

SITE PLAN ATTACHED

53-55 HIGH STREET, BRENTWOOD, ESSEX CM14 4RH

DEMOLITION OF EXISTING REAR STRUCTURE AND CONSTRUCTION OF 3 STOREY DEVELOPMENT CONSISTING OF 13 UNITS AND COMMERCIAL GROUND FLOOR USE.

APPLICATION NO: 21/01440/FUL

WARD	Brentwood North	8/13 WEEK DATE	22 November 2021
PARISH		Extension of Time	31 th March 2023
CASE OFFICER	Kathryn Williams		

Drawing no(s) relevant to this decision:

- Existing Location Plan (Drawing No. S01)
- Existing Elevations and Site Plan (Drawing No. S02)
- Topographical Survey (Drawing No. 22717 SE-01/A)
- Measured Building Survey (Drawing No. 22717 se-02)
- Proposed First Floor Plan (Drawing No. L02/D)
- Proposed Second Floor Plan (Drawing No. L03/D)
- Proposed Elevations 1:100 (Drawing No. L09)
- Proposed Ground Floor Plan (Drawing No. L01/F)
- Proposed Third Floor Plan (Drawing No. L04/F)
- Proposed Roof Plan (Drawing No. L05/F)
- Proposed Floor Plans & Accommodation Schedule, and Space Reference Key (Drawing No. L06/G)
- Proposed Elevations 1:200 with Context (Drawing No. L07/F)
- Proposed Elevations 1:100 (Drawing No. L08/F)
- Proposed Elevations 1:100 (Drawing No. L09/H)
- Proposed Elevations 1:100, Proposed Sections 1:100 (Drawing No. L10/G)
- Proposed Elevations 1:100 (Drawing No. L11/G)
- Design And Access Statement
- Daylight & Sunlight Report Ref: WW/DW/ROL00161
- Heritage Impact Assessment Ref: 240336
- Flood Risk Assessment and Surface Water Drainage Strategy Ref: 47191
- Financial Viability Appraisal (October 2022)

1. Proposals

This planning application seeks permission for the part demolition and redevelopment of the site, to create a three-storey development comprising two commercial units on the ground floor and 13 residential units above. The proposal retains part of the principal façade of the building.

The proposal comprises two blocks: A and B. Block A will front onto High Street and, to the rear, overlook the internal courtyard proposed as part of the scheme. It comprises a ground floor retail unit and 8 apartments, one of which will be duplex. Block B will front onto William Hunter Way and, to the rear, the proposed internal courtyard. It comprises a further 5 apartments and a ground floor retail unit.

The development includes 24 no. cycle parking spaces for residents and 4 no. cycle parking spaces for the commercial units. No on-site car parking is provided.

This planning application has been subject to extensive discussion with officers both at pre-application stage and post submission.

2. Site and Surroundings

The site is located on the northern side of Brentwood High Street within the designated Brentwood Town Centre (Settlement Category 1) and the Brentwood Town Centre Conservation Area. Nos. 53-55 is not a listed building but is situated 45m north-east of the Schedule Monument and Grade II listed ruins of the Old Chapel of St Thomas a Becket. The site sits within the Primary Shopping Area (Brentwood High Street).

The application site measures 0.064 hectares and is long, narrow and largely flat. The site is situated within the prime retail area of Brentwood High Street which provides a wide range of community amenities and services.

The site comprises a part two-storey commercial property fronting the High Street, and a part single storey element which serves as a storage space for the commercial unit, accessible from William Hunter Way. The building has been vacant since November 2020. The rear of the site also comprises a side alley (with private access) which links the front unit to William Hunter Way. Overall, the ground floor provides retail space and storage, the first floor additional storage and ancillary space.

The Historic Buildings and Conservation Officer advised that the High Street component of the building makes a neutral/positive contribution to the character and appearance of the Conservation Area, whilst the rear of the application site makes a negative contribution to the Conservation Area.

Immediately to the east is no. 51, a large modern post-war building that is currently a Boots store, and that makes a negative contribution to the Conservation Area. Adjacent

to the west lies no. 57, an early 20th century building which does contribute as neutral/positive to the Conservation Area.

The site is well connected to the local highway network, with the A1023 High Street to the front and William Hunter Way to rear, providing access to Brentwood and its surrounding environs. The site is also well-served by public transport: High Street is served by a multitude of bus routes, providing a frequent service between Brentwood and Warley, Pilgrims Hatch, Bulphan, Stondon Massey, Shenfield and Herongate. The site is only a 10 minute walk to Brentwood mainline railway station, providing access to central London (London Liverpool Street).

3. Policy Context

Adopted Brentwood Local Plan (the Local Plan) 2016-2033:

- Policy MG01: Spatial Strategy
- Policy MG03: Settlement Hierarchy;
- Policy MG05 Developer Contributions;
- Policy BE01: Carbon Reduction, and Renewable Energy;
- Policy BE02: Water Efficiency and Management;
- Policy BE04: Management Heat Risk;
- Policy BE05: Sustainable Drainage;
- Policy BE09: Sustainable Means of Travel and Walkable Streets;
- Policy BE12: Mitigating the Transport Impacts of Development;
- Policy BE13: Parking Standards;
- Policy BE14: Creating Successful Places;
- Policy BE15: Planning for Inclusive Communities;
- Policy BE16: Conservation and Enhancement of Historic Environment;
- Policy HP01: Housing Mix;
- Policy HP03: Residential Density;
- Policy HP05: Affordable Housing;
- Policy HP06: Standard for new Housing;
- Policy PC04: Retail Hierarchy of Designated Centres;
- Policy PC05: Brentwood Town Centre;
- Policy PC06: Mixed Use Development in Designated Centres;
- Policy PC07: Primary Shopping Area;
- Policy NE01: Protecting and Enhancing the Natural Environment;
- Policy NE05: Open Space and Recreation Provision;
- Policy NE09: Flood Risk;
- Brentwood Town Centre Design Guide

National Policy:

- National Planning Policy Framework (NPPF) 2021
- National Planning Practice Guidance (NPPG)
- National Design Guide (2021)

4. Relevant History

None relevant.

5. 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/>.

At the time of writing this report, a total of 2 neighbour representations were received raising a number of concerns: a letter written on behalf of 7 owners of the flats at Luke Court and a letter written by a local Ward Member Cllr Makr Lewis.

A third representation was received asking for clarifications, expressing neither support nor objection to the proposal. The issues raised have been addressed later in this report.

- The proposal is too tall.
- Adverse light impact for local residents. There will be privacy and visual impact issues.
- Concerns about the loss of privacy that would result from the stairwell windows facing Luke Court and the large glazed link.
- No provision for car parking, which will negatively impact on the available on-street parking provision in the area.
- Concern that the flat roof above the second floor flat number 3 could be utilised as a roof terrace to flat number 5, which would cause even greater overlooking and loss of privacy to the residents of Luke Court.
- William Hunter Way is a small road with limited capacity to cope with extra usage.
- Negative impact on local sewerage and drainage, which are at limits.
- Negative impact on local facilities such as doctors, dentists, schools and other social functions.
- There is no town centre plan in place to fit this scheme.
- The existing dwellings at Luke Court benefit from an existing, well-established level of daylight and sunlight. The majority of affected windows within this neighbouring building will suffer from an unacceptable loss of VSC and daylight. This is contrary to BRE guidelines and Policy C1.
- With the exception of the High Street elevation, the remainder of the building is considered uncharacteristic, bulky and rather bland and would not be of a high standard of design nor be compatible with its location and the surrounding development. This is contrary to local policies and the NPPF.
- The inclusion of a commercial unit (Class E) to the rear of the site is strongly objected to, as several of these uses would have a significant impact on the residential amenities of neighbours.

6. Consultation Responses

Detailed below is a summary of the consultation responses, if any received. The full version of each consultation response can be viewed on the Council's website via Public Access at the following link: <http://publicaccess.brentwood.gov.uk/online-applications/>.

- **Historic Buildings and Conservation Officer**

Having assessed this revised information holistically and considered fully the impact upon the significance of the Designated Heritage Asset of Brentwood Town Centre Conservation Area by way of this scheme, find the proposals would be of 'neutral impact', therefore I remove my standing objection subject to Conditions of planning to include:

- Details of doors eaves, verges and cills to be submitted
- Sash windows to be timber and without trickle vents
- Samples of materials to be submitted including sample panel of brickwork with bond, mortar and joint

No electricity, gas, water meter boxes, antennae (roof level) or extraction vents shall be fixed to the façade of the building. All soil and waste plumbing shall be run internally and shall not be visible on the exterior.

- **Planning Policy**

The open space and outdoor sports contribution has been calculated based on the BCC Open Space Calculator and Sport England's Playing Pitch Calculator, it amounts to: £16,701.

- **Housing Services Manager**

We accept that at present the development would be unviable if affordable housing given the viability position that has been assessed by the Council's own advisor. In line with that advice, we would also expect the resulting section 106 agreement to contain a 'clawback' provision to a maximum policy compliant position, should the viability prove better than expected as the works progress. The Council would engage with advisors to obtain a maximum value and 'clawback' assessment mechanism to be included in the section 106 agreement in due course.

- **Operational Services Manager**

No comments.

- **Environmental Health & Enforcement Manager**

There are concerns over the potential for noise disturbance from the High Street activity, including night-time economy uses, and also for the possible uses for the commercial and retail units below the residential accommodation, and between units of accommodation. As it is unlikely that the commercial use has been determined at present, there will need to be an assessment made to ensure that the levels of noise

attenuation between the ground and first floor are appropriate for likely situations, e.g., a bar/restaurant type activity that could extend into the evening period.

As such, I would wish to confirm that the internal noise levels of the residential units meet with the requirements of BS:8233-2014 Guidance on sound insulation and noise reduction for buildings.

In order to do this an assessment of road traffic and other ambient noise shall be undertaken, with regard to the windows and other elements of the structure facing onto the High Street area, to determine an appropriate specification for noise insulation on this façade. A similar assessment should also be made to determine whether additional measures to prevent noise transmission from the commercial units to the residential (and potentially vice versa) and between bedrooms and living area of adjacent units of accommodation. A condition has been recommended.

- **Arboriculturalist**

In principle there are no landscape or ecology objections to the proposal; however, if permission is granted a landscape condition would be required.

The DAS states that a detailed landscape scheme has not been prepared at this stage; however, illustrations indicate that new tree planting would form a key element of a central courtyard. The DAS also refers to the provision of two green roofs with plans showing additional trees. It is not clear if it is proposed for these to be podium gardens rather than traditional green roofs with no access.

The usability of the courtyard will be restricted both by its size and the fact that it is likely to receive limited sunlight due to the height of the surrounding buildings. This will also have implications as to the types of trees and other planting that would thrive in these conditions and therefore careful thought will be given to species choice.

Several illustrations within the DAS show the main roof as a green roof, although this is not picked up in the text. Clearly this would be welcomed and should be included if possible.

- **ECC Archaeologist**

The Essex Historic Environment Record (EHER) shows that the proposed development lies within the medieval settlement of Brentwood (EHER 525), which was first mentioned in 1176. The site is in proximity to the medieval Scheduled Chapel of St Thomas a Becket (EHER 528) at the heart of the medieval High Street. In addition to this likely medieval activity there are features and possible buildings marked on the 1st edition OS mapping, meaning these buildings pre-date 1880. Recent archaeological work carried out on the High Street, revealed extensive medieval and post-medieval remains and it is likely that further deposits will be found in the proposed development area. Any archaeological deposits may be destroyed or disturbed by the proposed work and should therefore be recorded prior to development. The programme of archaeological work will be carried out to the rear of the building following the demolition to ground level of the existing single storey structure. In view of this, a condition is requested in line with the National Planning Policy Framework.

- **ECC SUDS**

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.

The proposed development will only meet the requirements of the National Planning Policy Framework if the measures as detailed in the FRA and the documents submitted with this application are implemented as agreed.

- **Highway Authority**

From a highway and transportation perspective the impact of the proposal is acceptable to the Highway Authority subject to the following conditions:

1. No development shall take place, including any ground works or demolition, until a Construction Management Plan has been submitted to, and approved in writing by, the local planning authority. The approved plan shall be adhered to throughout the construction period. The plan 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. wheel and underbody washing facilities
2. Prior to first occupation, the redundant part of the existing vehicle access up to the site boundary to the west, shall be suitably and permanently closed incorporating the reinstatement to full height of the highway footway and kerbing.
3. Prior to first occupation the cycle parking shall be provided in accordance with the EPOA Parking Standards. The approved facility shall be secure, convenient, covered and retained at all times.
4. 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.

Reason: In the interests of reducing the need to travel by car and promoting sustainable development and transport in accordance with policies DM9 and DM10.

- **Historic England**

No comments.

- **Essex Police**

No objection

Essex Police considers that it is important that this development is designed incorporating the maximum achievable benefit of Crime Prevention Through Environmental Design (CPTED) for which Secured by Design (SBD) is the preferred enabler.

To ensure that these standards are met Essex Police requests that the developer seeks to formally achieve the full Secured by Design accreditation, which in this case will be Secured by Design Homes 2019 Version 2, March 2019 for the residential units and Secured by Design Commercial Developments 2015 Version 2 for the commercial units.

- **Thames Water Development Planning**

No objection subject to conditions.

7. Summary of Issues

Consideration of the proposal

The starting point for determining a planning application is the current development plan, which is the Brentwood Local Plan 2022 ('the Local Plan'). Planning legislation states that applications must be determined in accordance with the relevant development plan policies unless material considerations indicate otherwise. Relevant material considerations for determining this application are the National Planning Policy Framework 2021 (NPPF) and National Planning Practice Guidance (NPPG). Although individual policies in the Local Plan should not be read in isolation, the adopted plan contains policies of particular relevance to this proposal which are listed in section 3 above.

Principle of mixed-use development

The site is located within Brentwood Town Centre, in a very sustainable location within the designated Primary Shopping Area. Policies MG01 (Spatial Strategy) and MG03 (Settlement Hierarchy) confirm that Brentwood High Street falls under Settlement Category 1 where growth is supported, and where there is a wide range of existing community infrastructure and services to support the local population.

Policy PC04 (Retail Hierarchy of Designated Centres) states that Brentwood Town Centre should be the first choice for retail, leisure and main town centre uses, and that change of use of upper floors above commercial premises to working space and/or residential will be encouraged, provided that reasonable facilities and amenities are provided for, that development does not result in the loss of ancillary storage space or other beneficial use to the extent that it would make a ground floor unit unviable, and that the development would not prevent off street servicing of any ground floor unit.

This planning application entails the demolition of the existing building (retaining part of the front elevation) and erection of a ground plus 3 storey building, comprising commercial use at ground level and residential on the upper floors.

The proposed mixed-use development will, in line with Policy PC05 (Brentwood Town Centre), return the ground floor of 53-55 High Street to viable use after over two years of vacancy, ensuring that it contributes to the vitality and viability of the High Street, and it complements the character and appearance of the Conservation Area. There will be no detrimental loss of ancillary storage space for the retail units and off-street servicing will be retained.

In line with Policy PC06 (Mixed Use Development in Designated Centres), the proposal is considered to be in proportion to the scale and function of the centre, contains

appropriate ground floor uses, makes efficient use of the site and is considered to be of appropriate density.

To conclude, the proposed development complies with Policies PC04, PC05 and PC06, will contribute to the Council's housing supply and will improve the local retail offer in a sustainable, town centre location as supported by Policies MG01 and MG03.

Layout

The proposed layout has been dictated by the siting of the existing building, and the requirement to complement the surrounding urban fabric whilst preserving the amenity of neighbouring residential occupiers, especially Luke Court immediately to the west of the site.

The development comprises two separate elements, Block A fronting the High Street and Block B fronting William Hunter Way. The two blocks are linked by an internal courtyard that serves the residential entrance, residential and commercial refuse stores, the enclosed cycle storage, two storage areas for the commercial units and the rear entrance of both commercial units. The courtyard is accessible from William Hunter Way, echoing the location of the existing side alley.

The Conservation, Place & Development Officer commented that the mid and rear components of the development have been influenced by the courtyard arrangement. Given the evolution of the backlands of the Conservation Area, this is justifiable narrative to lead from and is informed by contextual analysis.

Whilst the front elevation of Block A is aligned with the other buildings along the High Street, Block B is slightly set back from the pavement line and the footprint of the upper floors above, and the building line has been designed at an angle, naturally leading the eye towards the entrance to the courtyard.

The proposed layout will deliver two active frontages. The retail unit on the High Street will contribute to the vitality and viability of the town centre, in line with planning policies. The retail unit on William Hunter Way positively addresses the aims of Policy PC05 (Brentwood Town Centre), which states that proposals on this road should provide additional shopfronts and contribute to the improvements of frontages and public realm through landscaping and redevelopment.

Therefore, it is considered that the proposed layout is appropriate and in line with Policies BE14 and PC05.

Design, scale and effect on the Conservation Area

Policy BE14 (Creating Successful Places) is supportive of development proposals provided they respond positively to the character and appearance of the surrounding area, protect the amenities of neighbours, are of a high standard of design, take

account of the need to conserve or enhance biodiversity, have satisfactory access and parking and can be accommodated by local highway infrastructure.

Policy PC05 (Brentwood Town Centre) states that development should conserve the positive qualities of Brentwood Town Centre while enhancing and improving negative aspects of function and appearance where relevant. Development in the town centre should contribute to the capacity and quality of the public realm, to a vibrant High Street and to the surrounding Conservation Area in line with the Town Centre Design Guide SPD.

The Town Centre Design Guide SPD requires new development in the High Street Character Area to be respectful of the architectural and historic context, respond appropriately to the scale of the surrounding context, consider the use of upper storey setbacks, and undertake daylight-sunlight studies to ensure that adjacent buildings are not adversely affected.

The scheme retains the first floor of the principal façade of the building whilst removing shopfront, signage and parapet (which is a modern addition). The small grill at first floor level will be removed and infilled with matching brickwork.

It is proposed to install a new, traditional-style shopfront and increase the scale of the elevation on the High Street, by way of an additional storey alongside residential accommodation within the roof space. This roofspace will be afforded natural light and ventilation by means of dormer windows.

The new parapet will be of matching brick to the historic walling and will incorporate a brick plat band. The new second floor is set back from the parapet and will also be built with matching gault brick. The proposed timber framed sash windows under flat brick arches match the floor below, and their size will be slightly smaller than the first floor ones.

The third floor will sit within the attic space and externally will have a plain clay tiles roof with leaded dormers with timber framed sash windows, aligned with the windows below. A hopper and rainwater pipe will be added to the front of the building, part of which to be concealed in the new shopfront.

The front elevation is the most significant element of the building, and this part of the proposal will have the greatest impact upon the Conservation Area. The proposed approach to the front elevation is considered appropriate and in line with the character and appearance of the Conservation Area, subject to conditions requiring the submission of architectural details and material specifications (see conclusions of this section).

With regards to the roof, the ridge line of the new extension has been kept below the height of the adjacent ridge line to the west, although it is noted that the Historic

Buildings & Conservation Officer would have preferred a more significant drop in ridge line.

Beyond the traditional-style pitched roof, the roof then extends all the way to William Hunter Way taking the shape of a flat, green roof. The Conservation, Place & Development Officer expressed concern that the flat roof element might be visible from the High Street, however views in the Design and Access Statement demonstrate that this is not the case.

Adding interest to the design and visual appeal, part of Block B fronting the courtyard is set back on the third floor, creating an opportunity for an additional green roof area. This is not to be used as a terrace to avoid overlooking onto Luke Court.

The roof above the refuse stores, at first floor level, has a similar treatment: the front half, abutting the courtyard, has been designed to be another green roof area whilst the rear half accommodates a 3 storey glazed element which indicates the presence of the corridor linking Blocks A and B.

The block fronting William Hunter Way (Block B) and the rear of Block A show a more contemporary architectural approach.

The William Hunter Way elevation has a strong vertical emphasis and is cladded in a type of brick that complements that of the main elevation. The recessed ground floor shopfront and the decorative protruding brickwork above add interest to the elevation. The contemporary approach is supported in this location and it is not considered to affect the significance of the Conservation Area.

There is a small gap between the William Hunter Way elevation and Luke Court elevation. The Conservation, Place & Development Officer does not support this design solution, which should not create a precedent for development in the Conservation Area, although it is not considered to be sufficiently detrimental to the scheme or the Conservation Area to warrant its refusal.

In the internal courtyard, the architectural treatment is similar to that of the rear elevation, with the addition of the glazed element and a seamed zinc roof with a modern interpretation of the High Street dormers.

The upper floors of the rest of the Block A element are set back from the building's footprint, to allow the introduction of windows and create a buffer between Block A and the building immediately to the west of the site. This element of the proposal retains the contemporary architectural approach and introduces a coated zinc cladding.

Whilst the contemporary design approach in the courtyard elevation and the rear of Block A is supported, the final material of the roof and cladding will need to be agreed via condition.

Officers agree with the conclusions of the Heritage Impact Assessment that although four storeys, the scale of this part of the building is broadly in keeping with large buildings located further east along the road.

It is suggested that the boundary treatment between the proposal and Luke Court will take the form of railings, as opposed to a hard, brick boundary treatment. The final material will have to be approved by officers as part of one of the design conditions.

Based on the advice of the Historic Buildings and Conservation Officer and subject to conditions, it is considered that the proposals would be of neutral impact on the significance of the Designated Heritage Asset of Brentwood Town Centre Conservation Area. The conditions attached to the permission are key to ensure the use of appropriate materials having regard to the importance of this scheme in the Brentwood Town Centre Conservation Area, and to ensure that the choice of materials and details will harmonise with the character of the surrounding development.

The proposal is therefore in accordance with Policies BE14 (Creating Successful Places), PC05 (Brentwood Town Centre) and BE16 (Conservation and Enhancement of Historic Environment), and the Town Centre Design Guide SPD.

Proposed commercial units

The proposal includes two commercial units (Class E): a 239 sqm unit fronting the High Street and a smaller 75 sqm unit fronting William Hunter Way, with a combined Class E floorspace of 314 sqm. Both units benefit from a separate store/office area accessible from the internal courtyard for a total floorspace of 29sqm, included in the overall 314sqm.

The two units will replace the existing 560 sqm retail floorspace, comprising 357sqm of retail unit and 203sqm of ancillary space.

Comparing the overall existing and proposed retail floorspace, there would be a loss of 246sqm. However, the loss of net retail floorspace would only be 72sqm, whilst there would be a greater loss of ancillary floorspace: 174sqm. This is not considered to be a concern, as the existing ancillary area is significantly oversized for any town centre retail unit.

Policy PC07 (Primary Shopping Areas) states that retail development in these locations should contribute to the area's attractiveness, accessibility and vibrancy by adding to or providing a range of shops to meet local needs, not result in subdivision of an existing large retail unit, be fully integrated with the existing shopping area, and facilitate safe, convenient and pleasant pedestrian movement through improved lighting and landscaping.

Whilst the proposal will result in a small loss of existing net commercial floorspace, 72sqm, the proposal will improve the vitality, viability and diversity of the town centre by

delivering a large, functional retail unit on the High Street (thus fully integrated in the shopping area). The smaller unit on William Hunter Way will contribute to activating this back street and improving its frontages. On balance, the proposal offsets the loss of existing retail floorspace and is considered to be in line with Policies PC05 and PC07.

Housing mix and density

The proposal seeks to provide 13 dwellings with the following unit mix:

Type	Market	Percentage
Studio	2	15%
1 bed apartment	5	38.5%
2 bed apartment	5	38.5%
3 bed apartment	1	8%

Whilst the percentage of 2 bedroom apartments is roughly in line with the Indicative Size Guide for Market Housing provided in the Local Plan (Figure 6), the proposed unit mix leans towards smaller units instead of family sized dwellings. Given the size and nature of the proposal, in a highly sustainable location in the town centre, 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. Therefore, the unit mix is considered acceptable.

In accordance with Policy HP06 (Standards for New Housing), all units meet the Nationally Described Space Standards.

A condition has been added to ensure that all units will meet the requirements of part M4(2) of the Building Regulations (accessible and adaptable homes), in line with Policy HP01 (Housing Mix).

Policy HP03 (Residential Density) expects proposals to achieve a density above 65 dwellings per hectare in Brentwood Town Centre. The proposal will deliver 13 units on a small site and therefore has a high density in excess of 200 dwellings per hectare. However, this is not uncommon with small scale accommodation in sustainable urban areas and would be comparable to the density of the adjacent development of Luke Court. The proposed density is thus considered appropriate for the site.

Affordable housing provision

Policy HP05 (Affordable Housing) requires the provision of 35% of the total number of residential units to be provided and maintained as affordable housing within all new residential development sites on proposals of 10 or more (net) units.

This planning application is accompanied by a Financial Viability Appraisal that was independently reviewed. It concludes that any affordable housing contribution would

make the scheme unviable and as a consequence, all the proposed 13 units will be market housing.

The Housing Manager accepts that at present the development would be unviable if affordable housing was provided, given the viability position that has been assessed by the Council's own advisor. In line with that advice, Officers would also expect the resulting section 106 agreement to contain a 'clawback' provision to a maximum policy compliant position, should the viability prove better than expected as the works progress. The Council would engage with advisors to obtain a maximum value and 'clawback' assessment mechanism to be included in the section 106 agreement in due course.

The applicant has agreed to include the 'clawback' provision as part of a Section 106 Agreement.

Residential amenity

The proposed development does not include provision for private amenity space, due to the very limited site area and likely negative impact on neighbouring residents. As such, the proposal does not meet the requirements of policy HP06 for external amenity space for the 2 and 3 bedroom units.

The courtyard, which measures 83sqm, will provide a communal amenity space to future residents. Town centre locations can be more difficult to provide private amenity space such as balconies, for the reason stated above; the closest quality public open space is considered to be Shenfield Common which is about 500m away and King Georges Playing Fields which is further afield. In the context of this planning application and on balance, the lack of private amenity is considered acceptable. Any private amenity proposal for this underutilised site would end up having a detrimental impact on the amenity of neighbouring occupiers, due to their close proximity, typical of a town centre location. Instead, the current scheme will return a derelict site into viable use, will contribute to the vitality of the High Street and help creating a new active frontage on William Hunter Way.

Policy NE05 requires all new development to maximise opportunities to incorporate new publicly accessible, high quality and multifunctional open space, enhancing provision where appropriate. It sets out the amount and type of provision required will be determined according to the Council's identified needs. The application site would not be able to deliver public open space, and it is also noted that studios and 1 bed apartments would not be required to contribute towards play space.

The Planning Policy team advised that, based on the BCC Open Space Calculator and Sport England's Playing Pitch Calculator, the contribution towards open space and outdoor sports would amount to: £16,701. The applicant has agreed to pay this sum as part of a Section 106 Agreement.

With regards to daylight and sunlight provision within the proposed dwelling, all habitable rooms have been assessed in accordance with the BRE methodology. The proposal demonstrates good levels of daylight, with 96% of habitable rooms achieving the recommended ADF target in accordance with the BRE guidelines. The proposed scheme also demonstrates very good levels of sunlight, with 100% of the rooms with south facing windows achieving or exceeding the BRE guidelines recommendation for annual sunlight hours. For winter sunlight hours, 100% of the rooms would achieve or exceed the BRE recommendation of 5%.

The above demonstrates the high level of amenity that will be enjoyed by future residents.

Refuse and recycling

The proposal includes dedicated residential and commercial refuse stores, based on commercial requirements and number of units. Both refuse stores are accessible from the courtyard and are located within 25m of the parking position of the refuse vehicle on the adopted highway, whether the High Street or William Hunter Way. They are also located right next to the entrance to the flats, ensuring convenience of use for residents.

Overall, the refuse strategy is considered appropriate and in line with the advice of the Essex Design Guide.

Parking and highway considerations

As previously explained, the application site is located in a highly sustainable location in Brentwood Town Centre. It enjoys access to a variety of public transport links, as well as to Brentwood's facilities and car parks.

The proposed development is therefore car free, an approach supported by Officers since the initial pre-application discussion. The Highway Authority confirmed that this is acceptable acknowledging the site's location and that the adopted parking standards state that "*for main urban areas a reduction to the vehicle parking standard may be considered, particularly for residential development*". Furthermore, the local highway network is protected by parking restrictions.

An enclosed, secure cycle parking area is provided as part of the proposals, accessible from the courtyard. A total of 28 spaces are delivered:

- 4 x commercial spaces
- 24 x residential spaces

The proposed commercial cycle parking provision accords with the requirements of the Essex Parking Standards, adopted by the Council, whilst the proposed residential provision exceeds the standards (14 spaces), which is welcomed and contributes to the use of sustainable transport modes.

Subject to conditions, including the provision of a Residential Travel Information Pack, the proposal therefore complies with Policies BE09 (Sustainable means of travel and walkable streets), BE12 (Mitigating the Transport Impacts of Development) and BE13 (Parking Standards).

Impact on neighbours' amenity

The proposed massing and the proximity of the proposal to existing buildings, especially 57-61 High Street and Luke Court, has been subject of extensive discussion with officers since pre-application stage. Blocks A and B have been designed so that the proposal will not have an overbearing impact on neighbouring residential properties.

With regards to the relationship between the proposal and Luke Court to the left, it is considered that the design of the building would not amount to an overbearing impact on the Luke Court units: Block B does not extend to a depth that would breach the 45-degree guidance and the courtyard design alleviates the bulk of built form away from the main habitable area of Luke Court.

The stairwell windows facing Luke Court and the glazed link could result in potential overlooking, as noted in the two objection letters received. However, this can be dealt with by carefully choosing the type of glass used in these elements of the proposal, and will be addressed as part of conditions 3 and 4.

The properties at 1-10 Luke Court will have 11 out of 24 (46%) windows assessed that will adhere to the BRE guidelines. The majority of the remaining windows have Vertical Sky Component (VSC) reductions between 0.60 and 0.79 times their former value. The Daylight and Sunlight Assessment notes that existing VSC levels for Luke Court are very high for an urban context, owing to the low-level existing building and the courtyard design of their building with the majority of the windows facing directly towards the proposed development site. The Assessment also comments that all of the windows will retain VSC results in the mid-high teens and low twenties which are frequently considered to be acceptable in an urban context with neighbouring buildings in close proximity.

In making assessments, a judgement is made as to the level of impact on affected windows. Where there is a less than 20% change in VSC the effect is judged as to not be noticeable. Between 20-30% it is judged to be minor adverse, 30-40% moderate adverse and over 40% major adverse. All these figures will be impacted by factors such as existing levels of daylight and sunlight and on-site conditions. The judgements that arise from these percentages do not form part of the BRE Guide and have become part of an industry standard utilised by Daylight and Sunlight specialists. It is for the Local Planning Authority to decide whether any losses result in a reduction in amenity which is or is not acceptable, depending on a number of circumstances.

The BRE Guidance also states: *“Although it gives numerical guidelines, these should be interpreted flexibly since natural lighting is only one of many factors in site layout design... In special circumstances the developer or planning authority may wish to use different target values. For example, in a historic city centre, or in an area with modern high-rise buildings, a higher degree of obstruction may be unavoidable if new developments are to match the height and proportions of existing buildings”*.

In this case, Luke Court indeed enjoys existing VSC levels that are very high for an urban context and that would not normally be found in a busy town centre. Nonetheless, the impact of the proposed development should not be detrimental to the amenity of existing residents.

Assessing the proposed values, there are only two windows that would experience a major adverse impact, both belonging to bedrooms. The windows that would be on the lower range of the ‘moderate adverse’ impact would also belong to bedrooms, with the exception of two living room/kitchen/dining areas. However, all these windows would retain VSC results in the mid-high teens and low twenties which are typical of many dense urban locations.

The Daylight and Sunlight Report shows that the living/kitchen/dining rooms of Luke Court are single-aspect deep rooms with the kitchen area located towards the back of the room. Inevitably, it is more difficult to receive good levels of daylight in the kitchen area, although the Report demonstrates that the area closest to the main window will still retain access to good levels of daylight.

In terms of daylight distribution, 9 out of 17 (53%) rooms will adhere to the BRE guidelines. The report demonstrates that 3 rooms are marginally below the BRE guidelines with reductions between 0.61 and 0.65 times their former values. The remaining rooms will retain between 0.3 and 0.58 times their former values. However, 2 of these rooms are bedrooms where it is acknowledged that daylight is of less importance.

In terms of sunlight, all windows that have been assessed (those orientated towards the south) will adhere to the BRE guidelines for both annual and winter probable sunlight hours.

One letter of objection comments that because the site is not within a historic city centre, nor is it in an area with modern high-rise buildings, there is no justification to interpret the BRE guidelines flexibly. Officers disagree with this consideration. In light of the location of the application site in a busy and accessible town centre location, where growth is directed and supported by local policies, it is inevitable that development proposals will result in a denser urban fabric, with taller buildings. Therefore, BRE guidelines will need to be interpreted flexibly, as recommended by the BRE Guidance itself, taking into account all aspects of the proposal and of the site context.

On balance, considering the dense urban location, the benefits that the proposal will bring to the High Street, the activation of the William Hunter Way frontage, and the fact that the worst affected windows would be bedrooms, it is considered that the impact on Luke Court is acceptable.

With regards to the impact on 57-61 High Street, 10 out of 11 (91%) windows tested for VSC will adhere to the BRE guidelines. Only 1 window will transgress marginally from the BRE guidelines, retaining 0.724 times their former value. All of the rooms tested will satisfy the BRE guidelines for daylight distribution.

There are no windows at nos.57-61 that qualify for sunlight assessment according to the BRE guidelines, as all the rear windows to this property face within 90 degrees of due north.

Therefore, the proposed development will not have a negative impact on the daylight and sunlight levels of the adjoining properties at 57-61 High Street that have rear windows facing in the direction of the site.

A condition has been added requesting the submission of a Construction Environmental Management Plan (CEMP), to demonstrate how the proposed construction activities will not adversely impact amenity, traffic or the environment of the surrounding area by minimising the creation of noise, air quality pollution, vibration and dust during the site preparation and construction phases of the development.

Landscape

The site contains buildings and hardstanding with no trees or other vegetation present. The proposal seeks to introduce a landscaped courtyard with planting, small trees and podium planting, as well as a green roof.

The Council's Landscape Officer has no objections to the proposal, subject to a detailed landscaping scheme being conditioned, and careful choice of planting that could withstand shady conditions, given its location within an internal courtyard.

The Officer also noted that the proposed green roof would provide a rainwater buffer and greater energy efficiency of the building and improve air quality in the area. Both the soft landscaped courtyard and green roof would contribute to biodiversity enhancement of the site and in turn encourage ecology within an urban location.

Overall, the landscape proposal is considered appropriate in this location, subject to a detailed landscape scheme being submitted, and it complies with Policy NE01 (Protecting and Enhancing the Natural Environment).

Flood and drainage

A Flood Risk Assessment and Surface Water Drainage Strategy have been submitted as part of the application submission and has been reviewed by Essex County Council who are the Lead Local Flood Authority (LLFA). The application site is within Flood Zone 1, at a low risk of flooding from all sources, and is located within a defined Critical Drainage Area (CDA).

In terms of SuDS strategy, the proposed green roof provides an opportunity for the collection of rainfall whilst reducing the velocity and time of concentration to the wider drainage system. Roof water will be conveyed by rainwater downpipes to ground level, where surface water will pass through a secondary treatment process in the form of permeable paving. Surplus run-off in extreme or intense storm events will be conveyed over the permeable paving surface and directed towards a rain garden in the courtyard.

Surface water will ultimately be discharged to the Thames Water public surface water sewer network within William Hunter Way at a discharge rate, in order to not have an exacerbating effect on the assets within this Critical Drainage Area. A vortex flow control device will be used to regulate flows and discharge volume.

The LLA have raised no objection to the proposal, which is thus in compliance with Policies NE09 (Flood Risk) and BE05 (Sustainable Drainage).

Noise

The Environmental Health Manager raised concerns over the potential for noise disturbance from the High Street activity, including night-time economy uses, and for the possible uses for the commercial and retail units below the residential accommodation, and between units of accommodation.

Therefore, a noise assessment has been conditioned to ensure that the levels of noise attenuation between the ground and first floor are appropriate for likely situations, e.g., a bar/restaurant type activity that could extend into the evening period.

A condition has been added requesting the submission of a CEMP, to demonstrate how the proposed construction activities will not adversely impact amenity, traffic or the environment of the surrounding area, by minimising the creation of noise, air quality pollution, vibration and dust during the site preparation and construction phases of the development.

Sustainability

According to Policy BE01 (Carbon Reduction and Renewable Energy), all applications for major development should be accompanied by a Sustainability Statement. The Sustainability Statement will need to address the requirements of Policies BE01

(Carbon Reduction and Renewable Energy), BE02 (Water Efficiency and Management) and BE04 (Management Heat Risk).

As this requirement was not relevant at the time of submission, no such assessment was submitted and has therefore been conditioned. The Sustainability Statement will need to demonstrate how, among other points, the proposal will achieve: at least a 10% reduction in carbon dioxide emissions above the requirements of Part L Building Regulations; limits of 110 litres per person per day; a minimum of 10% of the predicted energy needs of the development from renewable energy; a reduction for the potential for overheating and reliance on air conditioning systems.

Archaeology

The Essex Historic Environment Record (EHER) shows that the proposed development lies within the medieval settlement of Brentwood (EHER 525). In addition to this, the 1st edition OS mapping shows features and possible buildings, which would pre-date 1880. Indeed, recent archaeological work carried out on the High Street, revealed extensive medieval and post-medieval remains.

To ensure that any archaeological deposits found during the proposed works are recorded prior to commencement of development, the Essex Historic Environment Officer requested a number of conditions to be added to the decision notice, including a programme of archaeological works. The conditions have been added, and the proposal is considered to comply with Policy BE16 (Conservation and Enhancement of Historic Environment).

Legal Agreement

The applicant has accepted that it will be necessary for certain obligations in respect of the proposed application to be dealt with by way of an Agreement under Section 106 of the Town & Country Planning Act 1990. This is in line with Policy MG05 (Developer Contributions).

The Heads of Terms will include contribution to open space and the affordable housing clawback clause.

It is noted that as the proposal is for 13 units, of which 7 will be studios and 1 bed apartments, it does not meet the threshold for education or healthcare contribution.

8. Recommendation

It is recommended that a RESOLUTION TO GRANT PERMISSION is issued subject to the legal agreement being resolved, 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 Design details

Works above ground shall not be commenced until additional detailed drawings that show proposed new windows, doors, eaves, verges and cills by section and elevation at scales between 1:20 and 1:1 as appropriate have been submitted to and approved in writing by the local planning authority. The new sash windows (High Street) shall be in painted timber, and without trickle vents. Works shall be implemented in accordance with the approved details and shall be permanently maintained as such.

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

4 Materials

Development shall not be commenced until samples of the materials to be used on the external finishes have been submitted to and approved in writing by the local planning authority. This is to include a sample panel of brickwork (no less than 1 sqm) with bond, mortar and joint, and the glass to be used for the glazed link.

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

5 Design details

No electricity, gas, water meter boxes, antennae (roof level) or extraction vents shall be fixed to the façade of the building. All soil and waste plumbing shall be run internally and shall not be visible on the exterior.

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

6 Landscape

No development above slab level shall commence until a landscape scheme, providing specification of all proposed soft and hard landscaping and tree planting, is submitted to and approved in writing by the Local Planning Authority. The scheme of soft landscaping shall include details of a diversity of species, that includes native species or varieties of known biodiversity value where appropriate. The scheme of soft landscaping shall include details of the quantity, size, species, position and the proposed time of planting of all trees and shrubs to be planted, together with an indication of how they integrate with the proposal in the long term with regard to their mature size, anticipated routine maintenance and protection, and limited sunlight they are likely to receive. The specification shall include all green roof details. All tree and shrub planting included within the above specification shall accord with BS3936:1992, BS4043:1989 and BS8545:2014 and current landscape best practice.

The development shall thereafter be carried out solely in accordance with the details thus approved and shall thereafter be retained as such for the lifetime of the development unless otherwise approved, in writing, by the Local Planning Authority.

Reason: To ensure a satisfactory and appropriate landscape scheme relative to the development in order to comply with Local Policy NE01.

8 Highway

No development shall take place, including any ground works or demolition, until a Construction Management Plan has been submitted to, and approved in writing by, the local planning authority. The approved plan shall be adhered to throughout the construction period. The plan 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. wheel and underbody washing facilities

Reason: To ensure that on-street parking of these vehicles in the adjoining streets does not occur and to ensure that loose materials and spoil are not brought out onto the highway in the interests of highway safety and in accordance with Local Plan Policies BE09 and BE12.

9 Highway

Prior to first occupation, the redundant part of the existing vehicle access up to the site boundary to the west, shall be suitably and permanently closed incorporating the reinstatement to full height of the highway footway and kerbing.

Reason: To ensure the removal of and to preclude the creation of unnecessary points of traffic conflict in the highway in the interests of highway safety in accordance with Local Plan Policy BE09.

10 Highway

Prior to first occupation the cycle parking 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 in accordance with Local Plan Policies BE12 and BE13.

11 Highway

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 in accordance with Local Plan Policies BE09 and BE12.

12 Thames Water

No piling shall take place until a Piling Method Statement (detailing the depth and type of piling to be undertaken and the methodology by which such piling will be carried out, including measures to prevent and minimise the potential for damage to subsurface sewerage infrastructure, and the programme for the works) has been submitted to and approved in writing by the local planning authority in consultation with Thames Water. Any piling must be undertaken in accordance with the terms of the approved piling method statement.

Reason: The proposed works will be in close proximity to underground sewerage utility infrastructure. Piling has the potential to significantly impact / cause failure of local underground sewerage utility infrastructure.

13 Noise

Development shall not be commenced until a scheme for protecting the proposed accommodation from noise has been submitted to and approved in writing by the Local Planning Authority. The scheme shall include mechanical ventilation where appropriate and details of the specification for windows facing onto external areas, particularly on the High Street façade, to ensure that the internal noise levels within any habitable room are not predicted to exceed the recommended standards set out in Table 4 of BS8233:2014, i.e. no greater than 30dB LAeq23:00 to 07:00 (night time) and 45dB LAeq from 07:00 to 23:00 (day time). The building shall be constructed so as to provide sound insulation against internally and externally generated noise to ensure that internal noise levels will meet the standards of Table 4 BS8233:2014, with windows shut and other means of ventilation provided.

Reason: In order to protect the amenity of future occupiers.

14 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 shall identify that construction activities so far as is practical do not adversely impact amenity, traffic or the environment of the surrounding area by minimising the creation of noise, air quality pollution, vibration and dust during the site preparation and construction phases of the development. The demolition and construction works shall be completed in accordance with the information agreed within the CEMP by the Local Planning Authority.

Reason: to protect the amenity of neighbouring occupiers.

15 Sustainability

Prior to commencement of development, a Sustainability Statement shall be submitted to the Local Planning Authority to address:

- Detailed calculations of the energy demand of the proposed building
- Detailed calculations to demonstrate how the proposal will achieve at least a 10% reduction in carbon dioxide emissions above the requirements of Part L Building Regulations
- Renewable energy generation (wherever possible, a minimum of 10% will be required)
- Adaptation to climate change

- Water management
- Site waste management
- Use of materials

Reason: In the interests of improving resource efficiency to meet the government's carbon targets in accordance with Local Plan Policies BE01, BE02, BE03 and BE04.

16 Archaeology

Following the demolition of the existing buildings to ground level no further development or preliminary groundworks can commence until a programme of archaeological trial trenching has been secured and undertaken in accordance with a written scheme of investigation which has been submitted by the applicant, and approved by the planning authority.

Reason: To safeguard heritage assets of archaeological interest that may survive on the site, in line with Local Policy BE16.

17 Archaeology

A mitigation strategy detailing the excavation/preservation strategy shall be submitted to the local planning authority following the completion of the programme of archaeological trial trenching.

Reason: To safeguard heritage assets of archaeological interest that may survive on the site, in line with Local Policy BE16.

18 Archaeology

No development or preliminary groundworks can commence on those areas containing archaeological deposits until the satisfactory completion of fieldwork, as detailed in the mitigation strategy, and which has been signed off by the local planning authority through its historic environment advisors.

Reason: To safeguard heritage assets of archaeological interest that may survive on the site, in line with Local Policy BE16.

19 Archaeology

The applicant will submit to the local planning authority a post-excavation assessment (to be submitted within six months of the completion of fieldwork, unless otherwise agreed in advance with the Planning Authority). This will result in the completion of post-excavation analysis, preparation of a full site archive and report ready for deposition at the local museum, and submission of a publication report.

Reason: To safeguard heritage assets of archaeological interest that may survive on the site, in line with Local Policy BE16.

INFORMATIVES:

1 INF05

The following development plan policies contained in the Brentwood Local Plan 2016-2033 are relevant to this decision: MG01, MG03, MG05, BE01, BE02, BE04,

BE05, BE09, BE12, BE13, BE14, BE15, BE16, HP01, HP03, HP05, HP06, PC04, PC05, PC06, PC07, NE01, NE05, NE08 and NE09.

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 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.

4 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.

5 SUDS

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

6 SUDS

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.

7 SUDS

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.

8 SUDS

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.

9 SUDS

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.

10 Thames Water

A Groundwater Risk Management Permit from Thames Water will be required for discharging groundwater into a public sewer. Any discharge made without a permit is deemed illegal and may result in prosecution under the provisions of the Water Industry Act 1991. We would expect the developer to demonstrate what measures he will undertake to minimise groundwater discharges into the public sewer. Permit enquiries should be directed to Thames Water's Risk Management Team by telephoning 020 3577 9483 or by emailing trade.effluent@thameswater.co.uk. Application forms should be completed online via www.thameswater.co.uk. Please refer to the Wholesale; Business customers; Groundwater discharges section.

11 Highway

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.

12 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.

13 Highway

The applicants should be advised to contact the Development Management Team by email at development.management@essexhighways.org or by post to: SMO3 -Essex Highways, Childerditch Highways Depot, Unit 36, Childerditch Industrial Park, Childerditch Hall Drive, Brentwood, Essex, CM13 3HD

14 Secure by Design

Where possible, each element of the proposal shall be constructed to the standard required to achieve Secured by Design accreditation (as awarded by Essex Police) to provide a good standard of security to future occupants and visitors to the site and to reduce the risk of crime, in accordance with Local Plan Policy BE15 and the aims and objectives of the NPPF chapter 8.

Documents:

All background documents including application forms, drawings and other supporting documentation relating to this application can be viewed online:
<https://www.brentwood.gov.uk/-/applicationsviewcommentandtrack>