers.thameswater.co.uk/Developing-a-large-site/Apply-and-pay-for-services/Wastewaterservices>

### 6 Secure By Design

Essex Police, provide a free, impartial advice service to applicants who require advice on Crime Prevention Through Environmental Design and Secured by Design and we would welcome the opportunity to meet with the applicant to discuss the security design aspects of the application to ensure provision of a safe and secure environment for potential residents Contact with Essex Police Designing Out Crime team is via [designingoutcrime@essex.pnn.police.uk](mailto:designingoutcrime@essex.pnn.police.uk)

### 7 Highway Works

Arrangement shall be made for surface water drainage to be intercepted and disposed of separately so that it does not discharge from or onto the highway. All work within or affecting the highway is to be laid out and constructed by prior arrangement with, and to the requirements and satisfaction of, the Highway Authority, details to be agreed before the commencement of works.

### 8 SUDS

Essex County Council has a duty to maintain a register and record of assets which have a significant impact on the risk of flooding. In order to capture proposed SuDS

which may form part of the future register, a copy of the SuDS assets in a GIS layer should be sent to [suds@essex.gov.uk](mailto:suds@essex.gov.uk).

Any drainage features proposed for adoption by Essex County Council should be consulted on with the relevant Highways Development Management Office.

Changes to existing water courses may require separate consent under the Land Drainage Act before works take place. More information about consenting can be found in the attached standing advice note.

It is the applicant's responsibility to check that they are complying with common law if the drainage scheme proposes to discharge into an off-site ditch/pipe. The applicant should seek consent where appropriate from other downstream riparian landowners.

The Ministerial Statement made on 18th December 2014 (ref. HCWS161) states that the final decision regarding the viability and reasonableness of maintenance requirements lies with the LPA. It is not within the scope of the LLFA to comment on the overall viability of a scheme as the decision is based on a range of issues which are outside of this authority's area of expertise.

We will advise on the acceptability of surface water and the information submitted on all planning applications submitted after the 15th of April 2015 based on the key documents listed within this letter. This includes applications which have been previously submitted as part of an earlier stage of the planning process and granted planning permission based on historic requirements. The Local Planning Authority should use the information submitted within this response in conjunction with any other relevant information submitted as part of this application or as part of preceding applications to make a balanced decision based on the available information.

## *BACKGROUND DOCUMENTS*

### **DECIDED:**

