

Chelmsford Road Area Residents' Association Comments

Chelmsford Road Area Residents' Association Comments 30 November 2023	Croudace Response
<p>It is imperative for the developers to ascertain and assure that the proposed developments do not unduly strain infrastructure, traffic, biodiversity, health services, and the overall well-being of the community. The developers bear the responsibility to ensure that both the infrastructure and the community can effectively accommodate the increased demands resulting from the proposed developments</p>	<p>The planning application is accompanied by the following comprehensive list of documents to address all of these issues and to meet BBC validation requirements:</p> <ul style="list-style-type: none"> • Design and Access Statement • Transport Assessment • Travel Plan • Ground Investigation Report • Flood Risk Assessment and Drainage Strategy • Landscape and Visual Impact Assessment • Landscape and Biodiversity Management Strategy • Ecological Impact Assessment • Biodiversity Net Gain Assessment • Arboriculture Impact Assessment • Woodland Management Plan • Veteran Tree Management Plan • Sustainability Statement • Energy Strategy • Lighting Strategy • Heritage Assessment • Noise Assessment • Air Quality Assessment • Utilities Assessment • Education Report • Health Impact Assessment (of whole R03 allocation) • Statement of Community Involvement
<p>The potential for lack of coordination, conflicts, and discord among the developers is likely unless all pertinent issues, compliance with regulations, and adherence to the Brentwood Local Plan are adequately addressed. To foster harmonious development, it is essential for all parties involved to resolve these matters and commit to a binding agreement, which should include alignment with the preferences and concerns of the residents in the area.</p>	<p>Policy R03 was drafted - and adopted - knowing the site would come forward in four phases. Supporting paragraph 9.102 states, <i>“As the allocation comprises a number of parcels which could be brought forwards at different times it is important that consideration is given to how the site will develop holistically. As individual parcels are brought forwards any masterplan will need to appropriately consider and reflect what is being proposed elsewhere on the site. This is particularly important in ensuring that collective requirements for infrastructure</i></p>

	<p><i>provision are considered and delivered appropriately</i>". As such, Policy R03 required at paragraph 2a the production of <i>"a comprehensive masterplan and phasing strategy to inform detailed proposals"</i>. This part of the policy was fulfilled when the comprehensive Masterplan Development Principles document was approved in July 2023.</p> <p>The process is Local Plan, then Masterplan Development Principles document, then individual applications. As the applications are in conformity with the Masterplan Development Principles document, the developers would appreciate understanding in advance what the purpose of the meeting might be and what the agenda may cover.</p> <p>It should also be noted that the Developer Group worked very closely together during the Local Plan Examination and the 18 months of preparing the Masterplan Development Principles document. Jane Piper presented the draft Masterplan Development Principles document to Members on 3 August 2022, alongside all four Developers. During the preparation of the Masterplan Development Principles document, the layouts of all four applications were considered through individual pre-application discussions and reflected in the various iterations of the Masterplan Principles document. The draft layouts were circulated to the Group members at various times to ensure collaboration and cohesion. This was clear when all four draft applications were considered by the Quality Review Panel after the Masterplan Development Principles document on 18 May 2023.</p>
<p>Roads and Traffic</p> <p>There is inadequate consideration of a wide range of traffic management, road safety and right of way issues.</p> <p>There is a plan for a toucan crossing on Chelmsford Road south of the new development access, as outlined in the main traffic report RO4 SGT, Section 4.22. We believe this proposal to be inadequate when the totality of the developments across all four developers is considered.</p> <p>As a primary school is included in the application, a future application to build houses and a care home on the opposite side of Chelmsford Road pending, this should be addressed now. There will clearly be a need for safe crossings near to the proposed entrance to the development for children to cross and near the site of the proposed care home for the residents there to cross the road safely. We would</p>	<p>As part of the planning application a Transport Assessment was undertaken for the site which considered the effect of the proposed development on the transport network.</p> <p>As part of the development of the Local Plan, a Masterplan Development Principles document was drawn up for the area to guide the development of the site allocation. The submitted application complies with that and as such the transport plan within that guides the development. This is the comprehensive strategy for the area that has already been approved.</p> <p>The application considers the cumulative impact of the entire site allocation on the road network and is similar to that undertaken for the Redrow site (which also</p>

expect that this will require an extended pedestrian phase to cope with the anticipated mobility issues of the care home residents. These should be paid for by the developers once the locations have been agreed with Essex Highway and applications revised accordingly.

In addition to the obvious need for at least two pedestrian crossings, a proper overall plan needs to be drawn up by all the developers and reviewed by Essex Highways. This needs to show where the various junctions will be and how they will interact with each other. Until Countrywide submits its application this will not be possible, and this application should therefore be deferred until that time.

To summarise, from the junction of the Mountnessing roundabout with Chelmsford Road to the existing junction with Alexander Lane there will need to be at least one, possibly two, junctions from the Countrywide site onto Chelmsford Road; a junction from the Redrow site (very near to the existing Fen Close junction); a new junction next to the Zen House; at least one junction from the Croudace site; and a still to be agreed junction from the Hutton Football Club site. All this on an already congested road.

The existing service station sited just off the roundabout is already in a dangerous location, where vehicles frequently queue onto Chelmsford Road preventing vehicles from exiting the slip road and blocking access to Chelmsford Road itself. None of the traffic surveys submitted take any of this into account.

The speed limits on the stretch of the A1023 will need to be reduced and made consistent. At present, it is 60mph as vehicles come off the roundabout at the junction with the A12, reducing to 40mph for a stretch on the A1023 before being lowered again to 30mph. This variation in speed limits will clearly be inappropriate and dangerous with all the new crossing and junctions. There is a proposal to reduce the speed limit on Chelmsford Road to 30mph (Section 4.24 of the main traffic report RO4 SGT). We would suggest that should be reduced to 20mph to reflect the increased population density being proposed across all four developments as well as the additional traffic generated by the inclusion of a nursery, a primary school and a care home.

We suggest that at a minimum the traffic surveys are re-run with the impacts of all developments considered when analysing effects on the local infrastructure. Much of the data submitted was collected in May 2022. We believe that this data is not

included the entire allocation). All proposed amendments and accesses have been tested with this cumulative development included.

As part of these assessments, it has been determined through discussions with ECC that the site access roundabout and Toucan crossing would be the best solution onto Chelmsford Road. These have been subject of a Stage 1 Road Safety Audit which has not identified any road safety concerns with the proposals. Given the desire line for the proposed development there is no requirement for an additional signal-controlled crossing over Chelmsford Road as a result of the Croudace development.

Each development parcel will design their own access and this will be subject to the approval of Essex County Council as Highway Authority.

In relation to the A12 / Chelmsford Road / Service Station junction, detailed discussions led by RPS on behalf of the R03 Developer Group have taken place. Traffic surveys undertaken are independent and present a view of how the junction operates. These surveys were then discussed and agreed with the highway authorities. This has involved extensive testing of the junction. The conclusions are as reported in the Transport Assessment.

With regards to speed limits, discussions have taken place with ECC regarding the speed limit in close proximity to the site access to the Croudace site. At present, the speed limit in the vicinity of the site access is 40mph and the junction has been designed to reflect that speed limit. Croudace is willing, however, to fund the speed reduction and TRO process along the site frontage, if ECC were to agree.

Traffic surveys were undertaken in May 2022. Manual traffic counts were undertaken on Wednesday 25th May at junctions and weeklong counts of key links were between 21-27th May. This is not the bank holiday which was in early June because of the Jubilee. The traffic surveys are considered to be neutral and representative based on comparisons with other data such as DfT / National Highways data on the A12 which shows that Wednesday 25th May is comparable with Wednesdays in April and September 2022.

indicative of the usual traffic flows as they will have been affected by a reduction in traffic volumes as a result of the additional Bank Holiday for the Queen's Platinum Jubilee.

The map of the overall site submitted with this application shows a road running from Alexander Lane, through the proposed drainage mitigation area to Chelmsford Road. We suggest that this is no longer required as the site has effectively been split into two distinct sections because of the newly introduced drainage mitigation measures. It is worth noting that this had not been properly addressed in the original Local Plan and were added at the insistence of the Environment Agency. The proposed road has the potential to become a rat-run and would also push far too much traffic into Alexander Lane, the lower part of which is too narrow to cope with substantial volumes of traffic.

The pavement along that stretch of Alexander Lane is already a problem as in places it is less than 1 metre wide, making the proposal for that road to accommodate more cars, a cycle path and encourage people to walk into Shenfield impossible to achieve. The pavement from Farm Cottage towards Oliver Rd is very narrow in places and outside "Lecia rely" only 0.5m wide. Today, it is unsafe for pedestrians to continue until traffic has passed and there is no space for widening the pavement here. The increase in traffic and pedestrians coming from the development will make this an even bigger safety hazard.

The developers should be addressing this if walking is to be encouraged, which is a stated aim and proposed outcome of this development.

Removing the proposed (rat-run) road through the estate will necessitate dropping the poorly considered proposal to stop access to Alexander Lane beyond Shenfield School from Chelmsford Road as outlined in the original Local Plan. We suggest that this would also stop Oliver Road being turned into a major through road, another of the consequences of the development that needs serious consideration but which has not been taken into account.

Furthermore, in the light of the motion passed at the last Full Council about improving biodiversity in new developments (see Biodiversity comments) we should see the drainage mitigation measures as a golden opportunity to achieve the sort of improvements envisaged by the Council on this site. Any chance of doing that will be lost if a road is constructed through this flood-plain. All that is needed is a

The roundabout/main access to the Croudace site off Chelmsford Road is in an area susceptible to flooding during extreme storm events, which cannot be resolved without significant (and disruptive) reprofiling/redesign of Chelmsford Road. A new permanently safe access to all parts of the development via Alexander Lane is required to satisfy current planning policies. During such extreme storm events, this route will serve as a safe alternative to Chelmsford Road for all users.

To comply with the Local Plan policy and the Masterplan Development Principles document, it has always been proposed that Alexander Lane would be closed in the middle to through traffic. This was a requirement of ECC and Croudace do not see it as a negative and are willing to support its closure to through traffic.

As part of the development a new route has been designed through the site but this is a residential road which is not direct and has been designed with pedestrian and cycles in mind rather than through traffic. The Transport Assessment has considered the effect of this and has determined that it will not result in more through traffic using the southern part of Alexandra Lane than at present. The only increased traffic on Alexander Lane is related to the development and this is a relatively small volume of traffic as the majority uses the northern access onto Chelmsford Road.

Croudace has proposed a series of pedestrian and cycle improvements and is currently in discussions with ECC regarding offsite improvements. Croudace can only propose improvements off-site where they are deliverable and these discussions are ongoing.

As noted above, the roundabout/main access to the Croudace site off Chelmsford Road is in an area susceptible to flooding during extreme storm events, which cannot be resolved without significant (and disruptive) reprofiling/redesign of Chelmsford Road. A new permanently safe access to all parts of the development

footpath, with a cycle path alongside. However, the continued vulnerability of the site to flooding must be addressed so that any footpaths remain usable at all times of the year. This must raise a question mark over the routing of a footpath across a flood mitigation area.

The Local Plan requires enhancement of public rights of way yet there is no mention of the current consideration by Essex Legal Services of the application for formal recognition of the long-established network of footpaths across Officers' Meadow. This is a serious omission as, if approved, they would significantly impact the planned layout of the site.

There should be just one road from the Croudace and Stonebond sites onto Alexander Lane. Having two roads exiting the development sites in such close proximity is unnecessary and potentially dangerous as they will be near a tight bend with limited visibility. The proposed road in the Stonebond development should not exit onto Alexander Lane but be diverted to connect to the existing Croudace road network within the new development (or vice-versa).

In addition, cyclists will exit the cycle lanes onto Alexander Lane but will then be cycling on the road and contending with this increased traffic.

The proposed cycle path shown traversing Brentwood Borough Council (BBC) land (in Appendix O of the Transport Assessment), currently a playing field and one of only two open spaces in Shenfield, should be accommodated with the main development proposals. This will require co-operation between Croudace and Stonebond, yet another reason for deferring this application until the North Shenfield development can be considered as a whole. If implemented, this would pose a significant risk to residents when reversing out of their drives due to restricted visibility, as well as to pedestrians and cyclists. It would also lead to a loss of public open space. Surely, a development on this scale should be looking to

via Alexander Lane is required to satisfy current planning policies. This must be suitable for emergency vehicles thus a foot/cycle path is not sufficient.

The proposed crossing is being designed in liaison with the Environment Agency and will comprise 11 large (4m wide) box-culverts through the floodplain, effectively working as a causeway, which will minimise its environmental impact, allowing the movement of animals and the establishment of a biodiverse environment.

The public right of way crossing the attenuation basin in the north-eastern corner of the site will be a wooden causeway/footbridge construction not susceptible to flooding for storms up to the very extreme events considered in the design.

This is a separate legal matter and not a planning consideration.

In relation to Public Rights of Way (PRoW), there is a single PRoW (Footpath 86), which runs through the Croudace site. We are currently in discussions with ECC and Brentwood Borough Council who have agreed in principle to the minor diversion of the PRoW. There will be a large network of paths and routes created throughout the site as shown on the masterplan. At this stage, no discussions have taken place into the designation of such routes. They will be managed and maintained along with all the open space and SUDs by a management company. This will be set out in the s106 legal agreement.

Based on the designs put forward to date both accesses can be safely delivered as designed and do not present any road safety issues.

As part of the proposals, it is envisaged that south of the Stonebond site that cyclists will need to join the road as they currently do. This is a relatively quiet road and as such is safe for cycling.

It is not the intention to provide the path through the Brentwood Council land but it has been shown to demonstrate the opportunities available if the Stonebond site was not to come forward. It is fully anticipated that Stonebond will come forward and then the route would be provided along Alexander Lane.

<p>enhance that open space, not curtail it? It has potential to be better used if upgraded.</p>	
<p>Community facilities and employment</p> <p>The application falls short of the requirements of the Local Plan and good development in many regards, especially when it comes to community facilities and employment.</p> <p>It fails to provide any community facilities. The so-called "community hub" seems to be comprised of a tree and is only there because the tree in question is protected. There are no shops, cafes, or community buildings. There are no shops within a 15-minute walk of North Shenfield, which must be the gold standard for all future major developments. The nearest community hall is 1.5 miles away.</p> <p>For people living in the centre or at the far end of the proposed development, the nearest shops and cafes will be at least a 30-minute walk and will inevitably encourage the use of vehicles.</p> <p>The suggestion that the small shop at the garage at the far end of Chelmsford Road could meet the needs of new and existing residents is risible. This is at the back of a busy, cramped and often congested garage forecourt and is not safe for an increase in the number of pedestrians that would result from the proposed developments.</p> <p>Health service professionals have identified isolation and loneliness as a key contributor to poor health outcomes. This development will exacerbate those problems, especially as none of the associated developments by Redrow, Stonebond or Countrywide address the problems. It will be a large, soulless estate with no focus, no sense of community. This will almost certainly lead to significant levels of anti-social behaviour, especially if there are large numbers of teenagers living there. This needs to be addressed in consultation with the local NHS and Essex Police and a major revision of the plans to meet these shortcomings is clearly essential, especially as the health service has already identified the inability of existing GP and related services to cope with the demand from the new development. Concerns have been raised and lodged as part of the consultation process from both the police and health services - these concerns must be addressed and mitigated.</p> <p>The Local Plan requires the provision of employment opportunities as part of the R03 development. There are none in this application. All the developers should be</p>	<p>There is no requirement for no shops, cafes, or community buildings in Policy R03. Not only is there not enough development to sustain such facilities; any such facilities so close to those already existing in the vicinity would only bring unwelcomed competition. This was discussed during the preparation of the Local Plan policy</p> <p>As the Masterplan Development Principles document shows at Figure 4, the Croudace site is within a 20 minute walk or 10 minute bike ride of the centre of Shenfield with all its services and facilities.</p> <p>See approved Masterplan Development Principles Document</p>

<p>contributing to this. Without shops and cafes, community workshops, spaces for small businesses and perhaps a gym or similar, this will not only be a soulless development, it will add nothing to the local economy in terms of employment. There is nothing that will contribute to wellness - no pharmacy, no wellness hub of the type of the health service is asking for. We believe the developers should commission a joint report from all relevant health service organisations that addresses these broader health and wellness needs. This should include clear commitments to fund the recommendations.</p> <p>Both Redrow and Croudace's applications fall short in providing adequate employment opportunities and open spaces for the community. The absence of community-centric amenities and sports facilities is of serious concern. It is hard to understand why no provisions are being made for shopping and other facilities. It is not a quick walk to Shenfield town centre. The BP garage is not capable of serving the local community. We understand that Countryside will submit proposals to use their employment land allocation to site a care home. We struggle to see how land straddling a major dual carriageway (A12) and a major through road to Brentwood (A1023) could be considered a suitable site for this type of development. A more appropriate use of this site could be the provision of local amenities which we believe should be incorporated into these proposals.</p> <p>There is ambiguity surrounding the proposals for primary school provision in the area. We understand that the developers are favouring the expansion of Long Ridings Primary school as opposed to building a new school on the North Shenfield site, thus raising doubts about the development's alignment with the Local Plan. We know that Croudace would increase the numbers of proposed houses if this school were not required.</p> <p>If Essex County Council eventually decides it does not require the proposed new primary school, the land earmarked for it should be re-allocated to community use - a park, allotments etc - and not additional housing.</p>	
<p>Ecology and biodiversity</p> <p>The application fails to take account of the recent update to Brentwood Borough Council's policies on biodiversity. At the Full Council meeting on 27 September a motion was passed unanimously saying the target for Biodiversity Net Gain (BNG) should be lifted from 10% to 20%, sustainable over at least 30 years. The application falls short of this target.</p>	<p>The target for biodiversity net gain is to be lifted from 10% to 20% - albeit this is not reflected within the adopted policies and therefore does not apply to the development. As such, it remains that only hedgerows have a marginal gain, which is currently being addressed with the proposed hedgerow planting as previously discussed.</p>

It shows a predicted gain of habitat units of 16.33%, watercourse units gain of 22.35% (which exceeds the 20% target). Hedgerows however are currently predicting only a 0.49% gain which is clearly unacceptable given how important they are to biodiversity. There is no comment on how any BNG will be protected in the long-term. This is important because once the site is populated there will be an inevitable degradation of biodiversity.

Arnold's Wood at the far end of the Croudace site is a small ancient wood well populated with bats. We know there are dormice and slowworms at several locations within the development area and one resident along Chelmsford Road has recently found what we believe are crested newts at the end of her garden backing on to the meadow (see below photographs). There are many wild hedgerows that the developer proposes removing without any obvious replacement.



In terms of how the proposed habitats will be protected in the long-term, this will likely be secured through a suitable planning condition such as a Landscape and Ecological Management Plan. Further planning conditions may be required to ensure the long-term protection of faunal enhancements.

The BNG report does not refer to fauna as this is not within the remit of this report. Faunal implications are addressed within the Ecological Appraisal report, and the BNG report makes reference to the BNG survey work and the metric calculations only as stated within Section 5.2 of the report '*Further biodiversity benefits will be provided by faunal enhancements, for example through the provision of new bat and bird boxes (which can be secured via suitably worded planning conditions). Such faunal enhancements are not quantified under the Metric as this deals with habitats alone and does not address faunal benefits.*'

Arnold's Wood is to be retained and buffered from development, such that any bats that use the woodland will remain unaffected.

As stated within Chapter 6 of the Ecological Appraisal report, Dormouse will be safeguarded as vegetation clearance will be carried out under a European Protected Species development licence, which will also include the provision of replacement habitat to compensate for losses and erection of Dormouse nest boxes.

The photos provided are Common Lizard and not Great Crested Newt (GCN). Environmental DNA (eDNA) surveys for GCN were undertaken for on-site ponds and ponds within 250m, and of the ponds that could be accessed and had not dried up at the time of the survey, these ponds returned a negative result for GCN, such that GCN are likely absent from the ponds and unlikely to utilise the site. Nevertheless, precautionary safeguards are recommended during works. As stated above, the photos provided are of Common Lizard, and the survey work undertaken at the site confirmed the presence of reptiles throughout the site. As such, a translocation exercise to safeguard reptiles is to be undertaken, along with a specific receptor area and provision of hibernacula and log piles for reptiles.

The whole area is rich in biodiversity and residents are anxious that a proper baseline is established for this so the requirement for the developers to enhance the biodiversity can be meaningfully measured.

As the site is divided up between four developers, we fear that they will pass the responsibility for protecting the biodiversity and ecology of the site among each other with important elements falling between them. Moreover, if parallel development goes ahead at the proposed Croudace and Redrow development sites it is unlikely that the existing wildlife populations within the ancient woodland extension of Arnold's Wood, including badgers and bats, can be sustained for the duration of the development.

While the Biodiversity Net-gain report makes provisions for the introduction of vegetation in relation to the proposed drainage structures, this will require up to 3 years to establish from the point at which the development is completed, and the impact on fauna is explicitly ruled out of scope for the report. We would like the impact on fauna to be considered and would request this to be included in a report.

Similarly, the Woodland Management report makes provisions for establishing future habitats for animals. However, impacts on existing wildlife during and after development has not been addressed. And there is no clear provision for how wildlife would be re-established once the proposed development is complete. Instead, it should be considered if existing wildlife can be retained during and after the proposed development of the sites within the wider B03 development area, where parallel development of the proposed Croudace and Redrow sites could impact the ability of the existing wildlife populations to remain within area.

Establishing the baseline – Aspect Ecology have been involved in this project and undertaken Phase 1 Habitat Surveys as per the standard methodology at the site since 2016. As such, it is concluded that an accurate assessment of the baseline of the site has been established and an additional ecology survey would be disproportionate given the baseline and update survey work that has been undertaken, as well as the suite of faunal surveys to date.

The Woodland Management Plan has been prepared for Croudace and Redrow (although we are not sure it has been submitted as part of the Redrow application yet) and it sets out what the responsibilities of each developer will be, which can be dealt with by condition and or legal agreement.

All potential faunal impacts are addressed within the Ecological Appraisal report, with appropriate safeguards, enhancements and licensing requirements where needed included to mitigate and manage any potential impacts from the development.

<p>We believe that a single, independent ecology survey should be carried out for the entire North Shenfield (R03) area, paid for by the four developers.</p>	<p>Policy R03 allows for the four developers to bring forward separate applications. It is up to Brentwood BC to co-ordinate conditions and legal agreements to ensure a comprehensive approach, and we understand this is being done.</p>
<p>Drainage and Sewers</p> <p>Serious concerns are raised about the proposed road dividing the drainage mitigation area. This division could lead to flooding, and alternative footpaths and cycle paths should be considered to mitigate such risks. - Chelmsford Road regularly floods now. Any additional houses are going to make this worse. This does not seem to have been considered adequately in the plans.</p> <p>The capacity of sewers, rainwater drainage, and electricity infrastructure needs careful assessment. Sustainable solutions should be prioritised to avoid overburdening existing infrastructure. The sewer in Chelmsford Road has had many problems with blockages in recent years. All developments need to combine to install a future proof sewer infrastructure and treatment system, provided Anglian Water can accommodate the additional discharge from the properties. The additional discharge will only increase pressure upon Anglian Water and the existing treatment works with the potential risk for discharge(s)</p>	<p>As noted above, the roundabout/main access to the Croudace site off Chelmsford Road is in an area susceptible to flooding during extreme storm events, which cannot be resolved without significant (and disruptive) reprofiling/redesign of Chelmsford Road. A new permanently safe access to all parts of the development via Alexander Lane is required to satisfy current planning policies. This must be suitable for emergency vehicles thus a foot/cycle path is not sufficient.</p> <p>The proposed crossing is being designed in liaison with the Environment Agency and will comprise 11 large (4m wide) box-culverts through the floodplain, effectively working as a causeway, which will make its impact on flood risk (on site or elsewhere) negligible. During extreme storm events, this route will serve as a safe alternative to Chelmsford Road for all users.</p> <p>Anglian Water is a statutory consultee and has confirmed that the existing sewer along Chelmsford Road has sufficient capacity to accommodate the proposed development. Even if that was not the case, Anglian Water has an obligation under the Water Industry Act to undertake any upgrades to their infrastructure necessary to accommodate approved development (i.e., sewerage undertakers cannot obstruct development on the grounds of insufficient capacity). The costs of upgrade works are covered by the infrastructure charges levied on developers wanting new connections to Anglian Water sewers.</p>
<p>Rainwater</p> <p>Buildings affect the ability of the ground to absorb rainwater. As Chelmsford Road is regularly flooded, there will be a greater need for surface water drainage, soak-aways will not suffice in heavy rainfall, they soon fill, and the clay sub-strata is slow to absorb the water. Discharging rainwater into the foul sewers is not feasible as it will only increase the burden on Anglian Water. The L/Plan advocates conservation measures for water efficiency and management; 'Grey water' systems for harvesting and recycling rainwater should be mandated for all new developments, this will alleviate the risks of flooding and reduce water charges.</p>	<p>The proposed rainwater drainage system will not use soakaways nor discharge to foul water sewers. The system has been designed to attenuate the runoff generated by the proposed development to very low (i.e., greenfield) rates that will be discharged to the nearby watercourse without posing any flood risk on or off-site (in fact, slightly reducing flood risk to areas downstream of the proposed development).</p> <p>All units will be provided with water butts to minimise the waste of clean/treated water in gardening activities.</p>

<p>A thorough examination of the impact of traffic on drainage, particularly during peak times, is warranted. This assessment should form an integral part of the overall planning considerations.</p>	
<p>Flood Risks</p> <ul style="list-style-type: none"> • The flood risk assessment and drainage strategy report provided by Croudace appears to only address flood risk from surface water run-off. Firstly, it does not consider flood risks related to groundwater within what is a floodplain catchment and therefore subject to seasonal waterlogging. Secondly, it does not consider the impacts to areas immediately outside the boundary of the proposed development site. Specifically: • The flood risk assessment is carried out using unknown modelling of surface runoff from the area of the proposed development site that drains into the Shenfield watercourse. It does not consider that a significant area to the north targeted for the highest development density is located within a catchment draining across the ancient woodland and into the river Wid via a drainage channel along the adjacent field targeted for development by Redrow. • The proposed drainage design relies on the construction of a series of subsurface attenuation tanks where several of the tanks are located within areas subject to seasonal waterlogging. The efficiency of such structures will require further assessment. Challenges with their construction and ongoing maintenance need to be better understood in the context of published ECC design guidelines. Similar concerns exist regarding the construction of SuDS below a water table and within a functional floodplain referenced in the design manuals published by CIRIA and Anglian Water. • Construction of a subsurface attenuation tank at the norther corner of the proposed development site is likely to impact subsurface drainage across the ancient woodland. This appears to be within what appears to be the main outlet from the catchment area draining into the river Wid. The associated impacts on the immediate Fen Close and Chelmsford Road neighbourhood within what is identified by the EA as a high-risk area for surface water flooding needs to be assessed. This should be as part of a joint study covering the proposed Croudace and Redrow development site to define a consolidated drainage strategy. 	<p>The flood risk assessment covers all potential sources of flood risk, including groundwater. Waterlogging across the site is deemed to be a result of the clayey topsoil preventing the infiltration of runoff, rather than an elevated water table. The water table is estimated to be 3 to 4m below ground levels.</p> <p>The flood risk assessment is a site-specific document. Its purpose is to demonstrate that the proposed development can be made safe without increasing flood risk elsewhere, which it does.</p> <p>The site-specific modelling undertaken to support the flood risk assessment is being reviewed/approved by the Environment Agency.</p> <p>The area of the Croudace site contributing to the northern catchment (Redrow site) is small and will be intercepted and managed by the proposed surface water drainage system.</p> <p>As noted above, waterlogging across the site is deemed to be a result of the clayey topsoil preventing the infiltration of runoff, rather than an elevated water table. The underground tanks have been designed to be above the water table, which is estimated to be 3 to 4m below ground levels. If necessary, the tanks will be wrapped in impermeable membranes to prevent ingress of groundwater and weighed down to prevent flotation.</p> <p>All SuDS features are located outside of the 1 in 1000 year floodplain and well beyond the functional floodplain (usually 1 in 20 year).</p> <p>All subsurface SuDS respect a 15m buffer to the ancient woodland intended to minimise any negative impacts on this important ecological feature.</p> <p>As noted above, the Croudace site will not contribute to flooding within the northern catchment (Redrow site).</p> <p>All SuDS features and other more vulnerable parts of the proposed development have been steered away from the 1 in 1000 year floodplain.</p>

- The proposed location of a subsurface attenuation tank in the northeastern corner along the railway line appears to be within what would appear to form part of the functional floodplain along the Shenfield watercourse. This acts to provide natural attenuation of surface runoff from the upstream catchment. The impacts on the immediate Long Riding and Whitegates neighbourhoods are also identified by the EA as a high-risk area for surface water flooding; none of has not been considered.
- The Anglian Water SuDS design manual also recommends that surface water runoff from impermeable ground areas is collected separately from 'clean' runoff from roof areas and cleaned as it travels towards the watercourse. It is unclear to what extent this is accommodated within the proposed drainage design, and a more detailed design review may be required.
- A section of drainpipes connecting the attenuation tanks by Fen Close and the railway line also appear to be located below the mean water level of the lower attenuation tank. This raises further questions regarding the accuracy of the proposed drainage design and further reviews would be required.
- The presence of groundwater has been rapidly dismissed with a reference to a shallow confined aquifer at a depth of 3-4 meters while the standard hydrology of a floodplain environment has not been considered. Unconfined groundwater is typically found with drainage along preferential subsurface flow paths towards the main drainage channel (the Shenfield watercourse), and the proposed development can be expected to significantly alter the subsurface flows with impact for flora and fauna along the Shenfield watercourse and within the ancient woodland, these impacts need to be considered.
- The Environment Agency in their comments on the application state 'The development is unlikely to be granted a Flood Risk Activity Permit (FRAP)'. This reinforces what we are saying about the implications for the Shenfield watercourse. The Environment Agency warns that without the permit the Developer would be breaking the law.

The Long Riding and Whitegates neighbourhoods are located on the east side of the railway line, at (significantly) higher elevations than the Croudace site. The high flood risk in this area is a consequence of the obstruction caused by the railway embankment and insufficient capacity of the culverts underneath the railway. Nothing done at the Croudace site can reduce (or in fact increase) this flood risk.

All runoff generated within the proposed development will be appropriately treated in accordance with current best practices (namely the SuDS Manual), as detailed in the Flood Risk Assessment & Drainage Strategy report. Natural treatment of the (low pollution risk) runoff from the residential development will be achieved in the proposed detention basins and outfall swales. Additional proprietary treatment systems (e.g., vortex separators) will be provided if necessary.

The proposed drainage system has been modelled in detail. Sewers must be located below SuDS features to allow complete emptying by gravity.

Ground levels within the Croudace site fall generally away from the Ancient Woodland and towards the floodplain to the south. The same is expected with regards to groundwater flows. Therefore, any impact is expected to be negligible.

The drainage strategy directs all runoff collected across the proposed development to basins located along the edge of the floodplain. Unless the water table requires otherwise, the basins will allow runoff to infiltrate and partially replicate natural processes. Proposed pervious pavements and underground tanks will also allow infiltration where possible, to further replicate natural processes.

We expect the EA to withdraw their objection following the recent provision of clarifications and a more detailed design of the proposed floodplain crossing.

<p>In conclusion, our association objects to the current planning application. We propose a temporary halt to the progression of this application until all developers can submit detailed, cohesive plans that address the myriad concerns outlined above. A comprehensive and integrated approach must be submitted to ensure the development aligns with the policies outlined in the Local Plan and the standards set by Brentwood Borough Council.</p> <p>We advocate for a holistic evaluation of all planning applications for the entire R03 area to ensure the long-term sustainability of the development.</p>	<p>There is no need to halt, delay or considered the applications together. Adopted Policy R03 was drafted - and adopted - knowing the site would come forward in four phases. Supporting paragraph 9.102 states, <i>“As the allocation comprises a number of parcels which could be brought forwards at different times it is important that consideration is given to how the site will develop holistically. As individual parcels are brought forwards any masterplan will need to appropriately consider and reflect what is being proposed elsewhere on the site. This is particularly important in ensuring that collective requirements for infrastructure provision are considered and delivered appropriately”</i>. As such, Policy R03 required at paragraph 2a the production of <i>“a comprehensive masterplan and phasing strategy to inform detailed proposals”</i>. This part of the policy was fulfilled when the comprehensive Masterplan Development Principles document was approved in July 2023.</p> <p>The process is Local Plan, then Masterplan Development Principles document, then individual applications. As the applications are in conformity with the Masterplan Development Principles document, the developers would appreciate understanding in advance what the purpose of the meeting might be and what the agenda may cover.</p> <p>It should also be noted that during the preparation of the Masterplan Development Principles document, the layouts of all four applications were considered through individual pre-application discussions and reflected in the various iterations of the Masterplan Principles document. The draft layouts were circulated to the Group members at various times to ensure collaboration and cohesion. This was clear when all four draft applications were considered by the Quality Review Panel after the Masterplan Development Principles document on 18 May 2023.</p>
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