

APPENDIX 1 TO ECC CABINET MEMBER ACTION DATED 22nd FEBRUARY 2018 (FP/061/01/18)

ECC RESPONSE TO THE PUBLIC CONSULTATION OF THE BRENTWOOD BOROUGH DRAFT LOCAL PLAN PREFERRED SITE ALLOCATIONS (REGULATION 18) CONSULTATION, 2018

1. Introduction

- 1.1 Brentwood Borough Council (BBC) is currently consulting on the Draft Local Plan Preferred Site Allocations (Draft Plan) Regulation 18 document. The aim of consultation at this stage is to give people the opportunity to comment on the Council's preferred housing, specialist accommodation and employment sites for the Draft Local Plan, as well as a revised Vision, set of Strategic Priorities, and Spatial Strategy, and to ensure that BBC is aware of all possible policy options before they proceed to the next and final stage of plan preparation and consultation. The next stage of plan making, known as the 'pre-submission' or 'publication' version' (Regulation 19), is intended to be published and consulted on in the third quarter of 2018 (July-September), and submission to the Government is intended to be in the fourth quarter of 2018 (October-December) for public examination in early 2019, and subsequent adoption in summer 2019.
- 1.2 Essex County Council (ECC) supports the preparation of a new Local Plan for BBC. A Local Plan by setting out a specific vision and policies for the long-term planning and development of the borough can provide a platform from which to secure a sustainable economic, social and environmental future to the benefit of residents, businesses and visitors. A robust long-term strategy will provide a reliable basis on which ECC and its partners may plan future service provision and required community infrastructure for which they are responsible. ECC will also use its best endeavours to assist on strategic and cross-boundary matters under the duty to cooperate, including engagement and co-operation with other organisations for which those issues may have relevance.
- 1.3 The following is the response from ECC to the Draft Plan covering matters relevant to ECC. The response does not cover ECC as a landowner and/or prospective developer. A separate response will be made on these matters (if relevant) and that response should be treated in the same way as a response from other developers and/or landholders.
- 1.4 For easier reading the ECC response will work through each of the parts and sections as set out in the Draft Plan, and indicate where acknowledgements, recommendations and alterations are sought. This is preceded by commentary on ECC's interest in the Draft Plan and the duty to cooperate.

2. ECC Interest in the Draft Local Plan Preferred Site Allocations Consultation

- 2.1 ECC aims to ensure that local policies and related strategies provide the greatest benefit to deliver a buoyant economy for the existing and future population that live, work, visit and invest in Essex. As a result ECC is keen to understand, inform, support and help refine the formulation of any development strategy and policies delivered by Local Planning Authorities. Involvement is necessary and beneficial because of ECC's roles as:
- a. a key partner within Greater Essex, promoting economic growth, regeneration, infrastructure delivery, Garden Communities and sustainable new development;
 - b. provider and commissioner of a wide range of local government services throughout the county;
 - c. the highway and transport authority, including responsibility for the delivery of the Essex Local Transport Plan; Local Education Authority including early years and childcare; Minerals and Waste Planning Authority; Lead Local Flood Authority; lead advisors on public health; and adult social care in relation to securing the right housing mix which takes account of the housing needs of older people; and
 - d. as an infrastructure funding partner, that seeks to ensure that the proposals are realistic and do not place an unnecessary (or unacceptable) cost burden on the public purse, and specifically ECC's Capital Programme.

3. Duty to Co-operate

- 3.1 The 'duty to cooperate' (the Duty) was introduced by the Localism Act in November 2011. The Act inserted a new Section 33A into the Planning and Compulsory Purchase Act 2004. This placed a legal duty on all local authorities and public bodies (defined in Regulations) to 'engage constructively, actively and on an ongoing basis' to maximise the effectiveness of local and marine plan preparation relating to strategic cross boundary matters, and in particular with County Councils on strategic matters.
- 3.2 The National Planning Policy Framework (NPPF) provides detail on how strategic planning matters should be addressed in local plans (paragraphs 178-181). Local planning authorities are expected to work 'collaboratively with other bodies to ensure that strategic priorities across local authority boundaries are properly coordinated and clearly reflected in local plans' (paragraph 179). 'Strategic priorities' to which local planning authorities should have particular regard are set out in paragraph 156 of the NPPF.
- 3.3 Specific guidance on how the Duty should be applied is included in the National Planning Practice Guidance (PPG). This makes it clear that the Duty requires a proactive, ongoing and focussed approach to strategic matters. Constructive

cooperation must be an integral part of plan preparation and result in clear policy outcomes which can be demonstrated through the examination process.

- 3.4 The PPG makes it clear that the Duty requires cooperation in two tier local planning authority areas and states *‘Close cooperation between district local planning authorities and county councils in two tier local planning authority areas will be critical to ensure that both tiers are effective when planning for strategic matters such as minerals, waste, transport and education.’* (Paragraph: 014, Reference ID: 9-014-20140306)
- 3.5 In accordance with the Duty, as established in the Localism Act 2011, ECC will contribute cooperatively to the preparation of the Brentwood Local Plan, particularly within the following broad subject areas,
- ECC assets and services. Where relevant, advice on current status of assets and services and the likely impact and implications of proposals in emerging plans for the future operation and delivery of ECC services.
 - Evidence base. Guidance with assembly and interpretation of the evidence base both for strategic/cross-boundary projects, with a focus on education provision, transport studies and modelling, and economic growth requirements.
 - Sub-regional and broader context. Assistance with identification of relevant information and its fit with broader strategic initiatives, and assessments of how emerging proposals for the new Local Plan may impact on areas beyond and vice-versa.
 - Policy development. Contributions on the relationship of the evidence base to structure and content of emerging policies and proposals.
 - Inter-relationship between planning documents. Including the Essex Minerals Local Plan and the Essex and Southend-on-Sea Waste Local Plan.
- 3.6 BBC has already undertaken work with ECC under the Duty during the preparation of the Draft Local Plan with regards to highway matters, education, minerals and waste, and other areas of responsibility of ECC.
- 3.7 The ECC response identifies where and how BBC need to further engage with ECC to ensure BBC meets its duty to cooperate, and where BBC need to consider additional evidence to further inform and clarify the policies in its new Local Plan.
- 3.8 An Infrastructure Delivery Plan (IDP) will need to be prepared to support the pre-submission Local Plan, to identify the infrastructure required, and how and when it will be funded and delivered. As a provider of key services and subject to

statutory responsibilities, for example minerals and waste, highways and education, ECC will need to be involved in the preparation of the IDP.

- 3.9 ECC will continue to contribute cooperatively with BBC in the preparation of the new Local Plan through to examination. To this end, BBC will need to ensure ECC is involved in the further assessment of the impact of growth proposals on the transport and highway network and required mitigation (it is noted that transport modelling is being undertaken by external consultants and not through ECC, therefore ECC will need to review and qualify the external consultants' findings and recommendations); further assessment of the need for additional pupil places and school provision, including early years and childcare; consideration of surface water management; and consideration and planning for minerals and waste management, amongst other relevant matters. ECC will also engage actively with Highways England (HE) on the M25 and A12 to ensure that any strategic impacts arising from growth are considered on their network. The impacts of the preferred route of the Lower Thames Crossing (LTC) will also need to be considered in relation to transport movements within the Borough, and beyond, as well as any potential impact on the proposed spatial strategy.
- 3.10 ECC recommends that BBC ensures that engagement with ECC officers and members takes place collaboratively on an active, regular, and ongoing basis covering all areas of ECC responsibility to ensure the Local Plan is deliverable and viable as it prepares its Regulation 19 Local Plan. This will include seeking to ensure that the emerging Local Plan and the supporting evidence base contain appropriate information concerning the phasing, delivery and funding of infrastructure. Most notably education – primary and secondary schools, early years and child care provision - delivery of sustainable urban drainage (SuDS), transportation mitigation, and infrastructure required for the Dunton Hills Garden Village (DHGV).
- 3.11 This is crucial given that BBC's timetable for Local Plan preparation indicates 'Pre Submission' consultation is scheduled for the third quarter 2018 (July-September) and the Submission Local Plan is anticipated for the fourth quarter of 2018 (October-December). ECC notes this is an ambitious timetable given the need for BBC to address the full range of consultation responses and update the evidence base particularly the IDP and complete transport modelling and mitigation requirements, in order to produce a sound, justified and compliant Local Plan, in what would amount to a few months. ECC advises that other Essex authorities have generally taken 12 months between Regulation 18 to Regulation 19 given the complexity of issues and outstanding matters that need to be resolved.
- 3.12 ECC also recommends significant partnership working will be necessary with BBC, its transport consultants, and Highways England (HE), in reviewing and progressing the highway modelling to support the Local Plan, including the

identification of necessary mitigation measures on the strategic (M25/A12/A127) Corridor, local and wider highway network, including sustainable transport measures.

- 3.13 Such partnership working is to include regular joint liaison meetings between PBA (Peter Brett Associates – BBC’s transport consultants), HE, BBC and ECC to progress the plan regarding highway matters. It will also be necessary to identify the requirements for infrastructure and other planning mitigation measures with regards to individual sites, and especially those regarded as ‘strategic’ in nature.
- 3.14 Meetings and working groups should also be established with the other ECC functions, as well as associated external partners, including those relating to public health, education, minerals and waste, flooding and community infrastructure.

4. ECC Response to the Draft Local Plan Preferred Site Allocations Consultation

- 4.1 The following ECC response to the consultation follows the format and order in the Draft Local Plan Preferred Site Allocations consultation document, and highlights matters relating to specific sections of the document. A response is also included at the end of this section for general ECC comments in relation to the consultation and evidence base.
- 4.2 ECC draws attention to its response to the Draft Local Plan consultation in 2016, and would advise BBC that its content is still relevant to the current consultation. This is attached as Appendix 2.
- 4.3 In summary ECC re-iterated the need for the Local Plan to be supported by a proportionate evidence base and that all reasonable alternatives for a spatial strategy be considered. Further clarification was sought on a number of matters including:

Spatial Strategy –

- how the A127 Corridor provides more opportunities for growth than the A12 Corridor,
- identification of any cross border implications of the spatial strategy given ECC’s role as highway, education, minerals and waste authority,
- identification of what infrastructure is necessary to deliver the spatial strategy, strategic and individual site allocations;

Housing –

- demonstrate that level of growth can be accommodated by the existing and new social and physical infrastructure,
- how Independent Living programme is to be delivered,

- joint working with ECC and partner local authorities to identify and deliver transit sites for Gypsy and Travellers;

Economic Growth –

- additional evidence required regarding the impact of the significant employment land allocation at Brentwood Enterprise Park on the strategic junction, local road network, and necessary mitigation measures, including sustainable transport measures given the location is not favourable to sustainable travel;

Highways –

- joint working should be established between all the relevant partners to identify necessary mitigation at relevant junctions, to consider the cumulative impact of growth within the borough, and to consider the wider planned growth on the local and strategic route network;

Education –

- continued work required by BBC with ECC to ensure education needs are appropriately and adequately assessed as the new Local Plan continues,
- further assessment of potential delivery and resource requirements for accommodating anticipated pupil growth to inform pre-submission plan and Infrastructure Delivery Plan (IDP),
- consider potential cross-boundary issues with Basildon arising from Dunton Hills Garden Village (DHGV),
- early years and childcare requirements should be included.

- 4.4 ECC recommends that all of the matters raised in its 2016 response are addressed as the plan progresses through to pre-submission.
- 4.5 With regards to the evidence base ECC acknowledges that BBC will need to be satisfied that the Local Plan is supported by a proportionate and up to date evidence base and that all reasonable alternatives have been considered.
- 4.6 ECC notes, from Appendix E (Brentwood Local Plan Evidence Base Update) attached to the agenda report on the Local Plan presented to BBC's Ordinary Council in January 2018, that there are still gaps in the evidence base to support the BBC Local Plan, and a number of the evidence based documents currently available are considered out of date. Such evidence should cover all the relevant components of the proposed local plan, including highway modelling, and the production of an IDP. It is essential that this is addressed before the pre-submission document is produced.

Part 1 – Our Strategy for Growth

Introduction

Sustainability Appraisal (SA) –

- 4.7 ECC acknowledges that the Interim SA Report identifies a good range of both high level and more focused options for exploration, with a clear narrative throughout as to what constitutes a ‘reasonable alternative’. This is an important step at this stage in the context of the plan-making process to date and the issues that BBC has faced.
- 4.8 ECC considers that Table 6.2 presents a thorough and useful number of options / permutations related to a spatial strategy for the Plan area. The findings of the Interim SA in regard to the ‘preferred allocations’ however is similarly high level and is limited to the identification of general cumulative impacts over a broad area. It is considered that the Interim SA should offer more commentary and recommendations regarding the assessment of sites at the ‘local / micro level’ in order to justify some of the high level conclusions. This is in light of the wide range of impacts identified within the individual site assessments in Appendix III which do not appear to be elaborated on.
- 4.9 ECC also recommends further cumulative impacts could be identified at a more local level. This could serve to further assist BBC in both the site selection of small sites in an area, and also the development of site specific policies at the Regulation 19 stage.
- 4.10 ECC notes that the Interim SA takes the same approach as the 2016 Interim SA when arriving at reasonable alternatives, which seeks to develop the reasonable alternatives for strategic level growth arising from work undertaken in 2015/2016, rather than the overall SA process. ECC recommends that a comprehensive audit trail of those alternatives that have been considered and subject to SA throughout the plan-making process should be produced, including detailing the reasons for rejecting and progressing alternatives at each stage. In addition, the cumulative assessment of the ‘givens’, for the purposes of satisfying the requirements of SA, should be presented, alongside their cumulative impacts to inform the strategy proposed.
- 4.11 In paragraph 6.3.2 of the Interim SA, reference is made to significant concerns raised to the DHGV allocation in the 2016 consultation having been addressed. ECC seeks clarification as to how these concerns have been addressed, particularly those raised in the ECC response to the BBC 2016 Draft Local Plan.
- 4.12 ECC would draw attention to a number of the conclusions on the Draft Plan in Chapter 10 of the Interim SA, which appraises the Draft Local Plan. It is clear that a significant amount of work is still to be undertaken to address concerns

and uncertainties, and ECC seeks clarification that these matters will be addressed as part of the preparation of the pre-submission plan.

4.13 Areas of concern as to certain conclusions in the SA are as follows:

- Air Quality - concludes that no significant effects are likely to occur, however highlights there is considerable uncertainty at the current time ahead of further work still to be undertaken, including highway modelling;
- Climate Change - concludes that no significant effects are likely to occur, however highlights there is considerable uncertainty, with further work still to be undertaken, in relation to how the Plan can reduce CO2 emissions, including from transport;
- Economy and Employment - concludes possible significant effects, but uncertainty in the absence of detailed transport modelling;
- Landscape – concludes that there are likely to be significant negative effects; further work required to identify developable parts of sites and strategic open space and landscaping;
- Soil and Contamination - concludes that there are likely to be significant negative effects; an increase in the number of homes required is likely to increase the amount of agricultural land to be lost, some of which is likely to be ‘best and most versatile’;
- Water Quality and Water Resources - concludes effects are currently uncertain; need for detailed examination of waste water treatment capacity, and further work for robust DM policy to be in place.

4.14 ECC welcomes the comments in relation to the following:

- Biodiversity - further work to focus on borough-wide and site specific policy on ensuring development achieves net biodiversity gains
- Community Infrastructure - work on-going to understand issues, working with partners including ECC
- Flooding - thematic and site specific policies to be examined further including master planning and SUDs
- Waste - some waste infrastructure capacity issues locally to be addressed

4.15 In terms of assessing heritage in the SA, it is clear that listed buildings and conservation areas have been considered, however there is no reference to the extensive archaeological remains within the Borough. ECC considers that a Historic Environment Characterisation report, including consideration of archaeology, should support the preparation of the draft Local Plan.

4.16 ECC also recommends that Section 13.1.2 includes a bullet point on the impacts for archaeology and historic landscape.

Habitats Regulation Assessment (HRA) -

- 4.17 ECC welcomes the draft HRA screening report and the references to co-operating with other Essex local planning authorities (LPAs) on a strategic mitigation scheme for recreational disturbance (RAMS) to deliver measures to avoid adverse impacts on site integrity on European sites. The emerging RAMS is being co-ordinated by ECC for the 11 Essex LPAs needing to provide mitigation measures.
- 4.18 ECC recommends that references to developer contributions towards the Essex Coastal RAMS need to be clear. These should be sought from developers (not new residents), to avoid impacts from recreational disturbance, in combination with other plans and projects. A reference to the need for project level HRA for developments not proposing to contribute to the RAMS may also be helpful. This could be to secure bespoke mitigation measures in certain cases. Furthermore it is recommended that a reference is also made to project level HRA's, to ensure applicants minimise likely impacts from the developments alone in terms of layout.
- 4.19 ECC welcomes the acknowledgement for the need for a mitigation strategy for Epping Forest Special Area of Conservation (SAC) to deal with increased atmospheric pollution, and looks forward to receiving more details on modelling.
- 4.20 ECC notes that the evidence base for the Local Plan includes a Local Wildlife (LoWS) Review (2012) which enables consideration to be given to minimising impacts of site allocations on these non-statutory designated sites for biodiversity. However ECC advises that BCC should carry out assessments in relation to the preferred site allocations, including DHGV, to establish if they contain Priority habitats and species which could meet the criteria for new LoWS.

Vision

- 4.21 ECC welcomes the inclusion of a clear and concise vision for the Draft Local Plan, but recommends that reference to health and wellbeing, and the encouragement of healthy active lifestyles should also be included.

Strategic Objectives

- 4.22 ECC welcomes the inclusion of a clear set of strategic objectives. It is recognised that BBC is seeking to ensure the strategic objectives are consistent with the national planning guidance through managing growth; creating sustainable communities; seeking economic prosperity; protecting and enhancing the environment; improving quality of life and providing community infrastructure; and addressing transport and movement matters. This is consistent with the PPG. However concern is raised with the increase in objectives from the 2016 Draft Local Plan (13), to the current consultation (23), and whether they reflect the

strategic priorities for the Borough, or whether they are providing more detail which should be reserved for the policies within the Plan.

- 4.23 The strategic objectives clearly send the message that the purpose of the new Plan will be to align key infrastructure with sustainable growth, the development and resilience of health and wellbeing, creating a prosperous economy, whilst protecting the environment. ECC welcomes the anticipated benefits of this approach.
- 4.24 ECC seeks clarity on how Objective 13 (protecting the core office market) may be achieved. Recent evidence does not suggest that this is being supported, with existing commercial sites having been, or still being at risk of being lost to residential, including Library House, New North House, and BNY Mellon House.
- 4.25 ECC welcomes the protection and enhancement of the environment through Objective 16.
- 4.26 ECC is supportive of Objectives SO17 and SO22 in terms of BBC's support for enhancing the green infrastructure network and connectivity across the Borough. ECC is also supportive of Objective SO23 regarding supporting a low carbon future and inclusion of electric vehicle charging points.
- 4.27 Objectives SO21, SO22 and SO23 all cover Sustainable Transport and the document makes reference to the fact that sustainable transport is central to their plan making, which is supported in principle by ECC.
- 4.28 ECC acknowledges and supports the need for improvements for sustainable travel and the need for modal shift, however there are areas of the strategic highway network such as the A127 that will require significant mitigation measures if economic growth is to be realised.
- 4.29 ECC is concerned that the Objectives that cover transport and movement (SO21, SO22 and SO23) do not recognise the need for highway infrastructure to facilitate movement of goods / commuters.
- 4.30 As Highway Authority, ECC acknowledges the following strategic objectives, namely SO2 (Growth in transport corridors); SO5 (Growth accommodated by existing or proposed infrastructure), SO19 – (secure delivery of transportation and community infrastructure). ECC also welcomes the addition of the specific transport and movement strategic objectives SO21 (public transport infrastructure and connections), SO22 (cycling, walking and green transport corridors), and SO23 (infrastructure for low carbon future) in the Draft Local Plan.
- 4.31 ECC also recommends that reference be made to ensuring that proposals address the need for strategic and general highways infrastructure.

- 4.32 In order that the strategic objectives are met it is imperative that timely and appropriate highway modelling is undertaken. Further comments relating to highways and transportation matters are provided in the Spatial Strategy section below.

Spatial Strategy

Housing -

- 4.33 ECC acknowledges BBC's work that seeks to meet housing needs in full over the Plan period (7,600/380 dpa) and supports the 20 year Plan period (2013 – 2033). This would deliver the BBC's housing need in full and support the projected number of jobs/workers forecast in the Plan period. ECC supports the prioritisation of bringing forward brownfield sites and all appropriate land within existing urban areas, and through maximising density where appropriate. This will direct development towards existing settlements, particularly those that already benefit from access to a range of services and access to sustainable transport modes. However, in doing so any strategy will need to demonstrate that the level of growth can be accommodated by the existing and new social and physical infrastructure.
- 4.34 ECC acknowledges that BBC will need to be satisfied that the Local Plan is supported by a proportionate evidence base and that all reasonable alternatives have been considered. See ECC earlier commentary on the SA.
- 4.35 Following its response to the 2016 consultation, ECC continues to seek further clarification on a number of issues in relation to the proposed spatial strategy including:
- how the A127 Corridor provides more opportunities for growth than the A12 Corridor;
 - identification of any cross border implications of the spatial strategy given its role as highway, education, minerals and waste, and lead local flood authority, and public health responsibilities;
 - identification of what infrastructure is necessary to deliver the spatial strategy, strategic and individual site allocations; and
 - a full assessment of the highway and transportation implications of the proposed spatial strategy, both in terms of the impacts of the individual preferred site allocations, and cumulatively.
- 4.36 ECC therefore withholds support until the appropriate highway modelling has been undertaken, to assess both the site specific and cumulative impacts of such developments on the local, and wider highway network.

Transport and Highways -

- 4.37 BBC commissioned PBA to assess the impact of options for strategic development within the Borough in the coming years. The 'Brentwood Borough Local Plan Development Options – Highway Modelling' was published in draft form as part of the 2016 consultation. The draft Report set out the approach of PBA to highway modelling, the results of the modelling and junction assessments, and highlighted those worse performing junctions that may require mitigation, to enable the development sites to come forward.
- 4.38 ECC reviewed PBA's draft Report in 2016, and provided a significant number of comments and concerns to BBC. ECC highlighted that there were still areas of the methodology that would benefit from further clarification, and aspects of the modelling that would need to be revisited.
- 4.39 ECC highlighted that any further modelling work would need to consider a number of matters including:
- Rebuilding of forecast matrices to account for revisions made to development numbers contained in the Local Plan,
 - Recalculation of trip rates to also account for sustainable travel,
 - Consideration of background growth to incorporate fuel efficiency and income growth factors,
 - Validation of base model outputs to observed conditions,
 - Sensitivity testing of forecast model assignment,
 - Determining how the model can be improved to provide a more accurate assessment of cross-boundary impacts,
 - Remodelling of all junctions currently in scope of assessment, accounting for uneven lane usage, peak hour demand profiles and the impact of pedestrian movements.
- 4.40 ECC also advised that no analytical work had been undertaken on the strategic route network (A12 and M25) or in relation to the A127, which given the level of growth required, raised concerns.
- 4.41 The A127 is a vitally important primary route for the South Essex area which connects the M25, Brentwood, Basildon and Southend (including London Southend Airport). A major aim of ECC is to improve journey time reliability along this route. There is significant growth planned along the A127 corridor in adopted and emerging Local Development Plans along its entire route, which will need to be considered in any highway modelling in terms of capacity, key junctions and access.
- 4.42 The impacts of the preferred route of the LTC will need to be assessed and factored in to the further modelling in support of the Draft Plan. It is considered that the LTC would have an impact on/ and opportunities for the Brentwood

Borough as well as the wider transport network across South Essex and beyond. A new LTC will fundamentally change the dynamic of strategic transport movements within and across Brentwood and Greater Essex.

- 4.43 ECC is clear that the further modelling work needs to clearly illustrate the local and cumulative impact on the local and strategic transport network, to demonstrate that the proposed spatial strategy is the most appropriate, and to identify any mitigation measures which would be required. Any mitigation required will need to be clearly stated in the relevant policies.
- 4.44 ECC, as the Highway Authority, needs to be engaged on the further modelling work, to be satisfied with the approach, assumptions and outcomes, in order to provide support to BBC in the plan preparation process and at examination. As previously requested ECC require BBC to incorporate a review process, at the end of each stage, into the modelling programme.
- 4.45 BBC has begun work to address the outstanding issues and ECC are engaging with BBC and PBA to progress this. However, until this appropriate highway modelling has been undertaken, and ECC has reviewed and confirmed satisfaction of the work, ECC continues to withhold support for the Draft Plan.

Employment –

- 4.46 ECC acknowledges the ambition to develop new key strategic employment sites but this needs to be set within the wider context of Brentwood's Spatial Strategy, and any location to be consistent with the criteria to seek to ensure future developments are located in accessible locations reducing the need to travel. ECC therefore withholds support until the appropriate highway modelling has been undertaken, to assess both the site specific and cumulative impacts of such developments on the local, and wider, highway network.
- 4.47 ECC raises concerns over the allocation of 57% of the new employment land on one site, Brentwood Enterprise Park (BEP). The Economic Forecast Report also highlights concerns with regard to the considerable reliance on the BEP employment allocation. It is recommended that consideration be given to the phasing and deliverability of the site, to ensure a readily available supply of employment land across the short, medium and long term.
- 4.48 Furthermore ECC would draw attention to the 'red line' boundary for the LTC major road scheme, which seeks to incorporate a significant part of the BEP employment allocation. Whilst it is acknowledged that one of the aims of the LTC is to be a key driver for economic activity, and if such a scheme is not to impact on the deliverability of the BEP, clarification is sought over this matter, and in respect of the deliverability of the full allocation over the Plan period, particularly given the need for the site to come forward in phases over the short, medium and long term.

- 4.49 ECC acknowledges the significant contribution the BEP allocation would make to meeting the employment needs of the Borough over the Plan period. However, its location, in close proximity to the M25 and A127, which is presently over capacity, provides primarily car based connections to service centres, and potential sources of employees. The location is not favourable to sustainable transport measures and at present there is limited evidence regarding any potential connectivity of the proposed development via sustainable transport measures. Additional clarification will be required regarding opportunities for such measures, and the output of any impact on the strategic junction, local road network and potential mitigation requirements to be programmed (as part of the IDP). The potential impact on the above would also depend on the mix of B1, B2 and B8 uses proposed on the site.

Infrastructure –

- 4.50 ECC agrees that the Local Plan will be critical for making sure BBC has the right infrastructure, at the right time, to accommodate the new jobs and homes proposed within the Plan period. ECC considers that large scale housing developments will need to include appropriate infrastructure such as education provision, community and health facilities, flood mitigation through SUDs, and improvements to transport infrastructure. Small scale development should also fund improvements to existing services and facilities. ECC note that infrastructure provision is likely to have a major impact on the phasing and deliverability of development.
- 4.51 ECC consider the phasing of development and funding of infrastructure will be crucial for effective delivery and this will need to be reflected in the evidence base as Local Plan preparation progresses. Currently ECC consider that this is unclear.
- 4.52 ECC therefore consider it essential that all sites are assessed together as part of Plan preparation to identify which sites or strategic locations are the most suitable and deliverable for a particular use. It is imperative that the costs of providing infrastructure as a direct result of development proposals, particularly those related to early years and childcare, primary and secondary schools, and highways, for which ECC has a statutory responsibility, are included in the viability assessment from the outset, to ensure provision is guaranteed. ECC seeks clarity on how this process has been undertaken.
- 4.53 ECC would draw BBC's attention to the ECC Full Council Motion in October 2014, reaffirmed in July 2017, which states that *'Essex County Council will not support Local (Development) Plans unless adequate resources are identified from developers, local councils and/or Government grants to ensure that sufficient infrastructure, including roads, schools, medical facilities, parking, sewerage and drainage, is provided in a timely manner and in a way that balances the needs to promote economic growth and provide housing for*

residents whilst protecting their quality of life'. In accordance with this Motion, it is recommended that ECC continues to withhold support for the Draft Plan, until the appropriate work in relation to ensuring the provision of all suitable infrastructure has been undertaken, and ECC has reviewed and confirmed its satisfaction with the work.

- 4.54 The Local Plan spatial strategy is of particular importance to ECC as it will need to be satisfied that the impact of any planned scale and distribution of growth can be accommodated by ECC areas of responsibility, or identify what additional facilities or mitigation are required to make the strategy sustainable in social, economic and environmental terms.
- 4.55 An IDP will need to be prepared to support the Local Plan, and identify infrastructure required. The Local Plan should make clear, for at least the first five years, what infrastructure is required, who is going to fund and provide it, and how it relates to the anticipated rate and phasing of development. For the later stages of the Plan period less detail may be provided as the position regarding the provision of infrastructure is likely to be less certain. As a provider of key services and subject to statutory responsibilities, for example minerals and waste; highways, education, early years and childcare; and public health, ECC is keen to assist BBC in the preparation of the IDP, and welcomes the opportunity for engagement with BBC to assist in the preparation of the Local Plan towards pre-submission. However, as stated above, until this appropriate work has been undertaken, and ECC has reviewed and confirmed its satisfaction with the work, it is recommended that ECC continues to withhold support for the Draft Plan.

Metropolitan Green Belt –

- 4.56 ECC is committed to working closely with its local authorities to meet the increasing demand for housing and infrastructure that meets the needs of residents, drives economic prosperity and protects and enhances the local environment. Paragraph 83 - 85 of the NPPF identifies that Local Planning Authorities should establish Green Belt boundaries that ensure consistency with the Local Plan strategy for meeting identified housing requirements in sustainable locations, and any Green Belt review should be undertaken as part of the Local Plan preparation.
- 4.57 The Draft Plan Spatial Strategy seeks to maximise development on brownfield sites within existing urban areas, including the redevelopment/allocation of employment sites for residential use. The commentary provided in the consultation document states that given the finite availability of these sites in the Brentwood/Shenfield urban area, and lack of such sites to meet the objectively assessed need, significant growth will be (required on green belt sites).
- 4.58 The Draft Local Plan contains two 'strategic objectives' (SO15 and SO16), which seek to safeguard the Green Belt from inappropriate development and to protect

and enhance valuable landscapes, and the natural/historic environment. The Borough is covered by 89% Green Belt, along with a wide range of other environmental constraints including distinct landscape types of relatively high sensitivity to change; and two large Country Parks at Thorndon Park and Weald Park. Other designations include SSSI's, Local Nature Reserves, biodiversity habitats, and Thames Chase Community Forest.

- 4.59 ECC acknowledges the sensitive nature of the Borough and the need to balance growth with retaining local character. The Borough Council will need to be satisfied that it has identified its preferred spatial strategy, which includes significant Green Belt release, based on a range of proportionate evidence. In so doing, BBC will need to demonstrate that it has considered all reasonable locations for future growth against the relevant criteria, and demonstrate that the most appropriate sites have been identified for allocation.

General –

- 4.60 ECC welcomes reference in Paragraph 37 of the consultation document to BBC working jointly with the South Essex LPA's to secure infrastructure investment and consider wider growth opportunities. ECC recommends that more detailed reference is made to this work, including the Memorandum of Understanding that has been signed by the South Essex Authorities to work together on strategic cross boundary matters, the establishment of the Association of South Essex Local Authorities (ASELA), the work that has taken place on a South Essex 2050 Vision, and the work underway to progress a South Essex Joint Spatial Plan.

Housing and Specialist Accommodation – Need and Supply

Housing Need and Supply

- 4.61 ECC acknowledges BBC's work that seeks to meet housing needs in full over the Plan period (7,600/380 dpa) and supports the 20 year Plan period (2013 – 2033). This would deliver the Borough's housing need in full, and support the projected number of jobs/workers forecast in the Plan period. ECC supports the prioritisation of bringing forward brownfield sites and all appropriate land within existing urban areas, and through maximising density where appropriate. This will direct development towards existing settlements, particularly those that already benefit from access to a range of services and access to sustainable transport modes. However, in doing so any strategy will need to demonstrate that the level of growth can be accommodated by the existing and new social and physical infrastructure.
- 4.62 ECC acknowledges that BBC will need to be satisfied that the Local Plan is supported by a proportionate evidence base and that all reasonable alternatives have been considered.

- 4.63 Following its response to the 2016 consultation, ECC continues to seeks further clarification on a number of issues in relation to the proposed spatial strategy including:
- how the A127 Corridor provides more opportunities for growth than the A12 Corridor;
 - identification of any cross border implications of the spatial strategy given its role as highway, education, minerals and waste, and lead local flood authority, and public health responsibilities;
 - identification of what infrastructure is necessary to deliver the spatial strategy, strategic and individual site allocations; and
 - a full assessment of the highway and transportation implications of the proposed spatial strategy, both in terms of the impacts of the individual preferred site allocations, and cumulatively.
- 4.64 ECC therefore withholds support until the appropriate highway modelling has been undertaken, to assess both the site specific and cumulative impacts of such developments on the local, and wider, highway network.

Specialist Accommodation Needs and Supply – Registered Care

- 4.65 ECC acknowledges BBC is seeking to meet its identified needs for registered care provision, (424 spaces between 2013 and 2033) as identified in the SHMA. However ECC seeks clarification on the suitability of the proposed sites for the provision of specific registered care accommodation (424 spaces across 4 large preferred housing allocation sites), as well as information on any additional infrastructure requirements such accommodation may require.
- 4.66 ECC seeks careful consideration of locations of developments with specific allocations of homes for older people. Easy access to primary care services including GP, local facilities including pharmacists and shops and also public transport links are vital. This would also be applicable for permission given for conversions of buildings of previous use to residential care homes for older and vulnerable people.
- 4.67 Furthermore ECC seeks clarification on whether the location of such accommodation, on four large housing sites, has implications for the general housing capacity of the preferred housing sites. This should also be considered in combination with the location of the required Gypsy and Traveller pitches, which are proposed on 3 of the 4 same large housing sites (see comments below).
- 4.68 In order to meet its statutory obligations as the provider of adult social care, control the costs of adult social care and improve the lives of residents, ECC is committed to influencing the provision of a range of housing options for the older

population. Consequently, ECC is keen to support and enable older people to live independently.

- 4.69 At present a gap exists in the provision of Independent Living housing across Essex. There are not sufficient numbers of Independent Living units to relieve pressure for residential care placements. A target of 2,825 Independent Living units (available as rental or ownership units) has been set by ECC to be delivered by 2020 in the County. Not including units either in development or completed to date, there are 2,178 units remaining to be delivered across Essex. Within Brentwood, by 2020, 153 units are required; 26 units are already provided, which leaves 127 still to be provided by 2020.
- 4.70 A programme has been developed by ECC to increase the supply of Independent Living units across Essex. It is therefore recommended that reference to the ECC Independent Living programme and its role in housing delivery should be made in progressing the Plan.

Specialist Accommodation Needs and Supply – Gypsy & Traveller

- 4.71 ECC notes that BBC has been working in partnership with Essex local authorities, through jointly commissioning the Gypsy and Traveller Accommodation Assessment (GTAA) (2017) to provide a robust assessment of current and future need for Gypsy and Traveller and Travelling Showpeople families and has used this data to inform how it addresses this in its Draft Local Plan.
- 4.72 ECC acknowledges BBC is seeking to meet its identified needs (78 pitches between 2016 and 2033), as identified in the Brentwood GTAA Need Summary Report October 2017, and is seeking to follow a sequential approach to site identification. ECC recommends that reference should be made to the most up to date position which is from the Greater Essex GTAA for 2016-2033 which was endorsed by EPOA on 25th January 2018 and published in February 2018.
- 4.73 ECC also seeks clarification on the suitability of the proposed sites for the provision of specific Gypsy and Traveller accommodation (58 pitches across 4 large preferred housing allocation sites), as well as information on any additional infrastructure requirements such accommodation may require.
- 4.74 Furthermore ECC seeks clarification on whether the location of such accommodation, on four large housing sites, has implications for the general housing capacity of the preferred housing sites. This should also be considered in combination with the location of the required registered care facilities, which are proposed on three of the four same large housing sites (see ECC comments above).

- 4.75 ECC notes and welcomes reference to the GTAA recommendations for BBC to engage with other Essex authorities to establish whether there is a need for investment in more formal transit sites or emergency stopping places.
- 4.76 ECC recommends that BBC should reference the transit recommendations as set out in the published Greater Essex GTAA (2018), which recognises and seeks to address the strategic cross boundary matters at a larger 'Greater Essex' level, incorporating data from local authorities; the Essex Countywide Traveller Unit (ECTU) and other sources. There are a range of site options available to address enforcement and unauthorised encampment issues (ie not just Transit sites), but also emergency stopping places, temporary stop and stopping places and negotiated stopping places. There is a need for further investigation and analysis to provide a more robust appraisal of current and future transit needs, to be undertaken.
- 4.77 ECC recommends that as part of the Plan preparation process any policy provision and supporting text should be flexible enough to allow the outcomes of the further work to be incorporated.

Infrastructure Planning

General education comments -

- 4.78 Page 7: paragraph 19 – As recognised in this paragraph, sufficient work has yet to be undertaken to accurately assess the impact of growth on education infrastructure. It is critical that this takes place whilst the Regulation 19 plan is prepared. A full scenario test identifying the location of and likely unit mix of all allocation sites and permitted development is needed. BBC will need to provide ECC with this information in line with section 3.4 of our 'Planners' Guide to School Organisation'. Once ECC has received this information and completed the assessment, a realistic IDP for education can be prepared and agreed. Discussions with ECC are therefore vitally important to ensure that this growth is planned, phased, properly funded and delivered in an efficient and coherent manner. For information relevant sections of the ECC response to the 2016 Draft Local Plan are included below.

Where growth is to be located it will be essential to ensure the delivery of education facilities is undertaken in a timely and phased manner. Additional school places can be provided either by the expansion of existing schools/academies or the opening of new "free schools" or academies. Existing schools and academies can only be expanded if they have sufficient site area to do so. In many cases existing school/ academy sites are restricted and cannot, therefore, be expanded easily without the provision of additional land. This is often impracticable in urban areas as schools are located within the existing built up area. In many rural areas schools are on restricted sites but there may be land

adjacent to the existing school/ academy site that could be utilised to enable expansion.

Whilst faith schools and academies may have sufficient site area to expand this would need the agreement of the Anglican Diocese of Chelmsford/Roman Catholic Diocese of Brentwood/ the academy trusts responsible for these schools/ academies. This is particularly relevant as a significant proportion of schools/ academies located within the borough are faith schools.

As indicated, ECC can identify those locations, particularly in rural areas, where scope exists to expand existing schools/ academies without the provision of additional land. In those areas where expansion opportunities are limited, sites for new schools should be identified within or close to the proposed developments. If existing schools cannot be expanded or growth is insufficient to provide a new school, it will be necessary for ECC to seek contributions from developers towards meeting the cost of providing transport between homes and schools.

The scale of expansion of existing schools/academies is also important. The majority of primary schools are organised in classes of 30 pupils to comply with infant class size limits. It is easier, more cost effective and better from an organisational perspective to expand primary schools by a full form of entry (30 pupils per year group) or half a form of entry (15 pupils per year group) than it is to accommodate a smaller number of pupils. On this basis it is often easier and more cost effective to ensure that there is a sufficient supply of school places for larger scale housing developments than it is for relatively small scale developments, particularly in rural areas. Sustainable home-to-school travel and transport and the location of development sites to ensure viability to fund schools will need further consideration.

Primary Schools

- 4.79 Pages 39 – 42: Figure 15 and supporting text – Pupil planning takes place across school groups agreed with the DfE. It is unhelpful to show potential deficits against individual schools as admissions patterns may need to change in response to development proposals. Fewer larger projects will be required than might be assumed from Fig 15 and reading the supporting text. The figures in this and the following section have not been checked by ECC, as they do not form a full breakdown of the likely unit mix of all allocation sites (including DHGV), or of the already permitted and/or committed development.
- 4.80 Page 41: Paragraph 83a – New schools should normally be located on new developments rather than ‘within close proximity’. Where this is not possible the viability of suitable nearby land for acquisition, and recovering the cost from developers, must be ensured. The Local Plan must include D1 Use Class

allocations of land for new schools, agreed by ECC, which meet the criteria set out in ECC's Developers' Guide (section 4). 2.1ha of suitable land will be needed to establish each new school alluded to in this paragraph. Specific numbers of forms of entry should not be quoted in the Plan to retain sufficient flexibility.

- 4.81 Page 41: Paragraph 83b – ECC will be commissioning a viability study to look at expanding Mountnessing CE Primary School.
- 4.82 Page 42: Paragraph 83c – Expansion of West Horndon Primary School is already in ECC's 'Ten Year Plan' (page 28) to meet the demand for school places, adding half a form of entry for September 2019.
- 4.83 Page 42: Paragraph 85 and 86 – ECC's School Organisation team would welcome inclusion in the continued dialogue relating to the master planning of DHGV. The first new primary school site should be a minimum of 2.9ha and made available as early as possible within the development of the Garden Village Suburb. If 4,000 homes are built longer term then the preferred model will be three primary schools, with a minimum of 2.1ha sites sufficient for each of the latter two. Fewer larger schools would not be congruent with the Garden Village aim of sustainable travel patterns.

Secondary Schools

- 4.84 Page 43: Paragraph 91 – Attention must be paid to the longer term forecasts, based on current primary school cohorts, which are published in the Ten Year Plan (page 29). This is to ensure that the full Plan period is accounted for, as the ECC forecasting plan is for a period up to 2020/21, but the BBC draft Local Plan is up to 2033.
- 4.85 Page 43: Paragraph 92 – As set out in ECC's 'Planners' Guide to School Organisation' (section 2.2), a school that will grow to 6fe is the smallest that can be supported and would require a minimum of 7.9ha of suitable land. The growth within the Plan period should make this viable if the school is planned to meet some wider demand. Although the site promotor for DHGV has alluded to an 'all-through' school, the type of school has yet to be determined, and this model may not fit with the spatial distribution of primary school places that will be required elsewhere in the borough. The school's role in meeting wider demand and the potential need for future expansion must be agreed with ECC prior to the commencement of any master planning work. If the garden village is to grow to circa 4,000 dwellings a minimum of 10ha secondary school site should be reserved.
- 4.86 Para 92 – ECC is very supportive of a joined up Basildon/Thurrock approach to the identification of education needs in relation to Dunton Hills and adjacent developments in these other LPA areas.

Special Education Needs (SEN)

- 4.87 The consultation document provides some commentary on SEN in Brentwood borough, and advises that BBC will seek to support further development, in the form of sixth form facilities, at one of the two SEN schools located within the Borough.
- 4.88 Local Authorities should seek to provide a flexible range of provision and support that can respond to individuals' SEN and parents' and carers' preferences. This should cover the full range of ages. ECC seeks clarification as to how the requirements have been calculated and the evidence that supports this approach.
- 4.89 BCC will need to provide ECC with all the relevant information in order that ECC can undertake a further assessment of the potential delivery and resource requirements, for accommodating anticipated SEN requirements, to inform the pre submission plan, and its supporting IDP.

Healthcare – General Practice

- 4.90 BBC should be advised that Public Health is the responsibility of ECC, in addition to the roles of the CCG.
- 4.91 ECC considers the information provided in paragraph's 97 to 105 and figure 17 of the consultation document provides a good general overview of the up to date evidence relating to GP's in the borough; however there is no consideration of the wider health implications that need to be addressed as part of the plan making process.
- 4.92 Supporting the design and creation of healthy communities is fundamental to the NPPF. ECC is supportive of the general objectives around health within the plan, but consider that these could be greatly enhanced. ECC therefore question if the Draft Plan, at present, ensures that the inclusion of health and wellbeing can be fully assured. This is due to the lack of specific policy on health and wellbeing or associated requirements for the submission of Health Impact Assessments (HIA) with planning applications.
- 4.93 ECC considers that without such policies, the opportunities to support the positive impacts that development can have on health, wellbeing and the wider determinants may be missed. In addition, any negative impacts on health could be more difficult to remove or be mitigated against. The allocation of Section 106 monies to health and wellbeing may also be challenged without the appropriate policy background.

- 4.94 The Essex Planning Officers Association (EPOA) support the use of HIA and have guidance notes on thresholds. HIA, as a material consideration, ensures health and wellbeing is addressed. ECC recommends that HIA is undertaken to inform the preparation of the Local Plan.
- 4.95 Priorities for public health within spatial planning include reducing health inequalities, by supporting access to quality open and green/blue space, healthy diets including improving access to local and fresh food, improving community cohesion and reducing social isolation, supporting air quality through active travel, increasing physical activity opportunities through increasing movement and play across all ages and supporting good quality housing design across the life course. ECC recommends that such matters should be considered as the plan progresses towards submission.
- 4.96 ECC Public Health has been engaged with the Town and Country Planning Association (TCPA) on [work](#) around Garden Communities. In addition, Health and Wellbeing has been incorporated into the Essex Design Guide refresh and addresses Garden Community developments. ECC strongly encourage BBC to engage early with the ECC Director of Public Health and team for advice on healthy urban planning for this development.
- 4.97 In addition, ECC works closely with various health partners to support their healthcare estates including NHS England East and Community Health Partnership, on access of healthcare infrastructure and would be happy to be part of conversations with our partners to ensure that the whole health system is considered as part of the plan making process.
- 4.98 With regards to food retailers and premises, ECC would signpost BBC to the [tool](#) developed by the Centre for Diet and Activity Research (CEDAR) on food geography. This enables local authorities to see the types of food outlets in their areas. It includes A5 premises (under a wider scope of fast food). ECC advises that the management of A5 premises should be considered as part of the plans overall health and wellbeing approach, together with some [emerging evidence base](#) on overconcentration of fast food outlets and obesity. There are a [number](#) of [authorities](#) developing and adopting specific A5 policies, and ECC would be happy to support BBC on building on these principles.
- 4.99 ECC Public Health is engaged with planning teams for many Essex Garden Community proposals. This is to ensure that healthy urban design principles are incorporated into the design and planning of these strategic sites. ECC wish to be engaged in any HIA process that would be part of the development planning for DHGV. The refresh of the Essex Design Guide (EDG) provides references/advice on garden principles, and Sport England provide guidance on [active design principles and health](#).

- 4.100 ECC Public Health is supportive of lifetimes, adaptable homes. This would include housing design for older people. ECC encourages design to be inclusive and allow for accessibility. These aspects have been raised as part of the Essex Design Guide refresh. ECC also promotes dementia friendly community principles, such as those set out in the [RTPI dementia friendly practice guidance](#).
- 4.101 On key worker homes and affordable housing for NHS key staff, ECC advise that discussions on workforce planning with NHS providers should be considered to support the development of their workforce strategies. This would support the health and wellbeing of communities and also access to healthcare infrastructure to which the workforce should be considered as an integral part (as per the NPPF).
- 4.102 With regard to specialist housing, ECC Public Health advise that the social care team at ECC should be engaged on this matter. The relevant CCG should also be engaged to ensure GP provision is available to support these specialist homes.
- 4.103 ECC support the inclusion of an air quality policy, as part of the overall health and wellbeing agenda. ECC recommend that this can be further supported by active travel encouragement.
- 4.104 Other references that may be of assistance are [PHE health profiles](#) and [PHE guidance on planning and PH](#).

Other infrastructure comments

- 4.105 The infrastructure section of the consultation document contains no information on highway and transportation matters. As referred to earlier in this Appendix, this is a fundamental gap, especially in the wider South Essex context and on regional issues such as the A127. ECC is clear that further modelling work needs to clearly illustrate the local and cumulative impact on the local and strategic transport network, to demonstrate that the proposed spatial strategy is the most appropriate, and to identify any infrastructure and/or mitigation measures which would be required.
- 4.106 BBC will need to engage with ECC on this work, and allow for review mechanisms to be put in place, to allow ECC to be satisfied with the modelling approach, assumptions, and outcomes. Until this appropriate work has been undertaken, and ECC has reviewed and confirmed satisfaction of the work, it is recommended that ECC continues to withhold support for the Draft Plan.
- 4.107 ECC supports the aspiration to improve the public realm and circulation arrangements around Brentwood and Shenfield stations given the impact from Crossrail. ECC advises that similar improvements may be necessary at

Ingatestone and West Horndon stations to encourage sustainable travel and mitigate the potential growth. For all stations, park and walk, or park and ride sites, are potential tools that could form part of an overall parking and access strategy.

- 4.108 BBC should ensure policy requirements stipulating that a high quality digital infrastructure is installed from the outset of any new developments (residential and non-residential).
- 4.109 ECC advise that BBC should give consideration to enhanced infrastructure to serve strategic locations such as Brentwood Enterprise Park and Dunton Garden Village.

Early Years and Childcare (EYCC)

- 4.110 The consultation document makes no reference to the requirements for EYCC provision arising from the planned growth in the Plan period. ECC is responsible for meeting certain statutory responsibilities relating to the provision of EYCC services within BBC. This includes supporting EYCC providers with information, advice, guidance, training and a duty under the Childcare Act 2006 to ensure there is sufficient and accessible high quality early years and childcare provision. The Essex Early Years and Childcare Strategy 2015-2018 sets out ECC's strategic objectives and priorities relating to early years and childcare services across Essex.
- 4.111 An assessment of EYCC requirements will need to take place and those requirements will need to be included in appropriate policy and site allocations (both housing and employment) where growth generates need. Once ECC has received this information and completed an assessment, a realistic IDP for EYCC can be prepared and agreed. Discussions with ECC are therefore vitally important to ensure that this growth is planned, phased, properly funded and delivered in an efficient and coherent manner.
- 4.112 ECC also recommend that paragraphs 18a and 76 of the consultation document make specific reference to EYCC provision.
- 4.113 A high level assessment of the preferred housing site allocations detailed in the consultation document using the most up to date sufficiency data (summer 2017) has identified the need for the following:

Location	Requirement
Brentwood (site Refs. 002, 003, 022, 039, 040, 041, 044, 178)	Dependant on location of site developments, a new 56 place nursery and expansion of current provision would be needed. However this cannot be determined until more details around locations is provided.
Pilgrims Hatch (site Refs. 10, 023a, 023b)	Expansion of current provision would be needed to meet the places generated from this development.
Warley (site Refs. 27, 81, 83, 117a and 117b)	A new 30 place nursery and expansion of existing provision would be needed to meet the places generated from this development.
South Weald (site Ref. 32)	Small expansion to existing provision may be needed to meet the places generated from this development.
Shenfield (site Refs. 034, 087, 235, 276, 158, 186, 263, 311)	A new 56 place nursery and expansion to current provision would be needed to meet the places generated from this development.
Ingatestone, Fryerning and Mounthessing (site Refs. 079a, 106, 128)	A new 30 place nursery would be needed to meet the places generated from this development and address the shortfall of places.
Herongate, Ingrave and West Horndon (site Refs. 020, 021, 152, 200)	Four new 56 place nurseries and in addition to this one, 30 place nursery or expansion of current provision would be needed to meet the places generated from this development and address the shortfall of places.

4.114 Employment sites will be affected by the number of employees, and the amount of floorspace on each site. ECC therefore seeks further information in relation to proposed employee numbers and floorspace in order to provide comment in relation to the employment sites.

- 4.115 It is also important to note that the existing capacity has been considered by ward rather than settlement, and hence the available capacity by setting has not been translated into the number of dwellings that each settlement can accommodate. Until BBC provides ECC with a further breakdown as to exact numbers and locations, the figures could be subject to change.
- 4.116 It should also be noted that from September 2017 the Extended Funding Entitlement Offer (EFE) was introduced, which could also affect the calculations of the requirement figures.
- 4.117 BCC will need to provide ECC with all the relevant information in order that ECC can undertake a further assessment of the potential delivery and resource requirements for accommodating anticipated childcare requirements, to inform the pre submission Plan, and its supporting IDP.

Post 16 Education / Skills

- 4.118 ECC advises that there is a requirement for students to stay in a form of education and training until they are at least 18 years old. The consultation document makes no reference to such provision, and ECC recommends that BBC have consideration to the full range of opportunities for the provision of such education, including apprenticeships, in the Plan making process.
- 4.119 The consultation document makes no references to how the Local Plan will address the issue of improving the skills base in the Borough. The Essex Employment and Skills Board identifies 7 priority sectors which are set for growth in Essex and are suffering skills shortages in advanced manufacturing and engineering, care, construction, financial and related services, health, IT, digital and creative, and logistics. ECC recommends that BBC consider how the Plan can address this matter.
- 4.120 ECC also recommends the plan makes reference to the importance of the use of employment and skills plans, particularly in relation to the large scale developments proposed, such as DHGV.

Minerals and Waste

- 4.121 ECC is the Mineral and Waste Planning Authority for Essex. The Mineral Local Plan (2014) and Waste Local Plan (2017) form part of the development plan in Brentwood and therefore should be referenced as such within the opening pages of the Draft Plan.
- 4.122 ECC's response to the draft Local Plan in 2016 remains relevant and is attached as Appendix 2.

Minerals –

- 4.123 The Essex Minerals Local Plan (2014) (MLP) provides up-to-date planning policy for minerals development in Essex until 2029. In particular, it gives certainty as to the location of future minerals development by identifying sites and locations for the extraction of mineral deposits. There are also procedures to reduce the demand for primary mineral use, recycle more aggregate and safeguard mineral resources, reserves and important facilities.
- 4.124 There are deposits of sand and gravel within Brentwood Borough which are subject to Policy S8 Safeguarding Mineral Resources of the MLP. In line with national planning policy, Policy S8 identifies a Mineral Safeguarding Area (MSA) which covers large areas of the County where surface development will be resisted unless evidence can be provided to confirm that the resources are not viable/suitable for prior extraction.
- 4.125 There are areas around the urban area of Brentwood that are covered by a MSA for sand and gravel. In 2016, a high level assessment concluded that some proposed allocations in the Draft Local Plan fell within MSAs for sand and gravel. Now that new site allocations are proposed, it is necessary for mineral safeguarding matters to be thoroughly considered prior to inclusion in the Pre Submission Plan. ECC has provided assistance to all other Essex LPA's in relation to their Local Plans in this respect, by running a GIS based assessment process and identifying text for inclusion in site allocation policies where necessary.
- 4.126 It is essential that the preferred site allocations included in the Draft Local Plan are considered in respect of their mineral safeguarding implications. A GIS layer of the preferred sites should be provided to the ECC Minerals and Waste team as soon as possible to enable this assessment to take place.

Waste –

- 4.127 ECC is the waste planning authority for the Borough, and is responsible for preparing planning policies, and also for assessing applications for waste management development. The Essex and Southend-on-Sea Waste Local Plan (2017) (WLP) is a statutory Development Plan which should be read alongside the Draft Local Plan. It sets out where and how waste management developments can occur, and is the planning policy against which waste management development planning applications are assessed. The WLP does not allocate any strategic waste management allocations in the Borough. The WLP also identifies Areas of Search to meet the need for additional small scale waste management facilities. It identifies two Areas of Search within Brentwood Borough. These Areas of Search are existing industrial estates at Childerditch Industrial Estate and West Horndon and are located away from residential and other uses sensitive to amenity impacts such as schools, retail, leisure and office development. The WLP seeks to focus any new proposals for waste

management facilities, which support the local housing and economic growth, within these Areas of Search.

- 4.128 The Brentwood Local Plan should refer to ECC's role as the Waste Planning Authority and to the adopted WLP. The draft Local Plan 2016 contained limited reference to waste management facilities, and in particular advice for their provision in the proposed Development Management Policies. Some advice is provided in line with European, National and Planning Practice Guidance, which seeks the promotion of the waste management hierarchy within sustainable development. In particular, ECC recommends reference is made in appropriate policies in the Draft Local Plan to enabling the provision of waste management facilities in employment areas, by referring to 'any associated employment generating sui generis uses', given that the WLP does not allocate any strategic waste management allocations in Brentwood Borough. ECC continues to support references to renewable energy schemes and sustainable construction.

Water –

- 4.129 BBC should note that both the Strategic Flood Risk Assessment (SFRA) and Water Cycle Studies (WCS) for Brentwood are now out of date.
- 4.130 There have been a significant number of changes in relation to flood risk, including revised climate change allowances and updates to the surface water mapping since Brentwood last updated their SFRA. As a minimum ECC recommends the production of an addendum to the SFRA to consider the impact these changes would have on the proposed sites within the Draft Plan. This should be followed up by a more detailed review of the document that can be used as an additional assessment when dealing with development that is submitted outside the local plan processes. Similarly ECC recommends that a review of the WCS is undertaken to ensure that issues relating to water supply and demand as well as the processing of waste water are fully considered as part of the Local Plan process.
- 4.131 ECC advise that the Surface Water Management Plans (SWMPs) are being reviewed and an addendum to the SWMPs will be published shortly. The review of the SWMP has taken place following updates to the criteria used to assess properties at risk of flooding. Key changes to the SWMP include revised Critical Drainage Areas (CDAs) and some changes to flood extents.
- 4.132 An impact analysis of the proposed new CDA boundaries on the preferred site allocations proposed in the current consultation has been undertaken, which indicates that, of the 47 sites (housing and employment) 14 are not within a CDA, and 1 site is only within an old CDA. 14 sites are within both the old and new CDA's, and there are 18 of the sites which now fall within the new CDA's. Details are set out below:

- Childerditch Industrial Estate (ref. 112A) - Not In CDA
- William Hunter Way car park, Brentwood (ref. 102) - In New Only
- Land at Alexander Lane, Shenfield (ref. 87) - In Both
- Wates Way Industrial Estate, Ongar Road, Brentwood (ref. 3) - In New Only
- Horndon Industrial Estate, Station Road, West Horndon (ref. 21) - In Both
- Westbury Road Car Park, Westbury Road, Brentwood (ref. 39) - In New Only
- Chatham Way/Crown Street Car Park, Brentwood (ref. 40) - In New Only
- Land at Hunter House, Western Road, Brentwood (ref. 41) - In New Only
- Council Depot, The Drive, Warley (ref. 81) - In New Only
- Land west of Warley Hill, Pastoral Way, Warley (ref. 83) - In New Only
- Land adjacent to Tipps Cross Community Hall, Blackmore Road, Tipps Cross (ref.085B) - Not In CDA
- Brentwood railway station car park (ref. 2) - In Both
- Sow & Grow Nursery, Ongar Road, Pilgrims Hatch (ref. 10) - In New Only
- Land adjacent to Ingatestone by-pass (part bounded by Roman Road, south of flyover) (ref.079A) - In Both
- Land south of Redrose Lane, north of Woollard Way, Blackmore (ref. 77) - Not In CDA
- Land south of Redrose Lane, north of Orchard Piece, Blackmore (ref. 76) - Not In CDA
- West Horndon Industrial Estate, Childerditch Lane, West Horndon (ref. 20) - In Both
- Land at Honeypot Lane, Brentwood (ref. 22) - In New Only
- Land off Doddington Road, either side of A12, Brentwood (ref. 023A) - In New Only
- Land east of Nags Head Lane, Brentwood (ref. 32) - In New Only
- Officer's Meadow, land off Alexander Lane, Shenfield (ref. 34) - In Both
- Land at Priests Lane (west), Brentwood (ref. 44) - In Both
- Land adjacent to Carmel, Mascalls Lane, Warley (ref. 27) - In New Only
- Land adjacent to Ingatestone by-pass (part bounded by Roman Road) (ref. 079C) - In Both
- Ingatestone Garden Centre, Roman Road, Ingatestone (ref. 128) - In New Only
- Land East of Horndon Industrial Estate (ref. 152) - In New Only
- Land North of A1023 Chelmsford Road, Shenfield (ref. 158) - In Both
- Land at Priests Lane (east) adjacent Bishops Walk, Brentwood (ref.178) - In Both
- Land at Crescent Drive, Brentwood (ref. 186) - In Both
- Land south of East Horndon Hall (ref. 187) - Not In CDA
- Childerditch Industrial Estate (ref. 112D) - Not In CDA
- Brizes Corner Field, Blackmore Road, Kelvedon Hatch (ref. 194) - Not In CDA
- Site adjacent to Ingatestone Garden Centre (former A12 works site) (ref. 106) - In New Only

- Land to the north of Alexander Lane, Shenfield (ref. 235) - In Both
- Land east of Chelmsford Road, Shenfield (ref. 263) - In Both
- Oak Hurst, Chelmsford Road, Shenfield (ref. 276) - In New Only
- Chestnut Field, Backmore Road, Hook End (ref. 294) - Not In CDA
- The Eagle and Child Public House, Chelmsford Road, Shenfield (ref. 311) - In Both
- Ford Warley - Northern Site (ref. 117B) - In New Only
- Ford Warley - Southern Site (ref. 117A) - Not In CDA
- Land off Stocks Lane, Kelvedon Hatch (ref. 075B) - Not In CDA
- Childerditch Industrial Estate (ref. 112E) - Not In CDA
- Brentwood Enterprise Park (M25 Works Site at A127/M25 junction 29) (ref. 101A) - Not In CDA
- Land off Doddington Road, either side of A12, Brentwood (ref. 023B) - In New Only
- Codham Hall Farm (ref. 101C) - Not In CDA
- Codham Hall Farm (ref. 101D) - Not In CDA
- Dunton Hills Garden Village (ref. 200) - In Old Only

4.133 As a result ECC recommends that any changes arising from the SWMP review will need to be taken into account and inform the preparation of the pre-submission plan.

4.134 ECC recommends site specific policies relating to each of the sites that are now within CDA areas. Some suggested working is set out below:

The site is located within a Critical Drainage Area (CDA). This development may have the potential to impact on the CDA in respect of surface water flooding. As a result of this the site is likely to require an individually designed mitigation scheme to address this issue.

4.135 ECC advises that it is not clear whether the flood extents within the original SWMP documents have been used for determining surface water flood risk on the preferred site allocations or whether BBC have used the Environment Agency's Risk of Flooding from Surface Water Flood map. If the original SWMP extents have been used then further analysis will be necessary to understand the impact that this will have on the proposed housing and employment allocations.

4.136 ECC as Lead Local Flood Authority has provided comments throughout the Draft Local Plan process to ensure the delivery of Sustainable Drainage Systems to provide water quality, amenity and ecological benefits. ECC seeks further discussions with BBC to ensure its Local Plan policies comply with ECC requirements.

- 4.137 The adopted ECC Sustainable Urban Drainage Systems (SuDs) Design Guide should form part of the Plan making process, both in terms of policy formation and supporting evidence base work,.

Delivery of proposed development –

- 4.138 Paragraph 162 of the NPPF states that LPAs should work with other authorities and providers to assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk, and its ability to meet forecast demands. An IDP will need to be prepared to support the BBC Local Plan, and identify infrastructure required. The Local Plan should make clear, for at least the first five years, what infrastructure is required, who is going to fund and provide it, and how it relates to the anticipated rate and phasing of development. For the later stages of the Plan period it might be acceptable for less detail to be provided as the position regarding the provision of infrastructure is likely to be less certain. If it is known that a development is unlikely to come forward until after the Plan period due, for example, to uncertainty over deliverability of key infrastructure, then this should be clearly stated in the Draft Plan. As stated earlier, until appropriate work on infrastructure provision has been undertaken, and ECC has reviewed and confirmed its satisfaction with the work, it is recommended that ECC continues to withhold support for the Draft Plan.
- 4.139 Alongside the provision of infrastructure such as improved roads and public transport and the provision of schools to support and accommodate future growth, ECC would strongly advise that the provision of flood and drainage infrastructure is included within the IDP. This would be to alleviate any existing drainage and flood risk concerns and accommodate and support future development. ECC would also strongly advise the inclusion of details on the costing of such infrastructure.
- 4.140 ECC recommend the inclusion of a specific overarching section 106 and CIL policy to ensure a consistent approach and framework for the delivery of relevant infrastructure from developers. This approach would bring together the individual policy requirements and support the provision of further supplementary planning documents and/or CIL Regulation 123 Charging Schedule.
- 4.141 The new policy should consider covering the following:
- Specify when developers are required to either make direct provision or to contribute towards development for the provision of local and strategic infrastructure required by the development (including land for new schools);
 - Requirements for all new development to be supported by, and have good access to all necessary infrastructure;

- Requirement to demonstrate that there is or will be sufficient infrastructure capacity to support and meet all the necessary requirements arising from the proposed implications of a scheme (i.e. not just those on the site or its immediate vicinity) and regardless of whether the proposal is a local plan allocation or a windfall site;
- When conditions and/or planning obligations will be appropriate - as part of a package or combination of infrastructure delivery measures – likely to be required to ensure new developments meets this principle; and
- Consideration of likely timing of infrastructure provision – phased spatially or to ensure provision of infrastructure in a timely manner.

4.142 Recommended wording for an 'Infrastructure delivery and impact mitigation' policy is provided below.

Policy X: Infrastructure delivery and impact mitigation

Permission will only be granted if it can be demonstrated that there is sufficient appropriate infrastructure capacity to support the development or that such capacity will be delivered by the proposal. It must further be demonstrated that such capacity as is required will prove sustainable over time both in physical and financial terms.

Where a development proposal requires additional infrastructure capacity, to be deemed acceptable, mitigation measures must be agreed with the Council and the appropriate infrastructure provider. Such measures may include (not exclusively):

- *financial contributions towards new or expanded facilities and the maintenance thereof;*
- *on-site construction of new provision;*
- *off-site capacity improvement works; and/or*
- *the provision of land.*

Developers and land owners must work positively with the Council, neighbouring authorities and other infrastructure providers throughout the planning process to ensure that the cumulative impact of development is considered and then mitigated, at the appropriate time, in line with their published policies and guidance.

The Council will consider introducing a Community Infrastructure Levy (CIL) and will implement such for areas and/or development types where a viable charging schedule would best mitigate the impacts of growth. Section 106 will remain the appropriate mechanism for securing land and works along with financial contributions where a sum for the necessary infrastructure is not secured via CIL.

For the purposes of this policy the widest reasonable definition of infrastructure and infrastructure providers will be applied. Exemplar types of infrastructure are provided in the glossary appended to this plan.

Exceptions to this policy will only be considered where:

- it is proven that the benefit of the development proceeding without full mitigation outweighs the collective harm;*
- a fully transparent open book viability assessment has proven that full mitigation cannot be afforded, allowing only for the minimum level of developer profit and land owner receipt necessary for the development to proceed;*
- full and thorough investigation has been undertaken to find innovative solutions to issues and all possible steps have been taken to minimise the residual level of unmitigated impacts; and*
- obligations are entered into by the developer that provide for appropriate additional mitigation in the event that viability improves prior to completion of the development.*

- 4.143 EPOA is preparing a Viability Protocol by working with development interests to ensure the correct level of development related infrastructure is provided as well as a means to assist the LPAs unlock financial barriers that may hold up the development of housing.
- 4.144 Reference should also be made to the adopted ECC Developers' Guide to Infrastructure Contributions (2016), in relation to the level of contributions required from new development for the provision of essential infrastructure by ECC.
- 4.145 ECC would also recommend that there is a need to ensure that local facilities are in place to coincide with the completions of different phases of development. This will need to be progressed through the IDP to support the pre submission plan.
- 4.146 ECC recommends that BBC should seek to produce a Development Plan Document (DPD) to support the planning policy position for DHGV, and provide clarity of the deliverability of the allocation. This will ensure that the development can be delivered with the appropriate infrastructure and phasing. This is an approach that has been taken by the three North Essex LPA's in their part 1 Local Plans.

Employment Land – Need and Supply

- 4.147 ECC acknowledges the ambition to develop new key strategic employment sites but this needs to be set within the wider context of Brentwood's Spatial Strategy, and any location needs to be consistent with the criteria to seek to ensure future

developments are located in accessible locations reducing the need to travel. ECC therefore withholds support until the appropriate highway modelling has been undertaken, to assess both the site specific and cumulative impacts of such developments on the local, and wider, highway network.

- 4.148 ECC supports the proposed strategy of providing a range of employment and business development, through new employment (B use) land and existing employment sites, and their redevelopment where appropriate. However ECC considers uses should not be restricted to B use classes on allocated employment sites, other sectors, such as retail, hotel and leisure also need be provided for. Furthermore consideration should be given to the need for providing businesses with sufficient flexibility for them to function which reflects requirements for 'Grow-On Space'. ECC welcome the opportunity to engage with BBC in considering which interventions are the most appropriate and viable to ensure the Draft Plan provides flexible local employment space (such as flexible tenure) to meet the employment and economic needs of the Borough.
- 4.149 ECC welcomes and supports the ambition for economic growth in Brentwood Borough, seeking to deliver the upper range of employment land requirements, and notes the additional evidence base produced since the Draft Local Plan (2016) consultation, including the Economic Futures 2013-2033 (November 2017), and the Brentwood Economic Strategy (2017-2020).
- 4.150 As ECC advised under the Spatial Strategy section of this Appendix, concerns are raised over the allocation of 57% of the new employment land on one site, Brentwood Enterprise Park (BEP). The Economic Forecast Report also highlights concerns with regard to the considerable reliance on the BEP employment allocation. It is recommended that consideration be given to the phasing and deliverability of the site, to ensure a readily available supply of employment land across the short, medium and long term.
- 4.151 Furthermore ECC would draw attention to the 'red line' boundary for the Lower Thames Crossing major road scheme, which seeks to incorporate a significant part of the BEP employment allocation. Clarification is sought over the deliverability of the full allocation over the Plan period, particularly given the need for the site to come forward in the short, medium and long term.
- 4.152 ECC acknowledges the significant contribution the BEP allocation would make to meeting the employment needs of the borough over the Plan period. However, its location, in close proximity to the M25 and A127, which is presently over capacity, provides primarily car based connections to service centres, and potential sources of employees. The location is not favourable to sustainable transport measures and at present there is limited evidence regarding any potential connectivity of the proposed development via sustainable transport measures. Additional clarification will be required regarding opportunities for

such measures, and the output of any impact on the strategic junction, local road network, and potential mitigation requirements. The potential impact on the above would also depend on the mix of B1, B2 and B8 uses proposed on the site.

Part 2 – Preferred Site Allocations

- 4.153 It is recommended that area/site specific policies are included in the Pre-Submission Plan for preferred housing and employment sites, including DHGV. This would provide a clear picture of where development is to be focused and enable specific policy requirements to be outlined. This would cover infrastructure such as the need to provide land for a new school/EYCC facility, highway/access requirements, flooding and surface water mitigation and other community infrastructure requirements such as health services, as well as housing mix.
- 4.154 ECC recommends that BBC should seek to produce a Development Plan Document (DPD) to support the planning policy position for DHGV. This will ensure that the development can be delivered with the appropriate infrastructure and phasing.
- 4.155 Specific comments are also raised in relation to a number of the preferred sites set out in Part 2 of the consultation document, these are subject based and are set out below.

Education -

- 4.156 ECC advises that the accessibility of all housing sites to schools via safe direct walking and cycling routes must be considered. Particular attention should be paid to allocations 022 and 106.

Highways and Transportation (including sustainable and passenger transport) -

- 4.157 Whilst from a sustainable transport perspective it is a positive to see the reduction of car parking spaces through development of the car parks, ECC seek clarification on the balance to be achieved between providing residential development in the town centres, on sites currently providing car parking facilities, and the need to ensure local retail and leisure sector businesses continue to thrive and are provided with suitable facilities.
- 4.158 Many of the sites are reasonably well located and accessible, however it will still be important to ensure that additional passenger transport facilities and service funding is secured to enable the existing routes to be enhanced, in terms of frequency, quality and coverage/connectivity. Some of the more important ones are listed below.

- 4.159 The Draft Plan is light with regard to the specification of improved infrastructure to facilitate sustainable modes of accessibility throughout the Borough. There should be stated aspirations of infrastructure needs specified in the Draft Plan, to be addressed as and when opportunities arise.
- 4.160 There should also be enhanced arrangements to facilitate bus access at Brentwood Station (The Parade) and Shenfield Station.
- 4.161 Paragraph 67 - It is good to note the stated intention of the Council is to 'see an integrated and comprehensive approach to development' – this stance will certainly be beneficial when the LPA is considering the potential sustainable transport solutions necessary to serve its planned developments. It is likely that the Council will need to consider the cumulative impacts of adjacent / aligned developments, in order to ensure that through the pooling of contributions from sites, assurances can be obtained that sufficient pump priming funding can be provided to enable bus services at a suitably attractive level of frequency and quality can be procured for a sufficiently long bedding in period – thus containing the impact of developments on the local highway network.
- 4.162 Specific comments relating to a number of the preferred site allocations are set out in the table below:

Site Allocation Nos.	Comments
002	<p>One of the constraints listed is the fact that car parking (station users) will need to be considered as part of redevelopment proposals. Reference should be made to other station users, such as pedestrians, cyclists and those who use public transport to access the site.</p> <p>Development for this site needs to ensure that monies are secured to improve the sustainable transport facilities at the rail station including both layover bays and departure stands.</p>
020 / 021 / 152	<p>Need for clear, tested mitigation for impact on highway network, especially the A127 and A128.</p> <p>Development on these sites will need to be viewed from a holistic perspective to ensure that they contribute to a pool of funding to provide an enhanced level of bus service to serve the 580 homes planned. It will also be important to ensure that the design layout of the sites facilitates sustainable access, ideally with bus gates or other interventions designed to maximise such access whilst giving these modes a journey time advantage.</p>
022	<p>Development on this site will need to be contribute to a pool of funding to provide an enhanced level of bus service which will be especially important to ensure that it adequately serves the 200 senior citizen's homes planned. It will also be important to</p>

Site Allocation Nos.	Comments
	ensure that the design layout of the site facilitates sustainable access, ideally with bus gates or other interventions designed to maximise such access whilst giving these modes a journey time advantage.
032	Development on this site will need to contribute to a pool of funding to provide an enhanced level of bus service to serve the 125 homes planned. It will also be important to ensure that the design layout of the site facilitates sustainable access, ideally with bus gates or other interventions designed to maximise such access whilst giving these modes a journey time advantage.
034, 087, 235 & 276	Development on these sites will need to be viewed from a holistic perspective to ensure that they contribute to a pool of funding to provide an enhanced level of bus service to serve the 825 homes planned. It will also be important to ensure that the design layout of the sites facilitates sustainable access, ideally with bus gates or other interventions designed to maximise such access whilst giving these modes a journey time advantage.
081	Development on this site will need to be viewed from a holistic perspective to ensure that it contributes to a pool of funding to provide an enhanced level of bus service to serve the 473 homes planned. It will also be important to ensure that the design layout of the site facilitates sustainable access, ideally with bus gates or other interventions designed to maximise such access whilst giving these modes a journey time advantage.
101A	<p>Impact on the A127 and B186 requires full traffic assessment. Main access for this site to be J29. The secondary bus access onto B186 Warley Street will require significant highway improvement.</p> <p>Its location provides primarily car based connections to service centres, and potential sources of employees.</p> <p>Consideration should also be given to other modes of sustainable transport facilities. It should be noted that the B186 is not conducive to cycling and walking. Significant upgrade of the facilities for pedestrians and cyclists is required.</p> <p>There is still limited evidence regarding any potential connectivity of the proposed development via sustainable transport measures.</p> <p>This location is not favourable for sustainable modes of transport to be used to access the site apart from buses which have been briefly mentioned. BBC must ensure that any development in this area has a site wide Travel Plan written and implemented.</p>

Site Allocation Nos.	Comments
	There is major employment development planned adjacent to junction 29 of the M25, whilst the outline narrative does indicate that there is potential for bus links to be created, there is no further commitment to what this might look like and how it will be provided.
101C and 101D	Impact on the A127 needs to be fully assessed and suitable mitigation identified. Provision of sustainable modes of transport facilities are also required
112D and 112E	<p>Impact of development on the A127 needs to be fully assessed with significant improvement to the junction with the A127 / Childerditch Lane.</p> <p>Within the expansion and improvements, connectivity should be developed for accessing the sites via sustainable transport measures.</p> <p>The A127 does act as a deterrent for people using sustainable modes of transport..</p>
117A & B	Development on these sites will need to be viewed from a holistic perspective to ensure that they contribute to a pool of funding to provide an enhanced level of bus service to serve the 473 homes planned. It will also be important to ensure that the design layout of the sites facilitates sustainable access, ideally with bus gates or other interventions designed to maximise such access whilst giving these modes a journey time advantage.
158	Development on this site will need to be viewed from a holistic perspective to ensure that it contributes to a pool of funding to provide an enhanced level of bus service to serve the 825 homes planned. It will also be important to ensure that the design layout of the site facilitates sustainable access, ideally with bus gates or other interventions designed to maximise such access whilst giving these modes a journey time advantage.
187	<p>The impact of development on the A127 / A128 interchange is required. The proposals to improve the A127/A128 junction include widening / realignment of slip lanes for which land may be required. Therefore this area should be safeguarded.</p> <p>Consideration must be given to how residents will access nearby railway stations using sustainable transport.</p> <p>Good connectivity to the larger towns and employment opportunities via network of cycle paths should also be provided.</p>
200	Transport Assessment required to fully assess the impact on the A127 and A128. Brentwood needs to be aware of and acknowledge the A127 Corridor for Growth proposals one of which is to widen the A127 to 3 lanes. This will require land to

Site Allocation Nos.	Comments
	<p>both north and south of the corridor and therefore land should be safe guarded in the local plan to accommodate this future highway improvement.</p> <p>Consideration must be given to how residents of the new village will access nearby railway stations using sustainable transport.</p> <p>Good connectivity to the larger towns and employment opportunities via network of cycle paths should also be provided.</p> <p>Development throughout this site will need to be viewed from a holistic perspective to ensure that it contributes to a pool of funding to provide an enhanced level of bus service to serve the 4000 homes planned. It will also be important to ensure that the design layout of the site facilitates sustainable access, ideally with bus gates or other interventions designed to maximise such access whilst giving these modes a journey time advantage.</p>
263	<p>Development on this site will need to be viewed from a holistic perspective to ensure that it contributes to a pool of funding to provide an enhanced level of bus service to serve the 825 homes planned. It will also be important to ensure that the design layout of the site facilitates sustainable access, ideally with bus gates or other interventions designed to maximise such access whilst giving these modes a journey time advantage.</p>

Economy -

- 4.163 ECC questions the inclusion of site 121 (Mellon House) in the calculations of existing allocated employment land given evidence which advises that this site has been sold to a residential developer. The site has Permitted Development approval for 70 flats and planning permission granted for an additional 5 penthouses.
- 4.164 ECC seeks clarification over the assumptions and considerations taken when determining the delivery forecast figures assigned to the employment sites, other than BEP.
- 4.165 ECC seek clarification on the balance to be achieved between providing residential development in the town centres, on sites currently providing car parking facilities, and the need to ensure local retail and leisure sector businesses continue to thrive and are provided with suitable facilities.
- 4.166 Specific comments relating to a number of the preferred site allocations are set out in the table below:

Site Allocation Nos.	Comments
101A	ECC is supportive of bringing forward new high quality employment areas, which can create a genuinely new offer for Essex. However ECC have significant concerns about the deliverability of the site (see earlier comments in this Appendix). BBC could be exposed to significant risk in terms of achieving employment land targets. If this site is delayed or fails to deliver, given that the next largest new commercial allocation only accounts for 12% of the overall target. Consideration needs to be given to both private and public transport links to the town centre and other key areas in order to ensure there is an adequate supply and access to skills/talent to support potential jobs created by the site. Concerns that this out-of-town development is the only sizeable proposal for job creation, with little commercial space remaining in/near the town centre, what alternatives are proposed if this venture is not successfully delivered?
117a & 117b	Significant concern about the potential loss of a key local employer (Ford) if site is lost to residential. Brentwood has already lost BNY Mellon, EMoov in the last year.
187	Consideration should be given to including site as part of the DHGV (ref 200), to support the creation of a comprehensive masterplan.
200	Master planning is required in conjunction with neighbouring LPA's, and in the context of emerging South Essex 2050 vision.

Historic Environment – Listed Buildings, Conservation Areas, and Archaeology

4.167 ECC welcomes the inclusion of the historic environment, in the form of listed buildings and conservation areas, when considering sites for selection. However the setting of heritage assets and the overall historic environment, including archaeology and landscape, should also form part of these considerations, which is currently omitted.

4.168 Specific comments relating to a number of the preferred site allocations are set out in the table below:

Site Allocation Nos.	Comments
003	Opportunity: Former Iron Works site could provide opportunity for promoting the history of this former industrial production
039	Constraint: Archaeological potential for the historic core of Brentwood
040	Constraint: Archaeological potential for the historic core of Brentwood
041	Constraint: Archaeological potential for the historic core of Brentwood
039, 040 and 102	These all form car parks within the historic town centre.

Site Allocation Nos.	Comments
	Consideration will need to be given to alternative car parking provision and the potential for the loss of these car parking area to create either large areas of on-street parking or to discourage people from using the town centre. The former has the potential to unduly impact on the character and appearance of the conservation area, whilst the latter has the potential to harm the viability of listed buildings in commercial use
039, 041 and 102	Although none of these are objectionable in principle, they occupy important town centre locations and will need to be considered holistically as opposed to in isolation from each other
	Constraint: Known historic settlement complex, will require significant archaeological investigation Constraint: Potential historic settlement complex, likely to require significant archaeological investigation
076	Constraint: Potential archaeology associated with historic settlement
077	Constraint: Potential archaeology associated with historic settlement
102	Constraint: Archaeological potential for the historic core of Brentwood
106	Constraint: Roman Road runs through site
187	Given its intentionally prominent location within the landscape, this allocation also needs to consider the setting of the Church of All Saints located to the north of the A127 Constraint: Setting of East Horndon Hall and the setting and views of the church to the north of the A127
200	The site will completely surround Dunton Hills, with the potential to cause substantial harm to the heritage asset as per paragraph 133 of the NPPF (dependent on the contribution which its setting makes to its significance). It also heavily intrudes on the setting of Dunton Hall and the Church of St. Mary, which read as an historic church hall complex, the isolated setting of which makes an important contribution to their significance. Constraint: Historic Church Hall complex on boundary will impact on setting. Likely to contain further extensive archaeological deposits

Dunton Hills Garden Village (DHGV) -

- 4.169 ECC advise that if the DHGV allocation is being proposed as a 'Garden Village' it is recommended that the Garden City principles as outlined in the NPPF (paragraph 52) and the 2013 TCPA's publication "Creating garden cities and suburbs today" are incorporated into the Draft Plan policy to ensure delivery.
- 4.170 Paragraph 67 - This paragraph implies that, at some stage, the Dunton Hills Development is expected to increase from 2500 homes to 3500 homes. It will be important therefore in considering the initial design layout for this development to ensure that sufficient and appropriate access is provided for sustainable modes, to enable it to be served both in the initial and extended scenarios. This will likely mean safeguarding corridors for sustainable modes to traverse between the two phases. However paragraph 84 refers to pupil numbers based on the site accommodating 4000 dwellings as does the narrative for the site on P91.

General Comments

- 4.171 A number of general comments to support consistency and clarity are provided for the consideration of BBC as it finalises its new Local Plan.
- 4.172 ECC advises that developers of new sites with more than 30 premises can obtain free Fibre to the Premises (FTTP) provided by both BT Openreach and Virgin Media, giving access to ultrafast broadband speeds.
- 4.173 ECC recommends that the Essex Design Guide 2018 is referenced within the Draft Plan, and consideration given to embedding its principles into any design policies and supporting text, as the Draft Plan progresses to its pre-submission stage.
- 4.174 Figure 12 - It would appear that most of the areas identified for Registered Care are reasonably well located in terms of access to bus services, which is positive. Similar attention to detail should be employed when considering the locating of affordable homes, which are another group that proportionally tend to rely more heavily on bus services.
- 4.175 ECC advises that the [Sustainable Modes of Travel Strategy](#) (SMOTS) produced by ECC should be included within the evidence base. This strategy outlines the steps the authority are taking to enable accessibility to places of employment and education for all, including other neighbourhood services such as retail and leisure; with the associated health, social and economic benefits to them and their communities. The adoption of this Strategy provides the framework for the Council and its partners to co-ordinate the provision of services and infrastructure to achieve its objectives.

Green Infrastructure -

- 4.176 Green Infrastructure (GI) is a network of multi-functional high quality green spaces and other environmental features, (such as street trees, green roofs and walls, which together deliver multiple environmental, social and economic benefits , that contribute to the quality, attractiveness and distinctiveness of the Borough. A number of the site allocations do not mention the opportunities to enhance the GIs, and ECC seek clarity on how GIs will be integral to all site allocations (including those for commercial and educational developments).
- 4.177 The Forestry Commission produced a report on the economic value of Green Infrastructure. Within this report it states that the perceptions of a region can be a barrier to recruitment for businesses within that region, especially in relation to highly qualified staff. However, high quality GIs will have a benefit on people's health, wellbeing, quality of life and contribute to improved educational capability. The investment into maintenance and creation of high quality GIs can act to encourage and attract commercial industry, entrepreneurs and workers to that region.
- 4.178 A strong example of this is from the north of England, that of Riverside Park Industrial Estate in Middlesbrough where investment in the GI of the park created a setting for stimulating business growth and investment. The redeveloped site attracted new, high profile, occupants and saw occupancy grow from 40% to 78%, and levered over £1 million of private investment ([CLES/Groundwork, 2007](#))
- 4.179 Every development has the potential to enhance and create new GI and contribute to creating green corridors for better connectivity of the GI network. Therefore, ECC recommend that there should be a consideration for new housing and commercial development to have reasonable access and distance to green spaces and which includes the requirement to create new green spaces. Natural England produced a [guide](#) to help decision makers to ensure that everyone has access to good quality natural greenspace near to where they live and work. Accessible Natural Greenspace Standard (ANGSt) recommends for example green space of at least 2 hectares in size, no more than 300 metres (5 minutes' walk) from home and one accessible 100 hectare site within five kilometres of home. Another example is Bristol City which has put in place a distance standard to protect and promote an accessible network of green space, based on research with residents and layout to ensure credibility, including requiring a distance to the nearest green space of 400 metres or 9 minutes' walk, and natural green space within 700 metres 18 minutes' walk etc. ([Bristol's Parks and Green Space Strategy, 2008](#)).
- 4.180 ECC welcomes the opportunity to engage with BBC to ensure that GI is imbedded in its Draft Plan.