



To: Site promoters for the Land North of Shenfield

Sarah Kirk, Redrow Homes Ltd
Carl Glossop, Countryside Properties
Jack Lilliot, Stonebond Properties Ltd
Michael Jenner, Croudace Homes

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WITHOUT PREJUDICE

Dear All,

Redevelopment Of Land North Of Shenfield (Emerging Local Plan Allocation Site R03): Outline Planning Development Management Process.

Thank you for attending the initial meeting with Brentwood Borough Council Development Management officers on 22 April 2021. We felt this was a helpful opportunity for officers to be introduced to the project at this early stage of transitioning into the Development Management (DM) stage.

As promised, this letter provides our thoughts regarding the key issues discussed, with our intention to support the delivery process for the allocation site with an appropriate DM process and with commensurate resourcing.

Masterplan

It was made clear that the four promoters would prefer and are indeed pursuing an approach that facilitates the discrete delivery of the respective landholdings. The Statement of Common Ground (SoCG) for this site and the Brentwood Local Plan examination already establishes a coordination approach for delivery. However, this is at high level and the comprehensive masterplan for holistic delivery that is required by the emerging Local Plan policy will provide the next, more detailed level for which coordination between the sites constituent parts will again be required.

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As recognised at our meeting, the active involvement of Council officers at this stage will be important to ensure that the emerging details for the redevelopment continue to address policy requirements. The Council expects that the Masterplan process can be private sector led (in coordination with the Council and relevant stakeholders). Although officers envisage that the Masterplan phase should form part of the DM process, the continued involvement of Planning Policy officers will ensure that joint work to date can be progressed in a consistent way that is focused on the Council's emerging Local Plan delivery and the site specific circumstances.

Officers were asked to confirm the details to be included as part of the Masterplan. The relevant strategic matters to be resolved across the site are as follows.

- Deliverables listed in the allocation policy and any other relevant deliverables such as mitigation that may become apparent throughout the planning process. These include:
 - Site Layout with accesses and connectivity, including circulation principles including Public Right of Ways, plus sustainable links to the surrounding area;
 - Distribution of housing including specification of tenure, size and type across the site (as a minimum the apportionment to each sub-site), and the location of the residential care home;
 - Location of education facilities;
 - Distribution of self/custom build development (as a minimum the apportionment to each sub-site), approach to spatial integration and approach to implementation, considering that at the anticipated timescales for delivery, the Council may not have a comprehensive borough-wide scheme to support self/custom build;
 - Location of employment land relative to size and nature;
 - Spatial distribution of multi-functional green infrastructure, including size and nature;
 - Approach to protect/enhance Arnold's Wood Local Wildlife Site. What is proposed and does the proposed green infrastructure relate?
 - Solutions to Infrastructure Requirements; and
 - Approach to placemaking and design quality, including general design quality, gateway location, sustainability, landscape and buffers at sensitive boundaries.
- Mechanism for joined-up delivery (SoCG/MoU/etc), and Phasing Method – Trajectory for the site overall, broken down to the four landholdings with respective key deliverables, including those referred to above. Specifically, it may be helpful for this stage to consider:
 - Construction stage planning: in order for the four sub-sites to come forward with maximum efficiency and without conflicting approaches;
 - Stewardship arrangements for the operational phase; and
 - Options for the form of s106 legal agreements, such as an umbrella s106 also involving Essex County Council as a signatory to provide a comprehensive, unambiguous and transparent approach.

- Viability – The relevance of Viability to the masterplanning process will require further discussion. Although the involved Local Plan process is based on appropriate financial realism, which already provides a certain level of confidence, it would seem reasonable to provide an update beyond the Local Plan viability assessment if significant changes to delivery would result from the masterplanning process.
- Description of DM Process – To be agreed with the Council (see further).

Subject to the four promoters' robust commitments to the coordinated delivery of the site, and in accordance with Policy R03 Development Principle B(a), officers would not see a specific requirement for a separate formal endorsement stage for the masterplan, although as part of the process there would be a requirement for:

- An independent Quality/Design Panel Review. This will be appropriate, in order to inform officers' appraisal of the next level of detail that will need to reconcile the complexity of the delivery arrangements to focus on a successfully coordinated outcome. Officers envisage that a single review may suffice, in the event that a first Panel view is generally positively concluded.
- Appropriate member involvement. It would be particularly important that the final Masterplan would be presented to members in advance of being included as part of any planning application.

EIA

The Environmental Impact Assessment process was highlighted as an initial DM task that should commence at the earliest opportunity.

Officers consider that the allocation site calls for a "whole project" approach in terms of the EIA process. To be clear, in anticipation of a possible fragmented process, this would mean that any request for a Screening or Scoping Opinion would require the consideration of cumulative impact to involve specific consideration of the delivery of the allocation site; even if the smallest parcel would be put forward as the subject site for a Screening submission. We anticipate that the process for Screening/Scoping will necessitate the involvement of equal quality information such as baseline surveys for each of the sub-sites. There may be efficiencies and economies of scale to consider for the four parties in terms of generating such information. In any case, we would advise a robust Screening/Scoping process involving pre-submission inception discussion and a pre-submission review of the draft Screening/Scoping Report. We can suggest two relevant examples of EIA Screening and Scoping Reports: Ref. 19/0000782/EIASO and Ref. 18/01173/EIASO.

Subject to your confirmation of the integrated EIA process on a whole project basis and your agreement to fund the Council's EIA consultants, DM officers expect to be able to mobilise the consultants at short notice to commence on the Screening/Scoping stage in advance of the possibly more time-consuming task of setting up Planning Performance Agreements (PPAs) for the allocation site.

Programme and Resourcing

The SoCG describes the allocation site's short term programme milestones as follows:
"Working alongside BBC, with pre-adoption PPAs and having undertaken EIA screening/scoping where appropriate, it is anticipated that all four developers will have planning applications ready to submit on adoption of the local plan."

Further discussion will be required to agree how the Masterplan, EIA and subsequent planning applications will be brought forward, but with the timescales noted, it would seem that the target scenario would involve coordinated efforts on the Masterplan and on the EIA between the Council and all site promoters/agents, with more detailed pre-application work for each of the four individual landholdings and their respective teams running in parallel. The configuration options for this process can be streamlined in theory, but officers appreciate the individual accountability in respect of the four sub-sites. In consequence, a significant officer resourcing implication is anticipated in terms of the optimal involvement of a single planning officer dealing with four pre-application cases and potentially the Masterplan and EIA co-ordination. We foresee that officer capacity exists at the moment, to deal with initial masterplanning and EIA tasks, and subject to some further discussion to confirm the approach for individual sites, agreeing PPAs and to secure additional resource to cover officer requirements moving forward. Please rest assured that the Council has been anticipating an influx of pre-application enquiries on its allocation sites and options for expanding internal resources in line with the Council's housing trajectory are already being explored. You may be interested in a paper recently published as part of the Local Plan examination following questions on this subject from the Inspectors (see examination document library reference F94). Our discussion has added further urgency to this task and we hope to update you further soon.

Subject to further discussion, we may set up four individual PPAs to cover:

- Masterplanning and EIA (Screening/Scoping/Assessment), as a share of collective effort.
- Individual application proposals (including EIA if relevant)

Ideally, the Council's ambition is to run integrated PPAs with main statutory consultee stakeholders such as Essex County Council, but unfortunately as yet, there is no existing mechanism for that. Therefore, we would advise that complementary PPAs will need to be secured with Essex County Council. Despite the resulting separate contractual accountabilities, BBC and ECC officers would coordinate efforts in accordance with a joined up PPA programme, although due to our LPA role we envisage Brentwood's DM case officer to be the main conduit for the project's communications. This central role will therefore involve attendance at relevant meetings with ECC, etc.

Finally, DM officers appreciate that the focus around the emerging Local Plan has so far resulted in a loose consortium arrangement among the site's promoters. DM officers have thought about setting up efficient arrangements on all sides, and we have presented our thoughts on the Council's resourcing arrangements above. Clearly, DM officers dealing with a single party around a single proposal and a single initial planning application would be the efficiency optimum. Whilst such an arrangement may not be a realistic prospect, there may be ways to replicate some of these benefits. For example, the promoters could

nominate one promoter as a lead representative. If this is not acceptable, perhaps it may be an option to engage an independent lead consultant, either to run the project as a whole, or to at least deal with discrete elements such as the below to deal with the site-wide matters in advance of individual applications, and we would be happy to discuss the options further with you. This results in the following questions:

- In light of the Council's expectation that the Masterplan will be consortium-led, who will lead and coordinate the masterplanning process, including private sector side inputs?
- Assuming that there will be an integrated EIA process for the allocation site, who will initiate the EIA Screening/Scoping for "the project"?

Conclusion

Officers appreciate that the above information will likely give rise to a need for further discussion and so we reiterate that would be keen to continue our engagement with you, and in particular to confirm appropriate terms of reference for the project and to set up a pragmatic programme to jointly work through the necessary DM tasks involved with the successful delivery of the allocation site.

We look forward to hearing back from you in due course.

Yours sincerely,

A handwritten signature in black ink, consisting of a large, stylized 'J' followed by a horizontal line.

Justin Booij

Senior Planner, Dunton Hills Garden Village

CC

Phil Drane, Brentwood Borough Council
Caroline Corrigan, Brentwood Borough Council
Jonathan Quilter, Brentwood Borough Council
Jane Piper, Barton Willmore
Michael Calder, Phase 2 Planning
James Firth, Strutt and Parker
Nicky Parsons, Pegasus Group

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