

## Hole Farm Community Woodland Planning Statement

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**Forestry England**



**Hole Farm Community Woodland**  
7 July 2023

## Hole Farm Community Woodland Planning Statement

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## 1 Introduction

- 1.1 This Statement has been prepared by Jacobs on behalf of Forestry England ('the Applicant'). It supports a hybrid planning application and associated Listed Building consent for the creation of a community woodland facility comprising: vehicular access into a 94-space car and coach park with Electric Vehicle (EV) charging points and overflow area; substation; an open sided visitor shelter; a modular café with covered outdoor seating area, bin store, cycle parking and WC facilities; demolition of a grain store and development of a community building including staff welfare and office facilities, and outdoor terrace; staff and disabled car parking; demolition of an agricultural machinery store and construction of a Forestry England barn; service yard and vehicle turning circle; surfaced and unsurfaced woodland paths; creation of six new ponds; countryside heritage and interpretation boards and informal natural play areas ('the Project') at Hole Farm Lane, Great Warley, Brentwood, Essex CM13 3JD ('the Site').
- 1.2 Full planning permission is sought for the majority of the above but approval in outline, excepting certain design details, is sought for the following elements as their final design has yet to be determined:
- Substation
  - Open-sided visitor shelter
  - Modular café with covered outdoor seating area, bin store, cycle parking and WC facilities
- 1.3 Listed building consent is required for certain elements of the Project, as requested by Brentwood Council's planning and heritage officers, due to their location within the historic curtilage of the Grade II listed farmhouse. This is located outside the Project boundary on adjacent land.
- 1.4 The Application Site is owned by National Highways but the Community Woodland would be leased and managed on a long-term basis by Forestry England (FE). It would create an asset for the local community and add to the network of woodlands comprising the Thames Chase Community Forest. In this regard it is proposed to plant a new community woodland including a mosaic of wildlife-rich habitats and rides and glades species rich grassland linking into the wider Thames Chase Community Forest. The planted elements of the community woodland do not require planning permission. This is clearly set out in paragraphs 1.13-1.18 below.
- 1.5 The site is included within the Project Order Limits of the Development Consent Order application for the Lower Thames Crossing (LTC) (Nationally Significant Infrastructure Project (NSIP) Ref. TR010032). Its purpose is to deliver replacement 'Special Category Land' to compensate for the permanent acquisition of land used as public open space, habitat creation compensation for the potential impacts of nitrogen deposition (NDep) from vehicles using the LTC and woodland planting as compensation for ancient woodland which would be lost due to construction of the Project. Further details are provided in paragraphs 1.19 – 1.30 below.
- 1.6 The initial capital costs for developing the Hole Farm Community Woodland scheme are expected to be funded by National Highways, through discretionary

funding, regardless of whether the LTC Project proceeds. Ongoing running costs for the Community Woodland will be funded by Forestry England using income generated from the activities on site, such as the car parking and café.

1.7 If required, the Project could potentially be delivered in phases, with key elements required to enable the site to function as a community woodland being delivered first, including those elements required to provide an income stream to FE to fund the ongoing maintenance of the site. Phasing is further discussed in Section 3 of this Planning Statement.

1.8 The purpose of this Statement is to:

- Set out the consenting approach;
- Describe the site and surroundings;
- Detail the proposed Project elements;
- Summarise the stakeholder and public consultation process and feedback and address the issues raised;
- Set out the relevant national and local planning policy, including the National Planning Policy Framework (NPPF), the adopted Brentwood Local Plan 2016-2033, and any other policy, guidance or material considerations;
- Summarise the findings of the various environmental and other submitted reports;
- Provide a robust planning justification to demonstrate that the Project represents an acceptable and sustainable development.

### **The Applicant, landowner and user groups**

1.9 National Highways purchased Hole Farm in April 2021. Its established agricultural use ceased in September 2022. In addition to the elements of the community woodland that require planning permission, Forestry England propose a new community woodland including a mosaic of wildlife-rich habitats and rides and glades species rich grassland, linking into the wider Thames Chase Community Forest.

1.10 Although National Highways own the site, the new community woodland would be leased to, and managed by, Forestry England on a long-term basis. It is anticipated that the lease will be agreed this financial year (2023/24). This planning application is in respect of the buildings and hard landscaping infrastructure and engineering operations needed for the new community woodland.

1.11 The anticipated user groups for the proposed facility include:

- **Forestry England (FE)** - The Applicant and future long term lessee. FE currently have a Forestry Commission licence, in advance of the lease agreement, to allow for 5 hectares of tree planting. Planting of an area in the south east of the site adjacent to Codham Hall Lane was initiated in December 2022 with a community planting day. To date some 14,500 trees have been planted within this 5ha area. On 12 June 2023 FE submitted an Environmental Impact Assessment (EIA) for consideration by the Forestry Commission (EIA Ref. 2023-0285), in respect of the planting for the rest of

the woodland. It is anticipated that up to 150,000 trees could be planted in total. FE would manage the woodland in perpetuity, including felling and replanting as appropriate. Hole Farm will become part of Forestry England's Thames Beat woodlands which are managed by the Forestry England team based at the Thames Chase Forest Centre office. This site team is headed up by the Beat Manager who will be responsible for the day-to-day maintenance and management of the site. The Thames Beat woodlands are currently subject to weekly site and facility inspections. Through this, the team is able to monitor the sites and respond to any maintenance work that needs doing. Hole Farm will be incorporated into this management regime. There is likely to be one FE full time (FTE) staff member visiting daily for inspections between 8am – 5pm and infrequent visits from other staff members.

- **National Highways** – NH is the landowner of the Application Site. Planting on part of the site will provide compensation for the loss of ancient woodland and replacement public open space for Folkes Lane Woodland as a result of the LTC Project. NH may temporarily utilise part of the site as a tree nursery to grow on trees for planting on the wider Lower Thames Crossing highway scheme.
- **Thames Chase Trust** – The Trust was established in 1990 to improve landscapes in East London and South Essex. It has helped facilitate an increase in woodland and open spaces available to the public for informal recreation including improvements to cycleways, bridleways and footpaths. Landscape and biodiversity improvements have created new opportunities for nature conservation and access to the countryside. The proposals will add to this community resource. Thames Chase Trust staff and volunteers will be on site to manage the tree nursery.
- **Community/visitors** – Aside from the community tree nursery which will be staffed and maintained by volunteers, the local community and visitors will be able to utilise the site for informal recreation including walking, running, cycling and horseriding. An all abilities trail will provide access for the less abled visitors which will also incorporate a play trail and sensory sculpture trail. There will be a café, visitor shelter, informal play and heritage trails and a community room, managed by FE, that can be used by groups to learn about the natural world, sustainability and conservation. A range of other activities are also proposed from facilitating self-led exploration, to guided walks, physical activity sessions such as yoga, and more. All activities will be linked to the four key themes of the recreation, environment, heritage/archaeology, and wellbeing. Activities will be designed with local community groups and will target a wide range of audiences, from adventurous young families, to those seeking relaxed days out.

### The consenting approach

- 1.12 The Application Site red line boundary area is 99.14 hectares and therefore constitutes major development as defined by The Town and Country Planning (Development Management Procedure) (England) Order 2015. The Application Site boundary is shown on the Planning Application Boundary plan that forms part of this submission.
- 1.13 There are elements of the Project that do not require planning permission, eg. the creation of new woodland, other planting, and rides and glades species rich grassland, and some elements that do. The application site red line boundary

includes all elements of the proposed Community Woodland to demonstrate how the project as a whole would appear and operate once complete. The proposed planting areas that do not require planning permission, are subject to a separate EIA process for afforestation which is considered by the Forestry Commission.

- 1.14 The elements in the description of development (paragraph 1.1 above), all need permission under the Town & Country Planning Act 1990 (TCPA). The EIA Woodland Creation Design Plan within the DAS, submitted with the application, shows the proposed planting and rides and glades species rich grassland areas for illustrative purposes (see also paragraphs 1.17-1.18 below for additional detail).
- 1.15 In addition, Essex County Council’s Heritage Officer has advised that Buildings 1 and 2 are within the curtilage of a listed farmhouse (discussed further in the sections that follow) and that listed building consent will be required for any works to them.
- 1.16 For clarity, the following Table 1 sets out the various elements of the Project and indicates, for each, whether planning permission under the TCPA 1990 is required or not, whether planning permission is sought in full or outline and whether listed building consent is required.

**Table 1: Elements of the Project at Hole Farm and planning requirements**

Project Element	Planning Requirements
Construction of a new vehicular access from Great Warley Street and a 94-space, pay and display visitor car park with lockable, height restriction barrier including: <ul style="list-style-type: none"> <li>• Seven blue badge spaces (two of which are EV)</li> <li>• 14 Electric Vehicle EV charging points (including two blue badge EV spaces) and associated infrastructure</li> <li>• One coach parking space</li> <li>• Cycle parking</li> <li>• Bin store</li> <li>• Unsurfaced overflow car parking area</li> <li>• Landscaping</li> </ul>	Planning permission required
Substation with a maximum GEA of 50sqm. and height of 2.7m.	Planning permission required (details to be reserved, excepting floorspace and height)
An open sided wooden visitor shelter of maximum floor area of 50sq.m. and maximum 4.5m ridge height.	Planning permission required (detailed design to be reserved, excepting floorspace, height and materials)
Modular, timber clad, single storey, ‘Grab & Go’ café, seating area and visitor toilets with maximum GEA of 110sq.m. and maximum 4.5m ridge height.	Planning permission required (detailed design to be reserved, excepting floor area)
Network of woodland access paths comprising:	Planning permission required



Project Element	Planning Requirements
<ul style="list-style-type: none"> <li>• An 'all-abilities' access trail</li> <li>• Multi-user tracks for walking, cycling, horse riding, maintenance vehicles</li> <li>• Unsurfaced routes</li> </ul>	
Creation of 6 ponds	Planning permission required
Demolition of Building 1, former grain store, and construction of a community building with staff welfare and offices including: <ul style="list-style-type: none"> <li>• A community room for educational or recreational use</li> <li>• WC facilities</li> <li>• Kitchen</li> <li>• Office</li> <li>• Equipment store</li> <li>• Sheltered walkways connecting to adjacent storage barn</li> </ul>	Planning permission and listed building consent required
Demolition of an existing agricultural machinery store and construction of a barn for use by Forestry England.	Planning permission and listed building consent required
Six car parking spaces for staff at the building cluster and two surfaced and accessible spaces for staff or visitors	Planning permission required
Countryside heritage and interpretation boards and informal natural play	Planning permission required
Site signage boards	Planning permission required
Leaky dam water features	Planning permission not required
External community tree nursery	Planning permission not required
Tree planting (afforestation) including external planting on areas for seedlings/saplings	Planning permission not required. (Assessment required under the EIA (Afforestation) Regulations where there are likely significant effects)
Creation of rides and glades species grassland	Planning permission not required

1.17 The proposals for Hole Farm are split across different consenting regimes. National Highways and Forestry England have worked closely with consenting authorities and stakeholders to agree a strategy for the site that meets statutory requirements.

1.18 In this regard, the tree planting proposals require a Forestry Commission EIA decision under the Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999, as amended. This was submitted separately by Forestry England on 12 June 2023 (EIA Ref. 2023-0285) to determine whether the planting proposals constitute a relevant project, within the meaning of the aforesaid Regulations, and would therefore require the Commission's consent

to proceed. If there are no objections within 28 days the Forestry Commission can determine that the tree planting is not likely to have a significant effect on the environment. Stage 2 consent would not then be required prior to planting.

### **Relationship to Lower Thames Crossing Proposal**

1.19 As stated above, the Application Site is included within the Project Order Limits relating to the application for development consent for the Lower Thames Crossing (LTC) Nationally Significant Infrastructure Project (NSIP) (Ref. TR010032) as shown in Figure 1 below. The requirement to provide compensatory environmental works is set out in the Draft Development Consent Order Volume 3, Schedule 1, work no's. E50 – E52 which state:

*“Work No. E50 – as shown on sheets 46 and 47 of the works plans and being the implementation of environmental mitigation works to create a site for ancient woodland planting, including the construction of new ecological ponds.*

*Work No. E51 – as shown on sheets 46 and 47 of the works plans and being the implementation of environmental mitigation works to create a site for protected species, including the construction of new ecological ponds.*

*Work No. E52 – as shown on sheets 46 and 47 of the works plans and being the implementation of environmental works to create a compensatory habitat site for nitrogen deposition.”*

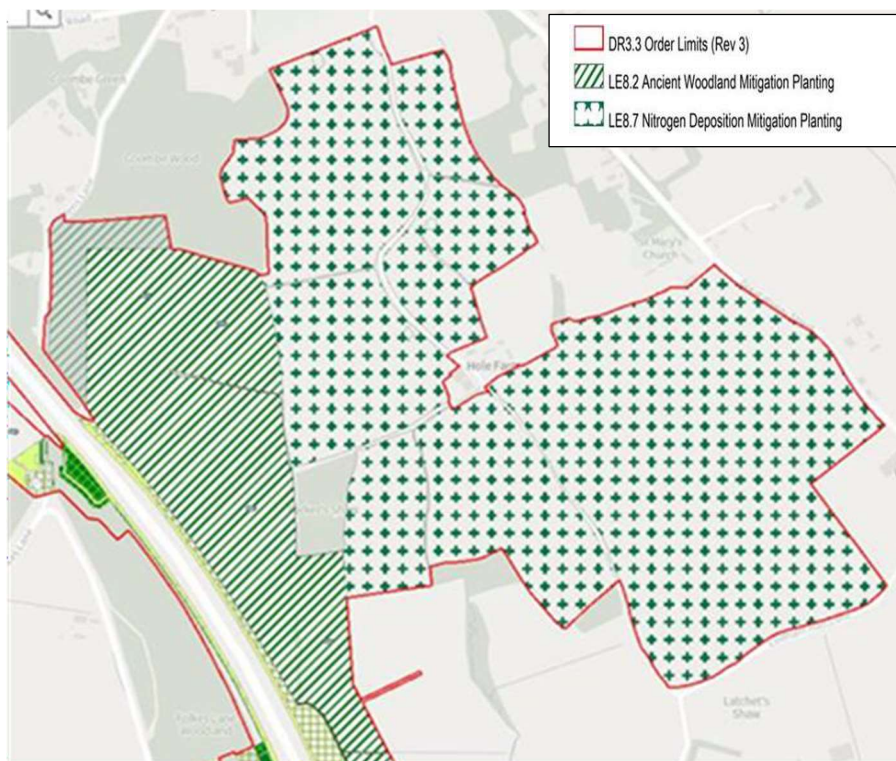
1.20 Its purpose is to provide compensation for the impacts of the LTC NSIP. Specifically, to provide compensation for ancient woodland loss, habitat creation compensation for the potential impacts of nitrogen deposition (NDep) generated by vehicles using the LTC and replacement 'Special Category Land' to compensate for the permanent acquisition of land used as public open space.

1.21 The initial capital costs for developing the Hole Farm Community Woodland scheme are expected to be funded by National Highways, through discretionary funding, regardless of whether the LTC Project proceeds. Ongoing running costs for the Community Woodland will be funded by Forestry England using income generated from the activities on site, such as the car parking and café.

1.22 In this regard the Community Woodland would deliver:

- Approximately 2.9ha of replacement 'Special Category Land' (SCL) in exchange for the permanent acquisition of land and rights over land at Folkes Lane Woodland, to the west of the M25 (Works No OSC12) (this is the grey/green hatched L-shape in the NW corner of the plan in Plate 1);
- Approximately 75.2ha of habitat creation, including six new and five existing ecology ponds, as compensation for the potential impacts of nitrogen deposition from vehicles using the LTC, on designated ecological sites (Works No E52). The site is considered appropriate for nitrogen deposition compensation because it would link with existing woodlands that form part of the habitat network in this area (this is the green crossed area – eastern half of the plan in Plate 1);
- Approximately 26ha of woodland planting to compensate for ancient woodland which would be lost due to construction of the LTC (Works No E50) as well as utilities works (Work Nos G10 and MU92) and working areas (Work No ULH01) (this is the green hatched area – western half of the plan in Plate 1);

- Eleven ecology ponds to provide habitat mitigation as illustrated in the landscape drawings accompanying this application. All of the five existing ponds on site would be retained and the proposal includes for the creation of six new ponds. The retained and new habitats would be taken into account in the BNG metric for the LTC project.



**Figure 1: Hole Farm community woodland, compensatory areas and the A122 Lower Thames Crossing Order limit**

- 1.23 Joint workshops have been held between National Highways, Forestry England and Natural England to discuss and agree the design and ongoing maintenance of the soft landscape elements of the community woodland. The workshops included discussion on how the development of new habitats would deliver against the LTC Project objectives for compensation for nitrogen deposition impacts and loss of ancient woodland.
- 1.24 Schedule 1 to the draft Development Consent Order (dDCO) for the LTC includes some of the works now proposed at Hole Farm, namely environmental mitigation works to create a site for ancient woodland planting and protected species, including the construction of new ecological ponds. Of these works, which include planting and creation of rides and glades species rich grassland, only the ponds require planning permission. Schedule 2 states the 'Requirements' pertaining to these works in respect of where relevant, environmental management, landscaping, ecology, groundwater, protected species and surface water drainage. In delivering the works for which planning permission is being sought including the new ponds, there would be a commitment to comply with the relevant measures prescribed by these Requirements within the DCO. This includes any applicable commitments set out in the register of environmental actions and commitments (REAC) prepared by National Highways in the context of its LTC DCO application, as secured by Requirement 4 in Schedule 2 to the dDCO.

- 1.25 The ancillary hard infrastructure associated with the community woodland, including: a community building, Forestry England barn with service yard and turning circle, car/coach parking, café, open sided shelter, substation and routes through the site for use by walkers, cyclists and horse riders, are not included in the LTC Development Consent Order (DCO) application.
- 1.26 The creation of new woodland at the site is not development and does not need planning permission. Planting has begun in part and will be undertaken in accordance with the Environmental Impact Assessment (Forestry) (England and Wales) Regulations 1999. The environmental assessments, presented in the Environmental Statement, for the LTC Project, acknowledge the opportunity to deliver up-front environmental compensation at Hole Farm, ensuring that planting is in place and has begun to establish prior to, or early in, the construction programme for the LTC NSIP.
- 1.27 The proposals would form part of, and integrate with, Forestry England's masterplan for the wider area, and therefore, will become part of the Thames Chase Forest. Delivering the Project in advance of the grant of development consent for the LTC will not only allow for the early establishment of environmental mitigation but will have significant biodiversity and community benefits in accordance with the shared objectives of National Highways, Forestry England and Thames Chase Forest.
- 1.28 Although, once developed, the Community Woodland can be funded and managed by Forestry England as a standalone project, should the LTC NSIP be approved, the DCO will require a management regime in perpetuity, which aligns with the principles set out in this application.
- 1.29 The provision of this Project does not need to be tied to the timetable of the LTC. In this regard, this twin track approach to secure the delivery of early mitigation including the principle of certain elements of DCO Projects being undertaken through other consenting mechanisms, in advance of the granting of the DCO, has already been established.
- 1.30 Notably and recently, case law (specifically that of *Girling vs East Suffolk Council* in October 2020 (CO/5052/2019)) relating to the development of Sizewell C nuclear power station, centred around the claimant's argument that East Suffolk Council's approval of plans for the construction of a visitor centre, training centre and associated car parks was premature, there being no need for the development as the DCO for Sizewell C had not yet been consented. The judge found in favour of East Suffolk Council and a further legal attempt to oppose the plans through the Court of Appeal also failed. In this case, the determination of the 'need' for the project was considered to be a matter of judgement for the local planning authority, which had relied upon reduction in delay to the completion of the project as the need for the advance works.

### **Planning application documents**

- 1.31 The documents listed below comprise the planning application submission. They accord with the requirements of Brentwood Council's validation checklist for applications for full planning permission, outline planning permission and Listed Building Consent.

### Forms and certificates

- Completed Planning Application and Listed Building Consent Form (signed and dated)
- Land Ownership Certificates and Agricultural Land Declaration
- Total planning application fee of **£5,544.00** based on the new gross floorspace to be created of 800sq.m. added to the fee relating to the site area of the outline elements of the proposals which is 0.0578ha. A full explanation is included in the covering letter to this planning application. The fee has been calculated in accordance with The Town and Country Planning (Fees for Applications, Deemed Applications, Requests and Site Visits) (England) Regulations 2012 (the Fee Regulations) and agreed with Brentwood BC planning officers. The respective areas are shown in the Fee Calculation Plan 375-FP-00-ZZ-DRG-A-000054 Rev. P04

### Drawings

Drawing Title	Drawing number	Revision	Scale
General Arrangement: Fee Calculation Plan	375-FP-00-ZZ-DRG-A-000054	P04	1:2500@A1/1:5000@A3
Planning Application Boundary	HE540039-CJV-VGN-GEN-DRA-LAP-08385	P04	1:6000 @A3
Location Plan	375-FP-00-ZZ-DRG-A- 000001	P05	1:5000@A1/1:10000@A3
Existing Site Plan	375-FP-00-ZZ-DRG-A- 000002	P06	1:2500@A1 / 1:5000@A3
Existing Buildings Cluster Site Plan	375-FP-00-ZZ-DRG-A- 000010	P07	1:250@A1 / 1:500@A3
Existing Buildings 1 & 2 Ground Floor Plan	375-FP-00-ZZ-DRG-A- 000012	P06	1:100@A1 / 1:200@A3
Existing Buildings 1 & 2 Roof Plan	375-FP-00-ZZ-DRG-A- 000013	P04	1:100@A1 / 1:200@A3
Existing Buildings 1 & 2 East & South Elevations	375-FP-00-ZZ-DRG-A- 000020	P06	1:100@A1 / 1:200@A3
Existing Buildings 1 & 2 West & North Elevations	375-FP-00-ZZ-DRG-A- 000021	P05	1:100@A1 / 1:200@A3
Existing Building Cluster Demolition Plan	375-FP-00-ZZ-DRG-A- 000040	P05	1:250@A1 / 1:500@A3
Proposed Overall Site Plan	375-FP-00-ZZ-DRG-A- 000050	P07	1:2500@A1 / 1:5000@A3
Proposed Buildings Cluster Site Plan	375-FP-00-ZZ-DRG-A- 000051	P07	1:250@A1 / 1:500@A3
Proposed Buildings Cluster Development Areas	375-FP-00-ZZ-DRG-A- 000052	P06	1:250@A1 / 1:500@A3

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Drawing Title	Drawing number	Revision	Scale
Proposed Site Plan	375-FP-00-ZZ-DRG-A- 000053	P07	1:2500@A1 / 1:5000@A3
Proposed Community Building, FE Barn & tree nursery setting - Ground Floor Plan	375-FP-00-ZZ-DRG-A- 000060	P08	1:100@A1 / 1:200@A3
Proposed Community Building, FE Barn & tree nursery layout - Ground Floor Plan	375-FP-00-ZZ-DRG-A- 000061	P06	1:50@A1 / 1:100@A3
Proposed Community Building Mezzanine Floor Plan	375-FP-00-ZZ-DRG-A- 000062	P04	1:50@A1 / 1:100@A3
Proposed Community Building, FE Barn & tree nursery setting - Roof Plan	375-FP-00-ZZ-DRG-A- 000063	P04	1:100@A1 / 1:200@A3
Proposed Community Building, FE Barn & Tree nursery - East & West Elevations	375-FP-00-ZZ-DRG-A- 000070	P07	1:100@A1 / 1:200@A3
Proposed Community Building - North & South Elevations	375-FP-00-ZZ-DRG-A- 000071	P07	1:100@A1 / 1:200@A3
Proposed FE Barn - North & South Elevations	375-FP-00-ZZ-DRG-A- 000072	P04	1:100@A1 / 1:200@A3
Proposed Community Building, FE Barn & Tree nursery - Sections	375-FP-00-ZZ-DRG-A- 000080	P06	1:100@A1 / 1:200@A3
Proposed Community Building - Cross Sections	375-FP-00-ZZ-DRG-A- 000081	P06	1:50@A1 / 1:100@A3
Proposed Community Building - Long Section F-F	375-FP-00-ZZ-DRG-A- 000082	P06	1:50@A1 / 1:100@A3
Proposed Forestry England Barn - Sections	375-FP-00-ZZ-DRG-A- 000083	P05	1:50@A1 / 1:100@A3
Proposed Community Building - Long Section J-J	375-FP-00-ZZ-DRG-A- 000084	P05	1:50@A1 / 1:100@A3
Proposed Car Park Location Plan	375-FP-00-ZZ-DRG-A- 000100	P07	1:500@A1 / 1:1000@A3
Proposed Modular Cafe and Open-sided Visitor Shelter Location Plan [OUTLINE PLANNING]	375-FP-00-ZZ-DRG-A- 000110	P07	1:250@A1 / 1:500@A3

## Hole Farm Community Woodland Planning Statement

Drawing Title	Drawing number	Revision	Scale
Proposed Modular Café Plan [OUTLINE PLANNING]	375-FP-00-ZZ-DRG-A- 000111	P08	1:100@A1 / 1:200@A3
Proposed Modular Café Elevations [OUTLINE PLANNING]	375-FP-00-ZZ-DRG-A- 000112	P05	1:50@A1 / 1:100@A3
Proposed Modular Café Sections [OUTLINE PLANNING]	375-FP-00-ZZ-DRG-A- 000114	P03	1:50@A1 / 1:100@A3
Proposed Substation Elevations [OUTLINE PLANNING]	375-FP-00-ZZ-DRG-A- 000115	P04	1:100@A1 / 1:200@A3
Pathways Design Plan	EFD-HLF PATHWAYS DESIGN PLAN 03-02-2023		1:7500 @A3
Hole Farm Catchment Plan	HE540039-CJV-HDG-SZP_DC000000_Z-DR-CD-00	R01	1:2500@A1/ 1:5000@A3
Hole Farm Proposed Drainage Plan	HE540039-CJV-HDG-ZZZ_DN000000_Z-DR-CD-000	R01	1:2500@A1/ 1:5000@A3
Hole Farm - Car Park layout	6314_101	C	1:750 @A3
Proposed T-bay south	Hole-Farm_Highways.001	R02	1:250 @A1
Proposed highway works at building cluster	Hole-Farm_Highways.002.3	R02	1:250 @A1
Proposed car park bell mouth	Hole-Farm_Highways.003.2	R02	1:500 @A1
Proposed Highways Masterplan	Hole-Farm_Highways.004	R01	1:1250 @A1
Proposed Forest Management Access Route	Hole-Farm_Highways.005.1	R01	1:1000 @A1

### Documents

Title of Document	Document Date	Author
Planning Statement	July 2023	Jacobs
Design and Access Statement	May 2023	Ferreday Pollard
Transport Statement	May 2023	Jacobs
Road Safety Audit	April 2023	Jacobs
Designers Response to Stage 1 Road Safety Audit	May 2023	Jacobs

## Hole Farm Community Woodland Planning Statement

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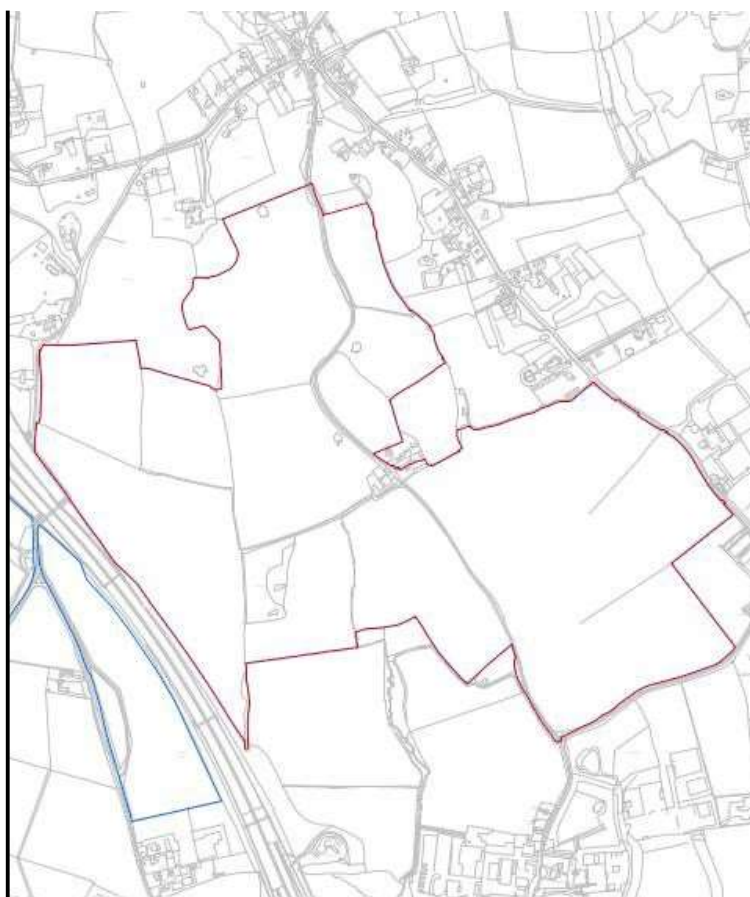
<b>Title of Document</b>	<b>Document Date</b>	<b>Author</b>
Sustainability Statement	April 2023	Arcadis
Equality Impact Assessment	April 2023	Forestry England
Health Impact Assessment	May 2023	Jacobs
Consultation Report	November 2022	LUC
Arboricultural Impact Assessment and Method Statement	March 2023	TR33 Limited
Archaeological Desk-based Assessment	April 2023	Place Services
Heritage Statement and Impact Assessment	April 2023	Oxford Archaeology
Interpretation Strategy	April 2023	Forestry England
Flood Risk Assessment	April 2023	Jacobs
Drainage Strategy Report	April 2023	Cowi
Bat Survey Report	November 2022	Atkins
Badger Survey Report (CONTAINS CONFIDENTIAL INFORMATION NOT TO BE MADE AVAILABLE TO THE GENERAL PUBLIC)	November 2022	Atkins
Ecological Impact Assessment	April 2023	Jacobs
Preliminary Ecological Appraisal Survey	June 2021	Sonar Ecology
Great Crested Newt Survey	July 2022	SureScreen Scientifics
Waterbody Concept Plan	January 2023	Forestry England
Security Plan	March 2023	Forestry England
Structural Survey Report	December 2022	Imperium Engineering
Asbestos Survey Report	November 2022	Imperium Engineering



## 2 Area and site description

### Area description

- 2.1 The Application Site is delineated in red in Figure 2 below and nearby land in the ownership of the applicant is shown in blue.
- 2.2 Linked by a footbridge over the M25, land to the west in the ownership of the Applicant (FE) is delineated in blue. This land is part of the Thames Chase Community Forest.
- 2.3 The site is located in the London Borough of Brentwood to the north east of central London, adjacent to the outer edge of the M25 motorway. The town of Brentwood is 3 miles to the north east.



**Figure 2: Site Location Plan**

- 2.4 The village of Great Warley is located to the north of the application site. The majority of Great Warley village is a designated Conservation Area. It is an attractive and unspoilt village centre in a wooded setting on a hilltop with mainly timber-framed and plastered houses in a vernacular or Arts and Crafts style, clustered around a green in the centre of a busy crossroads. The Church of St Mary the Virgin is located around 60 metres north east of the site on Great Warley Street and is a Grade I listed building. Its Lych Gate is Grade II listed.
- 2.5 The site is bounded by the M25 to the west, north of junction 29. To the north is Beredens Lane, the designated ancient woodland and Local Wildlife Site of Coombe Wood and open land. At the northernmost point of the site, the boundary joins an unnamed track leading through trees and past residential

properties to Warley Road in the centre of Great Warley. To the east is privately owned garden and hotel grounds with agricultural land and the separate residential properties of Hole Farm farmhouse and cottages. The site boundary runs in a north easterly direction from Hole Farm to meet Great Warley Street. With the exception of the Old Pump Works and LCC Support Services land, the site's southern boundary follows Codham Hall Lane to its junction with an unnamed track leading to Hole Farm. The southern boundary continues across agricultural fields and forested areas to meet the M25.

- 2.6 In landscape terms the site is within the wider Great Warley Wooded Farmland Character Area - an area of strongly undulating wooded farmland and hills scattered amongst a small-scale (predominantly arable) field pattern.
- 2.7 The area has a strong, recognisable sense of place provided by open views across the M25 road corridor over the Thames Chase to London and North Kent.

### Site description

- 2.8 Hole Farm farmhouse is a Grade II listed building (Hole Farmhouse (1250606)). The farmhouse and two 1930's semi-detached cottages adjacent to the farmhouse (Hole Farm Cottages) are and will remain in residential use, although the cottages are currently vacant. The Farmhouse and Cottages are adjacent to but excluded from the red line area as is a small brick built stable building and an open fronted barn.
- 2.9 In planning policy terms the site lies within both the Metropolitan Green Belt of London and Thames Chase Community Forest area as shown on the adopted Brentwood Local Plan Proposals Map (2016-2030). Parker's Shaw Wood within the south-west corner of the site is a designated Local Wildlife Site. The site is within Flood Zone 1, where there is less than a 0.1% chance of flooding.
- 2.10 The land within the site boundary has historically been managed as arable farmland until September 2022, with access tracks, remnant boundary features and a few small woodland copses. The Agricultural Land Classification is Grade 3 – good to moderate quality.
- 2.11 The existing buildings and hard standing areas with access tracks which are located within the site boundary, to the west of Hole Farmhouse are illustrated on Drawing no. 375-FP-01-ZZ-DRG-A-000010 Rev. P07 Existing Buildings Cluster Site Plan. They include:

Existing Building Cluster	GEAsq.m.	GIA sq.m.
Building 1	362	348
Building 2	532	514

- 2.12 Buildings 1 and 2 are surrounded by a concrete apron – 294sq.m. and a gravel track and service yard of 483sq.m.
- 2.13 Essex County Council's Heritage Officer has advised that Buildings 1 and 2 are within the curtilage of the listed farmhouse and that listed building consent will be required for any works to them. An application for Listed Building Consent accompanies this application.
- 2.14 The site is largely bounded by trees and hedgerows which form former or current field boundaries. This is only interrupted by the line of the M25 to the

west, where the replacement boundary is extant but juvenile in nature, and to the south-east where a modern field boundary exists. The site has a natural incline sloping upwards towards the north-west and Great Warley in the north. It slopes southwards towards Parkers Shaw and other areas of historic woodland beyond.

- 2.15 The site can be accessed by car from Junctions 28 and 29 of the M25 and the A127 and, from Brentwood, via Great Warley Street. The access road for Hole Farm, from Warley Road in the north, traversing the site to Codham Hall Lane in the south, has been extant since 1840 and is a private road. Similarly, the western section of the footpath, linking the former Bereden farmstead with Hole Farm and Warley Elms, is still in existence. There is one public right of way – a footpath which passes through Hole Farm west to east from a footbridge over the M25, through the building cluster and on to join Great Warley Street via an access to a small sewage works. Anglian Water has vehicular access rights to the sewage works along an unmade track leading from Great Warley Street to the east. A bridleway meets the southern site boundary before running south. Essex County Council has recently provided notice of two new proposed lengths of bridleway along Hole Farm Lane, this designation will be complied with if/when submitted.
- 2.16 There are existing bus stops on Great Warley Street which service bus route 269 from Grays to Brentwood. Buses arrive once every two hours in each direction.

### **Planning history**

- 2.17 A review of Brentwood Borough Councils' online planning register has indicated that there are no planning history records of relevance for this application on the site.
- 2.18 The site has operated as an arable farm for over ten continuous years, without constraint, or the benefit of planning consent. Since its agricultural use ceased in September 2022, following its purchase by National Highways, the site has not been in any particular use.

## 3 The proposals

### Management interests

- 3.1 As key delivery partners for the Thames Chase Community Forest and as custodians of the nation's forests, Forestry England (FE) has extensive experience in woodland creation and community forest management. Forestry England wish to ensure that Hole Farm is developed and managed to a high standard of sustainable forest management. All Forestry England's woodlands are independently audited to ensure that they meet the UK Woodland Assurance Standard (UKWAS), this means they are certified by the Forest Stewardship Council® (FSC®) and by the Programme for the Endorsement of Forest Certification (PEFC).
- 3.2 FE relies on income generated by timber, recreational activities (events, car parking), permissions and rents to meet the costs of caring for the nation's forests. In developing and managing Hole Farm Community Woodland, it will be necessary to match the operational costs with the income potential to fund that ambition.
- 3.3 The capital costs of creating Hole Farm Community woodland and the associated recreational facility infrastructure are expected to be met by National Highways Designated Funds but the long-term management and maintenance costs will be met by FE as leaseholders. New woodlands managed by the FE Thames Chase team operate at a number of different levels of facility provision and engagement, supported by endowments, funding or recreational income (primarily car parking).
- 3.4 Experience from Jeskyns Community Woodland (a similar FE project opened in 2006 in North Kent) tells us that visitor growth, even when undertaken by specialist consultants, is very difficult to predict for sites on the fringes of the large population of London. Much depends on the site offer with surfaced trails (a key draw at Jeskyns), play, refreshment and toilet facilities all adding to the attractiveness of a site, particularly whilst the new woodland develops. Initial desk-based analysis, undertaken by FE's commercial modelling team, would suggest that Hole Farm would attract between 50,000 and 150,000 economic visitors per year.
- 3.5 FE's objectives for the site are to increase biodiversity, increase public access to the landscape for informal recreation and ensure that the site is financially sustainable to support long-term management as a community woodland.
- 3.6 NH may temporarily utilise part of the site as a tree nursery to grow on trees for planting on the wider Lower Thames Crossing highway scheme. Following this, the area would be planted as per the plans for the community woodland and passed back to FE to manage.

### Project elements

- 3.7 The lead architect has produced a Design and Access Statement (DAS) which is submitted with the application. It outlines the existing site and surrounds, including the legislative context of the project, ecology, heritage and physical constraints, also describing how the consultation process has influenced and shaped the design proposals.

- 3.8 The Design section of the DAS describes the iterative design development process and presents the design principles including the scale, layout, use and appearance of the design to assist in illustrating the vision for the spaces and how they are experienced by the future users. It also provides more technical insight into the BREEAM assessment for the new Community Building and the targeted Excellent rating and the environmentally responsible, low carbon, low energy, sustainable strategy that has crafted the form and servicing of the building.
- 3.9 The Access section provides a break-down of transport access points and movement through and around the site by different user groups for different operations of the site. There is also information on the security considerations, the accessibility of the site and the buildings, the signage and interpretation and the spatial considerations of waste and refuse.
- 3.10 The elements of the Project are described below.
- Car/coach park**
- 3.11 Construction of a new vehicular access from Great Warley Street and construction of a pay and display visitor car and coach park with lockable, height restriction barrier, chip and tar vehicle surfacing, prime aggregate footpath and loading bay for delivery trucks and bin lorries to drive back out after visiting the café. The car park location is shown on the Proposed Car Park Location Plan 375-FP-00-ZZ-DRG-A- 000100 Rev. P07 with further detail on the Car Park Layout Plan 6314\_101 Rev. C.
- 3.12 The car park would provide:
- 94 car parking spaces
  - Seven blue badge spaces (two of which are EV)
  - 14 EV charging points and associated infrastructure
  - One coach parking space
  - Cycle parking
  - Bin store
  - Grassed overflow car parking area, for occasional summer use
  - Landscaping and footpath diversion
  - A pole mounted CCTV camera.
- 3.13 There would be capacity to expand the number of EV charging points to 22 at a later date.
- 3.14 The car park would offer people the opportunity to visit, connect with and benefit from the forest environment, whether through facilitated informal access or engaging in events and activities supported by Forestry England Rangers and partners.
- 3.15 Gated access will be provided onto the Public Right of Way (PRoW), which runs along the car park's northern edge, at its interface with the site. This will be wide enough for pedestrians, bicycles and wheelchairs. Appropriate consent will be

applied for to facilitate the gateway, the purpose of which is to deter motorcycles and quad bikes from entering the site.

### **Electrical substation**

- 3.16 Permission in outline is sought for an electrical substation adjacent to the car park area in the east of the site to provide a power supply to the car park (EV charging spaces), modular café and other facilities. It is positioned in this location as there is an existing overhead line which goes below ground in this area. The substation design will be subject to UKPN requirements.
- 3.17 The applicant is agreeable to the floorspace being limited to 50sq.m. and the height to 2.7m. It is not currently possible to submit the design details of this element of the proposals as the structure and finish of the substation enclosure would need to be agreed at a later date during consultation with UKPN and subsequently agreed with the planning authority. It will be screened from the main car park with vegetation, as far as reasonably practicable.

### **Open sided visitor shelter**

- 3.18 An open sided wooden structure for visitors to gather, eat lunch or retreat to in bad weather is proposed. This element of the proposals is necessarily submitted in outline only as it is intended to either work with students to design the shelter or hold a competition for its design. However Forestry England are agreeable to the following parameters being conditioned as appropriate:
- The proposed shelter location
  - Maximum 50sq.m. floorspace
  - Maximum ridge height of 4.5m
  - Open sided construction to at least 70% of structure
  - Fixed seating beneath shelter to accommodate up to 30 adults
  - Palette of materials: timber
- 3.19 Examples of shelters including those from other FE sites are included in the DAS submitted with the application.

### **Modular 'Grab and Go' cafe and visitor toilets**

- 3.20 The proposed modular café adjacent to the proposed car park is submitted in outline for the reason that a contractor cannot be determined at this stage and each contractor supplies a different modular design. However, the following parameters are suggested and could be conditioned as appropriate:
- Café/W.C. site location
  - Maximum GEA of 110sq.m.
  - Maximum ridge height of 4.5m
  - Single storey
  - Timber cladding

- 3.21 The design and access statement includes examples of this type of café at other greenspace locations and the proposed location is shown on the Proposed Modular Cafe and Open-sided Visitor Shelter Location Plan 375-FP-00-ZZ-DRG-A- 000110 Rev. P07. Indicative plans, sections and elevations are also submitted for indicative purposes only. These are: Proposed Modular Café Plan 375-FP-00-ZZ-DRG-A- 000111 Rev. P08; Proposed Modular Café Elevations 375-FP-00-ZZ-DRG-A- 000112 Rev. P05; and Proposed Modular Café Sections 375-FP-00-ZZ-DRG-A- 000114 Rev. P03.
- 3.22 The 'Grab and Go' cafe refreshment offer would likely include hot and cold drinks and snacks (e.g. soup, paninis, bacon rolls, pastries etc). The unit would include a minimum of two accessible toilets for visitors; staff welfare facilities including toilet, lockers, small kitchen and eating area; outdoor covered seating area, a bin storage area for café waste; and a delivery bay for lorries and bin collection.
- 3.23 The Café unit design would be in keeping with the forest environment, FE branding/ethos, and surroundings with a wood clad finish likely and of a scale relative to the potential demand with the flexibility to expand over time subject to future demand. A secure and robust design would be created to deter break-ins and vandalism.

### **Access**

- 3.24 Visitors to the Community Woodland could use the proposed 94 space car park off Great Warley Street. Coaches would also use this car park and could drop off and then park in the designated space. A grassed area adjacent to the car park provides space, if required, for overflow car parking at busy times.
- 3.25 The existing access track, which runs approximately north to south through the site from Great Warley to Cobham Hall Lane, will be resurfaced in tarmac with a tar and chip finish of natural coloured angled stone chip. The design and specification will make the track suitable for cars, cycles, horses, non-HGV delivery and maintenance vehicles.
- 3.26 Residents of Hole Farm and the Farm Cottages will utilise the part of this track leading south from Great Warley village to the building cluster while all non-HGV vehicle users specifically requiring access to the building cluster of the Community Woodland facility will use the part of the track leading to and from Codham Hall Lane. This will include any disabled visitors to the building cluster, staff, bin lorries servicing the building cluster, non HGV service vehicles and FE vehicles.
- 3.27 Infrequent HGVs for forestry operations would access the site through the car park off Great Warley Street and use the shared use element of the all abilities track. FE would manage these activities regarding the interface between vehicles and other users when there is a need to use the track. Bin collections for and deliveries to the modular café would also utilise the car park access.

### **Network of woodland access paths**

- 3.28 The proposed path network is illustrated in the Pathways Design Plan EFD-HLF 03-02-2023. It includes:
- A circular 'all-abilities' access trail from the car parking area surfaced in prime aggregate with a wearing course of tar and chip, grey granite finish suitable for all abilities.

- Multi-user tracks for walking, cycling, maintenance vehicles will wind through the existing and proposed woodland planting blocks. Surfaced with unsealed prime aggregate with compacted 6mm to dust, grey granite finish.
- Unsurfaced routes – grass tracks will also wind through the trees across the site.
- The existing PRow from Great Warley Street will not be altered. Where the PRow interfaces with the site a gate is proposed which will allow access for pedestrians, bicycles and wheelchair users. An application to facilitate this will be made at the appropriate time to the Essex County Council's PRow team.

### **Ponds and water features**

- 3.29 The creation of ponds or earthworks remodelling of existing water bodies is an engineering operation which will require planning permission.
- 3.30 There are five existing ponds within the site, which will be enhanced and retained. Six new ponds are also proposed as shown in the Waterbody Concept Plan. The ponds will provide increased diversity of wildlife habitat creation, connecting a site wide network with the dual function of natural flood water mitigation. The ponds will include:
- 10 seasonal wildlife ponds with seasonal cascade
  - One pond for dog use
- 3.31 There will also be a leaky dam to site drainage channels and a 150m reedbed for water filtration.

### **Demolition of grain store – Building 1**

- 3.32 An external structural survey found significant defects with building 1 including:
- Steel frame structure including corrosion on the steel column and rust on the steelwork.
  - Defects with the corrugated wall panels including broken sections and the presence of moss and lichen.
  - Gutter defects including leaks, cracking and vegetation growth.
  - Defects with the rainwater downpipes including loose connections, leakage, moss and vegetation growth and not discharging into the required drain
  - Vegetation and plant growth including excessive internal plant growth and the presence of trees.
- 3.33 The structure is in poor condition overall. Lack of access to the interior has meant its condition could not be fully assessed, however because of the extent of the exterior defects it has been deemed to be unsuitable for retention.
- 3.34 The corrugated wall panels were also found to be asbestos and their removal would be managed under the appropriate licences.



### **Demolition of Agricultural Machinery Store – Building 2**

- 3.35 An external structural survey found significant defects in building 2 as follows:
- The timber frame including the presence of damp timber, timber rot and disconnected structural members.
  - Defects with the blockwork including cracking, damp, lack of lateral restraint straps, perishing mortar joints and the presence of vegetation and trees.
  - Vegetation and plant growth including excessive internal plant growth and the presence of trees.
- 3.36 Although the structure could be repaired, based on the degree of damage to the whole structure, it is recommended that it be demolished.
- 3.37 An asbestos survey of this building also found that the rainwater goods and corrugated sheeting contained asbestos and their removal would be managed under the appropriate licences.

### **Development of new community space with staff welfare and office**

- 3.38 The proposed 310sq.m. GEA Community Building (271sq.m. net ground floor and 47sq.m. mezzanine) will provide a multi-function, indoor space for community groups and schools, situated at the heart of the woodland and providing facilities to host presentations and workshops.
- 3.39 The building will be constructed largely on the site of the demolished building 1. It will contain a lobby leading to the community room off which there would be a community kitchen and store. Unisex toilets and a separate accessible toilet are included for use by visitors. To the rear of the community room, sliding glass doors will open onto an external patio/picnic area and lawn. The building will also accommodate an office for FE staff, a staff kitchen, staff toilet and shower room and additional store. Forestry England plan to manage the Hole Farm site through its team based at Broadfields (RM13 4NS), with Rangers visiting Hole Farm daily for facility inspections, volunteering, activities and events.
- 3.40 To the north of the building external covered walkways surround the proposed community nursery area and provide sheltered passage to the proposed FE storage barn to the north. There are external handwashing facilities attached to the northerly side of the community building for those working in the community nursery.
- 3.41 The proposed building will be timber clad with glazed sliding doors to the external patio area. It will be located mainly within the footprint of the existing grain store. Its highest point at tower ridge height will be 8.6m, compared to the highest point of the existing grain store at 12.1m. The main proposed ridge height would be 6.1m. The proposed ground floor plan, proposed elevations – east and south and west and north and proposed Sections, 1 of 2 and 2 of 2, provide further design detail, as does the Design and Access Statement.
- 3.42 Externally eight car spaces are proposed for staff including two disabled parking spaces. This area would have accessible surfacing for wheelchair and buggy users. All staff cars (and any disabled staff or visitor cars) will access the community building via the access track to the south which leads to Codham Hall Lane.

- 3.43 Foul drainage would be provided through a new stand-alone system, as detailed in the Design and Access Statement.
- 3.44 The power supply to the buildings cluster will be determined during consultation with UKPN.
- 3.45 A BREEAM Excellent rating of 73.86%, is targeted and considered to be achievable, with 8.98% identified as potential additional credits which could increase the targeted score to 82.84%.
- 3.46 It is anticipated that the community room would be open 8am-5pm Monday – Sunday as a maximum. This is however unlikely to be every day. There may be days when it is open until 9pm but this is likely to be infrequent.

**Construction of a FE barn**

- 3.47 The proposed 420sq.m. GEA (406sq.m. net) building is for use by FE and will be constructed largely on the site of the demolished agricultural machinery store. It will include areas for FE storage, community storage (accessed externally), a waste/refuse store (accessed externally) and a barn with sliding full height doors allowing vehicles, tools and equipment to be stored inside.
- 3.48 The building has a distinct pure agricultural form. It would be clad in timber with full height timber clad doors. The ridge height would be 6.5m compared to the ridge height of the existing building which is 6.9m.
- 3.49 To the west and rear of the barn building is a service yard with access road into it and a lorry turning circle for large logging vehicles in unsealed prime aggregate. The service yard will accommodate a timber stacking area for future forest management operations.
- 3.50 The external and internal site areas of the buildings, existing and proposed, are listed in Table 2.
- 3.51 The two existing building footprints total 894sq.m. The proposed building footprints total 730sq.m. (this excludes the mezzanine level).

**Table 2: Building Cluster Floor Areas**

<b>Building Cluster Development Areas</b>	<b>GIA m<sup>2</sup></b>	<b>GEA m<sup>2</sup></b>
<b>Existing</b>		
Building 01	348	362
Building 02	514	532
Concrete Apron		294
Gravel Track and Service Yard		483
<b>TOTAL</b>	<b>862</b>	<b>1,671</b>
<b>Proposed</b>		
Community Building Ground Floor	271	310
Community Building Mezzanine Level	47	
Forestry England Barn	406	420
Paved Building Surrounds		411

<b>Building Cluster Development Areas</b>	<b>GIA m<sup>2</sup></b>	<b>GEA m<sup>2</sup></b>
Service Yard and Vehicle Turning Bay		690
<b>TOTAL</b>	<b>724</b>	<b>1,831</b>

### **Thames Chase Trust Community Tree Nursery**

3.52 Although not requiring planning permission the Project will incorporate a new community tree nursery between the two new buildings, (approximately 131sq.m.) in partnership with Thames Chase Trust (TCT). This will provide a facility for local volunteers to collect and propagate local seeds on-site, while offering new skills and woodland based learning opportunities. The community building provides supporting facilities for visitors to the nursery.

3.53 Forestry England has a long-established relationship with the TCT and work in partnership to realise the vision for the Thames Chase Community Forest . They jointly manage the Forest Centre site at Broadfields, which includes a small existing nursery.

3.54 The community nursery will include:

- Raised beds with a larger square lower bed for storage of plants awaiting distribution
- Compost bays
- Good drainage with paths
- Irrigation
- Electricity and water supply with an outdoor sink
- Access to toilets
- Sheltered space with work benches for school activities or taking lunch breaks.

### **Site security**

3.55 The residential properties and access would be separated as far as possible from the Hole Farm Community Woodland buildings to avoid conflicting use and keep members of the public away from the residential area, yet still allowing the residents right of access along Hole Farm Lane to the north.

3.56 The Site Security Plan outlines the proposals for security and access points to reduce any chances of anti-social behaviour on site. This document has been created in correspondence with Essex Police who will continue to be consulted with as the site develops.

3.57 The document identifies two key zones: the central building cluster and the new car park area. Within these two areas the operational hours and usage is explained, and the potential security risks are outlined with suggested mitigation strategies. The central building cluster proposal comprises of a site office, community room, community tree nursery and an operations barn and yard space. The measures needed to keep these facilities secure include the provision of lockable facilities and security lighting. The car park area proposals comprise of a 94-space car park, café, and toilet facilities. Security cameras and

lighting have been proposed here, along with secure casing for the car parking payment machines and EV charging points.

- 3.58 There will be nine different access points to site, including both vehicle and non-vehicle access. Vehicle access points will be secured with lockable gates. Non-vehicle access points will have the relevant infrastructure installed, such as kissing gates and horse step-overs to allow the movement of people through the site without allowing access to unwanted vehicles. This document details the type of infrastructure required at each of these points. All access codes to gates will be provided to the emergency services so they can easily access the Site as required.

### **Landscape concept**

Hole Farm is currently an agricultural holding with low levels of biodiversity. The aim of this project is to deliver a significant uplift in biodiversity and quality. In relation to the specific developments requiring planning permission there are opportunities through landscaping to provide biodiverse habitats such as hedgerows and native species planting.

#### *Planting*

- 3.59 The FE Interpretation Strategy and FE Woodland Masterplan detail the planting proposals. The masterplan for the woodland, provided for information only, has been created by FE and as forementioned is subject to a separate Environmental Impact Assessment for afforestation application.
- 3.60 The planting and areas of species rich grassland do not require planning permission but a description of the concept and layout is included for completeness and because of its relevance to the proposed buildings.
- 3.61 While utilising existing hedges, trees and shrubs, natural regeneration will be encouraged, alongside a proposal for planting 67 hectares (approximately 70% of the site) of predominantly native species, with some non-native species and a small proportion of conifers. Rides and glades species rich grassland will also be created for landscape appreciation, biodiversity and recreation. The overall aim is to create a productive woodland to primarily maximise carbon sequestration as well as meet objectives for habitat creation whilst creating a site for recreation for local communities.
- 3.62 The planting will also serve a further purpose of screening the surrounding road network from the site and helping exclude users of vehicles such as quad bikes which would not be permitted in the woodland.

#### *Countryside heritage and interpretation areas and informal natural play*

- 3.63 The interpretation strategy identifies existing and proposed new features of the site which will be of most importance and interest to visitors and sets out the proposed communicative methods for facilitating physical and intellectual access to these. Methods of interpretation include proposals for signage, wayfinding, trails, view, and activities. The four key themes of interpretation will be: environment, recreation, heritage, and wellbeing.
- 3.64 The objectives of the Interpretation Strategy are:
- To enhance the landscape and heritage setting, enabling improved access to the widest range of people.

## Hole Farm Community Woodland Planning Statement

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- To deliver and increase awareness of the value to society of access to green space.
- To increase awareness of the positive impact of the new and existing habitats on the climate and biodiversity.

- To promote and signpost connectivity to the wider network of green spaces.
- To create a sense of place and convey cultural authenticity by responding to the heritage and knowledge of the local area.
- To support the financial sustainability of the site.

3.65 To achieve these objectives, the interpretation strategy sets out plans for interpretative signage, trails, and activities across the site. It is proposed wayfinding and information signage is installed to aid navigation and convey meaningful information about the site and surrounding area. Within the interpretation panels there will be reference to the historic landscape including the neighbouring Grade I listed church, alongside explanations of the new habitats being created on site.

3.66 A range of activities are proposed for Hole Farm, from facilitating self-led exploration, to guided walks, physical activity sessions such as yoga, and more. All activities will be linked to the four key themes of recreation, environment, heritage/archaeology, and wellbeing. Activities will be designed with local community groups and will target a wide range of audiences, from adventurous young families, to those seeking relaxed days out.

3.67 Across Hole Farm there will be walking and running routes of varied length to enhance enjoyment and appreciation of the landscape. Trails will be signposted by information panels, maps, and waymarkers. An all-abilities access track has been designed to form a 1km loop in the south-eastern section of the site, linking to the car park and visitor facilities. On this loop a play trail and sensory sculpture trail will be created.

### **Environmental sustainability**

3.68 This has directed building design throughout the process including:

- Low embodied carbon
- Passive heating & cooling systems
- Daylight & balancing solar gain
- Low energy space and water heating
- Rainwater harvesting and water recycling
- Sustainable energy sources
- Package treatment tanks for foul waste water
- Building design life cycle of 75 years
- Building adaptability
- Reuse & recycling of construction materials

3.69 These elements are further detailed in the Design and Access Statement and Sustainability Statement.

### **Secure by Design**

- 3.70 Security for the occupants, visitors and assets of Hole Farm has been considered throughout the design process. The design team have liaised with Essex Police and have met on site to discuss how best to design out crime.
- 3.71 The form of different access points to the site for different users has been carefully considered. The access gates are designed to allow pedestrians, cyclists, dog walkers and horse-riders through. Signage, and where possible design of gates, aims to prevent motorbikes, motor-cross and quad bikes from entering the site.
- 3.72 Other proposed security measures are:
- The car park and facilities will be open in daylight hours with the gates locked after dusk
  - Lighting to bike storage and to the car park will be motion detection only to mitigate the impact on wildlife and generally avoid urbanisation of this natural setting.
  - The buildings are to be locked at night.
  - Natural surveillance has also been incorporated into the Project where possible.
- 3.73 The potential security risks of the Project have been identified and mitigation measures are in place with the aim of reducing risk. These include:
- Secure casing for the Electric Vehicle charging points.
  - Secure doors/shutters for overnight and lighting for lockups in the winter for the office and community building.
  - Providing cover over the bike storage while maintaining visibility, and the provision of lighting.
  - Securely locking the barn when not in use, provision of a locked gate into the yard area.
  - Lockable storage at the community tree nursery so all equipment and tools can be locked away when not in use.
  - To mitigate antisocial behaviour, lighting around the building for secure lock up after dark will be installed, sensor lighting will also be provided in the car park area for use after hours, and implementation of a lone working policy for FE staff.
  - Emergency services access has also been considered in the design and layout.
  - Hole Farm will become part of FE's Thames Beat woodlands and thus will be inspected on at least a weekly basis to check the condition and security of the site.
- 3.74 The Hole Farm Security Plan accompanies this application.

### **Phasing**

- 3.75 It is anticipated that the community woodland will develop incrementally as the planting matures over time. Initially the trees will be immature, although faster growing species such as Poplar have been selected to be planted in areas of high footfall, such as near the car park and on the all abilities route, to help create a woodland feel earlier on; however, it will take time for a sense of place to develop across the whole site and for ecosystems to establish. It is anticipated that visitor demand will initially be low and will build over time; development of the entirety of the proposals at the outset will not be feasible.
- 3.76 The planting, ponds, pathways and car parking areas are likely to be laid out in the first instance with any related service requirements such as the substation, modular cafe and visitor WC facilities, to both attract visitors and provide FE with a source of income to maintain the site. Other elements will be built as visitor demand increases and to meet the needs of FE in relation to site presence and storage of machinery and other equipment.



## 4 Consultation overview

4.1 Full details of the consultation undertaken with the public, Local Authorities and Technical Consultees, up to November 2022, are set out in the Consultation Report (November 2022) submitted with the planning application. This section of the Planning Statement summarises the Report and updates the consultation activity since November 2022 leading to submission of the planning application. Many of the comments relate to elements of the proposals that do not require planning permission however they have been included for completeness.

4.2 At the outset of the Project, Forestry England (FE) held a stakeholder mapping session in November 2021 with local authorities and the local community to identify who would be involved in collaborating on the Hole Farm project.

### Questionnaire

4.3 A printed questionnaire was sent out to stakeholders and a webpage was set up with more information and details on how to get in touch and submit a questionnaire response.

4.4 The following key points from the responses are summarised as follows with the corresponding Applicant response in relation to the detailed design.

Stakeholder Response	FE Response
Positively, over half of the respondent's thought they would visit the facility several times a month or more.	Supportive of usage of proposed woodland
There was a preference locally for lower intensity uses, less development and preservation of the natural landscape including woodland, mature trees, hedgerows, water, habitats and wildlife.	The masterplan includes all of these elements
Existing walking and horse riding on the site, which has occurred over many years on informal paths/bridleways, was highly valued. The retention of such routes was welcomed.	The design masterplan has been developed in consideration of this feedback. Walking and horseriding routes are provided for within the site including a multi user surfaced track.
It was strongly felt that the existing horse riding and cycle routes in the wider area should link up to the wider network.	Links with the wider path network have been included in the masterplan
Some concerns about conflicts between walkers, cyclists and horse riders were voiced.	The path network has been designed to minimise pinch points and conflict between users.
There was a wish that far-reaching views should be preserved.	Views of St Mary the Virgin Church and the surrounding listed buildings have been preserved as far as possible.

Stakeholder Response	FE Response
Some people mentioned the need to preserve the listed buildings on the site.	There are no listed buildings within the red line boundary. A Heritage Statement and Impact Assessment addresses the demolition of buildings within the curtilage of the listed Hole Farmhouse.
The most common concern was over-development of the site with buildings/paths/car parking/activity. A few people were keen for more extensive facilities (visitor centre/environmental education) but most preferred a limited number of facilities (small café, toilets).	A range of facilities would be provided to enable the Woodland to be used for recreation but also as an educational purposes serving school and community groups. The new buildings will be situated largely within the footprint of existing buildings. Overall internal floorspace will be reduced compared to that existing. In the car parking area the only new structures will be the small café/kiosk and toilet facilities for visitors. All buildings will use natural cladding materials and be designed to be sensitive to their rural location.
Concerns about visitor road traffic were discussed in the workshops.	<p>Convenient, well-designed connections between routes on site and the wider PROW network and the bus stop have been designed to help facilitate other means of accessing the site.</p> <p>The Transport Statement concludes that the Project would have a marginal impact on the local highway network during traffic peaks and that the existing and proposed transport infrastructure is adequate to serve the new facilities.</p> <p>It will be a number of years before the site matures and becomes a destination for visitors.</p>

## Stakeholder engagement workshops

4.5 A series of planned workshops were then held to enable members of the public and other stakeholders to add to their questionnaire feedback and discuss their views with others and the Applicant. The workshops were planned around four key considerations:

- Community and Recreation - 22nd February 2022
- Traffic and Access - 3rd March 2022
- Design and Delivery Approach - 8th March 2022
- Biodiversity Approach Workshop - 16th March 2022

4.6 Feedback was taken and participants were invited to send any further information about their views to FE. In addition to individual views, responses

were also received from a number of organisations. Details of the questions set, and summarised responses are set out in the aforementioned Consultation Report.

4.7 Key comments and responses which are in addition to those above are set out in the following table.

Comments raised	FE Response
Generate community cohesion through opportunities for volunteering, forestry walks and talks, tree nursery.	A community tree nursery, orchard and coppicing areas will open up the opportunity for volunteering. The Thames Chase Trust and Forestry England volunteer groups could help broaden the diversity of users beyond those in the immediate vicinity.
Concern that ancient woodland and trees are not removed	The Project will result in ecological and biodiversity benefits. No Ancient Woodland will be removed and only limited tree removal will take place to enable the construction of the building cluster, car park and lorry turning area.
Will this still go ahead if LTC is not consented	Yes, the Project is not dependent on LTC.
Safe and equal non-vehicular access for the local area as well as beyond Brentwood, including to other local FE sites.	The Project includes the provision of five dedicated pedestrian entrance points. Entrance 1 is located by an existing footbridge that connects the Project to Folkes Lane Woodland on the other side of the M25.
Accessibility of parking including the cost and ability to park horse boxes.	The Project will provide a 94-space car park with a provision for coach parking and an overflow area. This includes 14 Electric Vehicle (EV) charging points, as well as 7 blue badge spaces, 2 of which will have access to EV charging points. The car park would be pay-and-display.
Collaboration when creating the woodland including with the community, the Great Warley Conservation Society and Essex Wildlife Trust. Regular community updates.	Two dedicated engagement sessions have been held with the Great Warley Conservation Society which have contributed towards the design of the Project. Community tree planting days were held in December 2022 and more will be held in the future.
Opportunity to design in wet features such as ditches as well as species to encourage repopulation.	The Project has incorporated ponds and water features throughout the site. The Project would also enhance the existing waterbody on site.

Comments raised	FE Response
Safeguard and enhance current biodiversity by expanding hedgerows, ensuring planting is both herbaceous and woody, establish scrubby areas and wildflower meadows.	Retaining mature trees and hedgerows, providing additional native planting and adding bird boxes will also help enhance the Site's biodiversity. The landscape-led design approach will include new hedgerows, shrub borders to the tree planting blocks and rides and glades species rich grassland that would safeguard and enhance current biodiversity.

### Drop in sessions

- 4.8 Drop in sessions were also held over two days at Folkes Lane engaging with the local community and other interested parties on the Woodland Design Plan. Attendees were also given a tour of Hole Farm. In addition, FE conducted tours of the site with local MPs, Natural England staff, Essex Bridleways association, Thames Chase Trust volunteers, residents and neighbouring community members, Essex County Council staff, Trailnet, Conservationists, local walking groups, horse riders and cyclists.
- 4.9 The following key questions were raised at the drop in days, excluding comments already made above.

Questions raised	FE Response
What impact will this have on local traffic?	A transport assessment has been carried out and the Transport Statement concludes that the Project would have a marginal traffic impact on the local highway network during the traffic peaks, and that the existing and proposed transport infrastructure is adequate to serve the new facilities.
How can the site be accessed by public transport, walking or cycling?	The woodland path network has been designed to connect with existing footpaths and bridleways outside the site. A new entrance point has been positioned by the local bus stop on the B186. Brentwood train station is approximately a 30 minute walk away from Great Warley via pavement.
Can trees be planted and paths put in for public access asap. Can faster growing trees be planted across the site?	Fasting growing species such as Poplar has been selected to be planted in areas of high footfall which are faster growing than other species. This planting will help create a woodland feel earlier on.
Can there be more conifers to give greenery during the winter months?	A small proportion of Scots pine has been planted across the site to provide

Questions raised	FE Response
	greenery and cover during the winter months.
Could there be a community orchard?	A community orchard has been included in the design masterplan.
Will pathways be multi-use?	Yes.
Preference for environmentally friendly infrastructure and use of materials as opposed to tarmac.	Natural materials are proposed to be used wherever possible. The material palette for the site is primarily timber or timber cladding. Timber construction is comparatively low-carbon and does not have high embodied energy expenditures of concrete and steel. Tarmac is proposed to be used for some of the hard-standing areas with coloured surface dressing of natural angled stone chip.
Could there be a 3 mile loop for horse riders, small provision of horse box parking and higher barriers on the M25 footbridge crossing?	orse riders will be welcome to ride at Hole Farm utilising the grass ride network and accessing the site via existing bridleways

### Great Warley Conservation Society

- 4.10 Sessions have also been held with Great Warley Conservation Society in March and June 2022.
- 4.11 In general there was agreement with the planting plan and tree selection but concerns about traffic generation, the location of the access and cumulative built infrastructure in the area. Traffic generation is addressed above, the access from Great Warley Street has been moved and the only additional building will be the modular café and toilets which are small in scale and are basic amenities to enhance the visitor experience.

### Stakeholder roundtable

- 4.12 In July 2022 FE hosted a stakeholder roundtable to review the design and discuss how to maximise the opportunities in and around Hole Farm. Attendees included Essex County Council, Brentwood Borough Council, National Highways and the Thames Chase Community Forest.
- 4.13 Feedback not addressed above included the following.

Feedback point	FE response
Active travel and electric vehicles should be reflected in the design	The design has incorporated multi-user surfaced tracks which are appropriate for walkers, cyclists and horse riders. The proposed car park includes 14 EV charging points, as well as 7 blue badge

Feedback point	FE response
	spaces, 2 of which will have access to EV charging points
The educational offering should be aimed at all levels of education and development. Non-academic skills should be promoted through learning with opportunities to engage with local educational institutions and community organisations	A community room has been designed that will provide a space for educational institutions and community organisations to hire out for activities.
Consider the importance of disabled access and create a sensory walk	The car park design incorporates seven blue badge spaces (two of which are EV). The nine access points to the site offer access to a range of user types including wheelchairs and mobility scooters. The informal parking adjacent to the community building has two blue badge spaces. The spaces within the community building have been designed to far exceed Building Regulations for wheelchair users, and gradients to landscaping are for unaided wheelchair users. The new main entrance area will offer a starting point to the woodland walk.  The all-abilities trail will incorporate a sensory sculpture walk.
How will potential anti-social behaviour be addressed?	A site Security Plan has been developed to address potential anti-social behaviour.

### Final public consultation

4.14 The final public consultation was undertaken over two drop in days on 2 and 3 September 2022 hosted by FE. In addition display boards and brochures were left in the Thames Chase Visitor Centre for comment and on the Hole Farm FE webpage with an email for comments.

4.15 Feedback not addressed above included the following.

Feedback point	FE response
Concern that Codham Hall Lane and other roads could be used by users to park for free.	There is the potential that some users may choose not to park on site to avoid the parking charges.
Retain views from Folkes Lane Woodland to Landon Hills.	Tree planting will have no immediate effect on views from the site. In the medium to long term tree and shrub growth will restrict the open character of the site. Key long distance views from the northern boundary of the site looking across the community forest and towards the estuary,

Feedback point	FE response
	and from west to east at certain points will be maintained.
The proposed car park is too large.	The assumption on parking provision has been based on existing parking demand at the nearby Thorndon Country Park that attracts over 100,000 visitors per year and has 145 spaces. This is similar to the levels expected at Hole Farm. In this location parking demand requires 100 spaces. The overflow area could accommodate overspill of up to 100 spaces. It will remain grassed. ECC Highways recommended that the car park and overflow area should provide for a total of 200 spaces.
Can horses access the multi user track for horse riding and how is access gained?	Horse riding routes have been designed across the site to connect the two existing bridleways to the west and south of Hole Farm.
Will the M25 air pollution affect the Woodland?	Traffic on roads such as the M25 can lead to increased levels of nitrogen deposition on habitats adjacent to them which can result in nutrient enrichment. Hole Farm is being designed and would be managed to maximise its biodiversity and landscape value through the range of woodland and grassland species proposed. This active management would help maintain the species diversity across the site.
Could fruit trees or allotments be included to compensate for loss of agricultural land?	A community orchard that will host a range of fruit trees has been included in the design masterplan. The agricultural land will be replaced by forestry. The new buildings will be constructed on the footprint of existing buildings and hardstanding. The proposed car parking and café area will be the only part of the site where new hardstanding will be created that does not already exist.

### Local authorities and technical consultees

4.16

There has been ongoing consultation with the Local Planning Authority initially and also with technical consultees, including other teams within Brentwood Council and Essex County Council. Full details are included in the aforementioned consultation report however the following table summarises the key points raised by consultees and how the Applicant has responded in preparing the final Project proposals.

Key points raised by consultees	FE response
<b>Brentwood Borough Council Planning Officer written comments</b>	
Ponds and water features should be considered as development.	Planning permission is sought for this aspect of the Project.
Some permitted development rights require prior notifications.	No elements of the Project require prior approval.
Requirement to consider policies relating to energy, water efficiency and low carbon generation.	These policies have been considered in this Planning Statement, the Sustainability Statement and the SuDS Report. A BREEAM Assessment is also being conducted where best practice and polices are considered in relation to credit achievement for energy, carbon and water credits.
No objection to contemporary typologies in relation to any new buildings. This can help limit their impact on the countryside.	The design of the replacement buildings has been carefully considered in relation to their setting and the proximity of the listed farmhouse. A simple material palette has been developed consisting of timber cladding and zinc standing seam roofs to compliment the rural character of the setting.
Any hot food provision should include appropriate deodorising equipment.	The proposed modular café will serve both hot and cold food. The café will not be cooking food on site. Hot food will consist of heating pre-prepared food items.
Concern raised re the potential for noise and amenity impacts on adjacent occupiers in relation to the proposed use of the existing access onto the B186 and use of land for car parking. An access to the south would address the concerns.	This concern relates to early stages of design when an alternative to use the existing Anglian Water access track onto B186 was considered as access to the car park. Following consultation and design iterations, the proposed access is now 110m south of the existing bell mouth and therefore no impact on the adjacent property to the north of the site boundary (the Hermitage) is expected.
The proposed car park appears urban in nature. A more rural approach should be followed with no or minimal lighting. The number and location of car charging points should be shown.	These points have been addressed in the design which includes blocks of groundcover and tree planting within the car park to help integrate into the surrounding woodland setting.  EV Charging zones and spaces have been shown on the drawings.
Create and retain important vistas when considering tree planting blocks (non-planning, but LPA offered advice).	As part of the consultation process, key vistas have been identified and will be retained through the design masterplan.



Key points raised by consultees	FE response
<b>Historic England written comments 17.06.22</b>	
A Forestry Commission EIA decision is required for the proposed afforestation, which exceeds 50ha.	FE secured consent to deliver 5ha of planting in 2022 and will be submitting an EIA (for afforestation) to cover the remainder of the proposed planting.
The sinuous woodland blocks do not reflect existing blocks in the landscape which have straighter edges. Aligning the proposed blocks with historic hedgerows or field boundaries would be more in keeping with local landscape character, with scalloping of edges along internal woodland rides.	As with all FE woodland creation sites, FE follow the best practice and guidance set out by UKFS, and this includes the consideration for historic landscape character. Whilst Hole Farm is not a protected or designed landscape, efforts have been made to ensure the planting mixes and design of the woodland will be visually consistent and in character with the adjoining areas of woodland and the predominantly wooded ridge to the north. The planting design with its mosaic of open habitat and tree planting has been informed by the existing and historic field boundaries and landform. Additionally, existing hedgerows will be either retained as features, or allowed to naturally regenerate into shrubby wildlife corridors, allowing for these features to be traced and understood into the future.
Existing or historic hedgerows should be retained as freestanding elements or edges for woodland blocks.	Existing hedgerows will be either retained as features, or allowed to naturally regenerate into shrubby wildlife corridors, allowing for these features to be traced and understood into the future.
Re-creation of a wood pasture/parkland by reducing planting, on the arable field in the NW of the Project site (west of the lane to Hole Farm and north of the public footpath) akin to patterns of historic land use.	The northwest part of the site has been identified as key areas for natural regeneration and rides and glades species rich grassland that will retain the views from the high point of the site.
<b>Historic buildings and conservation advice 15.6.22</b>	
Need to draw on the contribution of the historic environment on the character of the place. Heritage interpretation of Hole Farmhouse and St Mary's Church required; permissive access to the War Memorial; permissive parking for church visitors; retain sightlines to Hole Farmhouse in planting layout.	The following have been incorporated into the proposals: <ul style="list-style-type: none"> <li>• An interpretation panel in the car park relating to local history and the St Mary the Virgin Church.</li> <li>• Retention of the view of the church spire from location TQ 5815 8988 within the wood.</li> </ul>

Key points raised by consultees	FE response
	<ul style="list-style-type: none"> <li>• Pathways will make it possible for people to use the car park and visit the Church.</li> <li>• An information board about the post medieval farmstead at Hole Farm (sited near farm).</li> <li>• A series of self-led themed walks through the woodland are proposed including:               <ul style="list-style-type: none"> <li>– Sensory Trail, incorporating sculptures to encourage the appreciation and understanding of the landscape.</li> <li>– Natural play trail to encourage children to explore their natural surroundings.</li> </ul> </li> </ul>
Any hard landscaping to remain rural in character and permeable. Any signage relating to access must be appropriate for the heritage environment.	Timber signage will be sustainably sourced and follow FE's branding.
Modification of barn and grain store and addition of tree nursery gives opportunity to enhance the setting of the listed farmhouse.	The dilapidated barn and grain store require demolition and will be replaced by a sympathetic design proportionate to the existing and clad in natural materials.
Opportunity to signpost access from the woodland, to the conservation area for pedestrians.	Wayfinding and information signage to aid navigation and convey meaningful information about the site and surrounding area is proposed. Information on the nearby St Mary the Virgin Grade I listed church and nearby Conservation Area will be provided. There will also be reference to the historic landscape, alongside explanations of the new habitats being created on site.
<b>Essex CC Archaeology 13.06.22</b>	
Recommend a programme of archaeological mitigation on any areas, eg. the new ponds, that will result in below-ground disturbance (carried out post determination) as part of a condition. The likely below-ground impact of the Project should be provided in the revised DBA with the planning application	The Archaeological Desk-based Assessment has been updated and included in the planning application.
Require the likely below-ground impact of the development to be	The updated Archaeological Desk-based Assessment identifies the risk of below-

Key points raised by consultees	FE response
assessed in any revised Desk Based Assessment.	ground impact on archaeology within the proposed areas of development. It recommends further investigation within these areas that could involve geophysical surveys and trial trenches prior to construction.
<b>Essex County Council Highways written comments 08.07.22</b>	
Recommendation to use the existing access by The Hermitage or from the south, not from Great Warley Street, being a minimum of 5.5m wide with a separate 2m footway for pedestrian access. Visibility splays of 2.4m x 120m are required in both directions.	Residents of Hole Farm and the Farm Cottages will utilise the existing track leading south from Great Warley village while other users of the Community Woodland facility including staff, deliveries and FE vehicles will use the existing track leading north from Codham Hall Lane. Visitors and coaches will access the new car park from the B186. Access to the car park has been designed 7m wide + 2m footpath. Full Stopping Site Distance (SSD) is ensured in accordance with DMRB CD123 considering a 70kph design speed - minimal vegetation clearance is envisaged for the bell mouth construction and SSD requirements (circa 50m linear veg clearance).
Due to the status of the road, any new or improved vehicle access would require a Stage 1 Road Safety Audit.	A Road Safety Audit has been provided in relation to the creation of a new vehicular access into the proposed car park from Great Warley Street.
Recommended that the existing access from Great Warley to the north should have restricted use.	Use of this track will be restricted to residents of Hole Farm and the Farm Cottages.
Footpaths to be kept separate from motorised vehicles; various signage suggested; PRow to remain open at all times.	The PRow will remain open throughout the construction period and thereafter. Should there be an unexpected reason the PRow could not be open, then a diversion route would be created as is required.
Area to be designated for overflow parking of @ 100 vehicles; cycle parking to be conveniently located, secure and covered.	A grassed area adjacent to the car park to accommodate around 100 vehicles has been included as shown on the Car Park Layout plan (drawing reference 6314_101). Covered cycle parking has been located adjacent to the modular café (at the main entrance) as shown on the Modular Café Plan (drawing reference 375-FP-02-ZZ-DRG-A-000111 Rev. P08).
The TS should provide as much detail as possible on trip generation by all	The Transport Statement considers all means of access to the Community

Key points raised by consultees	FE response
<p>modes; detail the times of operation of the site; Highway capacity assessments are unlikely to be necessary if most trips will be off peak.</p>	<p>Woodland. The forecast traffic impact on the highway network and car parking demand is supported by new traffic surveys which shows that the majority of trips generated for this type of Project occur in off-peak hours when the highway network is less sensitive to increased traffic demands. The junction capacity assessment shows that the junction is forecast to operate within capacity in both peaks in 2023, with very little delay to the operation of the B186 Great Warley Street.</p>

### Post November 2022 consultations

- 4.17 Since November 2022 following design changes, consultation with the following statutory consultees has also taken place.

Key points raised by consultees	FE response
<p><b>Essex County Council Development and Flood Risk, Waste and Environment written comments 12.01.23</b></p>	
<p>The principles of the drainage scheme are acceptable. Change the climate change allowance from 25% to 45%.</p>	<p>The Environment Agency's Climate Change Allowances have been incorporated into the drainage design. The current design is based on upper end allowance of climate change of 45%.</p>
<p>The flood risk assessment should consider all forms of flood risk and it should be considered how any existing flood risk will interact with the proposed development drainage scheme.</p>	<p>The FRA has considered all sources of flood risk. There was deemed to be potential for surface water and groundwater flooding, albeit a precautionary approach was taken.</p> <p>A number of mitigation measures have been incorporated into the design which largely resolve the risk. Residual flood risk would be managed by establishing a planned, risk-based maintenance programme and establishing overland flow paths from the retention ponds away from sensitive receptors.</p>
<p>Surface water run-off should be disposed of in line with the discharge hierarchy.</p>	<p>Surface water run-off will be managed sustainably. Due to the abundance of clays in the bedrock and the grey soils present in the superficial deposits, the use of SuDS methods incorporating infiltration techniques is not appropriate for site drainage. Hence, SuDS such as swales and detention basins have been proposed</p>

Key points raised by consultees	FE response
	for conveyance and attenuation with outfall into existing ditches.
Rainwater re-use should be considered, in line with the updated 2020 Essex County Council SuDS Design Guide. If not proposed a clear explanation as to why this is not a viable option should be provided.	Rainwater butts have been proposed near tree nursery for rainwater storage and reuse.  It may be possible to incorporate rain water harvesting at the modular café and public loos. This would need to be assessed at detailed design, once a supplier has been identified to work with their proprietary modular building system.
Confirm whether infiltration is proposed and conduct the appropriate ground investigation/groundwater and infiltration testing.	Due to the abundance of clays in the bedrock and the grey soils present in the superficial deposits, the use of SuDS methods incorporating infiltration techniques is not appropriate for site drainage.
Ensure the site discharges at a suitable rate and that appropriate permission are in place if discharge to a watercourse or sewer is proposed.	The drainage design proposes to discharge attenuated run-off in a secondary/ tertiary river.
Peak flow – if infiltration is found to be not feasible on site, discharge should be limited to the Greenfield 1 in 1 year rate for all storm events.	Greenfield run-off has been calculated for 1 year return period using ICP SuDS (see Appendix D of Drainage Strategy). The outflow from networks have been limited to greenfield run-off for 1 year return period or 1lps whichever is higher.
It should be demonstrated how surface water up to the 1 in 100 year plus climate change event is managed within the development. Detailed calculations considering a range of summer and winter storms should be submitted for storage requirements.	Detailed micro-drainage result summary for the proposed drainage networks have been produced in Appendix F of the Drainage Strategy Strategy.
There should be water quality treatment in line with Chapter 26 of the CIRIA SuDS Manual C753 for all areas of the site. The pollutant risk depends on traffic movements. Trapped gullies and catch pits are generally not considered appropriate forms of mitigation.	The SuDS proposal is sufficient to mitigate the pollution hazard posed by the development (based on Simple Index Approach of Assessment) and hence the water quality of the receiving watercourse would not be worsened.
It should be ensured that surface water is managed so there is no flooding in a 1 in 30 year storm event and no internal flooding in a 1 in 100	The proposed drainage network does not flood for rainfall of 1 in 30 year return period. The detention basins have been designed to allow for 300mm freeboard for

<b>Key points raised by consultees</b>	<b>FE response</b>
year, inclusive of climate change storm event.	the rainfall of return period 100 year and 45 percent climate change.
A maintenance plan should be provided. Adoption by FE to be discussed at a later stage, Anglian Water adopt SuDS schemes in this region.	The Drainage Strategy sets out how the SuDS will be maintained. The on-site drainage will be managed by FE which will be responsible for maintaining any on-site services including drainage.
At some point during the planning stage, you would need to show how surface water will be managed during the construction phase.	This will be addressed at the appropriate design stage.
You would also need to demonstrate how surface water impacts on the drainage system before and after development, and how the new development improves existing land drainage or surface water management.	The proposed drainage system intercepts and conveys the overland flow through swales which eventually flow through detention basins to discharge at a rate lower than the existing condition.
Under Section 23 of the Land Drainage Act (1991) any proposed structure that impacts on the cross-sectional area of a watercourse will require Ordinary Watercourse consent to be sought from Essex County Council. Such applications are separate from and are required in addition to the planning process.	The current proposal retains the existing watercourse without any cross-sectional modifications.
<b>Essex County Council Place Services written response 02.02.23</b>	
A requirement for a conditioned programme of archaeological evaluation;	FE is agreeable to an appropriate condition relating to further evaluation and recording.
Requirement for an updated desk-based assessment to be submitted with the application;	This has been included.
Only a requirement for building 3 (small brick stable) to be recorded;	Building 3 now sits outside of the Project's red line application boundary.
Heritage Impact Assessment required including assessment of impact on Hole Farmhouse;	A Heritage Statement and Impact Assessment and Archaeological Desk-based Assessment are included with the planning application submission.
Any required archaeological evaluation work would be pre-commencement or during construction.	FE is agreeable to an appropriate condition relating to further evaluation and recording.
<b>Brentwood Borough Council Planning written response 08.03.23</b>	

Key points raised by consultees	FE response
Requirement for a two-vehicle width access, a hardened access to a distance back from the highway to avoid loose material tracking onto the highway.	A carriageway width of 7m has been provided leading to the car park. The bell mouth cross section is designed to cater for the simultaneous egress and ingress of 2 standard Rigid Vehicles (FTA Design LG Rigid Vehicle - 7m long). The car park access is proposed to be a tarmac surface as shown on the Car Park Layout drawing (reference 6314_101) and shown in detail on the proposed car park bell mouth drawing (reference Hole_Farm_Highways.003.2).
No objections in principle to buildings. Green Belt argument to be tweaked	The Planning Statement demonstrates that the Project is an appropriate use within the Green Belt and will not be detrimental to its openness nor conflict with the purposes of using land within it.
Preference for kiosk, shelter and substation to be in full rather than outline to judge their impact on the openness of the Green Belt.	Parameters are provided for the modular café, visitor shelter and substation including locations and maximum floorspaces and heights. These elements could be conditioned as appropriate. The openness of the Green Belt would not be compromised by these ancillary uses which will be screened from view as the woodland matures. The reason for applying in outline is detailed in the Planning Statement.
Informal car/coach parking appears tight and unworkable. Why is this needed in addition to the field car park?	The car parking at the building cluster has been formalised. Coaches will no longer park in this area. This is needed for FE staff and for disabled staff or visitors attending the building cluster.
Clarification needed in respect of how works not requiring permission are referred to.	This has been clarified.
<b>BBC Ecology Officer, March 2023</b>	
Clarity required regarding the extent of the existing boundary hedge requiring removal in the car park to create the new access and appropriate visibility splay.	Minimal vegetation clearance is envisaged for the bell mouth construction and SSD requirements (circa 50m linear veg clearance).
<b>BBC Historic Buildings Officer, March 2023</b>	
To minimise negative impacts on the setting of the listed building, the car park should have a natural (ie. not	The Project is thoughtfully designed and considerate of any issues that may impact the surrounding heritage. In the car park,

Key points raised by consultees	FE response
bituminous) permeable wearing course. Lighting must not detract from the character of the rural setting or contribute to light pollution.	the main vehicle circulation area consists of tarmac with a coloured surface dressing of natural angled stone chip, with the parking bays formed of unsealed prime aggregates with compacted 6mm to dust grey granite finish. There will be no external lighting provided as the car park will be closed after dark. Security lighting, on a sensor and timeclock will be provided around the modular cafe for employee's locking/unlocking and at the entrance to the site. Lighting at the entrance will provide enough light for the ANPR/CCTV systems to recognise vehicles entering and leaving the car park in low light.
Materials for the open sided visitor shelter should be renewable and of agricultural character.	The principles of location, scale and materiality have been outlined in this planning application and will be subject to reserved matters when the final design is completed. The open sided visitor shelter will be of timber construction.
If the Café is a permanent structure, materials should be renewable and of agricultural character.	The principles of location, scale and materiality have been outlined in this planning application and will be subject to reserved matters when the final design is completed. The materiality of the modular café will be timber cladding.
Paths should have a natural (ie. not bituminous) permeable wearing course. Any path lighting must not detract from the character of the rural setting or contribute to light pollution.	The surfacing for the all access abilities pathway will be prime aggregate with a wearing course of tar and chip, grey granite finish. The surfacing of the multi-user pathway and path from the bus stop will be unsealed prime aggregate, with compacted 6mm to dust, grey granite finish.  The external lighting across the site is to be limited as far as practicable in order to restrict any urbanisation of the site and to mitigate any impact upon wildlife.
Strongly objects to demolition of the Stable.	Building 3 (small brick structure) is now outside of the Project's red line boundary and will not be demolished.
Supports demolition of the open fronted shed conditional upon demarcation of its outline in hard or soft landscaping to acknowledge the scale of the former historic courtyard.	Building 4 (open fronted shed) is now outside of the Project's red line boundary and will not be demolished as it houses a maternity roost of bats.



Key points raised by consultees	FE response
<p>Footprint and massing of new community building and FE Store should not exceed that extant today. Materials should be renewable and of agricultural character.</p>	<p>The proposed new buildings within the building cluster makes use of the existing development areas and reduces built footprint and volume from that existing. The buildings are sited on the existing footprints yet are elongated into rectangular plan forms.</p> <p>The material palette for the buildings and for the site in general, as a community forest, is primarily timber. Timber construction with timber framing and roof trusses is also in direct reference to the historical architecture of agricultural barns on the site.</p>
<p>Informal car and coach parking should have a natural (ie. not bituminous) permeable wearing course. Any lighting must not detract from the character of the rural setting or contribute to light pollution.</p>	<p>The informal car parking (adjacent to the community building) will consist mainly of unsealed prime aggregate with two blue badge parking bays and access road formed of tarmac with coloured surface dressing of natural angled stone chip. There will be no external lighting provided as the car park will be closed after dark. Security lighting, on a sensor and timeclock will be provided around the community building and Forestry England barn to ensure staff safety and security. Lighting at the entrance will provide enough light for the ANPR/CCTV systems to recognise vehicles entering and leaving the informal car park in low light.</p>
<p>Signposting and heritage interpretation should be provided to inform visitors of the Conservation Area and St Mary's Chapel.</p>	<p>It is proposed wayfinding and information signage is installed to aid navigation and convey meaningful information about the site and surrounding area. Information on the nearby St Mary the Virgin Grade I listed church and nearby conservation area will be provided. Within the interpretation panels there will be reference to the historic landscape, alongside explanations of the new habitats being created on site.</p>
<p>The significance of any other agricultural structures should be assessed and the existence of a natural pond should be protected</p>	<p>The Heritage Statement and Impact Assessment has considered the significance of the buildings and structures at Hole Farm. The Project would also enhance the existing waterbodies on site.</p>
<p>Requests that the planning officer consider how the applicant could fund appropriate enhancement of Hole</p>	<p>The Project will enhance awareness and community engagement with features of historic interest at both Hole Farm and</p>

<b>Key points raised by consultees</b>	<b>FE response</b>
Farmhouse or otherwise enhance the heritage setting for public benefit.	Great Warley. It is considered that the creation of a community woodland will have an overall positive impact on Hole Farm, its setting, and Great Warley Conservation Area.

## 5 Planning policy and guidance

- 5.1 Section 38(6) of the Planning and Compulsory Purchase Act 2014 requires that applications be determined in accordance with the Development Plan unless material considerations indicate otherwise.
- 5.2 Accordingly, the relevant policies in the National Planning Policy Framework 2021 (NPPF) and Brentwood Council Local Plan (2016-2033) are set out below. Section 7 of this Planning Statement addresses how the proposals comply with policy, taking into account all material considerations.
- 5.3 Other documents considered include:
- Essex Green Infrastructure Strategy 2020
  - Essex Green Infrastructure Standards – Technical Guidance (undated)
  - The Essex Design Guide 2018
  - Essex Development Management Policies – Highways 2011
  - Public Health England: Improving Access to Greenspace 2020

### **NPPF 2021**

- 5.4 The presumption in favour of sustainable development underpins the NPPF. This is set out in Paragraph 11. which states that for decision-taking this means “*approving development proposals that accord with an up-to-date development plan without delay*”. Where proposals may depart from a development plan, local planning authorities (LPA’s) may approve the application “*but only if material considerations in a particular case indicate that the plan should not be followed*”.
- 5.5 Chapter 8 of the NPPF states that planning decisions should aim to achieve healthy, inclusive and safe places which:
- Promote social interaction
  - Are safe and accessible
  - Enable and support healthy lifestyles eg. through the provision of *inter alia* accessible green infrastructure and layouts that encourage walking and cycling.
- 5.6 Positive planning for sport and recreation means that “*access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change*” (paragraph 98.).
- 5.7 The NPPF also states the importance of protecting and enhancing public rights of way and access, including “*taking opportunities to provide better facilities for users, for example by adding links to existing rights of way networks*” (paragraph 100.)
- 5.8 In all developments the promotion of sustainable transport modes is key, thus prioritising pedestrian and cycle movements both within and outwith Schemes and facilitating access to public transport. Safe and suitable access to the site

for all users and the design of parking areas should accord with current national guidance.

- 5.9 A transport statement is submitted in support of the planning application as required by paragraph 113 of the NPPF.
- 5.10 With particular relevance to the Project, the NPPF promotes the effective use of land. In this respect, planning decisions should inter alia:
- “a) encourage multiple benefits from both urban and rural land, including through mixed use schemes and taking opportunities to achieve net environmental gains – such as developments that would enable new habitat creation or improve public access to the countryside;*
  - b) recognise that some undeveloped land can perform many functions, such as for wildlife, recreation, flood risk mitigation, cooling/shading, carbon storage or food production”* (paragraph 120)
- 5.11 In addition to the Essex Design Guide 2018, the site and building design has been cognisant of the policy advice in Chapter 12 of the NPPF in relation to function, visual attractiveness, layout and landscaping. The proposals also take account of the nearby and more distant listed buildings.
- 5.12 In terms of the existing and proposed trees, paragraph 131 states that appropriate measures should be put in place to *“secure the long-term maintenance of newly-planted trees, and that existing trees are retained wherever possible”*.
- 5.13 The views of the community and LPA *et al* that emerged from the early and ongoing consultation process have helped shape the site and building layout and design. In this regard, NPPF paragraph 132 states *“applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot”*.
- 5.14 The Application Site is located within the Metropolitan Green Belt. Section 13 of the NPPF that addresses the requirements to protect Green Belt land. In this regard paragraph 137 states *“the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open”*.
- 5.15 Paragraph 138 sets out five purposes for the Green Belt:
- “a) to check the unrestricted sprawl of large built-up areas;*
  - b) to prevent neighbouring towns merging into one another;*
  - c) to assist in safeguarding the countryside from encroachment;*
  - d) to preserve the setting and special character of historic towns; and*
  - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land”*.
- 5.16 The NPPF states that inappropriate development in the Green Belt should not be approved except in very special circumstances. Authorities are directed to ensure substantial weight is given to any harm to the Green Belt in the consideration of planning applications. *“Very special circumstances’ will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations”* (paragraph 148).

- 5.17 Although the construction of buildings is inappropriate in the Green Belt, there are a number of exceptions, as listed in paragraph 149. These include, of potential relevance, either directly or contextually:
- “a) buildings for agriculture and forestry”* – although the Project is not for commercial forestry, the northern-most building is required for woodland management purposes by Forestry England;
  - “b) the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport, outdoor recreation, cemeteries and burial grounds and allotments; as long as the facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it”* – this is of particular relevance as the proposed scheme will provide outdoor recreational opportunities for the local community.
- 5.18 Other forms of development are not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land within it. Of relevance to the Project, this includes:
- “b) engineering operations;*
  - e) material changes in the use of land (such as changes of use for outdoor sport or recreation, or for cemeteries and burial grounds)”* (paragraph 150).
- 5.19 With respect to the natural environment, paragraph 174 states that planning decisions should contribute to and enhance the natural and local environment by:
- “a) protecting and enhancing valued landscapes, sites of biodiversity or geological value and soils (in a manner commensurate with their statutory status or identified quality in the development plan);*
  - b) recognising the intrinsic character and beauty of the countryside, and the wider benefits from natural capital and ecosystem services – including the economic and other benefits of the best and most versatile agricultural land, and of trees and woodland;*
  - d) minimising impacts on and providing net gains for biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures;*
  - e) preventing new and existing development from contributing to, being put at unacceptable risk from, or being adversely affected by, unacceptable levels of soil, air, water or noise pollution or land instability”.*
- 5.20 Paragraph 145 encourages local planning authorities to plan positively to enhance the beneficial use of designated Green Belts, by *“looking for opportunities to provide access; to provide opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; or to improve damaged and derelict land”.*
- 5.21 The proposed Community Forest will sit within the wider Thames Chase Community Forest, and in this respect paragraph 146 states *“Community Forests offer valuable opportunities for improving the environment around towns and cities, by upgrading the landscape and providing for recreation and wildlife”.* Also that *“an approved Community Forest Plan may be a material consideration in....deciding planning applications”* although it is recognised that development

proposals within Community Forests in the Green Belt should be subject to the normal policies for controlling development in Green Belts.

- 5.22 When determining applications, Local Authorities are required to support development whose primary objective is to conserve or enhance biodiversity.
- 5.23 The Grade II listed Hole Farmhouse and its curtilage is adjacent to the Application Site. When considering the impact of a proposed development on the significance of a designated heritage asset, the NPPF states that great weight should be given to the asset's conservation. Any harm from development, either to the building or its setting, should require clear and convincing justification. Substantial harm to or loss of grade II listed buildings should be exceptional.
- 5.24 Paragraph 202 states *"where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal."*
- 5.25 The Government recently consulted on a relatively minor re-draft of the NPPF, with the public consultation period closing on 2<sup>nd</sup> March 2023. The changes proposed are likely to be of limited relevance to the Project, due to the nature of what is proposed, with the increased emphasis on visual attractiveness being of particular note.

### **Brentwood Council Local Plan (2016-2033) adopted in 2022**

- 5.26 The site lies entirely within the jurisdiction of Brentwood Borough Council. The statutory development plan is the Brentwood Local Plan (2016-2033), adopted in March 2022. The site has three designations: Green Belt and the Thames Chase Community Forest cover the whole site while Parker's Shaw Wood is designated as a Local Wildlife Site.
- 5.27 One of the Local Plan's strategic aims is to *"ensure that proposals demonstrate how outcomes will deliver healthy communities on multiple levels"* (paragraph 3.3). The Plan's strategic objectives are *inter alia* to promote a landscape-led design approach which will help to *"protect and enhance areas of environmental and heritage value; creates spaces that encourage social interaction, sustainable connectivity and mobility and healthy active lifestyles"* (paragraph 3.9) and deliver a biodiverse, clean and functional natural environment, to *"provide net gains for, the borough's natural environment and biodiversity; and where our natural heritage is protected, and ecosystem services are restored, enhanced and.....opportunities are pursued for securing measurable net gains for biodiversity"* (paragraph 3.11).
- 5.28 Strategic Policy MG02 (Green Belt) directs that the Green Belt will be preserved from inappropriate development so that it continues to maintain its openness and serve its key functions. In this regard, *"planning permission will not be granted for inappropriate development in the Green Belt other than in very special circumstances"*. All development proposals will be considered and assessed in accordance with national policy.
- 5.29 The Council will however *"seek to enhance the beneficial use of the Green Belt to provide and improve access to it; to provide and enhance opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity; and to improve damaged and derelict land"*. Development proposals in the Green Belt will therefore be expected to include measures to achieve these objectives as far as possible.

- 5.30 Policy MG04 (Health Impact Assessments (HIAs)) requires the provision of an HIA with applications for non-residential developments of 1,000m<sup>2</sup> or more to assess the positive and negative health implications of proposed schemes.
- 5.31 Strategic Policy NE01 (Protecting and Enhancing the Natural Environment) applies to the designated Local Wildlife Site: Parker's Wood, where development proposals should protect and enhance the quality of the natural environment and where possible *"incorporate measures to secure a net gain in biodiversity, protect and enhance the network of habitats, species and sites (both statutory and non-statutory) and avoid negative impacts on biodiversity and geodiversity"*.
- 5.32 Further, development proposals that are likely adversely to affect locally designated sites, including their functional status within any identified ecological network, will only be permitted where *"the applicant can demonstrate that the ecological coherence of the site and any local ecological network is maintained; and it can be demonstrated that the benefits of the development clearly outweigh the loss"*.
- 5.33 The Project will contribute to Brentwood's Green and Blue infrastructure network (GBI) where Policy NE02 directs development to *"enhance or restore existing GBI provision and/or create new provision on site that connects to the wider GBI network. Its design and management should also respect and enhance the character and distinctiveness of the local area"*. Maintenance plans are also required for the lifetime of the development.
- 5.34 Policy NE04 (Thames Chase Community Forest) states *"development proposals which fall within the Thames Chase Community Forest Area should not prejudice the implementation, aims and objectives of the Thames Chase Plan"*. This Plan provides a green infrastructure framework, *"to support and guide applications in enhancing the local environment, through landscaping, conservation works and upgrading of footpaths or bridleways"*. It is noted that such benefits are welcome, providing uses are consistent with Green Belt policy.
- 5.35 With regard to the adjacent listed Hole Farmhouse, Policy BE16 (Conservation and Enhancement of Historic Environment) states, *"great weight will be given to the preservation of a designated heritage asset and its setting"*. Development proposals potentially affecting a listed building are required to *inter alia*:
- sustain and where possible enhance the significance of the asset and its setting;
  - be supported by a Heritage Statement;
  - provide clear justification for any works that would lead to any harm to the asset.
- 5.36 Policy BE12 (Mitigating the Transport Impacts of Development) highlights that *"developments must not have an unacceptable impact on the transport network in terms of highway safety, capacity and congestion"*. The policy requires the provision of a Transport Assessment or Statement, as appropriate, with applications, in line with the Essex County Council Development Management policies, which are discussed further below.
- 5.37 Policy BE13 (Parking Standards) requires vehicular and cycle parking to be provided in line with the latest Essex Parking Standards, which have been

adopted by Brentwood Borough Council as a Supplementary Planning Document. Parking numbers will need to be justified through reference to the accompanying Transport Assessment or Statement.

- 5.38 Strategic Policy BE09 (Sustainable Means of Travel) promotes sustainable transport, seeking to prioritise cyclist and pedestrian movement and access to public transport within new development and to safeguard existing walking and cycling routes. The policy also highlights the need to have regard to the adopted Essex County Council Development Management Policies or successor documents, to which reference is made below.
- 5.39 Strategic Policy PC10 (Protecting and Enhancing Community Facilities) states that *“new facilities should be easily accessible by public transport, cycling and walking”* and that *“development proposals should make best use of land, including, where possible, the co-location of different forms of community facilities and the rationalisation or sharing of facilities”*.
- 5.40 Policy BE11 (Electric and Low Emission Vehicles) requires that, where possible, all development proposals should maximise the provision of electric vehicle charging/plug in points and/or the space and infrastructure required to provide them in the future.
- 5.41 In terms of the water environment, Policy BE05 (Sustainable Drainage) states *“all developments should incorporate appropriate Sustainable Drainage Systems (SuDS) for the disposal of surface water, in order to avoid any increase in surface water flood risk or adverse impact on water quality”*. The Site is in Flood Zone 1 where Strategic Policy NE09 (Flood Risk) requires that all new development in flood zone 1 which is greater than 1ha in size will be required to prepare a site specific Flood Risk Assessment (FRA).
- 5.42 In relation to the overall scheme design, Strategic Policy BE14 (Creating Successful Places) requires development proposals *“to meet high design standards and deliver safe, inclusive, attractive and accessible places”*, with the policy setting out a detailed list of design criteria. The supporting text to the policy (paragraph 5.123) also highlights that designs should make reference the Essex Design Guide 2018 and other design guidance, such as Secured by Design. The strategic policy is supported by Policy BE15 (Planning for Inclusive Communities) that requires inclusivity to be integral to scheme designs.
- 5.43 Of relevance to the landscape proposals, Policy NE03 (Trees, Woodlands, Hedgerows) seeks the retention of existing trees, woodland and hedgerows on site where possible where they make a positive contribution to landscape, biodiversity and/or amenity.
- 5.44 Strategic Policy BE01 (Carbon Reduction and Renewable Energy) requires all major development *“to achieve at least a 10% reduction in carbon dioxide emissions above the requirements of Part L Building Regulations”* and that all new non-residential development *“achieve a certified ‘Excellent’ rating under the BREEAM New Construction (Non-Domestic Buildings) 2018 scheme, or other equivalent standards”*.
- 5.45 The policy further requires that *“wherever possible, applications for major development will be required to provide a minimum of 10% of the predicted energy needs of the development from renewable energy”*. If this is not possible on site, then the policy allows for this to be provided through ‘allowable solutions contributions’ or ‘off-site provision’.



- 5.46 The policy also requires that applications for major development “*should be accompanied by a Sustainability Statement outlining their approach to the following issues:*
- a. adaptation to climate change;*
  - b. carbon reduction;*
  - c. water management;*
  - d. site waste management;*
  - e. use of materials”.*
- 5.47 Policy BE02 (Water Efficiency and Management) requires new non-residential development to achieve the BREEAM Excellent rating in category Wat 01 and requires all major development “*to provide more substantial water management measures such as rain/ and grey water harvesting*”. The policy also seeks to ensure there is suitable wastewater infrastructure capacity, requires the inclusion of water saving measures and seeks to protect and improve water quality.
- 5.48 Policy BE04 (Managing Heat Risk) outlines the necessity for development proposals to consider the potential for internal heat gain/overheating as a result of rising temperatures.

### **Other documents**

- 5.49 Other material documents which have been considered in the design of the Project include:

#### **Essex Green Infrastructure Strategy 2020**

- 5.50 The Strategy’s purpose is to enhance, protect and create an inclusive and integrated network of high-quality green infrastructure in Greater Essex and to identify opportunities for delivery.
- 5.51 The role of the planning system in delivering green infrastructure is recognised. All developments are directed to consider a number of guiding principles in the provision of green infrastructure. It is suggested that:
- *“Planning and design of green infrastructure results in a coherent, meaningful and practical network of open green spaces.*
  - *Create connectivity to ensure there are good accessible links for all between urban, rural areas and green infrastructure widening the green infrastructure network.*
  - *Deliver and enhance multifunctionality to provide multiple benefits (i.e. recreation, flood management), creating synergies, while reducing conflicts and trade-offs.*
  - *The benefits of Green Infrastructure can be improved through the recognition of the value of ecosystem services.*
  - *Green infrastructure is designed to enhance, create and protect local landscape character and heritage.*

- *Deliver social inclusive processes that are open to all and incorporate the knowledge and needs of diverse parties.*
- *That results in safe and accessible green spaces designed to respond to changing population needs.*
- *Site management plans and funding for any development proposals should incorporate the long-term management and maintenance of green infrastructure and that these arrangements are agreed and secured alongside planning permissions to ensure that assets maintain their functions and benefits”. (page 68)*

#### **Essex Green Infrastructure Standards – Technical Guidance (undated)**

5.52 The Guidance sets out nine Principles and corresponding Standards to ensure the successful development of high quality Green Infrastructure.

#### **Essex Design Guide 2018**

5.53 The online document provides guidance on a range of relevant design considerations, including parking, landscaping and greenspace and sustainable drainage systems. This document has been taken account of in the design.

#### **Essex Development Management Policies – Highways 2011**

5.54 The policies, which have been adopted as supplementary guidance by Essex County Council, seek to ensure the appropriate consideration of transport-related issues in new development schemes.

5.55 Of particular relevance are:

- Policy DM1: General Policy, which seeks to “*protect the highway network for the safe and efficient movement of people and goods by all modes of travel*”, requiring the design of suitable site accesses and careful consideration of highway safety in all proposals.
- Policy DM4: Other Routes, which requires that “*new access points will be designed and constructed in accordance with the current standards*” and states that improvements will be sought to existing substandard accesses.
- Policy DM7: Application of Design Standards, which requires the use of specific design standards for accesses and internal roadways.
- Policy DM8: Parking Standards, which requires that parking in schemes complies with Essex County Council’s latest parking standards.
- Policy DM9: Accessibility and Transport Sustainability, which seeks to minimise trips by private vehicles and encourage the use of more sustainable modes of transport.
- Policy DM11: Public Rights of Way, which seeks to protect existing Public Rights of Way.
- Policy DM13: Transport Assessments, which requires the provision of a Transport Assessment or Transport Statement with applications, where relevant.

- Policy DM14: Safety Audits, which requires a Stage 1 Road Safety Audit to be provided where the planning application seeks to materially alter the existing highway.
- Policy DM15: Congestion, which seeks to ensure that there will not be any detrimental effect on the existing highway from the scheme.
- Policy DM20: Construction Management, which seeks to prevent detrimental effects on the highway from the construction of the scheme and requires the provision of construction traffic management information as part of planning applications.

### **Public Health England: Improving Access to Greenspace 2020**

- 5.56 This report highlights that local green and blue infrastructure should be considered as “critical assets for maintaining and supporting health and wellbeing in local communities” (p.57), with access to greenspace associated with a range of positive health and social outcomes.

### **Policy summary**

- 5.57 Planning policy necessitates development proposals to accord with the development plan unless material considerations outweigh this presumption.
- 5.58 Proposals for recreational facilities, that prioritise walking and cycling, support social interaction, accessibility for all and healthy lifestyles are supported at national, regional and local policy levels. The delivery of benefits for nature, biodiversity, the green and blue network and climate change also meet the need for development to be sustainable.
- 5.59 The effective use of land to achieve multiple benefits is also promoted by the NPPF, such as habitat creation, access to the countryside, carbon storage and production of materials, while policy at all levels seeks to safeguard and enhance the natural environment, biodiversity and built heritage.
- 5.60 The NPPF and Local Plan policy allow for exceptions in terms of new buildings and other forms of development in Green Belts for the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport and recreation and for engineering operations where such buildings or facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.
- 5.61 Further, the NPPF encourages local planning authorities to plan positively to enhance the beneficial use of designated Green Belts including looking for opportunities to *inter alia* provide access, outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity. It also recognises that Community Forests offer valuable opportunities for improving the environment around towns and cities, by upgrading the landscape and providing for recreation and wildlife.

## 6 Supporting reports

- 6.1 In addition to the Design and Access Statement, a number of supporting reports have been prepared and are submitted with the application package. They have advised the design of the Scheme and any mitigation required. The following paragraphs summarise their respective findings.

### **Transport Statement & Road Safety Audit**

- 6.2 The Transport Statement submitted with the application demonstrates that the site can be satisfactorily accessed by all relevant modes of transport and will have a marginal traffic impact on the local highway network during the traffic peaks.
- 6.3 A new access will be formed connecting the car and coach park to Great Warley Street. The car park will have EV charging points and a parking overflow area. A car park accumulation assessment shows that the peak parking demand for the site would be 100 spaces. The site provides 94 formal and around 100 overspill parking spaces and could therefore easily accommodate the forecast demand.
- 6.4 Once the facility is established in future years, the estimated movements at the proposed vehicular access to the car park would be 35 vehicles arriving and 20 departing in the AM peak hour, with 18 vehicles arriving and 21 departing in the PM peak hour. The peak traffic increase as a result of the development would be less than one vehicle per minute. The Transport Statement concludes that there will be a marginal traffic impact on the local highway network during the traffic peaks.
- 6.5 The proposals will provide additional pedestrian access points on Great Warley Street and would link existing footpaths and a bus stop on Great Warley Street. In addition, a network of access paths with links to surrounding public rights of way comprising a network of routes that include multi-user tracks suitable for walking, bicycle and horse riding and an all abilities access trail suited for mobility impaired visitors, would improve permeability through the site for pedestrians and cyclists.
- 6.6 A Stage One Road Safety Audit (RSA) for the proposed access from Great Warley Street has been undertaken to provide an independent review of the road safety implications of the proposed access arrangements. The highway plans provided as part of this application take into account the findings of the RSA. The Designer's Response has been prepared and accepted by the Road Safety Auditor. This is also included within the submission.

### **Sustainability Statement**

- 6.7 The Sustainability Statement reports sustainable opportunities from a project delivery and engineering perspective in line with related policy in the Brentwood Local Plan 2016-2033. It outlines a Sustainability Strategy which sets out the approach, objectives and targets for the Project. This includes sustainable energy and carbon reduction measures - more specifically, the expected building performance standards, how the Project will balance solar gain against overheating risk, the approach to minimising energy demand through careful building design, efficient heating solutions and the renewable energy supply.

- 6.8 The Statement also describes how the Project will adapt to climate change, this applies to both the built and external environments and how they interact. Site waste management, use of materials, biodiversity and ecological improvements, health and wellbeing improvement measures as well as mitigation measures for both air quality and noise are also detailed.

### **Equality Impact Assessment**

- 6.9 An Equality Impact Assessment (EqIA) has been conducted to understand the potential impact that the project will have on people. The EqIA process is designed to ensure Forestry England promotes an inclusive environment and meets its obligations under the Equality Act 2010.
- 6.10 The EqIA considers people who may be impacted by the Project, how any negative impacts could be reduced, and the opportunities for positive benefits for people. It reviews the available demographic information, including census data, and considers any potential impacts on each of the protected characteristic groups, indicating any modifications needed to address the impacts of the project where necessary.
- 6.11 The Project will help to meet FE's general equality duty, to:
- eliminate discrimination, harassment, victimisation or any other prohibited conduct;
  - advance equality of opportunity; and
  - foster good relations – by tackling prejudice and promoting understanding.
- 6.12 The outcome from the assessment is to “*continue the policy*” as no significant negative impacts were identified. Engagement with local communities and users will continue beyond the planning phase of the project to continue to capture feedback and informing plans where possible.

### **Health Impact Assessment**

- 6.13 The Health Impact Assessment (HIA) provides a high-level evaluation of the Project against the ten determinants of health including: access to education; access to work and training; access to health and social care services and other social infrastructure; access to open space and nature; accessibility and active travel; housing and home design; access to healthy food; social cohesion and inclusive design; crime reduction and community safety; and environmental sustainability.
- 6.14 The Project is assessed against each of these determinants and evidence is provided as to whether there is a positive, neutral or negative impact as a result of the Project, including identifying where any mitigation is required. The HIA concludes that the Project has a positive impact on all the determinants of health (excluding housing and home design which is not applicable), and a neutral impact on access to healthy food.

### **Ecological Impact Assessment**

- 6.15 A range of reports were compiled by Atkins and Sonar Ecology in 2022. The results of the Preliminary Ecological Appraisal found badgers and bats to be on the application site which were then surveyed further. The absence of great

crested newts returned negative results, therefore this species was not subsequently considered as part of the assessment.

- 6.16 Badger signs were mainly noted outside of the Project site boundary. Pre-works surveys would be undertaken prior to any development taking place to ensure any changes in badger activity are identified and appropriately mitigated. In the long term it is considered that the conversion of arable land to woodland and grassland would increase the value of the site for foraging and sett establishment for badgers, and therefore this Project would be beneficial for the species.
- 6.17 Common and soprano pipistrelle bats were found to be using the existing Buildings 1 and 2 as day roosts. As these buildings are scheduled to be demolished these roosts will be lost. This will be mitigated for by providing a minimum of three bat boxes per lost roost, to be installed within the Hole Farm Community Woodland site. Brown long-eared bats were found to be using Buildings outside, but adjacent to, the site boundary ie. an open fronted barn, as a maternity roost and a smaller shed building adjacent to the east as a feeding perch. As both of these buildings sit outside the red-line boundary of the Project, no detrimental effects are considered. As with the badgers, the conversion of arable habitats on this site will increase the foraging and roosting habitat value for the bat species on site and would therefore be beneficial.

### **Arboriculture**

- 6.18 Elements of the Project may have the capacity to generate construction impacts including the formation of new, or replacement, hard surfacing, the installation of gate posts and fencing, and the installation of underground services and utilities.
- 6.19 Five trees would need to be removed in the vicinity of the existing and proposed building cluster to facilitate demolition, construction, and an increased level of occupancy. This would include three low-quality category C trees and two very low-quality category U trees in poor physiological condition and terminal decline.
- 6.20 Three trees and an estimated 37m long section of hedge would be removed in the proposed car park to facilitate construction and for reasons of sound arboricultural management. A low-quality category C tree would be removed to facilitate construction of the proposed electrical substation. A 37m long section of very-low quality category U hedge would be removed to facilitate vehicular access from the car park to the B186 Great Warley Street.
- 6.21 There is no foreseeable requirement for tree pruning. However, if a requirement arose it would be assessed by a competent and suitably experienced arboriculturist in accordance with the appropriate British Standards.
- 6.22 A specification and construction methodology would be compiled which avoids significant adverse impacts. This would include:
- Routing new hard surfacing, underground services and utilities outside the root protection area (RPA) wherever practicable.
  - Retention and reuse of any existing sub-base where practicable or where not, using a minimal dig design.

- Excavation of foundations for gate posts and fencing using hand tools only and relocation of the gate/fence in instances where tree roots over 25mm diameter cannot be severed without detriment to a tree.

### **Desk Based Archaeological Report**

- 6.23 The archaeological desked-based assessment was carried out to inform the potential for, and significance of, heritage assets at Hole Farm and identify any Project constraints.
- 6.24 The report assesses the potential for below ground archaeology within the Site and its immediate environment and considers and potential impacts. Built heritage assets were also reviewed to inform archaeological potential but are otherwise not considered in the assessment. Other methods of assessment included a review of the Essex Historic Environment Record, consultation of online resources, a search for conservation areas, locally listed historic buildings or structures of interest and archaeological priority areas. The potential for and significance of known, and any as yet unknown, archaeological remains to survive within the Site was also assessed. OS maps, historic maps, aerial photography and lidar sources were all referred to in the assessment.
- 6.25 No designated heritage assets were identified within the Site, and there is no evidence of activity on the Site until the Site was used as agricultural land associated with Hole Farm from the medieval period. No pre-historic or Roman features were found. Evidence of Anglo-Saxon activity was identified at Hobbs Hole, south of the site, and there is evidence of medieval exploitation of the landscape. Within the Site a range of historic field boundaries, routeways, lynchets and ponds were identified from the site walkover and aerial and LiDAR survey. There are also numerous historic trees on site, but the landscape has experienced 20<sup>th</sup> century boundary loss.
- 6.26 Hole Farm farmhouse is a Grade II listed property that sits outside the application site boundary. There are two non-designated heritage assets within the Site. These comprise the post-medieval farmstead of Hole Farm and a bomb crater at Tooks Farm.
- 6.27 The report concludes that the Grade II listed building at Hole Farm comprises the most sensitive designated heritage asset within the environs of the Site and must be considered in the development. Additional investigations to further assess the need to mitigate any impact of the development proposals on the historic environment may be needed in the areas proposed for development where there is the potential to impact below ground remains.
- 6.28 In this regard, as part of any initial assessment of the site, a programme of geophysical survey and trial trenching would potentially be required in advance of development.

### **Heritage Statement and Impact Assessment**

- 6.29 The principal aim of the Heritage Statement is to assess the impact of the creation of a community woodland and the demolition of some of the buildings at Hole Farm on the Grade II listed farmhouse and its setting.
- 6.30 The site was visited on 14th December 2022 during which the wider setting and the Conservation Area were assessed as well as the site of Hole Farm. A photographic survey was undertaken at Hole Farm and at the nearby site of the

Grade I listed Church of St Mary the Virgin. The assessment has been prepared in accordance with national guidance and advice. Essex Record Office, Census records, Victoria County History, and various online resources were consulted for information on the site.

- 6.31 The document concludes that the project is thoughtfully designed and considerate of any issues that may impact the heritage of the site and its setting. Indeed, it will enhance awareness and community engagement with features of historic interest at both Hole Farm and Great Warley. It is considered that the creation of a community woodland will have an overall positive impact on Hole Farm, its setting, and Great Warley Conservation Area.

### **Interpretation Strategy**

- 6.32 The interpretation strategy identifies the existing and proposed new features of the site which will be of most importance and interest to visitors and sets out the proposed communicative methods for facilitating physical and intellectual access to these. Methods of interpretation include proposals for signage, wayfinding, trails, view, and activities. The four key themes of interpretation will be: environment, recreation, heritage, and wellbeing.

- 6.33 The objectives of the Interpretation Strategy are:

- To enhance the landscape and heritage setting, enabling improved access to the widest range of people.
- To deliver and increase awareness of the value to society of access to green space.
- To increase awareness of the positive impact of the new and existing habitats on the climate and biodiversity.
- To promote and signpost connectivity to the wider network of green spaces.
- To create a sense of place and convey cultural authenticity by responding to the heritage and knowledge of the local area.
- To support the financial sustainability of the site.

- 6.34 To achieve these objectives, the interpretation strategy sets out plans for interpretative signage, trails, and activities across the site. It is proposed wayfinding and information signage is installed to aid navigation and convey meaningful information about the site and surrounding area. Within the interpretation panels there will be reference to the historic landscape including the neighbouring Grade I listed church, alongside explanations of the new habitats being created on site.

- 6.35 A range of activities are proposed for Hole Farm, from facilitating self-led exploration, to guided walks, physical activity sessions such as yoga, and more. All activities will be linked to the four key themes of the recreation, environment, heritage/archaeology, and wellbeing. Activities will be designed with local community groups and will target a wide range of audiences, from adventurous young families, to those seeking relaxed days out.

- 6.36 Across Hole Farm there will be walking and running routes of varied length to enhance enjoyment and appreciation of the landscape. Trails will be signposted by information panels, maps, and waymarkers. An all-abilities access track has



been designed to form a 1km loop in the south-eastern section of the site, linking to the car park and visitor facilities. On this loop a play trail and sensory sculpture trail will be created.

### **Flood Risk**

- 6.37 The Flood Risk Assessment (FRA) has considered all potential sources of flood risk relating to the site and proposed development. The site lies wholly within Flood Zone 1 where the risk of fluvial flooding has been assessed as negligible. The surface water flood risk for the design flood (1 in 100-year event) has been assessed and the risk is relatively minor, however the inclusion of ponds across the site would further mitigate the potential for surface water flooding.
- 6.38 There is some potential for groundwater flooding across the western part of the site which may also extend further east. Site investigation would however be undertaken prior to construction of above ground facilities to provide further information on groundwater levels. Mitigation in the event of potential groundwater flooding would include lining ponds, basins and swales to ensure that system storage capacity is not compromised by groundwater intrusion.
- 6.39 There are no water mains or sewers in the vicinity of the site and in this regard the risk of flooding as a result of any of these assets becoming blocked, overwhelmed, damaged or burst is considered to be negligible. The site is not in an area at risk from reservoir flooding.
- 6.40 Flood mitigation measures embedded into the drainage design include climate change allowances, ensuring that the level of impermeable surfaces are high enough to allow drainage under gravity, a 300mm freeboard on the detention basins which is able to accommodate the upper end peak rainfall intensity allowance for the design flood (1 in 100 year event), and incorporating SuDS features wherever possible and practicable. Watercourse flood mitigation measures include ensuring that watercourse connectivity is retained in the site drainage network, and the use of culverts would only be included where unavoidable. Subject to the results of additional groundwater information, if mitigation for groundwater inundation is required then ponds, basins and swales which form part of the drainage system would be lined to ensure that system storage is not compromised by groundwater intrusion.
- 6.41 The FRA has identified two residual flood risks following mitigation ie. in the event of a severe storm event or blockage. To further mitigate the residual risk, a planned, risk-based maintenance programme would be established. Planning maintenance interventions would ensure efficient operation of the drainage network.
- 6.42 The second residual flood risk identified is the overtopping of the retention pond in event of a severe storm, which would be mitigated by establishing overland flow paths to manage any overtopped flows, where appropriate, and locating the pond away from sensitive receptors to avoid potential risks resulting from residual impacts.

### **Sustainable Drainage System**

- 6.43 Similar to the existing drainage arrangement which drains the run-off through a combination of ditches and basins, the Project would be drained through a combination of swales, pipes and detention basins, which would help attenuate the outflow to allowable rates and provide mitigation for any pollution from the

site along with tying into the surrounding landscaping and building proposal to provide biodiversity benefits. All the drainage assets have been designed in accordance with guidance laid out in Sustainable Drainage Systems Design Guide (Essex County Council, February 2020), The SuDS Manual (CIRIA C753).

- 6.44 The scheme extent has been sub-divided into three catchment areas, based on ground topography and proximity to outlets, the drainage network for which discharges to existing ditches and tertiary or secondary rivers at greenfield discharge rates corresponding to a one year return period. Discharge through infiltration could not be proposed due to existing ground conditions shown by preliminary soil investigation. Rainwater butts are proposed to store some rainwater for re-use in the tree nursery and modular cafe. In the event of higher than design return period rainfall, the flooded water would follow the natural ground slope to flow towards the existing watercourse at the southwest of the site.
- 6.45 Preliminary water quality assessments, using the Simple Index Approach, have been undertaken which show that the SuDS proposal is sufficient to mitigate the pollution hazard posed by the development and hence, the water quality of the receiving watercourse would not be worsened.
- 6.46 The on-site drainage would be managed by FE who would be responsible for maintaining any on-site services including drainage in accordance with Table 7.1 of The SuDS Manual (CIRIA C753) as modified to suit the Project.
- 6.47 The current SuDS proposal is preliminary, based on available existing site information and the current design and will be developed through the detailed design stage in accordance with agreed standards.

### **Security Plan**

- 6.48 The Security Plan outlines the proposals for security and access points to reduce any chances of anti-social behaviour on site. This document has been created in correspondence with Essex Police who will continue to be consulted with as the site develops.
- 6.49 The document identifies two key zones: the central building cluster and the new car park area. Within these two areas the operational hours and usage is explained, and the potential security risks are outlined with suggested mitigation strategies.
- 6.50 The central building cluster proposal comprises of a site office, community room, community tree nursery and an operations barn and yard space. The measures needed to keep these facilities secure include the provision of lockable facilities and security lighting.
- 6.51 Within the car park area off Great Warley Street, security cameras and lighting are proposed, with secure casing for the car parking machines and EV charging points.
- 6.52 There would be nine different access points to site, including both vehicle and non-vehicle access. Vehicle access points would be secured with lockable gates. Non-vehicle access points would have relevant infrastructure installed, such as kissing gates and horse step-overs to allow the movement of people through the site without allowing access to unwanted vehicles.

- 6.53 The Site Security Plan document details the type of infrastructure required at each of these points. All access codes to gates will be provided to the emergency services so they can easily access the Site as required.

## 7 Planning assessment

### Introduction

- 7.1 The Hole Farm Community Woodland proposal aspires to become an inspiring place for the local community to enjoy and explore. The scheme seeks to transform previously biodiversity poor agricultural land into a biodiversity rich outdoor space providing recreational and educational opportunities to assist with improving people's health and wellbeing. The buildings proposed have been designed to be sympathetic to the local landscape and heritage features and with sustainability in mind.

### The Need for the Project

- 7.2 The Project meets a range of needs in contributing towards local and national government objectives regarding habitat creation, climate mitigation and improving public health and wellbeing through the provision of new green infrastructure in line with aspirations of the Thames Chase Plan.
- 7.3 The Project also meets the need of providing suitable mitigation and compensation for the LTC scheme; however, it is highlighted that the Project will proceed whether or not the Development Consent Order for the LTC scheme is granted.

### Policy Compliance

#### Green Belt

- 7.4 The Project is located within the Green Belt. Strategic Policy MG02 seeks to protect the Green Belt from inappropriate development "*so that it continues to maintain its openness and serve its key functions*". The policy highlights that proposals will be assessed in accordance with the provisions of national planning policy, as set out in the NPPF.
- 7.5 Paragraph 149 of the NPPF sets out exceptions to the general rule that the construction of new buildings is inappropriate in the Green Belt. The proposed buildings that form part of the project, ie. the community building, FE barn, café, open sided shelter and substation, would provisionally fall within the exception provided in paragraph 149. b) in that they comprise the provision of appropriate facilities (in connection with the existing use of land or a change of use) for outdoor sport and recreation.
- 7.6 Similarly, paragraph 150 of the NPPF highlights other forms of development that may also not be inappropriate in the Green Belt. With regards to the Project these include 150. B) engineering operations – the construction of six new ponds and also 150. E) a material change in the use of land (such as changes of use for outdoor sport of recreation).
- 7.7 In order to meet these policy criterion however, paragraphs 149 and 150 stipulate that it must be shown that such buildings or facilities preserve the openness of the Green Belt and do not conflict with the purposes of including land within it.
- 7.8 Paragraph 137 of the NPPF highlights that "*the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the*

*essential characteristics of Green Belts are their openness and their permanence*". Paragraph 138 sets out the five purposes of the Green Belt:

- "a) to check the unrestricted sprawl of large built-up areas;*
- b) to prevent neighbouring towns merging into one another;*
- c) to assist in safeguarding the countryside from encroachment;*
- d) to preserve the setting and special character of historic towns; and*
- e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land"*.

- 7.9 The Project is in keeping with the fundamental aim and purposes of the Green Belt in ensuring that the land will be permanently open. The two largest new buildings proposed – the FE barn and the community building – are broadly on the footprint of existing buildings and hardstanding on the site and have a smaller footprint than the two buildings to be demolished as part of the scheme. The other structures proposed on the site are small, sympathetically designed to blend into the landscape and ancillary to the proposed outdoor recreational use; they are vital in providing funding for the maintenance of the site going forward, enabling the site to continue in an open outdoor use. The structures on the site are well screened with appropriate planting and will primarily be screened from the outside by the new woodland.
- 7.10 Cognisance should also be given to paragraphs 145. and 146. of the NPPF which are particularly relevant to the proposals. Paragraph 145. encourages local planning authorities to plan positively to enhance the beneficial use of designated Green Belts including looking for opportunities to *inter alia* provide access, outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity.
- 7.11 The proposals would provide access to almost 100ha of land which was not previously open to the public, other than a single PRoW passing through it. The Community Woodland would provide opportunities for various types of physical activity and play including walking and dog walking, cycling, horse riding, children's play and learning, community learning and volunteering, multi-user pathways and sensory areas. The landscape, visual amenity and biodiversity would be enhanced, and managed in perpetuity, by the associated extensive woodland/hedgerow planting, rides and glades species rich grassland and pond creation. The Project would provide a positive outcome for wildlife and biodiversity.
- 7.12 NPPF paragraph 146. also recognises that Community Forests offer valuable opportunities for improving the environment around towns and cities, by upgrading the landscape and providing for recreation and wildlife. It states, "*an approved Community Forest Plan may be a material consideration in preparing development plans and in deciding planning applications*". The proposed Community Woodland would be managed by FE and form part of the Thames Chase Community Forest which extends over land west of the M25 (Folkes Lane Woodland) west of the application site and also extends east of the site at Warley Place and Warley Gap and the country parks beyond. The proposed woodland would bridge the gap between these two areas and has been designed in alignment with the Thames Chase Plan (2014).

- 7.13 Strategic Policy MG02 (Green Belt) states that *“the Council will seek to enhance the beneficial use of the Green Belt to provide or improve access to it; to provide or enhance opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity and; to improve damaged and derelict land”*. The Project will provide significant benefits in this regard.

### **Transport and highways**

- 7.14 The site can be accessed through the public highway and it links well with existing open spaces and the PRoW network, which is encouraged through national planning policy (NPPF Paragraph 100). Local and national planning policy, including BCC Policy BE09, seeks to prioritise travel by cycling, walking and public transport where possible. The network of routes within the site has been designed to encourage travel to the site other than by private vehicle. The route network within the site links up with existing PRoW around the site and likely access points for pedestrians, cyclists and horse-riders. Cycle parking is provided on site. One pedestrian access is also proposed adjacent to the bus stop on Great Warley Road, which provides public transport access to the site, albeit with limited frequency due to the site’s rural location.
- 7.15 A Transport Statement and Road Safety Audit accompanies this application, in line with local planning policy requirements, particularly BCC Policy BE12, which seeks to ensure that developments do not have *“an unacceptable impact on the transport network in terms of highway safety, capacity and congestion”*. The highway designs that form part of this application, and in particular the proposed new vehicular access from the public highway, have been subject to a Stage 1 Road Safety Audit and take into account its recommendations. The Transport Statement finds that most vehicular movements associated with the Community Woodland will occur at off-peak times; it finds there to be a marginal traffic impact on the local highway network during the traffic peaks.
- 7.16 A 94-space car park, with the provision for further grassed overflow parking for busy periods such as bank holidays, is included as part of the Project, with design and space provision in line with Essex Parking Standards and the recommendations of both the Transport Statement (in line with BCC Policy BE13), assessments of visitor parking needs from other FE sites and the recommendation of Essex Highways, details of which are set out in preceding sections of this Planning Statement. Provision of sufficient parking on site will avoid visitors seeking to park on surrounding roads.
- 7.17 To support the transition to electric vehicles, the car park includes 14 EV charging points and associated infrastructure (car parking spaces and substation), in line with local planning policy aspirations in BCC Policy BE11.
- 7.18 Access proposals are set out in further detail in the Design and Access Statement that accompanies this application.

### **Heritage**

- 7.19 This application is for Listed Building Consent, in addition to planning permission, due to the potential impacts of the scheme on the setting of the Grade II listed Hole Farmhouse that lies on land adjacent to the Application Site.
- 7.20 A Desk-Based Archaeological Report and a Heritage Statement and Impact Assessment have been produced to evaluate potential effects on heritage

assets as a result of the development of the Project, in line with local and national policy requirements. The Grade II listed Hole Farmhouse is noted to be the most significant heritage asset on the site.

- 7.21 The Heritage Statement evaluates the potential effect of the Project on heritage assets – in particular the Grade II listed Hole Farmhouse, the Great Warley Conservation Area and the nearby Grade I listed Church of St Mary the Virgin and listed Lye gate as its entrance. It finds that: the changes to the setting as a result of the Project will have a low to neutral impact on the site of Hole Farm; the removal and replacing of the modern farm buildings will have an overall positive impact on the listed farmhouse and the site; the changes to the site will have a positive impact on the Great Warley Conservation Area; and the changes to the setting of the listed church and the listed Lye gate will have a positive impact.
- 7.22 The Heritage Statement concludes that *“the project is thoughtfully designed and considerate of any issues that may impact the heritage of the site and its setting. Indeed, it will enhance awareness and community engagement with features of historic interest at both Hole Farm and Great Warley. It is considered that the creation of a community woodland will have an overall positive impact on Hole Farm, its setting, and Great Warley Conservation Area”*.
- 7.23 Heritage is one of the four key themes promoted through FE’s Interpretation Strategy. Signage and interpretation boards are proposed that will highlight historic landscape features and key local heritage assets, such as the Grade I listed Church of St Mary the Virgin. Heritage-related interpretation boards will be located at relevant points throughout the site and in and around the proposed community room. Heritage-related trails and activities, guided walks and events are also proposed as part of the Project.
- 7.24 Overall, in line with BCC Policy BE16, the Project is likely to have a positive impact on the setting of the Grade II listed Hole Farmhouse and other local heritage assets, and local heritage and the historic landscape actively promoted as part of the Project.

### **Blue and green infrastructure**

- 7.25 Although the Project’s woodland and rides and glades species rich grassland creation is outside the scope of this Planning application, the Project will contribute to and connect with Brentwood’s Green and Blue infrastructure network (GBI), in line with BCC Policy NE02.
- 7.26 In accordance with BCC Policy NE03, the Project seeks to retain existing trees, woodland and hedgerows on site, recognising their positive contribution to landscape, biodiversity and amenity; the only exception to this is a small section of hedgerow removal required to form the new access to the car park from the public highway.

### **Biodiversity**

- 7.27 Strategic Policy NE01 seeks to protect and enhance the quality of the natural environment, including the designated Local Wildlife Site of Parker’s Wood that is located within the site boundary. The policy states that, where possible, measures should be incorporated *“to secure a net gain in biodiversity, protect and enhance the network of habitats, species and sites (both statutory and non-statutory) and avoid negative impacts on biodiversity”*.

- 7.28 The Preliminary Ecological Appraisal of the site and subsequent species-specific surveys found evidence of badgers and bats in and around the Application Site (badgers mainly outside of the site boundary). Pre-works surveys will be undertaken prior to any development taking place to ensure any changes in badger activity are identified and appropriately mitigated. Common and soprano pipistrelle bats were found to be using the existing Buildings 1 and 2 as day roosts; as these buildings are scheduled to be demolished these roosts will be lost, so this will be mitigated for by providing a minimum of three bat boxes per lost roost, to be installed within the Hole Farm Community Woodland site, as set out in the Design and Access Statement. For both bats and badgers the Ecological Appraisal found that the conversion of arable land to woodland and grassland would increase the value of the site for foraging, badger sett establishment and bat roosting habitat, and therefore this Project would be beneficial for both species.
- 7.29 The Interpretation Strategy highlights that wildlife and woodland management will be promoted to visitors, including through interpretation boards, walks and events.
- 7.30 Overall the Project will generate an increase in habitat. The mitigation strategy for the species on site demonstrates that the Project will provide a positive outcome for wildlife and biodiversity at the Hole Farm site.

### **Sustainable design and construction**

- 7.31 Sustainability has been at the heart of the project design. A Sustainability Statement accompanies this application in line with the requirements of BCC Strategic Policy BE01 in relation to major development. In accordance with the policy requirements, the Sustainability Statement outlines the approach taken with regard to: adaptation to climate change; carbon reduction; water management; site waste management; and use of materials. This is further supported with design details set out in the Design and Access Statement.
- 7.32 BCC Policy BE01 also requires that all new non-residential development *“achieve a certified ‘Excellent’ rating under the BREEAM New Construction (Non-Domestic Buildings) 2018 scheme, or other equivalent standards”* utilising the most recent version of BREEAM. The only building suitable for assessment under the BREEAM methodology is the Community Buildings, which meets the criteria for a Simple Building assessment; the FE Barn is mainly for storage and so not suitable for assessment and Modular Café is too small in scale to be capable of meaningful assessment. The most recent version of BREEAM New Construction (Non-Domestic Buildings) is being used to assess the Community Building – Version 6. A BREEAM rating of ‘Excellent’ has been targeted for the building; further details are provided in the Design and Access Statement that accompanies this application.
- 7.33 With regard to sustainable water management, BCC Policy BE02 requires new non-residential development to achieve the BREEAM Excellent rating in category Wat 01 and requires all major development *“to provide more substantial water management measures such as rain/ and grey water harvesting”*. The policy also seeks to ensure there is suitable wastewater infrastructure capacity, requires the inclusion of water saving measures and seeks to protect and improve water quality. The Design and Access Statement that accompanies this application states that the BREEAM Excellent rating is being sought in category Wat 01 and highlights the use of grey water and rainwater recycling within the Project to reduce mains water use. Waste water is



to be treated in new package treatment tanks on site and then discharged into the drainage swales, rather than the buildings being connected to the foul sewer system. Both the foul water system and surface water drainage system have been designed to avoid negative impacts on water quality and are further detailed in the Design and Access Statement.

- 7.34 In terms of the wider water environment, a Flood Risk Assessment and Drainage Strategy have been provided for the Project, in line with BCC Policies NE09 and BE05. The site is in Flood Zone 1 for fluvial flooding. The Sustainable Drainage Systems (SuDS) proposed for the disposal of surface water, which consist of swales and detention basins, seek to avoid any increase in surface water flood risk, taking into account the effects of climate change, and to prevent adverse impact on water quality.
- 7.35 With carbon dioxide being a major contributor to climate change, carbon reduction is sought through BCC Strategic Policy BE01; this requires all major development *“to achieve at least a 10% reduction in carbon dioxide emissions above the requirements of Part L Building Regulations”*. This is being sought through the inclusion of a range of energy efficiency measures including a passive heating and cooling strategy to minimise energy requirements for heating and cooling and the utilisation of heat pumps to meet residual heating and hot water requirements. These are further detailed in the Design and Access Statement.
- 7.36 The project is currently targeting a BREEAM score of 73.86%, ‘Excellent’, with 8.98% identified as potential additional credits which would increase the targeted score to 82.84%. The targeted credits have been agreed as achievable by the design team and there is a commitment to ensure an ‘Excellent’ rating will be achieved.
- 7.37 The Design and Access Statement also sets out how the buildings have been designed to manage the potential for internal heat gain and overheating from rising temperatures associated with climate change, in line with BCC Policy BE04; measures include building orientation and passive and mechanical ventilation.
- 7.38 BCC Policy BE01 also states that *“wherever possible, applications for major development will be required to provide a minimum of 10% of the predicted energy needs of the development from renewable energy”*. The Design and Access Statement highlights the inclusion of solar photovoltaic panels on the roofs of the proposed Community Building and Forestry Barn, which are expected to generate approximately 36,750 kWh/m<sup>2</sup>/year. This will provide power to the electrical requirements of the building, with any excess stored in batteries on site or feed back into the grid.

### **High-quality, inclusive, attractive and sustainable design**

- 7.39 Designs that are high quality, inclusive, attractive and sustainable are promoted by both national and local planning policy. Issues such as accessibility, security, health and wellbeing, visual appearance and sustainability have been integral considerations in the development of the Project.
- 7.40 In relation to the overall scheme design, Strategic Policy BE14 (Creating Successful Places) requires development proposals *“to meet high design standards and deliver safe, inclusive, attractive and accessible places”*, with the policy setting out a detailed list of design criteria. The supporting text to the

policy (paragraph 5.123) also highlights that designs should make reference to the Essex Design Guide 2018 and other design guidance, such as Secured by Design. Chapter 12 of the NPPF sets out policy advice in relation to function, visual attractiveness, layout and landscaping. BCC Strategic Policy BE14 is supported by Policy BE15 (Planning for Inclusive Communities) and national planning policy that requires inclusivity to be integral to scheme designs.

- 7.41 With regard to health and wellbeing for all, the woodland, parking and buildings have been designed for inclusive access, with key inclusive features identified in the Design and Access Statement. A range of trails are available on site to encourage healthy outdoor activities, including walking, cycling and horse riding, including an all-abilities access track with a play trail and sensory trail; these are detailed in the Design and Access Statement and FE's Interpretation Strategy, which has recreation and wellbeing as key themes.
- 7.42 The positive impacts of the Project on health and wellbeing are highlighted throughout the Health Impact Assessment (HIA), which is provided in line with BCC Policy MG04. The HIA assesses the Project against ten determinants of health, including social cohesion and inclusive design, access to education and access to open space and nature; the scheme scores positively against the relevant determinants. An Equality Impact Assessment was also undertaken to ensure inclusivity.
- 7.43 To ensure site visitors feel safe on site and that the buildings and wider site remain secure, FE have produced a Site Security Plan, developed in conjunction with Essex Police. Measures include the provision of access gates, lighting, CCTV and secure storage. Public safety and security measures are supported by BCC Policy BE14 and the NPPF, which recognises the importance of designing schemes to minimise opportunities for crime, which improves both actual and perceived public safety.

### **Stakeholder Engagement**

- 7.44 The involvement of stakeholders in project design is encouraged through national and local planning policy. The Design and Access Statement and Consultation Report accompanying this application highlight the evolution of the Project design and the input into it from a wide range of stakeholders to ensure the production of a high quality scheme that meets both FE's practical operational requirements and local design aspirations. The process has resulted in an aesthetically appealing design that sits well in the rural landscape. The views of the community and LPA *et al* that emerged from the early and ongoing consultation process have helped shape the site and building layout and design. In this regard, NPPF paragraph 132 states "*applications that can demonstrate early, proactive and effective engagement with the community should be looked on more favourably than those that cannot*".

### **Beneficial site use**

- 7.45 Although the woodland, and rides and glades species rich grassland, that form the Hole Farm Community Woodland are outside the scope of this planning application, the ancillary buildings and infrastructure here proposed enable the site to be utilised by the wider public as an outdoor recreational space, with associated health and wellbeing benefits, and provide ongoing funding for FE's management of the site. The Project will help to meet the aims and objectives of the Thames Chase Plan, which are supported through BCC Policy NE04 regarding the Thames Chase Community Forest.

- 7.46 The NPPF supports positive planning for sport and recreation, highlighting that *“access to a network of high quality open spaces and opportunities for sport and physical activity is important for the health and well-being of communities, and can deliver wider benefits for nature and support efforts to address climate change”* (paragraph 98.).

### **Benefits and Opportunities**

- 7.47 In summary, the benefits and opportunities afforded by the Project include:

- Community health and wellbeing benefits associated with an outdoor recreational use and exposure to nature, which are promoted through national and local policy.
- The high-quality, inclusive, attractive and sustainable design.
- The provision of improved walking, cycling and horse-riding paths and 14 new electric vehicle charging points.
- Significant habitat creation and opportunities for the public to learn about wildlife and woodland management.
- Positive impact on the setting of local heritage assets, including the Grade II listed Hole Farmhouse, and the promotion of local heritage to visitors.

### **Potential Impact and Mitigation**

- Traffic generation, with marginal traffic impact on the local highway network during the traffic peaks.
- Temporary construction-related impacts, minimised through the use of best practice construction methodologies.
- Visual impact of new structures – mitigated by the FE planting outside of the scope of this planning application.

### **The Planning Balance and Conclusion**

- 7.48 Although the woodland, and rides and glades species rich grassland, on the site are consented through separate non-planning application processes, this hybrid planning application seeks planning permission for key elements of the Project that are vital to supporting the outdoor recreational use of the site and to FE’s ability to generate an income to support the ongoing management of the Project. Full planning permission is sought for the majority of planning elements of the Project, including the provision of a visitor car park and the demolition of two existing farm buildings that are in poor structural condition and their replacement with a Community Building and FE Barn; outline permission is sought for the Modular Café, Open-sided Visitor Shelter and the substation as it not possible to finalise the detailed designs for these elements at this point.
- 7.49 The Hole Farm Community Woodland has significant social and environmental benefits. The Project accords with relevant planning policy and supports many of the community and environmental aspirations set out in local and national policy. It is therefore requested that the Project be granted full and outline planning permission, as relevant and set out above, in line with the presumption in favour of sustainable development set out in paragraph 11 of the NPPF.

- 7.50 It is also requested that Listed Building Consent be granted in recognition of the positive impact of the Project on the setting of the Grade II listed Hole Farmhouse and other local heritage assets, as set out in the Heritage Statement, Design and Access Statement and this Planning Statement.