

Local Plan 2015- 2030

**Preferred Options for
consultation**

DRAFT

June 2013

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Chapter 1: Introduction and Context

1.1 Welcome to Brentwood Borough Local Plan. This plan sets out a long term vision for how the Borough should develop by 2030 and the Council's strategy and policies for achieving that vision. The plan proposes land allocations for development and planning policies to guide decisions on the location, scale and type of development and changes in the way land and buildings are used.

1.2 The Council would like your views on our preferred approach and alternatives. Following consultation we will consider all comments received and, depending on issues raised, may amend the plan in light of these. There will then be a further opportunity to comment prior to the Council submitting the plan to the Secretary of State for examination by an independent inspector.

1.3 Once adopted, the plan will be a statutory document and a material consideration in determining planning applications. Some background to the document preparation is given in the paragraphs that follow.

Legislation and national policy

1.4 This plan covers the whole of the Borough of Brentwood and has been prepared in light of the Planning and Compulsory Purchase Act 2004, the Localism Act 2011 and the Town and Country Planning (Local Planning) Regulations 2012. It takes account of the National Planning Policy Framework (March 2012), Planning Policy for Traveller Sites and National Policy Statements.

The Localism Act 2011

1.5 This Act introduces some major changes to the planning system, abolishing regional plans and introducing a new tier of neighbourhood planning. The East of England Plan was revoked in January 2012. The system remains 'Plan led', which means the Local Plan provides the starting point for taking decisions on new development.

1.6 In future the development plan will comprise the Local Plan together with any neighbourhood plans that are produced.

National Planning Policy Framework

1.7 The National Planning Policy Framework (NPPF) (2012) states that each local authority should produce a Local Plan for its area which can be reviewed in whole or in part. Additional planning documents should only be used where justified. This differs from the previous Local Development Framework system with its suite of documents with an overarching Core Strategy.

Developing the local plan

1.8 The plan has been drawn up following extensive consultation and is supported by evidence from a variety of sources.

Consultation

1.9 During November and December 2009, Brentwood Borough Council and Local Strategic Partnership consulted on issues and options facing the Borough up to 2031. Copies of the *Pathway to a Sustainable Brentwood consultation* leaflet were sent to all Borough residents and other stakeholders. Views were sought on a vision, objectives, spatial options to guide future development in the Borough and broad themes, such as sustainable use of resources, environmental protection, and meeting people's needs. Focus groups reflecting on key issues raised by the consultation were held in January 2010.

1.10 Between 2007 and 2010 there were separate consultations on a Gypsy and Traveller Development Plan Document. However, the document did not proceed to adoption.

1.11 Following the 2009 Consultation, for pragmatic reasons and in light of changing national policy and legislation the Council decided to bring the Core Strategy together with site allocations and development management policies and produce a Local Plan rather than a suite of separate documents as part of a Local Development Framework. This approach seemed consistent with the new approach to planning that was emerging and is reflected in subsequent legislation and national policy guidance.

1.12 Reflecting a new emphasis on localism and to give local people an opportunity to participate in planning, in May and June 2011 the Council undertook a comprehensive neighbourhood consultation. The consultation sought views on priorities for the Local Plan, neighbourhoods, housing numbers and potential sites and took the form of a questionnaire delivered to every household, 16 street consultation events and four stakeholder workshops. Consultation on potential housing sites (SHLAA areas) formed part of the process. More than 3,000 people responded to the consultation with around 1,000 people taking part in the consultation events.

Sustainability Appraisal

1.13 Sustainability Appraisal (SA) is an exercise carried out at key stages in preparing the local plan and a statutory requirement. The SA considers potential impacts of the plan on economic, social and environmental considerations, and incorporates the requirements of the European Directive on Strategic Environmental Assessment.

1.14 An SA has been carried out at Issues and Options stage for the Core Strategy, for development plan work on Gypsy and Traveller sites and at the present preferred options Local Plan stage. SA recommendations at each stage have informed the production of this plan.

Habitats Regulation Assessment

1.15 In accordance with Regulation 61 of the Conservation of Habitats and Species Regulations 2010 a Habitats Regulation Assessment (HRA) screening has been carried out to determine whether this draft Local Plan is likely, either alone or in combination with other plans and projects, to have a significant effect upon the international sites identified. The results of the HRA have yet to be confirmed, however no significant effect is anticipated.

Borough Context

1.16 This plan has been prepared in the context of the Council's Corporate Plan 2013-16. This identifies the following overarching priorities:

Corporate Plan 2013-2016

- 1 – *Street Scene and Environment*
- 2 – *Localism*
- 3 – *A Prosperous Borough*
- 4 – *Housing, Health and Wellbeing*
- 5 – *A Safe Borough*
- 6 – *A modern council*

A new Local Development Plan, to be adopted by 2014, will shape the way our borough will change over the next fifteen years. We will work hard to get the best outcome and achieve a good balance for residents, business and the economy in a way that celebrates Brentwood's unique history and quality of life; both within the borough and influencing the outcome of regional developments that will affect Brentwood residents

Priority 3 – A Prosperous Borough

Brentwood is a clean, green and pleasant borough. Maintaining and improving this involves not just the council but also our communities and many partners. We will find new ways of working with our partners and communities, and improve the way we play our part, to enhance the environment and attractiveness of the borough

Priority 1 – Street Scene and Environment

4.1 Corporate Priorities most relevant to the Local Plan are as follows:

- *Set planning policy that supports discerning economic growth and sustainable development*
- *Implement a planning framework to guide and enable infrastructure delivery*

- *Promote a mixed economic base across the Borough, maximising opportunities in the town centres for retail and a balanced night time economy*
- *Broaden the range of housing in the Borough to meet the needs of our population now and in the future, with new planning policies that help to ensure we will have the right mix of homes in our towns and villages*

Brentwood – Key Characteristics

1.17 The Borough of Brentwood is in the south-west of the county of Essex to the east of the Greater London Metropolitan area. All of the Borough's countryside lies within Metropolitan Green Belt and the Borough has a total area of approximately 15,300 hectares. The population in 2011 was 73,601 (Census) of which approximately 70% live in Brentwood town. The Borough contains attractive countryside with a variety of landscapes and settlements ranging from the town of Brentwood, the historic village of Ingatestone, to small villages and hamlets.

Economy and Employment

1.18 Brentwood Borough has a successful and buoyant local economy, providing for over 30,000 jobs.

1.19 Banking and finance is the main business sector followed by distribution/hotels/restaurants and public services. The local business structure is dominated by micro (1-10 employees) and small businesses (11-49 employees), while entrepreneurial activity is high. Office employment areas are mainly in Brentwood town centre, Brentwood station area and Warley Business Park. Major employers include BT, BNY Mellon, Countryside Properties Ford, and Océ. Despite the Borough's rural character employment in agriculture is below the national average, as is manufacturing.

1.20 Three quarters of the Borough population is of working age. This proportion has fallen over time as the population ages. There continues to be a rise in the number of people of working age in the Borough, but a disproportionate rise in the number of older people. Average weekly wages for those who live here but work elsewhere are higher than those who work in the Borough. A high proportion of people are employed as managers, senior officials, and in associated professional and technical occupations, reflecting the number of people commuting to places like Central London.

1.21 New employment land in the Borough is constrained by its Green Belt location. The current availability of undeveloped allocated employment land is limited.

Shopping, Leisure, Arts and Community

1.22 Brentwood Borough offers a wide range of retail, leisure and community facilities. The main shopping area, Brentwood Town Centre, is centred on the High Street. District centres at Shenfield Hutton Road, Ingatestone High Street, and many smaller local parades and individual shops

serve residential areas and villages. Each centre plays an important role providing a range of essential local services.

1.23 The Borough benefits from extensive open areas for informal recreation. South Weald and Thorndon Country Parks, provide 324 hectares of open space along with numerous publicly accessible playing fields, parks, woodlands and amenity greens. Brentwood Leisure Centre and Shenfield Sports Centre along with privately run sports and leisure facilities are the focus for indoor sport and recreation.

1.24 Local facilities, such as parish, village and neighbourhood halls provide for a range of community and cultural activities, such as play groups, clubs, social activities and public meeting space. The Borough has a thriving community arts sector, including over 70 organisations and societies who deliver high quality events throughout the year.

Transport and Travel

1.25 Brentwood is well connected to road and rail networks. Major roads such as the M25, A12 and A127 run through the Borough and the M11 and Stansted Airport are within easy reach. Despite good accessibility and location, traffic congestion is one of the main issues affecting quality of life and local economic performance. Brentwood has a very high level of car ownership compared to the national average. Without alternative means of transport the use of cars will continue to be an essential factor in access to services, employment and leisure. Therefore the delivery and encouragement of sustainable transport alternatives is essential.

1.26 There are four rail stations in the Borough: Ingatestone, Shenfield and Brentwood stations on the Great Eastern Main Line and West Horndon station on the Fenchurch Street to Southend line. Fast train services stop at Shenfield and Ingatestone; metro services stop at Brentwood and Shenfield. In future Crossrail will replace the existing metro service, stopping at Brentwood and terminating at Shenfield. Crossrail will provide the Borough with an improved train service, increased capacity, station improvements and a direct link to London Heathrow airport.

1.27 Bus services are centred on Brentwood town with links to other parts of the Borough and centres outside. Bus services in more rural areas are limited, particularly at off-peak times.

1.28 The percentage of those who cycle to work is below the national average, but more people walk to work than average. Encouraging sustainable travel patterns is of key importance.

Environment and Resources

1.29 The Borough has significant built and natural heritage: 500+ Listed Buildings, 13 Conservation Areas, 12 Scheduled Ancient Monuments, 100s of sites of archaeological interest, accessible countryside and parks, varied landscapes and numerous Local Wildlife Sites. Together, these features provide an attractive, sought after environment for residents, visitors and business.

1.30 Development, whether existing or new, invariably places demands on the environment. Among these are unsustainable use of resources (materials, water, energy), waste disposal issues, pollution (of air, water or soil) and loss of or harm to wildlife habitats, historic buildings and landscapes.

1.31 The Borough, in common with other places, depends on fossil fuel energy for homes, business and transport, and other finite resources, such as water and land. Fossil fuel energy gives rise to greenhouse gas emissions and climate change and in future may not be readily available in the way it has been in the past. We therefore need alternatives, including renewable energy and local supplies. Agricultural land grades 1, 2 and 3a is the best and most versatile land, a national resource that needs protecting. Brentwood contains grades 2 and 3a land.

1.32 This plan places a high priority on the prudent use and good management of resources and effective protection for the environment. Both the form and location of future development and how buildings and land are used are fundamental to safeguarding those qualities which make Brentwood special and ensure these continue to be available for future generations to enjoy.

Vision

1.33 The Borough Council has the following vision to describe the type of place we want the Borough to be in the period up to 2030 and beyond:

The Borough of Brentwood will continue to be a thriving, attractive and unique destination for people to live, work and visit by protecting and nurturing its existing high quality environment, growing its prosperous local economy and fostering development which is responsive to local community needs.

Outstanding leisure opportunities and high quality greenspaces such as Thorndon and Weald Country Parks will continue to be a significant attraction. Brentwood Town Centre will expand its focus for niche shopping, quality employment, exciting cultural opportunities and super connectivity into London via Crossrail. This combined with surrounding attractive countryside and villages will continue to make the Borough of Brentwood a destination of choice.

Brentwood will grow sustainably with new development directed to locations well served by local services and facilities to help further improve existing and new residents' quality of life. This will be achieved by realising opportunities to enhance the quality and character of places and provision of facilities, and minimising the negative impacts of development on people, the environment and resources.

Strategic Objectives

1.34 The following strategic objectives set out how the Borough Council intends to achieve the vision described above:

SO1 Direct development growth to the existing urban areas of Brentwood, Shenfield and West Horndon in locations well served by existing and proposed local services and facilities.

SO2 Manage development growth to that capable of being accommodated by existing or proposed infrastructure, services and facilities.

SO3 Foster a prosperous, vibrant and diverse local economy by attracting new commercial investment in order to maintain high and stable levels of economic and employment growth.

SO4 Expand and enhance Brentwood Town Centre's retail offer in particular opportunities for high quality niche shopping.

SO5 Promote and encourage the continued regeneration of Brentwood Town and Local Centres to provide high quality public realm and mixed use developments.

SO6 Optimise the social and economic benefits that arise from Crossrail for the benefit of residents and visitors to the Borough.

SO7 Safeguard the Green Belt and protect and enhance valuable landscapes and the natural and historic environment.

SO8 Plan for housing that meets the needs of the Borough's population and contributes to creating inclusive, balanced, sustainable communities.

SO9 Protect and nurture existing leisure, cultural and recreational assets such as the Borough's Country Parks for residents and visitors to the Borough and promote and enhance social inclusion, health and well being.

SO10 Improve public transport, cycling and walking facilities and encourage sustainable transport choices.

SO11 Secure the delivery of essential infrastructure, including transportation schemes and community facilities in order to support new development growth throughout its delivery.

Chapter 2: Spatial Strategy

2.1 The Spatial Strategy for Brentwood Borough provides the context for managing change and shaping how the area develops in future. The strategy sets out the level and location of development, highlights key areas of change up to 2030 and provides the basis for delivering strategic objectives, planning policies and land allocations. This overarching strategy applies to all development in the Borough. Core and Development Management Policies that follow provide the framework for its delivery.

S1: Spatial Strategy

The Council's preferred spatial strategy for the Borough aims to protect the Green Belt and local character and foster sustainable communities by focusing the majority of new development between 2015 and 2030 on land within accessible settlements. Brentwood, Shenfield and West Horndon will be the main focus for development along with the redevelopment of suitable developed sites in the Green Belt. Limited development, including infilling where appropriate, will take place in other villages at a level commensurate with services and facilities available and which maintains local amenity and distinctiveness.

All development sites will be identified having regard to whether they:

- a. are accessible to public transport, services and facilities**
- b. will have no significant impact on the Green Belt, visual amenity, heritage, transport and environmental quality including landscape, wildlife, flood-risk, air and water pollution**
- c. are likely to come forward over the plan period**

Other than that required to accommodate a strategic allocation at West Horndon and minor changes to accommodate proposed development on existing developed sites in the Green Belt, no change to Green Belt boundaries is envisaged.

Alternative Options

The following four spatial options were the subject of a public consultation in 2009 as part of a Core Strategy Issues and Options consultation.

Alternative Option 1: Centralise Growth in and around the town of Brentwood

Reason for rejection: The Council's preferred option is similar to this option since the majority of development is expected to take place in Brentwood. However, there are limits to how much development the town can sustainably accommodate. Having more than one strategic location for development will provide flexibility to meet development needs over the long term.

Alternative Option 2: Transport Led Growth - develop at settlements with a rail station, ie Brentwood, Ingatestone, Shenfield and West Horndon.

Reason for rejection: The Council's preferred option is a variant on the transport led option, since growth is planned for all places with a rail station, apart from Ingatestone, which is excluded due to infrastructure constraints and a lack of suitable sites.

Alternative Option 3: Semi Dispersed Growth (larger villages)

Reason for rejection: Under this approach it would be difficult to deliver sustainable development due to infrastructure constraints, notably a lack of sewerage treatment capacity to the north of the Borough, limited public transport to serve development, and poor access to services. There would be greater reliance on greenfield sites, which would lead to loss of Green Belt and detract from the quality and rural character of the Borough. One of the Borough's larger villages, West Horndon, is considered less affected by these constraints and a strategic allocation is proposed here.

Alternative Option 4: Dispersed Growth (all settlements).

Reason for rejection: The same concerns that apply to Option 3 apply here more strongly, Smaller settlements lack the infrastructure necessary to support development, such as local services and public transport and many are in areas of landscape sensitivity. Out of all options this approach would require the greatest investment in infrastructure. Development in remote locations would undermine the rural character of the Borough and increase car dependency. Feedback at issues and options stage showed the public oppose this option. Out of all options identified, it is the least sustainable and hardest to deliver.

Justification

2.2 The preferred approach seeks to conserve and enhance the character and quality of the borough and deliver development which meets the needs of all who live, work and spend their leisure time in the Borough. Key considerations are land availability, development requirements (informed by objectively assessed need), scale of growth proposed, the existing settlement pattern and hierarchy and capacity of places to accommodate growth in a sustainable manner. The Council has carefully considered evidence on all these matters from a variety of sources before reaching a view on the preferred spatial approach.

2.3 Brentwood and Shenfield are considered sustainable locations for growth, given excellent transport links, access to jobs and services and town centre facilities. Developing in the wider Brentwood Urban Area would support redevelopment and regeneration, underpin the viability of the town centre, and provide opportunities for development where access to services and jobs is greatest.

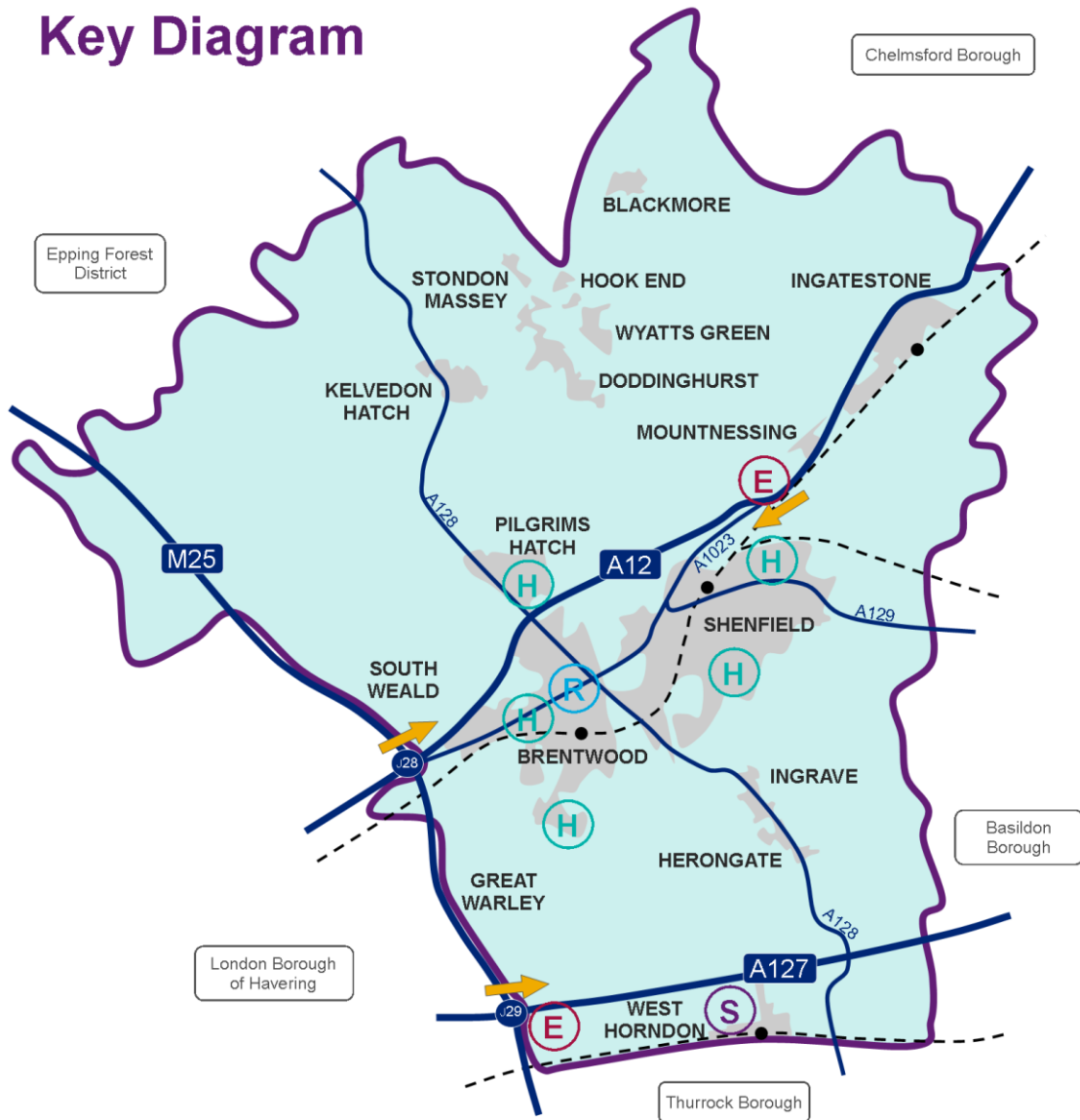
2.4 Having good road and rail access, local shops, employment and community facilities, West Horndon offers potential for sustainable

development over the long term. Developing here provides an opportunity to address conflicts arising from heavy freight passing through the village, strengthen the village centre, and improve service provision. Significant improvements to infrastructure and services would be required to support growth at West Horndon.

2.5 The key diagram below (Figure 2.1) shows the main aspects of the spatial strategy set within the broader local context.

Figure 2.1

Key Diagram



Key:

- Borough boundary
- Highway
- Road
- Railway
- Green Belt
- Existing urban area
- Key gateway

Broad Growth Locations:

- Employment growth
- Retail growth
- Strategic allocation (mixed-use)
- Housing (existing settlements & brownfield)

2.6 Key features of the preferred approach and a description of how it was arrived at is given in the following paragraphs.

Protecting the Green Belt and the quality and character of the Borough

2.7 Eighty per cent of the Borough lies in Green Belt. Residents place a high value on protecting the Green Belt viewing this as their top priority for the development plan along with protecting the quality and character of the Borough. Other than the redevelopment of already developed sites within the Green Belt and a strategic allocation in West Horndon, the aim will be to minimise development in the Green Belt.

Developing within existing settlements

2.8 Over the plan-period the majority of new development is expected to take place in existing built up areas, primarily through the development, conversion or re-use of previously developed land and buildings. The Council will take a pro-active approach towards identifying and securing development in these locations along with the benefits that redevelopment can bring, for example, an enhanced public realm and new facilities

Development in Villages excluded from the Green Belt

2.9 The Strategy allows for limited development in villages excluded from the Green Belt with a strategic allocation to be made at West Horndon. Taking into account homes already built and committed, together with the potential shown in the SHLAA, analysis of extant planning permissions and site appraisal work, 1700 new dwellings (net) can be expected to be built in these communities over the plan period, ie between 2015 and 2030. Out of this total, 1500 dwellings are expected to be built in West Horndon over the plan period.

Previously developed land within the Green Belt

2.10 Previously developed sites within the Green Belt in suitable locations adjacent to existing built up areas are expected to 178 of new dwellings (net). A strategic employment allocation at a former M25 works site will provide for new jobs and business.

Villages in the Green Belt

2.11 Other than small scale development to meet identified needs, very little development is expected to take place in these generally remote, landscape-sensitive locations which lack the facilities and infrastructure needed to support development.

Hierarchy of place

2.12 Within the Borough a settlement hierarchy can be discerned based on the characteristics of each settlement taking into account services and facilities available. These characteristics help suggest where might be best placed to accommodate growth in a sustainable manner.

Settlement Category 1: Main Town

2.13 Brentwood is the Borough's largest settlement and only town. Accessible and well served by public transport, with rail stations at Brentwood

and Shenfield, the town provides a range of shopping, employment areas, secondary schools, health and leisure facilities in close proximity to residential areas. Brentwood town centre is the Borough's main focus for shopping, community and leisure activities, supported by shopping facilities around the rail station and other local shopping parades. Within this settlement category, Brentwood and Shenfield offer the most scope to develop in accordance with sustainable development principles.

Settlement Category 2: Village Service Centres

2.14 A district shopping centre with a good range of jobs, community and health facilities, Ingatestone provides the second category in the hierarchy. As the Borough's largest village, facilities here serve a significant catchment beyond immediate area. Public transport accessibility is relatively good. The village has a rail station and secondary school. While Ingatestone has relatively good facilities, a modest level of development is envisaged here, due to infrastructure constraints and a lack of suitable sites.

Settlement Category 3: Larger Villages

2.15 Larger villages in the Borough are served by a local shopping parade and a primary school. They generally have limited community and health facilities, local jobs and a variable bus service. As well as these facilities, West Horndon has a rail station, significant employment area and potentially some redundant industrial land. Among the Borough's villages it offers the most scope for development. Remaining villages in this category are Blackmore, Doddinghurst, Herongate, Ingrave, Kelvedon Hatch and Mountnessing.

Settlement Category 4: Smaller Villages

2.16 These are remote, smaller settlements, with poor public transport, limited shops, jobs and community facilities and include the villages of South Weald, Great Warley and Hook End.

Background work to inform the Spatial Strategy

2.17 Brentwood Sustainability Appraisal at Core Strategy Issues and Options stage concluded that a combination of transport led growth and semi-dispersed growth would provide the greatest sustainability benefits for the Borough. However, this conclusion was reached prior to technical work carried out since which sheds further light on opportunities and constraints.

2.18 *Brentwood Water Cycle Study* identifies constraints to developing in the north of the Borough which has a lack of sewerage treatment capacity. This limits spatial options available but does not affect the Council's preferred strategy since proposed growth areas lie in central and southern parts of the Borough. Here there is more scope for sustainable development with better public transport, jobs and facilities and less impact on the Borough's landscapes and rural character.

2.19 Brentwood SHLAA and subsequent analysis of potential sites, identifies sufficient land required to deliver the preferred spatial strategy while offering flexibility in how this is achieved.

2.20 National policy advises that local plans should be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development. (NPPF, paragraph 182). Following a technical exercise to objectively assess development needs, as national policy requires, the Council has considered the implications for the Borough of meeting these needs. The preferred spatial strategy seeks to accommodate a significant proportion of this need. Due to significant capacity constraints, however, it is not possible to accommodate fully the scale of growth implied within the context of a coherent spatial strategy in accordance with sustainable development principles set out in the National Planning Policy Framework. Growth above a certain level would lead to significant impacts: notably harm to the landscape, Green Belt, settlement identity and character and town centre traffic congestion.

2.21 The NPPF advises planning authorities to look to neighbouring authorities to meet unmet need, where they cannot meet this themselves, through a 'Duty to Cooperate'. The Council is exploring options in this regard. Policies S2 and S3 below deal with the quantum of development.

Evidence

Brentwood Scoping and Outline Water Cycle Study (Entec, 2011)

Brentwood Strategic Housing Land Availability Assessment (SHLAA) (Atkins, 2011)

Landscape Sensitivity Testing and Green Belt Assessment (forthcoming)

Utilities Assessment (forthcoming)

Mid-Essex Landscape Character Assessment (2006)

Objectively Assessed Needs Assessment (PBA, 2013 forthcoming)

Transport modelling work (forthcoming)

Consultation

In 2009, the Council consulted on four spatial options as part of an Issues and Options consultation *Pathway to a Sustainable Brentwood*. The most popular was Option 1 - Centralise growth in and around the town of Brentwood, followed by Option 2 Transport led growth, and Option 3 - Semi-dispersed growth – develop around Brentwood town and the main villages. Option 4 - Dispersed growth - develop at all settlements across the Borough) was the least popular option.

National Policy

NPPF Paragraph 14: *At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking. For plan-making this means that:*

- *local planning authorities should positively seek opportunities to meet the development needs of their area;*

- *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change, unless:*
 - any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole; or
 - specific policies in this Framework indicate development should be restricted.

NPPF Core Principle, Paragraph 17: *Plans should set out a clear strategy for allocating sufficient land which is suitable for development in their area, taking account of the needs of the residential and business communities.*

NPPF, Paragraph 182: One of four ‘soundness tests’, the plan should demonstrate that it has been ‘Positively prepared’: *the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.*

S2: Amount and Distribution of Residential Development 2015-2030

Provision is made for 3,500 new dwellings (net) to be built in the borough between March 2015 and March 2030 at an annual average rate of 200 new dwellings 2015-2020 rising to 250 new dwellings 2020-30 to be distributed as follows:

Location	Number of net new dwellings	% of total requirement
Brentwood and Shenfield Urban Area	1,800	51%
West Horndon	1,500	43%
Villages excluded from the Green Belt (other than West Horndon)	200	6 %
Villages in the Green Belt	0-15	0-1%

Sites with a capacity for 10 or more dwellings (major housing sites) allocated for residential development are shown on the Policies Map.

Alternative Growth Options

Alternative Option 1 – 4,960 to 5,600 dwellings (331 to 373 homes a year) - Objectively Assessed Need

Reason for rejection

This level of growth would require significant Green Belt release, significantly worsen congestion in Brentwood Town Centre and irrevocably change the rural character of the Borough. Significant investment in infrastructure and services

would be required to support this level of growth and there is no guarantee this would be forthcoming. This option fits poorly with the Council's preferred spatial strategy and available alternatives.

Alternative Option 2 – 2,625 (175 homes a year) – (comparable to former RSS/East of England Plan target)

Reason for rejection

This level of growth could be accommodated with less Green Belt release than the Council's preferred option, relying mainly on redeveloping brownfield sites. While environmentally this option has clear advantages it would fall further short of objectively assessed need than the Council's preferred level of growth and may be harder to justify in light of national policy requirements.

Justification

2.22 This policy sets how many dwellings the Borough will accommodate over the plan period. Figures include existing commitments (permissions and allocations) and take account of housing potential on sites identified through the *Brentwood Strategic Housing Land Availability Assessment (SHLAA)* (2011) and related exercises, including the Council's asset review. Reflecting prevailing economic conditions, land availability and realistic prospects for deliverability, an average annual target for house building is lower for the first five years of the plan increasing thereafter for the remaining 10 years.

2.23 The Government expects Local Plans to meet objectively assessed needs for market and affordable housing, with sufficient flexibility to adapt to rapid change unless the adverse impacts of doing so would significantly and demonstrably outweigh the benefits (NPPF, paragraph 14).

2.24 In deciding how many homes the Borough should plan for, the Council has taken into account national policy and evidence on the number and kind of homes needed and the capacity to accommodate new development while maintaining the Borough's distinctive quality and character. Availability of supporting services and infrastructure are also key considerations which affect capacity.

Background work to inform the housing figure

2.25 Until recently, regional plans set local housing targets. The Localism Act introduced provisions to abolish regional plans and enable Councils to set their own targets. Previously, the East of England plan set a requirement for Brentwood for 3,500 net additional dwellings between 2001 and 2021 of which between 2001 and 2011, 2,321 dwellings were built (net additions), leaving a requirement to provide 1,179 dwellings to 2021, (the remaining RSS period).

2.26 National policy makes it clear that the Government expects the household and population projections to be the starting point in determining 'objectively assessed need' for development, taking into account migration and demographic change, which in turn plans should seek to accommodate.

2.27 The Department for Communities and Local Government project an increase in the number of households in the Borough from 31,000 in 2011 to 34,000 in 2021 (CLG, 2011 interim Household Projections).

2.28 The Borough faces a high level of demand for housing from people seeking to move into the area. Around 80 per cent of projected household growth between 2010 and 2033 arises from people expected to move here, mainly from elsewhere in the UK. The remainder is from natural change - an excess of births over deaths (Office for National Statistics (ONS) 2010 based sub national population projections).

Objectively Assessed Need

2.29 To enable the Council to reach an informed view on objectively assessed needs and in light of this, how many homes the Borough can sustainably accommodate, technical work has been commissioned. This includes the following studies: *Objectively Assessed Needs For Brentwood* (Working Draft Report, 2013), *Housing Growth Scenarios* (2012), *Landscape and Green Belt Assessment*, Transport modelling, *Utilities Study* (forthcoming) and SHMA update (forthcoming),

2.30 A study to consider objectively assessed needs has been carried out by Peter Brett Associates on behalf of the Council. Work undertaken as part of the study includes consideration of 13 demographic forecasts produced by Edge Analytics for Essex Planning Officers Society and a review of the Department for Communities and Local Government (CLG) and Office for National Statistics (ONS) projections. The study concludes a figure of somewhere between 331 and 362 homes a year would represent objectively assessed need for the Borough.

Capacity considerations

2.31 A Housing Growth Scenarios study, commissioned by Brentwood BC, Maldon DC and Chelmsford CC, examined the implications of growth at different levels: Population Stable - 1,680 dwellings over the plan period (112 homes a year); Workforce Stable - 1,950 (125 homes a year) and ONS/CLG projections - 6,000 (400 homes a year). The first scenario, Population Stable - reflects the number of new homes required to keep the Borough population the same size as it is now after taking into account a fall in the average household size. The second scenario, Workforce Stable, reflects the number of new homes required to keep the workforce the same size at present (taking into account the ageing population, but assuming the proportion commuting remains unchanged). For the third scenario the study used Department for Community and Local Government and Office for National Statistics (2010 based) population and household projections. A sustainability appraisal shows positive and negative impacts for all three scenarios. The lower scenarios perform well environmentally, but less well economically and socially. The study notes that growth at the level of ONS/CLG projections (6,000 homes over the plan period) would give rise to significant adverse impacts in terms of urban sprawl, congestion, harm to landscape and ecology and substantial loss of Green Belt. This study did not specifically consider objectively assessed needs.

2.32 The Council's preferred level of growth has been informed by a comprehensive analysis of site and location constraints and opportunities. Evidence suggests there exists capacity to accommodate development in the Borough up to around 3,500 homes over the plan period. Above this, the consequences of development would cause irrevocable harm and it would become harder to deliver development in a sustainable manner: that is in places with good access to services, public transport, jobs and facilities while safeguarding local character and environmental quality. Evidence suggests that a higher level of growth would significantly worsen existing traffic congestion problems (Traffic Modelling Study – forthcoming); require sites to be developed in landscape sensitive locations; be difficult to service with necessary infrastructure; and have a generally urbanising effect through widespread loss of Green Belt affecting the identity and setting of Brentwood Town and neighbouring settlements and the Borough's rural character.

Land availability

2.33 Brentwood SHLAA provides an overview of potential housing land availability. Following an open call for sites exercise in 2009, whereby interested parties were invited to put forward suggestions, an exercise was carried out to identify and assess land to determine whether it is available, suitable and achievable. The SHLAA identifies more land than would be required to meet housing requirements, although not all potential sites meet broader policy considerations. The present five year housing trajectory identifies sufficient deliverable sites to meet requirements. For the longer term, housing land supply is expected to come forward as follows:

Components of housing land supply 2015 – 2030 (Net New dwellings)

Existing commitments	589
Site allocations	2,522
Small sites allowance	67
Windfall allowance	322
TOTAL	3,500

2.34 Minimal allowance has been made for windfall sites although in practice these are expected to contribute towards supply. For the past five years windfalls on non-residential sites account for 22% of total housing completions in the Borough. Any additional windfall can therefore provide some contingency in the event that sites do not come forward as and when planned. Sites less than 10 dwellings are not allocated but included in a small sites allowance.

The need and demand for housing

2.35 Brentwood's *Strategic Housing Market Assessment* (2010) identifies a high level of need for affordable housing within the Borough which has among the most expensive housing in Essex, comparable to London house prices. Local wages, however, do not compare well with London and many local

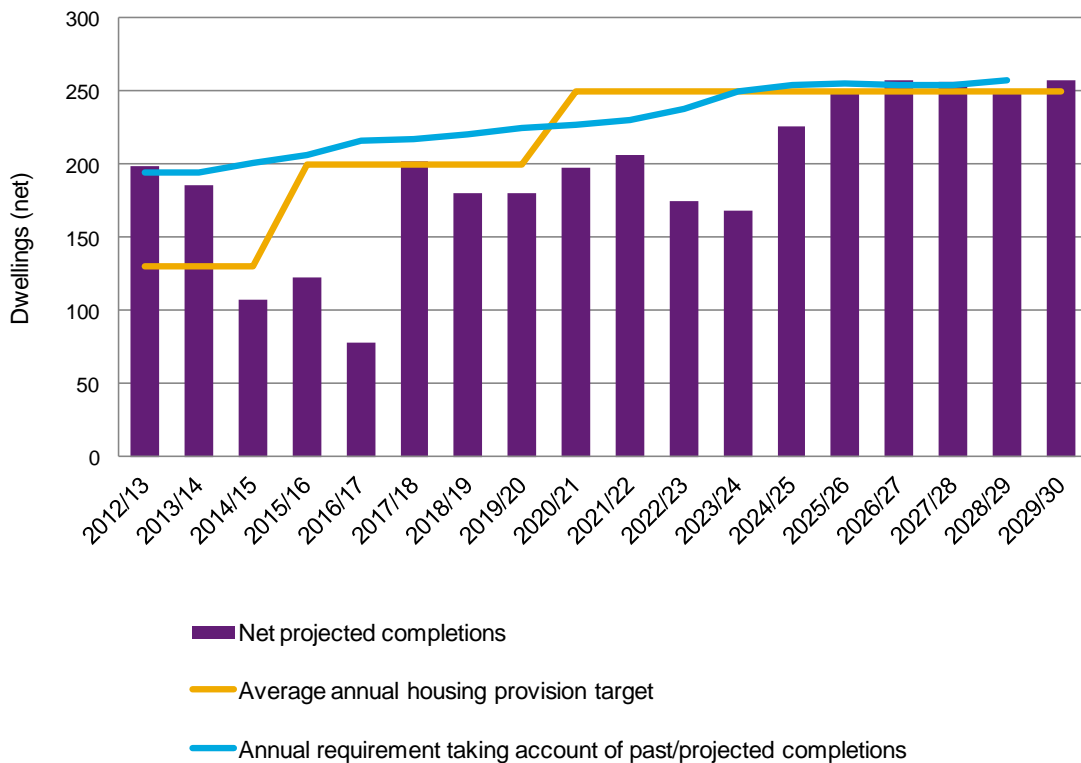
workers cannot afford to live here. This makes it harder for business to recruit, increases commuting and worsens transport congestion and quality of life.

2.36 Lack of funding for affordable housing is a significant barrier to meeting objectively assessed needs. The plan seeks to maximise affordable housing provision in light of identified needs: the suggested approach aims to be both aspirational and pragmatic. Commitments to protect the Green Belt, quality and character of the Borough and ensure adequate infrastructure to serve residents (existing and new) precludes an approach which seeks to accommodate the totality of market demand.

Brentwood Borough Housing Trajectory

2.37 Figure 2.2 sets out the expected rate at which new homes will be provided in the Borough over the plan period. The Trajectory is based on information about sites with the potential to deliver housing over the next 15 years, taken from the Strategic Housing Land Availability Assessment and work on Local Plan allocation sites. Further detail on the Housing Trajectory is given in Appendix 4.

Figure 2.2 Housing Trajectory



Evidence

Brentwood Housing Strategy - forthcoming

Brentwood Strategic Housing Land Availability Assessment (Atkins, 2010)

CLG Household Projections

Essex Planning Officers' Society *Stage 3 Demographic Forecasts (2012) Stage 4* (forthcoming).

Heart of Essex Housing Growth Scenarios Study (2012)

Infrastructure Delivery Plan (forthcoming)

Landscape Sensitivity Testing and Green Belt Assessment (forthcoming)

Laying the Foundations: A Housing Strategy for England (2011)

Objectively Assessed Needs For Brentwood (Working Draft Report, (Peter Brett Associates, March 2013)

Office for National Statistics 2010 based Sub-National Projections

Strategic Housing Market Assessment (SHMA) - forthcoming

Site Analysis (BBC)

Traffic Modelling (forthcoming)

National Policy

NPPF Paragraph 47: *To boost significantly the supply of housing, local planning authorities should use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework.*

NPPF Paragraph 182: *the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.*

NPPF Paragraph 17 Core Principle: *Planning should take account of the different roles and character of different areas, promoting the vitality of our main urban areas, protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it.*

Consultation feedback

In 2011 Brentwood held an extensive consultation looking at new housing provision and the strategic policy direction in the Borough. (*Your Neighbourhood Consultation* report, November 2011). Overwhelming feedback from respondents showed a desire to protect the Green Belt, quality and character of the Borough and therefore limit the growth of new homes which are perceived to threaten the Green Belt.

The consultation sought views on priorities for the development plan and the draft regional plan target of 170 homes a year (as proposed by the East of England Regional Assembly, March 2010). 59% (890) of respondents disagreed with the housing target, 35% (537) agreed. 6% (97) did not know. Out of respondents who disagreed 92% (820) said the target too high; 1.5% (13) too low. Reasons for disagreeing with the target include concerns about infrastructure, transport, over-development and population and the need to protect the Green Belt, local character and re-use existing buildings. Some support was shown for providing affordable housing to meet local needs.

Target

An average completion rate of 200 dwellings per annum between 2015 and 2020 and 250 dwellings per annum between 2020-2030. This equates to an annual average of 233 dwellings per annum over the Plan period

Indicator

Annual Monitoring Report indicators: housing completions compared with housing trajectory.

Distribution of housing development compared with spatial strategy.

Delivery

The Council has agreed a Local Investment Plan in partnership with the Homes and Communities Agency (2011).

Actions identified through the Borough Housing Strategy (in preparation).

Through a comprehensive review of assets it owns and discussions with partners and stakeholders, the Council will take a pro-active approach to identifying and realising opportunities for new housing in suitable locations on publicly owned land.

RSLs, Housebuilders

S3: Job Growth and Employment Land

Provision is made for 5,400 additional jobs to be provided in the Borough between March 2015 and March 2030 at an annual average rate of 285 to be distributed as follows:

	Total Area	Indicative Job Growth
Existing Employment sites (B-use)	53 ha	
New employment allocations (B-use)	31 ha	5,400
Retail, hotel and leisure uses	-	

Providing for this many jobs will require a total of 26 ha of new employment land. Areas allocated for employment purposes are set out in Policy DM6 and identified on the Policies Map.

Alternative Growth Options

Draft RSS > 2031 – 3,700 jobs (2011-2031, 185 net additional jobs per year)

The Draft RSS Revision to 2031 gave an indicative figure for Brentwood Borough of 3,700 net additional jobs (2011-2031).

Reason for rejection: This Review progressed no further and the Council has since obtained more up-to-date evidence (*Heart of Essex Economic Futures 2012*).

Dwelling Constrained – 4,800 jobs (2012-2031, 250 net additional jobs per year)

The Heart of Essex Economic Futures Study sets out two scenarios for economic growth to 2031. The Dwelling Constrained Scenario projects job growth and the amount of employment land required assuming 170 homes are built per year in the Borough (Former RSS figure). However, this does not accommodate issues such as local land constraints, subsequently requiring 9.4 ha of additional B-use employment land, including significant distribution warehouse floorspace. Given the Borough's Green Belt location this type of land requirement is not considered to be an appropriate option.

Reason for rejection: The Preferred Policy is based on the study's second growth scenario, Sector Derived. This scenario takes account of planned economic investment and intelligence as the basis for modelling an uplift factor, identified in consultation with Brentwood First. This results in more jobs being provided with less need to release greenfield land, 6.8 ha required instead of 9.4 ha. Therefore, it is considered to be a more suitable basis for the Preferred Policy.

Justification

2.38 This policy sets out how many new jobs are to be provided in the Borough over the plan period and how much additional employment land will be allocated to provide these. Reflecting the Borough's desirable location, high quality and distinctive offer and land constraints, the Council's preference is for efficient land use and the creation of and provision for high value business. With regard to the rural economy, the preferred approach seeks to encourage rural enterprise which benefits local communities while respecting the quality and character of the countryside.

Background work to inform the Employment Target

2.39 With the recent abolition of Regional Spatial Strategies, a baseline figure for local job growth is now something that needs to be determined to inform future planning policy. As a result, the Council is required to determine its own locally-derived employment targets. Together with the other Heart of Essex Partnership authorities, comprising Chelmsford City Council and Maldon District Council, the Council commissioned Nathaniel Lichfield & Partners (NLP) and Experian to prepare an Economic Futures Study for the Heart of Essex sub-region.

2.40 The *Economics Futures Study* developed two potential future scenarios to consider economic futures in the Heart of Essex. The outputs of each scenario are expressed in terms of total employment (including self-employed) and Gross Value Added (GVA), which provides a measure of economic output as follows:

- Dwelling constrained scenario: A dwelling constrained scenario for Brentwood has been developed based upon both current assumptions at a regional and UK level as to how the economy will perform, constrained to a housing figure for Brentwood of 170 dwellings per annum. The scenario also takes into account the strengths and historic trends within

the local economy. The scenario suggests that total employment will grow 0.6% per annum between 2012 and 2031 to just less than 43,200 in Brentwood. This equates to an additional 4,800 jobs over the next two decades and is in line with the County and UK average. It is however behind the East of England average of 0.8 per cent growth year on year. This indicates growth of 1,250 B-class jobs, mainly reflecting growth in office-based and warehousing sectors, which more than offsets loss of manufacturing jobs. B-Class job forecasts have been converted to future employment space requirements. This results in a net B-Class requirement of 44,400sq.m (9.4ha) over period 2012- 2031.

- Sector derived scenario: This alternative “sector driven” scenario takes account of planned investment or intelligence about future sectors as the basis for modelling an uplift factor (on top of the dwelling constrained scenario) applied to the growth rates for individual sectors by 2031. This scenario generates a higher level of employment growth by 2031 than is implied by the dwelling constrained scenario. Economic output increases by 16% (1,525 B-class Jobs) in Brentwood. This is as a result of increased growth of office-based sectors and a reduction in manufacturing losses, while warehousing sectors have been further constrained. This results in a net requirement of 36,038sq.m (6.8ha) over period 2012-2031.

2.41 For both scenarios, the employment land requirement is significantly greater than the 4ha of land currently identified as available for employment development in the Borough. The 6.8ha requirement arising by the sector derived scenario is of similar magnitude to the requirement identified by the 2010 *Brentwood Employment Land Review* (ELR), but the dwelling constrained scenario is somewhat higher at 9.4 ha. However, the potential total B-class floorspace requirement identified through this study, 36,000 – 44,500sq.m, is lower than the 2010 ELR Study reflecting different underlying assumptions about which sectors’ growth will occur within, as well as generally more up to date forecasts, that reflect the long term impact of the recession to a greater extent than the 2009 East of England Forecasting Model results which underpinned the 2010 ELR analysis.

2.42 The ELR prepared for Brentwood in 2010 sets out the future availability of employment land in the Borough as follows:

2.43 Vacant and opportunity land together provide a theoretical capacity of 20,000sq.m. Sectoral forecasts prepared for the study identified a net growth of 41,000 jobs in the borough to 2031. The future requirement would be for an additional 47,500sq.m B1a office space (equivalent to 6.3ha).

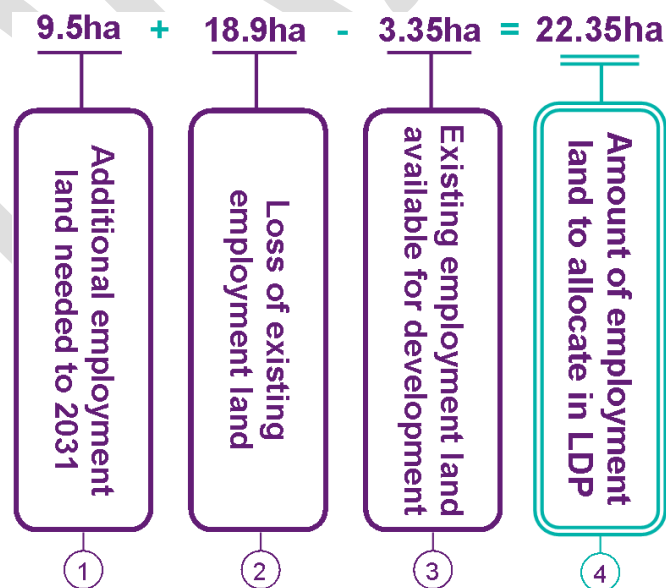
2.44 A local business survey, carried out as part of the ELR, identified a high level of satisfaction with current business premises. In order to expand 50 per cent of businesses surveyed stated they would require additional space and the majority were unable to accommodate their additional floorspace needs at their existing premises. The study recommended provision should be made for a net additional increase of 71,000sq.m B- Class floorspace in Brentwood

to 2031. Given the tightness of identified future supply relative to demand, it was recommended the Council consider allocating new employment sites.

2.45 The findings of these studies inform the amount of land the Council needs to allocate to provide for economic growth. This calculation is summarised in Figure 2.3, which gives a breakdown of new B-use employment land required to inform Draft Plan allocations. This calculation is explained below:

- The amount of additional employment land needed to 2031 is taken from the Council’s Employment Land Review (2010), which is verified in the Heart of Essex Economic Futures dwelling constrained scenario for Brentwood Borough (2012).
- The total amount of existing employment land lost to preferred housing allocations is taken from three sites to be allocated for housing/mixed use.
- Existing employment land available for development is made up of unused employment allocations from the Brentwood Replacement Local Plan (2005) and extant planning permissions for employment land at April 2012. The 2011/12 AMR sets out net employment land available at April 2012 to be 4ha (1.13ha extant planning permissions and 2.87ha extant allocations). Taking away unused employment land at the Council Depot in Warley ((draft housing allocation 081) 0.65ha of unused land) this reduces the total available land to 3.35 ha.
- Figure 2.3 shows these elements combined result in a total additional employment land requirement of 22.35ha.

Figure 2.3



Employment Allocations

2.46 Major employment sites contributing to the Borough's job growth over the period 2015 to 2030 are identified on the Policies Map and listed in Policy DM6. Estimated capacity is based on calculating on employment density by sector type as set out in the *Heart of Essex Economic Futures Study* and subsequent analysis.

National Policy

NPPF Paragraph 9: *Pursuing sustainable development involves seeking positive improvements... making it easier for jobs to be created in cities, towns and villages.*

NPPF Paragraph 17, core planning principle: *Planning should proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.*

NPPF Paragraph 18 emphasises the Government's commitment to securing economic growth in order to create jobs and prosperity and in meeting the twin challenges of global competition and of a low carbon future.

NPPF Paragraph 19 states that significant weight should be placed on the need to support economic growth through the planning system.

NPPF paragraph 20: *To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century"*

NPPF paragraph 21 *"...In drawing up Local Plans, local planning authorities should:*

- *Set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth*
- *Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period*
- *Support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances*
- *Plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries*
- *Identify priority areas for economic regeneration, infrastructure provision and environmental enhancement*
- *Facilitate flexible working practices such as the integration of residential and commercial uses within the same unit."*

NPPF Paragraph 22: *Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect*

of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of a site being used for the allocated employment use, applications for alternative uses of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.

NPPF Paragraph 28: *Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development.*

NPPF Paragraph 160: *Local planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area. To achieve this, they should:*

- *work together with county and neighbouring authorities and with Local Enterprise Partnerships to prepare and maintain a robust evidence base to understand both existing business needs and likely changes in the market; and*
- *work closely with the business community to understand their changing needs and identify and address barriers to investment, including a lack of housing, infrastructure or viability.*

NPPF Paragraph 161: *Local planning authorities should use this evidence base to assess:*

- *the needs for land or floorspace for economic development, including both the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period, including for retail and leisure development;*
- *the existing and future supply of land available for economic development and its sufficiency and suitability to meet the identified needs.*

Target

An average growth rate of 285 net additional jobs per annum over the Plan period

Indicator

Number of jobs in the Borough (full time equivalent)

Annual Monitoring Report indicators: actual non-residential development

Distribution of non-residential and retail development compared with spatial strategy

Net change in employment land provision as a result of planning permissions and changes of use for B1, B2 and B8 purposes

Level of vacant retail units in Borough centres

Delivery

Allocation of a range of sites and better utilisation of existing employment sites to provide higher quality employment and more jobs.

Through a comprehensive review of assets it owns and discussions with partners and stakeholders, the Council will take a pro-active approach to identifying and realising opportunities for new employment growth in suitable locations on publicly owned land.

S4: Provision for Retail and Commercial Leisure

Provision is made for 7,275 sqm (net) of comparison retail floorspace and 4,277 sqm (net) of convenience floorspace to be provided in the Borough up to March 2030. The primary location for new retail growth will be Brentwood Town Centre. Provision will also be made at West Horndon as part of a mixed use development.

Justification

2.47 Growth in retail and commercial leisure is expected to make a significant contribution towards job growth in the Borough. The planned redevelopment of William Hunter Way car park will provide mixed use retail and leisure development, including a foodstore and multiplex cinema. Redevelopment of this key site will provide opportunities for investment, additional retail and attract more visitors, helping to ensure the town centre remains a competitive retail location. There will be further opportunities for retail provision through the redevelopment of the Baytree Centre; as part of a mixed use scheme at West Horndon; and elsewhere through the redevelopment of smaller sites.

2.48 Brentwood Town Centre is the Borough's focus for shopping, cultural, leisure community and employment uses. It is also a place where people live. Brentwood attracts many visitors with good access to major roads and rail links and benefits from a refurbished, high quality shopping environment. This policy aims to encourage existing strengths to be supported and developed further, such as a distinctive offer, high quality shopping environment, 'niche' independent shops, and a variety of evening entertainment.

2.49 Figure 2.4 sets out the retail allocations and opportunities for improved links between these. Improved links will also help increase the amount of linked trips to High Street stores. Opportunities to improve the public realm around the Chapel ruins site as part of redevelopment of the Baytree Centre will help create a new 'town square'. This will provide new and attractive public space while making more of the Chapel ruins and protecting this ancient monument.

2.50 The Council's Preferred Option is to include Warley Hill (area around Brentwood Station) within the Brentwood Town Centre boundary, as shown on the Policy Map. This differs from the 2005 Replacement Local Plan which separates the two centres. Brentwood Retail and Commercial Leisure Study (2011) recommends setting a boundary for Warley Hill centre and this will be achieved by including it within the wider Brentwood Town Centre. This option will also assist in the aim to better link the station area with the High Street, as was the rationale for including a wider boundary in Brentwood Town Centre Regeneration Strategy (2010).

2.51 Shenfield is home to a major railway station with fast train services to central London. It will be the terminus for Crossrail and it is vital that the most is made of this opportunity to invest in improving Shenfield's retail and leisure offer.

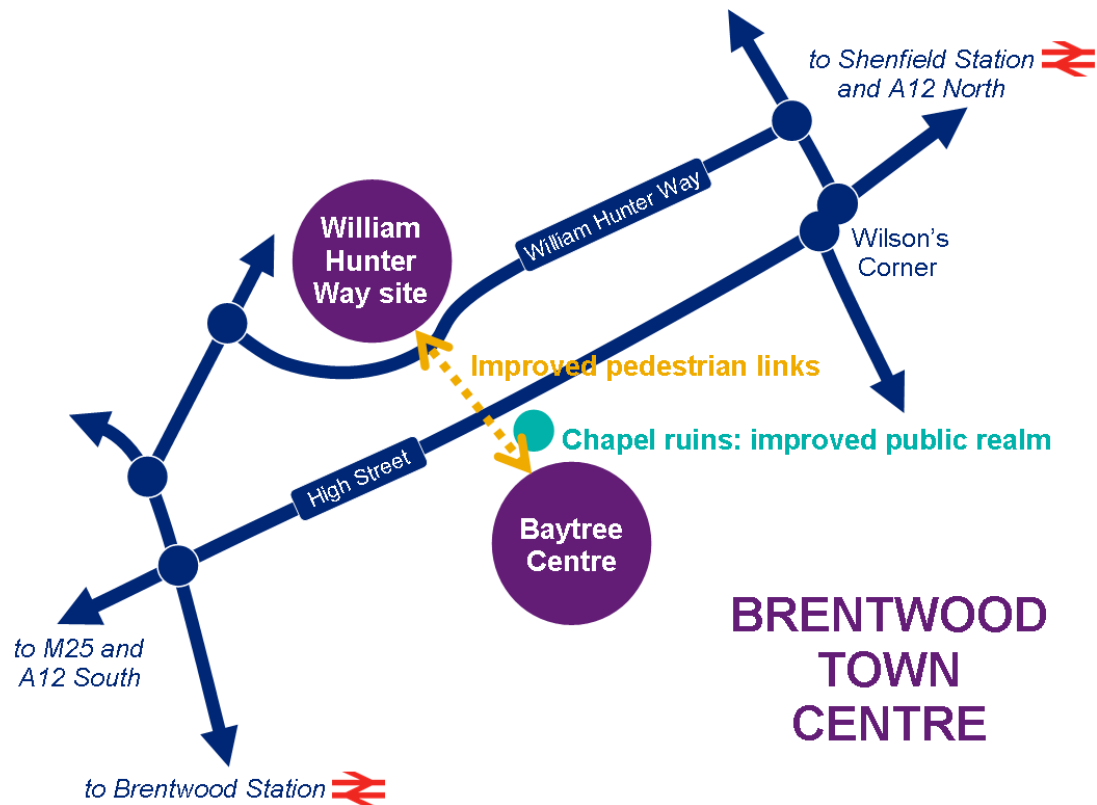
Background Studies to inform the Retail Policy

2.52 A Retail and Commercial Leisure Study was undertaken by consultants Chase and Partners in 2011 to assess retail and commercial leisure growth to 2031 in line with the timescale for the Council's emerging local development plan. A quantitative need assessment formed part of the study and concluded a reasonable level of need for both convenience (4,491sq.m) and comparison (5,963sq.m) goods floorspace by 2031. Although current economic uncertainty will undoubtedly have an effect on consumer expenditure and will constrain the need for development in the town centre in the short term, the potential for new convenience and comparison floorspace over the medium/long term is clear.

2.53 As part of the assessment Chase & Partners commissioned a household survey. Those surveyed were within an agreed catchment area where Brentwood town centre and the Borough's other main retail centres exert an influence over existing shopping behaviour. From this it is possible to identify the relationship between the town and other nearby retail centres – including Billericay, Basildon, Chelmsford, Romford and the shopping centres at Lakeside and Bluewater – particularly for comparison goods shopping.

2.54 *Brentwood Retail and Commercial Leisure Study* notes that the redevelopment of William Hunter Way will meet forecast retail need in the medium term. Other opportunities exist to provide additional retail floorspace in Brentwood Town Centre through the redevelopment of the Baytree Centre. Town centre opportunities are shown below:

Figure 2.4



Evidence

- East of England Regional Plan Review (March 2010)*
- Greater Essex Study (2009)*
- Brentwood and Epping Forest Employment Land Review (2010)*
- Retail and Commercial Leisure Study (2011)*
- Heart of Essex Economic Futures Study (2012)*

National Policy

NPPF paragraphs 23-27:

“Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, local planning authorities should:

- *Recognise town centres as the heart of their communities and pursue policies that support their vitality and viability;*
- *Define a network and hierarchy of centres that is resilient to anticipated future economic changes;*
- *Promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres;*
- *Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for*

retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of sustainable sites;

- *Allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If sufficient edge of centre sites cannot be identified, set policies for meeting the identified needs on other accessible locations that are well connected to the town centre;*
- *Set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres*
- *Recognise that residential development can play an important role in ensuring the vitality of town centres and set out policies to encourage residential development on appropriate sites; and*
- *Where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity.*

NPPF, Paragraph 24 requires that the *sequential test* be applied to applications for main town centre uses that are not in an existing centre.

Issues and Options Consultation Feedback

In 2011 the Council carried out an extensive consultation allowing residents, business and stakeholders to have their say on local plan issues. Feedback included a desire to see town centres thrive, with a good mix of shops and convenient parking. Residents in smaller centres are keen to maintain local shops and facilities. When asked what could be improved a common response was 'more or better shops'. Key issue raised regarding the Borough's centres was the need for a mix of shops, including provision for independent business and 'niche' shopping and better management of the high-time economy.

DRAFT

Chapter 3: Core Policies

Policy CP1 Sustainable Development

When considering development proposals the Council will take a positive approach that reflects the presumption in favour of sustainable development contained in the National Planning Policy Framework. It will always work proactively with applicants jointly to find solutions which mean that proposals can be approved wherever possible, and to secure development that improves the economic, social and environmental conditions in the area.

Planning applications that accord with policies in this Local Plan (and, where relevant, with policies in neighbourhood plans) will be approved without delay, unless material considerations indicate otherwise.

Where there are no policies relevant to the application or relevant policies are out of date at the time of making the decision then the Council will grant permission unless material considerations indicate otherwise – taking into account whether:

- a. Any adverse impacts of granting permission would significantly and demonstrably outweigh the benefits, when assessed against the policies in the National Planning Policy Framework taken as a whole; or
- b. Specific policies in that Framework indicate that development should be restricted.

Alternative Approach

No alternative policy has been identified.

Justification

3.1 National Planning Policy describes the presumption in favour of sustainable development as “the golden thread” which runs throughout plan-making and decision taking. This Plan includes the Planning Inspectorate’s ‘Model’ policy highlighting the Council’s commitment to taking a positive, proactive approach to achieve sustainable development in the Borough.

Policy CP2: Managing Growth

The Council expects the majority of new development to be provided within existing settlements, as identified on the Policies Map, through the development, conversion or re-use of previously developed land and buildings. In allocating sites or granting planning permission the Council will have regard to:

- a. The settlement hierarchy and role of key settlements

- b. The need to phase development to ensure employment and infrastructure are delivered prior to, or in conjunction with, new housing development**
- c. Areas where development should not take place (eg undeveloped Green Belt, land valuable for food production or at risk of flooding or of high landscape value)**
- d. The need to achieve a better balance of jobs, services, facilities and homes**
- e. Essential infrastructure requirements (whether existing or new requirements)**
- f. The importance of creating well designed places which are socially inclusive and respect local character**
- g. The need to ensure a flexible, responsive supply of land, and to prioritise the re-use of previously developed land and buildings in order to support regeneration**

Alternative Approach

No alternative policy has been identified. The Council considers the preferred approach to be essential in order to deliver sustainable development.

Justification

3.2 The level of development planned for the Borough aims to strike a balance between responding to the need for development and acknowledging constraints which determine how much development the Borough can sustainably accommodate. Residents place a high value on protecting the Green Belt and safeguarding the quality and character of the Borough.

3.3 NPPF core principles are that plans should take account of the role and character of different areas, promote the vitality of the main urban areas, achieve high quality, inclusive design, protect Green Belt and the intrinsic value of the countryside and support thriving rural communities. The Council's preferred approach to managing development and growth in the Borough reflects these principles and the overriding presumption in favour of sustainable development.

3.4 The emphasis on recycling and re-using previously developed land and buildings reflects national policy and the Council's commitment to making the best use of scarce land resources within the Borough.

3.5 Phasing refers to the timing of development in relation to other activity, for example, land assembly or provision of infrastructure. Development may require phasing, both to ensure that new occupants have access to services they need and to minimise disruption caused by development to existing communities or the services they depend on. Phasing helps ensure the timely delivery of development over the plan period. Therefore in this regard, an

important role of this plan is to indicate when sites are expected to come forward.

Evidence

Settlement Hierarchy – sets out the role and function of different settlements (see Policy S1 justification above).

Constraints: Land designations and existing use eg sites of value for nature conservation, landscape or agriculture. Evidence from the *Strategic Flood Risk Assessment*, *Water Cycle Study* and *Landscape Character Assessment*, *Strategic Housing Land Availability Assessment*, *Infrastructure Delivery Plan* (forthcoming), transport modelling. Availability of services, public transport and other infrastructure are among factors which influence the suitability of a site or location for development.

Housing Trajectory – see Figure 2.2 above and Appendix 3.

National Policy

NPPF paragraph 17, Core Principles.

Consultation Feedback

Key issues for respondents, to both the 2009 and 2011 consultations (*Issues and Options to 2031: Pathway to a Sustainable Brentwood* and *Your Neighbourhood* Consultation), include protecting the character and quality of the Borough and ensuring the necessary infrastructure exists to support new development.

Target

Deliver development in accordance with policy.

Indicator

Monitor development to assess compliance with policy.

Delivery

Development management and site allocations.

Policy CP3: Strategic Sites

In order to meet identified development requirements in accordance with the spatial strategy the following strategic sites are allocated:

West Horndon – Mixed Use Development – housing, employment, community/education/health, open space, retail

William Hunter Way – Mixed Use Development – retail, leisure, housing

The Baytree Centre – Mixed Use Development – retail, housing

Brentwood Enterprise Park – Employment

Alternative Approach

Alternatives are considered alongside site specific policies below.

Justification

3.6 The above sites are deemed strategic because they are critical to delivering the Plan. Other site specific allocations are set out in Development Management Policies.

Evidence

Sustainability Appraisal
Site Analysis / pro formas

National Policy

NPPF, paragraph 21: *In drawing up local plans, local planning authorities should set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period.*

The NPPF, paragraph 17, advises that in selecting sites for allocation the preferred choice should be brownfield land and land of lesser environmental value.

Target

Development in line with policy.

Indicator

Monitoring delivery through the AMR

Delivery – see site specific policies CP4, 5 and 6

Policy CP4: West Horndon Opportunity Area

The Council will work in partnership with the local community to identify and realise opportunities for regeneration and improvement through redevelopment of employment land and a strategic allocation to provide mixed use development for Housing, Employment, Retail, Community, Open Space, Education and Health purposes. The Council will seek a community masterplanning exercise, to agree the form, mix and siting of development which best reflects local aspirations and the wider Borough Spatial Strategy.

West Horndon could give rise to further capacity depending on its ability to accommodate a self sustaining community and provision of infrastructure can be met over the plan period.

Alternative Approach

1. Redevelop for housing with supporting community, health and retail facilities

Reason for rejection: This option would require the Council to identify land and premises elsewhere to offset the loss of business and jobs that would occur and would exclude the established business community. There is no guarantee new jobs and businesses would be forthcoming elsewhere or that established business would relocate within the Borough. The preferred option has the ability to better serve residents and business, both existing and new.

2. Redevelop to provide a high tech business park with some residential and community facilities

Reason for rejection: This option would require high density residential development to be able deliver the level of housing required, and commitment from the business and residential community to deliver. This would be more challenging to deliver than the preferred option.

Justification

3.7 Having good road and rail access, local shops and community facilities, West Horndon offers potential for sustainable development to the benefit of the local community. As well as meeting the village's longer term needs, developing here provides an opportunity to address current conflicts from competing uses, most notably, heavy freight passing through residential areas; improve the quality of the public realm; provide multi-functional, accessible green space; and strengthen the village centre.

3.8 It is envisaged that development here would provide a mix of uses, including housing, community, health and neighbourly (ie compatible) employment uses. To ensure that development takes into account long term community aspirations for the village the Council will seek a community masterplanning exercise to determine the precise scale, nature and siting of development and associated works.

Evidence

Infrastructure Delivery Plan (forthcoming)

Modelling work (forthcoming)

Site Analysis/pro formas

National Policy

NPPF, Paragraph 17: A core principle of the NPPF is that plans should:

- *encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value; and*
- *promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production)*

NPPF, Paragraph 21:

Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure, services or housing. In drawing up Local Plans, local planning authorities should:

- *set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;*
- *set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;*

- *support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances;*
- *plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;*
- *identify priority areas for economic regeneration, infrastructure provision and environmental enhancement; and*
- *facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.”*

NPPF, Paragraphs 37 and 38:

Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.

For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site. Where practical, particularly within large-scale developments, key facilities such as primary schools and local shops should be located within walking distance of most properties.

NPPF, Paragraph 58 states that planning policies should aim to ensure that developments: *“optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks.”*

NPPF Paragraph 70: *To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:*

- *plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;*
- *ensure an integrated approach to considering the location of housing, economic uses and community facilities and services”*

Target

Realisation of development in line with policy

Indicator

Development Monitoring

Delivery

Development Management Decisions

CiL Charging Schedule (forthcoming)

Infrastructure Delivery Plan

Policy CP5: William Hunter Way

The Council will seek the redevelopment of the car park Site to provide for new retail/ commercial floorspace to maintain and enhance Brentwood Town Centre as a shopping destination. The Council will promote improvements to the character and built environment of William Hunter Way, including the public realm, creating an attractive mixed use environment with integrated High Street links.

Opportunities to improve frontages on the south side of William Hunter Way will be encouraged through landscaping and redevelopment. A mix of uses including residential will be considered appropriate. For proposals affecting the rear of premises on the north side of the High Street, the Council will encourage additional shopfronts and the provision of double fronted shops.

Alternative Approach

No alternative policy has been identified. The Council considers the preferred approach essential in order to deliver sustainable economic growth and realise opportunities in an underutilised area in Brentwood Town Centre for the benefit of all.

Justification

3.9 William Hunter Way is a former service road north of Brentwood High Street that faces directly onto the rear of High Street premises. Yards and spaces serving these on the southern side of William Hunter Way are underutilised and untidy, with the area used mainly for car parking. Significant opportunities exist to improve this frontage and public realm through high quality landscaping and redevelopment. Enhancement can be delivered by improving pedestrian links, encouraging double fronted units, and redeveloping yards for a mix of uses including residential.

3.10 The boundaries of Brentwood Town Centre Conservation Area were amended in 2010 to include the southern frontage of William Hunter Way in recognition of this underutilised land and to encourage high quality redevelopment that is sympathetic to the wider conservation area.

3.11 Redevelopment of the William Hunter Way car park site will provide a major new leisure and retail destination for Brentwood Town Centre. This development is the largest in the town centre for many years, providing opportunities to attract more visitors and additional investment. However, it is vital that the development is carefully integrated to the High Street and not seen as a separate destination.

3.12 A key part of Brentwood's local economy is linked trips. Many people who park and shop at Sainsbury's combine their trip with a visit to the High Street to shop for other goods offered by local shops, or use the variety of services available, eg cafes, restaurants, banks. The redevelopment of William Hunter Way provides an opportunity to attract more people to the High Street

and better serve existing patrons. Creating a more pleasant built environment with legible links to the High Street is vital in order to realise this potential.

Evidence

Brentwood Town Centre Conservation Area Appraisal and Management Plan (2007)

William Hunter Way Development and Enhancement Review (Essex Design Initiative, 2010)

Retail and Commercial Leisure Study (2011)

National Policy

NPPF Paragraph 23: *Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, local planning authorities should:*

- *...Recognise town centres as the heart of their communities and pursue policies that support their vitality and viability...*
- *...Promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres...*
- *...Recognise that residential development can play an important role in ensuring the vitality of town centres and set out policies to encourage residential development on appropriate sites..."*

Policy CP6: The Baytree Centre

The Council will seek a mixed use scheme to include retail, leisure and residential as part of the redevelopment of Baytree Centre shopping precinct. Redevelopment will also provide public realm improvements around the Chapel Ruins to create better links with the High Street and between new retail/leisure at William Hunter Way.

Justification

3.13 Brentwood Town Centre will need to continue to extend the range and quality of shopping outlets in order to respond to and compete with the continuing development of other retail centres. Consideration is therefore given to what opportunities exist for enhancing the provision of shopping. Not unexpectedly in a centre the size of Brentwood, the range of comparison shops is limited and a large outflow of expenditure is experienced. In assessing the potential for further retail provision within the town centre there are two sites of any significance that can be identified at the present time: William Hunter Way Car Park and the Baytree Centre.

3.14 The Baytree Centre provides an important opportunity for improving the range and quality of shopping provision in the town centre. The Centre, while having been refurbished in 2005, does not meet modern retailer needs in the 21st century. The quality of a shopping environment plays an important role in encouraging people to shop in a particular centre and may have a positive impact in the long term on its viability.

Policy CP7: Brentwood Enterprise Park

Brentwood Enterprise Park will provide new floorspace for employment development (Use Classes B1, B2 and B8), made up of land at the former M25 works site (south of A127, site ref: 101A) and land at Codham Hall (north of A127, site ref: 101B), as set out on the Policies Map.

Development proposals should meet the following criteria:

- a. Employment uses and jobs provided on site are consistent with the economic strategy set out within this Plan, and support the vitality and viability of Brentwood Town Centre and other Borough centres**
- b. Development is of a high design standard, meeting aspirations to enhance this location as a key gateway to Brentwood**
- c. Landscaping and planting should be used to create a buffer and provide improved visual amenity between the site and surrounding land, minimising any amenity impacts**
- d. in accordance with Policy CP13 (Sustainable Transport) proposals should be accompanied by:**
 - i. a Green Travel Plan linking this site with Brentwood Town Centre and West Horndon**
 - ii. a Transport Assessment**

Brentwood Enterprise Park will comprise employment floorspace requirements, as set out below:

Land at former M25 works site, south of A127 (101A)

Provision of 23.5ha (235,000sqm) of employment land is made at the former M25 Works Site, with a particular onus on high quality B1 employment floorspace along the site frontage with the A127 exit road to M25 Junction 29. Behind this frontage will be a mix of B1, B2 and B8 employment floorspace. No more than 12ha (120,000 sqm) of the total site area (approx 51%) will be made up of B8 uses.

Land at Codham Hall, north of A127 (101B)

An opportunity will be taken to regulate existing employment uses on land at Codham Hall with provision of up to 4ha of employment development, specifically Use Classes B2 and B8 but with B1 office space where appropriate to support industrial uses and provide front-office functions.

Justification

3.15 Previously developed land in this location provides an opportunity for new employment land in the form of a business park. The location is excellent

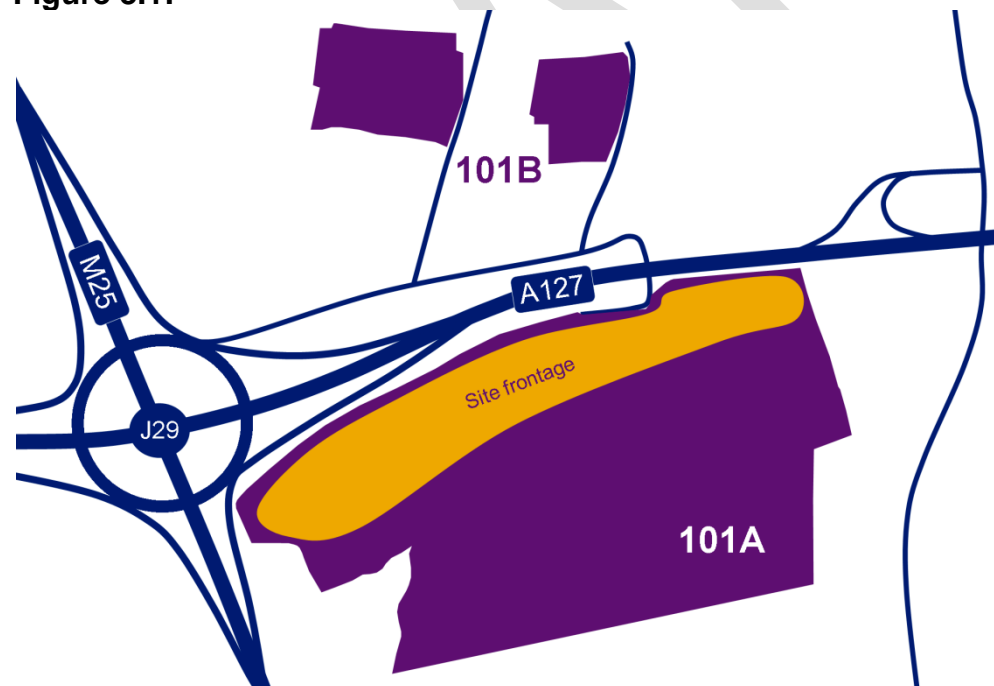
in terms of transport links and is suitable for new floorspace of a scale that it would be extremely difficult to accommodate elsewhere in the Borough.

3.16 Employment allocations for this site are proposed to be made up of two areas of land adjacent to the M25. Referred to collectively as Brentwood Enterprise Park (draft name), this includes the former M25 works site (101A) to the south of the A127 and land at Codham Hall (101B) to the north, as set out on the Policies Map.

3.17 It is proposed that land at the M25 works site (101A) will accommodate a new business park of mixed B-uses. The front of the site facing the A127 exit slip road, as it approaches M25 Junction 29, will be used to provide high quality building design of a higher density than the rest of the site. This area will predominantly provide B1 office floorspace and create an attractive gateway to the Borough. In order to ensure the site caters for a range of employment uses, and maximises the potential for job creation, a maximum of 12ha of B8 use (warehousing) can be accommodated on the site. A study analysing industrial sector growth potential recommends a figure of 12.1ha for new B8 employment land (Heart of Essex Economic Futures study (2012) dwelling constrained scenario).

3.18 Figure 3.1 sets out the site in context including the approximate frontage area.

Figure 3.1:



3.19 Land at Codham Hall, site 101B, provides an opportunity to regulate existing industrial uses that have grown up over the years in agricultural type buildings. The site is well screened from the south and can accommodate predominantly B2/B8 uses.

3.20 For both 101A and 101B, it is expected that careful attention will be paid to minimising amenity impacts. Provision of improved visual amenity and landscaping will be required as part of any development proposal.

Evidence

Employment Land Review (2010)

Hear of Essex Economic Futures Study (2012)

National Policy

NPPF Paragraph 21 *In drawing up Local Plans, local planning authorities should: set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period*

Target

To deliver employment land at the site in accordance with the Policy in order to provide for local job growth.

Indicator

Development monitoring.

Delivery

Development management.

Policy CP8: Housing Type and Mix

The Council will seek a mix of dwelling types, sizes and specialist accommodation to provide choice, respond to needs and contribute towards the creation of sustainable, balanced communities. In all new residential schemes the Council will expect a proportion of new homes to be affordable. Schemes should be inclusive and designed in such a way that affordable housing is indistinguishable from market housing.

On sites of six units and above or 0.2 hectares or more, at least 50% of total dwellings should be one and two bedroom properties except where this would be detrimental to the character of the area or site constraints prevent this.

In determining the mix for any particular scheme, the Council will take into account local housing market conditions, housing needs, the nature, character and context of the site and specific scheme requirements. The Council may use conditions to ensure a particular housing type provided, such as a bungalow, remains available in perpetuity.

Where:

- a. application is made for part development of a larger residential site identified on the local plan Policies Map, or
- b. the proposed residential development site is contiguous with one or more other potential residential development sites

The area to be used for determining whether this policy applies will be the larger site in relation to (a) above and the aggregate area of such contiguous sites in relation to (b) above.

In appropriate circumstances a condition will be imposed on smaller units to prevent extensions providing additional habitable floor space.

Alternative Approach

1. To have no policy and leave the mix and type of housing to market forces.

Reason for rejection: This approach is less likely to respond to the Borough's housing needs than the preferred approach.

2. To have a more prescriptive policy with regard to type, tenure and size, for example controlling the size of conversions from other properties.

Reason for rejection: The preferred policy is more flexible and should therefore be more responsive to changing circumstances.

Justification

3.21 A high proportion of the Borough's existing dwellings are larger three and four bedroom detached properties. By contrast, evidence shows a significant need for smaller one and two bedroom properties with single person households accounting for half of projected household growth (2008 to 2033). Recent completions have started to address this imbalance, with 60% of completions in 2010/11 being one and two bedroom homes. With regard to the size of dwellings required, the Strategic Housing Market Assessment (SHMA, 2010) forecasts a need for 58.6% of new dwellings to be 1 and 2 bedroom dwellings and 41.4% dwellings 3 or more bedrooms.

3.22 11.7% of households in the Borough contain a member with special needs, a rate comparable to the national average. An above average proportion of the Borough's households contain older persons (27.1%). The proportion of the Borough's population living beyond 65 years of age is forecast to rise from 18% in 2012 to 22% in 2033 and for those aged 85 years from 3% to 5% over the same period.

3.23 Increasing the provision and range of accessible, special needs and supported accommodation in the Borough will be essential if development is to meet the needs of an ageing population and foster housing choice and mobility. Meeting the accommodation needs of older people who wish to downsize will have the added benefit of freeing up larger properties for families.

3.24 One consequence of the Welfare Reform Act 2012 is that people in receipt of Housing Benefit living in homes considered too large for their needs may move to smaller properties. This in turn could increase the need for smaller dwellings in the Borough.

3.25 Factors which will influence the type, tenure and mix of housing that should be provided include the following:

- The largest proportion of household growth is among single people and this is expected to increase demand for smaller homes
- The significant majority of need is for intermediate housing. However this is price sensitive. Pitching rents at 80% of market level will exclude some people and apply additional pressure to social housing.
- The provision of affordable intermediate housing has the potential to release social housing
- The implications of introducing fixed term tenancies and affordable rents
- Rural communities' needs
- Older Person's and specialist housing needs, taking account of provision within the Council's own stock and the implications for the ageing population and models of social care
- An increased demand for private rented property driven by reductions in access to owner occupation as identified by the SHMA
- The need to address overcrowding among Black and Ethnic Minority households
- A Strategic Housing Market Assessment, currently underway, will provide evidence on need for different types of housing, including affordable housing.

Evidence

Affordable Housing Viability Assessment (2010)

Greater Essex Phase 3 Demographic Forecast (June 2012)

Housing Strategy (forthcoming)

Local Investment Plan

Older Person's Housing Strategy (forthcoming)

Strategic Housing Market Assessment (SHMA), 2010

Strategic Housing Market Assessment 2013 (forthcoming)

Sustainability appraisal (2009 and forthcoming)

National Policy

NPPF Paragraph 50: *To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:*

- *plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older*

people, people with disabilities, service families and people wishing to build their own homes); and

- *identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand.*

Target

To deliver homes which meet policy requirements

Indicator

Housing completions monitoring by type, size and tenure

Delivery

Development management decisions

Site Allocations

Local Investment Plan

Policy CP9: Protecting the historic and natural environment and landscape character

The Council is committed to safeguarding the diversity and local distinctiveness of the Borough, including its varied landscapes, heritage, biodiversity and habitats. New development should foster a sense of place and local identity, and respect, and where possible enhance, the character of the area. In assessing proposals, regard will be given to:

- a. The sensitivity of an area to change**
- b. The importance of retaining the individual identity of separate settlements and parts thereof**
- c. Conserving and, where appropriate, enhancing heritage assets and their settings**
- d. Conserving and enhancing biodiversity and habitats, including through the creation of new habitats**

The Borough Council will designate and keep under review Conservation Areas in order to protect or enhance their special architectural or historic interest, and will seek to protect the character, significance, and setting of Listed Buildings, Historic Parks and Gardens and Protected Lanes.

Alternative Approach

No alternative has been identified to this policy approach.

Justification

3.26 The Borough is fortunate to have significant natural and built heritage assets, and these are valued by residents, visitors and business. Any future development should therefore conserve, protect and enhance these features.

3.27 National planning policy requires local authorities to set out a positive strategy in their Local Plan for the conservation and enjoyment of the historic environment. It also states that Local Plans should plan positively for the protection and enhancement of the natural environment. The Council is committed to protecting Brentwood's special and valued historic environment and natural landscapes. This commitment is supported by consultation responses which identify protecting the historic environment as a high priority. The preferred policy approach seeks to ensure that the historic and natural environment is protected and that new development will contribute towards the enhancement of Brentwood's historic and natural environment.

Landscape

3.28 The *Mid-Essex Landscape Character Assessment* (2006) gives an insight into the Borough's varied landscapes, their qualities, distinctiveness and sensitivity to change. The study identifies three types of landscape in the Borough: wooded farmland, river valley and fenland.

- The vast majority of the rural area is "wooded farmland", comprising undulating areas of deciduous and mixed woodland interspersed with arable fields, mature hedgerows, smaller pastures and paddocks, and narrow lanes with a sense of tranquillity away from the main roads. Several areas of ancient woodland are present. This landscape type is highly sensitive to change.
- The Roding River valley, to the north-west of the Borough, comprises linear patches of woodland, mature hedgerows, a dispersed settlement pattern, sense of remoteness and tranquillity. There are 15 areas of ancient woodland. This landscape type is highly sensitive to change.
- Fenland south of the A127 is characterised by widespread arable agriculture with a flat landscape with a pattern of large fields, large field pattern, hedgerows, distant views south to Tilbury and north to Little Warley and East Horndon Church, and four areas of ancient woodland. This landscape type is moderately sensitive to change.

3.29 In the Mill Green area lies the Forest of Writtle, a designated Ancient Landscape.

Nature Conservation Sites

3.30 The Borough contains three Sites of Special Scientific Interest: Curtis Mill Green, Thorndon Park and The Coppice, Kelvedon Hatch.

3.31 A Local Nature Reserve at Hutton Country Park and 147 Local Wildlife Sites are identified for their value as semi-natural habitats and occasionally for their role in environmental education and public engagement with wildlife. Other

natural features of conservation interest include commons, small copses, tree belts, ponds and watercourses, hedgerows and protected lanes.

Historic and Archaeological Heritage

3.32 Registered Parks and Gardens of Special Historic Interest are at Warley Place, Weald Park and Thorndon Park.

3.33 Within the Borough are 13 Conservation Areas: Blackmore, Brentwood Town Centre, Fryerning, Great Warley, Herongate, Highwood Hospital, Hutton Village, Ingatestone Village Centre, Ingatestone Station Area and South Weald, Thorndon Park, Warley Place and Weald Park. 518 buildings are Listed for their Special Architectural or Historic Interest.

3.34 Essex Historic Environment record identifies 636 sites within the Borough of known archaeological interest. These include isolated discoveries like Stone Age flint axe, below ground evidence of prehistoric, Roman, Saxon and medieval occupation and upstanding post medieval and modern structures. Of known sites, 12 are Scheduled Ancient Monuments, including the St Thomas a Becket Chapel in Brentwood town centre.

Evidence

Mid-Essex Landscape Character Assessment (2006)

Essex Historic Environment Record

Brentwood Borough Local Wildlife Sites Review (Essex Wildlife Trust, 2012)

Essex Biodiversity Action Plan

Essex Biodiversity Project

The National Heritage List for England

English Heritage Registered Parks and Historic Gardens

Natural England Sites of Special Scientific Interest

National Policy

NPPF paragraph 17 recognises the intrinsic character and beauty of the countryside as a core planning principle.

NPPF paragraph 114: *Local planning authorities should set out a strategic approach in their Local Plans, planning positively for the creation, protection, enhancement and management of networks of biodiversity and green infrastructure.*

NPPF paragraph 126: *local planning authorities should have a positive strategy for conservation and enjoyment of the historic environment, in particular recognising that new development can make a positive contribution to local character and distinctiveness.*

NPPF paragraph 137: *local planning authorities should look for opportunities for new development within Conservation areas and heritage assets to enhance their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.*

Target

To prevent harm to landscapes, heritage assets, protected flora, fauna and their habitats and sites of nature conservation value.

100% of Conservation Areas with up to date appraisals by 2020.

Indicator

Number of permissions for development adversely affecting species and habitats covered by the Essex Biodiversity Action Plan, Local Wildlife Sites/Local Nature Reserves

Number of adopted Conservation Appraisals

Number of Conservation Appraisal recommendations implemented

Total area in Borough designated a Local Wildlife Site or other Nature Conservation Designation

Delivery

Development Management decisions, Streetscene – Countryside & Open Spaces, and working with Essex Wildlife Trust, Essex Biodiversity Project, English Heritage and Natural England.

Implementation of Conservation Appraisal recommendations

Policy CP10: Green Belt

The general extent of the Green Belt across the Borough will be retained subject to minor allocations made in this Plan affecting Green Belt, where new development has had the effect of consolidating settlement patterns so as to create a defensible boundary.

The following settlements are excluded from the Green Belt as identified on the Policies Map:

Blackmore, Brentwood, Doddinghurst, Herongate, Hook End, Ingatestone, Ingrave, Kelvedon Hatch, Mountnessing, Stondon Massey, West Horndon and Wyatts Green.

Alternative Approach

No alternative has been identified.

The National Planning Policy Framework stresses the great importance of Green Belts and their essential characteristics of openness and permanence. The importance of protecting Green Belt land is supported by Borough residents who in consultations identify the protection of the Green Belt as their top priority. The Council supports this through strategic objective SO7 which aims to safeguard the Green Belt.

Justification

3.35 The majority of the Borough (80%) lies within the Green Belt and comprises a mix of villages, residential properties and agricultural land. There are large areas of woodlands, golf courses, playing pitches, parks and an

extensive network of public rights of way providing public access to open countryside. The Green Belt contains extensive areas important for nature conservation including Hutton, Weald and Thorndon Country Parks, three Sites of Special Scientific Interest (SSSI) and 147 Local Wildlife Sites. The Green Belt has local strategic importance preventing coalescence of settlements within the Borough and adjoining districts.

3.36 The new Local Plan provides an opportunity to refresh Green Belt boundaries for minor alterations to be made where necessary. The Council will set these out on the Policies Map to reflect any changes around urban areas and defined settlements where new development has taken place since 2005.

3.37 The Green Belt serves five purposes:

- 1 to check the unrestricted sprawl of large built-up areas
- 2 to prevent neighbouring towns merging into one another
- 3 to assist in safeguarding the countryside from encroachment
- 4 to preserve the setting and special character of historic towns; and
- 5 to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Evidence

Landscape Sensitivity Testing and Green Belt Assessment (forthcoming)

Survey and Assessment of Needs and Audit of Open Space, Sport and Recreation Facilities in Brentwood Borough (PMP, 2007)

National Policy

NPPF paragraph 79: *The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.*

NPPF paragraph 80 sets out the five purposes of the Green Belt as set out in paragraph 3.22 above.

NPPF paragraph 83: *Local planning authorities with Green Belts in their area should establish Green Belt boundaries in their Local Plans which set the framework for Green Belt and settlement policy. Once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. At that time, authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period.*

NPPF paragraph 85 advises that when defining boundaries *local planning authorities should:*

- *ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
- *not include land which it is unnecessary to keep permanently open;*

- *where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- *make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;*
- *satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
- *define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.*

Target

Maintain the extent, character and openness of the Borough's countryside and Green Belt, allowing proposals only where these meet national policy guidance.

Indicator

Number and type of planning permissions granted within Green Belt.

Delivery

Development Management decisions based on Green Belt policy and boundaries defined on the Policies Map.

Policy CP11: Strong and Competitive Economy

The Council and its partners will seek to maintain high and stable levels of local economic growth, enabling the Borough's economy to diversify and modernise through the growth of existing business and the creation of new enterprises. Support will be given to proposals that secure job growth with 'high value' business and retail. This will be secured by:

- a. Capitalising on the economic benefits that arise from Crossrail**
- b. Improving access to a range of employment opportunities for Borough residents in order to meet local employment needs and maintain viable, sustainable communities**
- c. Promoting economic growth through the intensification of vacant employment floorspace and underutilised sites, the regeneration of previously developed land, and the allocation of new sites necessary to support employment growth in sustainable locations**
- d. Making better use of existing business premises by opening up vacant employment floorspace for use by other businesses**
- e. Directing major new retail, office and leisure investment to the Borough's Town Centres, stimulating improvement and regeneration**

- f. Supporting proposals which achieve the renewal and improvement of business premises to provide local employment opportunities, particularly in areas with good public transport**
- g. Enhancing and protecting the important role of small and medium sized commercial enterprises within the Borough's economy**
- h. Supporting the Borough's rural economy and growing agricultural enterprises.**

Alternative Approach

No alternative has been identified.

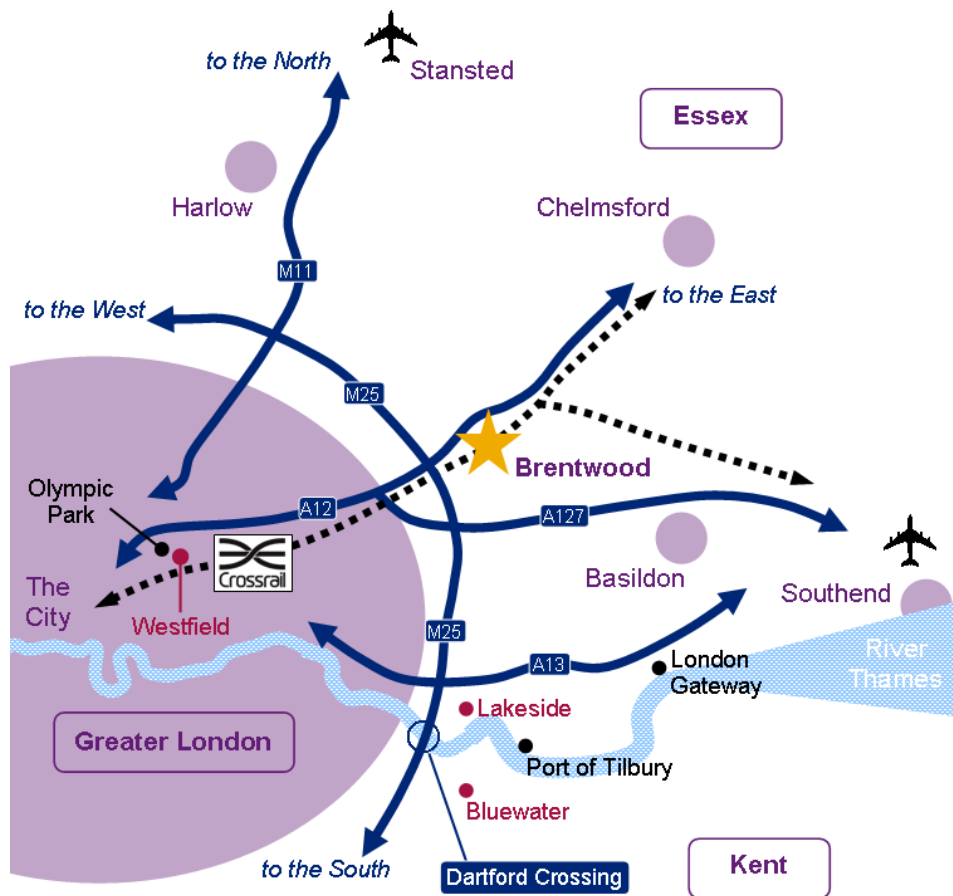
Justification

3.38 Brentwood Borough is an attractive location for business, combining a high quality environment with close proximity to London, a well qualified workforce and good transport links. A diverse local economy provides a total of 30,383 jobs (2008) with an annual growth rate of 1.6% (1998-2008). The Borough has a thriving entrepreneurial culture, with above average rates of business start-ups, and is popular with some major national firms whose regional headquarters are located here.

3.39 The Council seeks to promote a mixed economic base and a discerning approach to economic growth. High value employment uses will be particularly encouraged. This will tend to be business uses such as offices with related high-tech manufacturing floorspace that provide a significant number of skilled jobs, rather than large distribution warehouses that employ very few people. A diversity of uses will also be encouraged with an emphasis on good quality, sympathetic and efficient use of land and buildings and good quality jobs, including through better utilising, upgrading and redeveloping existing land and buildings. This approach recognises and responds to the Borough's strengths: skilled workforce, attractive environment and good transport links, and takes account of land and infrastructure constraints. Continuing prosperity in future will rely upon safeguarding those features which comprise Brentwood's distinctive offer and make the Borough a destination of choice today.

3.40 The map below (Figure 3.2) shows how well Brentwood is placed in terms of transport links to surrounding centres in Essex, London and Kent, legacy opportunities from the 2012 Olympic Park, and airports at Stansted and Southend. Crossrail will improve links with Central London and open new direct links to West London and Heathrow airport. The Borough is close to competing retail centres such as Basildon, Romford and Chelmsford, and Lakeside, Bluewater, and Westfield Stratford City Shopping Centres.

Figure 3.2 Transport Links



3.41 Currently a high proportion of Borough residents commute to work elsewhere. While it is accepted that many residents will continue to work outside the Borough local employment opportunities need to be enhanced and diversified in order to reduce this need to travel and benefit the local economy.

3.42 More than half of total employment is provided by small businesses of up to 49 employees and development that supports this sector will be encouraged. The role of larger companies is also recognised and the Council with partners such as Brentwood First to consider how best their needs can be met.

3.43 Brentwood and Shenfield will be the focus to attract economic growth given their excellent geographic position along with provision at West Horndon and Brentwood Enterprise Park (see policies CP4 and CP7). Larger villages are in a position to accommodate a limited amount of employment and retail development and here the emphasis will be on the provision of local services.

3.44 Sustainable patterns of growth should be encouraged by utilising existing employment space where possible, developing on previously developed land and encouraging smart working practices. In Brentwood Town Centre, and suitable locations elsewhere, opportunities for higher density business development will be considered since this will relieve pressure to develop in less sustainable locations.

3.45 Improvements in technology and working arrangements have enabled more flexible working, freeing up existing employment floorspace. This trend is expected to continue in future with more remote and home working. Businesses with underused floorspace will be encouraged to make this available for use by other business users.

3.46 The Borough has seen an above average growth in agriculture since 1998. Rural enterprise is fundamental in maintaining and developing rural communities by securing appropriate business, inward investment, jobs and wealth in rural areas and is a vital part of the local economy. Rural enterprise and development which supports its expansion should be encouraged providing there are no severe adverse impacts on the environment and development is sympathetic to its rural surroundings.

3.47 Rural enterprise refers to land-based industries, such as agriculture and forestry, enabling rurally based businesses, tourism and the environment. It is recognised that some activities in rural areas might equally well be carried out in a built up area. The key difference is their impact and whether the activity in question, due to its scale and nature has an urbanising effect or can be sensitively accommodated with no adverse impact on the countryside. Stewardship of the countryside, soil and landscapes has traditionally rested with farmers and therefore sympathetic diversification schemes which support this sector should be encouraged in recognition of these wider benefits.

3.48 New employment allocations are identified in Policy DM6 and on the Policies Map.

Evidence

Brentwood and Epping Forest Employment Land Review (2010)

Brentwood Retail and Commercial Leisure Study (2011)

Heart of Essex Economic Futures Study (2012)

2011 Census

National Policy

According to the NPPF, a key dimension to achieving sustainable development is the economic role of planning. This is to contribute *“to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including the provision of infrastructure”* (NPPF paragraph 7)

NPPF Paragraph 9: *Pursuing sustainable development involves seeking positive improvements... making it easier for jobs to be created in cities, towns and villages”*

NPPF paragraph 17, Core Planning Principle: *planning should proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. Every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.*

To help achieve economic growth, local planning authorities should plan proactively to meet the development needs of business and support an economy fit for the 21st century” (NPPF paragraph 20)

NPPF paragraph 21:

In drawing up Local Plans, local planning authorities should:

- *Set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth*
- *Set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period*
- *Support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances*
- *Plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries*
- *Identify priority areas for economic regeneration, infrastructure provision and environmental enhancement*
- *Facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.*

Policy CP12: Thriving Town and Local Centres

ALL BOROUGH CENTRES

Within the Borough’s urban areas the Council will promote sustainable urban living and working through development proposals that support a diverse range of uses, make best use of previously developed land, and protect and enhance local character. Development should enhance the attractiveness, vitality, safety, environmental quality, historic character, employment opportunities and social inclusiveness of these areas.

Change of use of upper floors above commercial premises to residential will be encouraged provided reasonable facilities and amenities are provided for and development does not result in demand to replace lost storage space.

Proposals should take account of the Hierarchy of Place as set out in Policy S1. The Borough’s Primary Shopping Areas are defined as follows:

**Town Centres: Brentwood Town Centre
 Shenfield, Hutton Road**

Village Centre: Ingatestone High Street

BRENTWOOD TOWN CENTRE

The Council will conserve the positive qualities of Brentwood Town Centre while enhancing and improving negative aspects of function and appearance. Proposed development should balance requirements of those who live, work, shop, and enjoy leisure time to create a vibrant town centre around an efficient, convenient network of public transport, cycling and walking routes and a high quality High Street and public realm.

Opportunities to enhance the public realm around the Chapel Ruins will be encouraged. This space should be used as the centre of the High Street, somewhere for people to enjoy spending time while providing the key link from the High Street to both the Baytree Centre and William Hunter Way.

NIGHT-TIME ECONOMY

Cultural, entertainment and leisure uses will be encouraged as part of mixed use development. After-hours leisure should raise standards and broaden the appeal of the night-time economy. Proposals should:

- a. Be safe and welcoming, delivering high standards of customer care
- b. Allow people to walk and cycle around the centre with ease
- c. Offer a vibrant choice of leisure and entertainment for a diversity of ages, lifestyles and cultures, including families and older people
- d. Provide a mix of activities that reinforce local character and identity.
- e. Provide evidence of responsible management and stewardship arrangements to ensure there is no disturbance to surrounding properties and residents or harm to the amenity of the surrounding area

Alternative Approach

1. Have separate policies for Brentwood Town Centre and other Borough centres

Reason for rejection: To be succinct the Preferred Option is to have one policy dealing with all Borough Centres. As the main town centre and the focus for growth Brentwood Town Centre is given its own section within the Policy. However some issues relating to Brentwood will be relevant to Shenfield and other centres. Therefore, a joint Policy for all Borough centres is considered most suitable.

2. Have a separate policy covering the night-time economy

Reason for rejection: The night-time economy is particularly relevant to Brentwood Town Centre and it is therefore considered most appropriate to set this out within the same Policy.

Justification

3.49 The Borough has two main centres: Brentwood and Shenfield, both within the wider Brentwood urban area and a number of smaller village centres and shopping parades. The Borough's centres are performing well at a time when the future of high streets is under threat from growing competition elsewhere. This plan seeks to achieve a good balance of mixed uses in the Borough's centres to meet the needs of those who live, work, shop and spend leisure time here.

3.50 Brentwood Town Centre is the Borough's focus for shopping, cultural, leisure community and employment uses. It is also a place where people live. Brentwood attracts many visitors with good access to major roads and rail links and benefits from a refurbished, high quality shopping environment. This policy aims to encourage existing strengths to be supported and developed further, such as a distinctive offer, high quality shopping environment, 'niche' independent shops, and a variety of evening entertainment.

3.51 The Council's Preferred Option is to include Warley Hill (area around Brentwood Station) within the Brentwood Town Centre boundary, as shown on the Policies Map. This differs from the 2005 Replacement Local Plan which separates the two centres. *Brentwood Retail and Commercial Leisure Study* (2011) recommends setting a boundary for Warley Hill centre and this will be achieved by including it within the wider Brentwood Town Centre. This option will also assist in the aim to better link the station area with the High Street, as was the rationale for including a wider boundary in *Brentwood Town Centre Regeneration Strategy* (2010).

3.52 Shenfield is home to a major railway station with fast train services into central London. It will be the terminus for Crossrail and it is vital that the most is made of this opportunity to invest in improving Shenfield's retail offer.

3.53 Ingatestone has the largest village centre in the Borough, an attractive local service and convenience centre with a train station. There is potential for West Horndon to be a similar order centre in future if the Preferred Option of housing redevelopment here provides sufficient investment in community, service and retail facilities. If so, the review of the Local Development Plan post 2030 may need to consider identifying West Horndon as a high order Borough centre.

3.54 At present West Horndon's retail offer is largely provided by convenience stores in local shopping parades. Elsewhere in the Borough villages of varying sizes are served by shopping parades. These provide key local services to the community and communities nearby.

3.55 *Brentwood Town Centre Regeneration Strategy* (2010), produced with Brentwood Renaissance and Essex County Council, sets out a regeneration

framework and vision for the town centre. This policy reflects that vision. The following priorities are based on the Strategy, particularly relating to Brentwood and Shenfield, although some, eg the need for attractive shopfronts, may apply equally elsewhere:

Quality public realm: Opportunities exist for a high quality, safe, pedestrian-friendly public realm. Within Brentwood Town Centre, development needs to complement the local distinctive character and opportunities taken to reconnect key spaces such as the Chapel Ruins, Baytree Centre, William Hunter Way and Brentwood station. Public space around the Chapel Ruins is vital to achieving this with an opportunity to provide a public square or piazza. Public realm improvements in Shenfield will be encouraged, capitalising on the arrival of Crossrail.

Sustainable transport network: Development should enhance key gateways to Brentwood and Shenfield. Opportunities to improve railway stations and surrounding forecourts should be prioritised as key gateways. Development will be encouraged that improves sustainable transport connections and offers alternatives to the car, including safe, direct, well located cycle and pedestrian routes.

Investment in local heritage: Brentwood Town Centre has a rich, diverse character and built environment. The town centre is designated a Conservation Area. Development that improves the character of Shenfield will be encouraged.

Attractive shopfronts: No other single aspect of a building has such significant impact on its surroundings as shopfronts and signage. Proposals need to incorporate high quality, attractive shopfronts, enhance the street scene and be designed to a high standard, in line with the Council's adopted shopfront guidance SPD.

Mix of residential and commercial uses: A mix of uses is essential to create vibrant and successful town centres. Where appropriate, higher density development can help meet the need for more affordable housing and local jobs. The most efficient use of previously developed land and buildings should be made, such as making good use of upper floors above shops. To create a vibrant and competitive location high quality retail needs to be attracted. Major drivers of footfall in suitable locations will help increase the number of 'linked trips' to benefit all local shops.

Culture, entertainment and leisure: Borough centres host a wide variety of culture, leisure and entertainment, such as libraries, theatres, gyms, restaurants, arts and youth clubs, adult education and sports facilities. Brentwood Town Centre has a flourishing night-time economy popular with many people visiting to eat out and socialise in the evenings. The Policy aims to positively manage the night time experience to overcome negative public perceptions by creating a high quality environment that is safe, convenient and enjoyable for all.

Evidence

Brentwood Town Centre Regeneration Strategy (2010)

Shopfront Guidance for Brentwood Town Centre SPD (2010)
Retail and Commercial Leisure Study (2011)

National Policy

NPPF paragraphs 23-27

NPPF Paragraph 23

Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, local planning authorities should:

- *Recognise town centres as the heart of their communities and pursue policies that support their vitality and viability;*
- *Define a network and hierarchy of centres that is resilient to anticipated future economic changes;*
- *Promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres;*
- *Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of sustainable sites;*
- *Allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town centre sites are not available. If sufficient edge of centre sites cannot be identified, set policies for meeting the identified needs on other accessible locations that are well connected to the town centre;*
- *Set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres*
- *Recognise that residential development can play an important role in ensuring the vitality of town centres and set out policies to encourage residential development on appropriate sites; and*
- *Where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity.”*

NPPF

Paragraph 24 requires that the *sequential test be applied to applications for main town centre uses that are not in an existing centre.*

Consultation Feedback

In 2011 the Council carried out an extensive consultation allowing residents, business and stakeholders to have their say on local plan issues. Feedback included a desire to see town centres thrive, with a good mix of shops and convenient parking. Residents in smaller centres are keen to maintain local shops and facilities. When asked what could be improved a common response was ‘more or better shops’. Key issues raised regarding the

Borough's centres were the need for a mix of shops, including provision for independent business and 'niche' shopping and better management of the high-time economy.

Policy CP13: Sustainable Transport

The Council will work with partners to facilitate and promote sustainable transport. This includes improving accessibility, creating opportunities for 'active travel' and reducing congestion and pollution.

Future development in accessible locations will help reduce the need to travel. Where travel is necessary, public transport (rail, bus, taxi), walking and cycling will be promoted as an alternative means of transport to the private car. Major generators of travel demand should be located in Brentwood Town Centre and in District Centres.

Sustainable transport links will be improved, including provision for cycling, walking and Quality Bus Partnerships. Where appropriate contributions will be sought towards sustainable transport improvements in association with planning permission for new development. Sustainable travel will be encouraged through the requirement for travel plans from major developments, employers and institutions and residential travel packs.

In order to provide better Borough links for strategic allocations for housing and employment outside Brentwood urban area, a Green Travel Plan will be required. A Green Travel route linking Brentwood Town Centre with strategic allocations at West Horndon and Brentwood Enterprise Park will provide sustainable public transport.

Applications for large scale development proposals will need to be accompanied by a Transport Assessment. For smaller scale developments a Transport Statement may suffice.

The Council, in consultation with partners, will seek the retention of existing bus and rail services and, where possible, encourage improved and new services. Support and encouragement will be given to the refurbishment of rail station buildings and other improvements in facilities for public transport users including transport interchange improvements. The Council will seek additional taxi facilities for the borough, where appropriate.

Traffic and car parking will be carefully managed to encourage sustainable travel.

The Council will support the development of Crossrail, maximising the potential for an overall improvement to Borough rail services, and mitigating any environmental or transport impacts as a consequence of the proposals through improving and encouraging sustainable transport, and other measures as required. In suitable locations, the Council will consider the scope for 'park and walk' schemes.

Cycling will be promoted through the provision of improved cycle parking and other facilities and new cycle routes as part of highway infrastructure improvements/traffic management measures and, where appropriate, in association with planning permission for new development. Particular attention will be given to proposed cycle routes as indicated on the Policies map.

Alternative approach

To have a more prescriptive policy in addition to requirements above, to incentivise sustainable travel, through the creation of home zones, quiet lanes, priority for car sharers, car clubs, low emission vehicles, pedestrianisation, community transport schemes and car free development.

Reason for rejection: This approach would require a commitment from partners, including Essex County Council, transport providers and the local community to promoting, and using, alternatives to the car and accepting development schemes in suitable locations with parking below adopted standards.

Justification

3.56 Sustainable transport is a key component of sustainable development. Sustainable transport refers to any means of transport with a low impact on the environment, and includes non-motorised transport, ie walking and cycling, public transport, low emission vehicles and car sharing. This policy aims to ensure that new development reduces the need to travel, gives priority to pedestrians and cyclists and convenient access to jobs, homes, shops, public transport and services, such as education, healthcare, recreational facilities and open space.

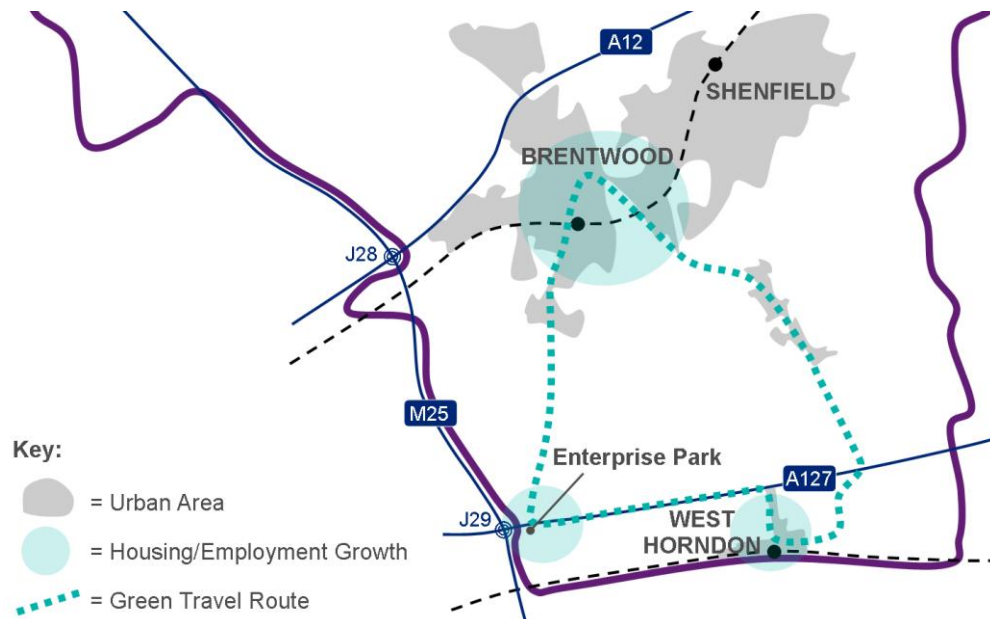
3.57 While the aim will be to offer a choice of transport, reducing dependency on the car will improve resilience in the face of future fuel shortages or price rises. Securing public transport improvements and better provision for walking and cycling will reduce pollution, make it safer and easier for people to travel to jobs and services and lead to better health, less congestion and more pleasant streets. The Government's *Active Travel Strategy* (Dept of Health and Dept for Transport, 2010) aims to get more people walking and cycling in recognition of the many benefits these bring. As the Strategy notes, walking or cycling can be quicker and cheaper than driving or taking public transport for many short trips and are an easy way to become more physically active thereby improving health and wellbeing.

3.58 In order to consider the transport implications of development proposals, applications for large scale development proposals will need to be accompanied by a Transport Assessment. For smaller scale developments a Transport Statement may suffice.

3.59 To better link strategic allocations at West Horndon and Brentwood Enterprise Park (M25 Junction 29), it is proposed that a Green Travel Route will link these areas to Brentwood Town Centre. This will provide sustainable public

transport links that integrate key locations in the Borough. Figure 3.3 illustrates this proposal:

Figure 3.3: Green Travel Route



3.60 The arrival of Crossrail will provide many benefits to local residents and businesses in terms of improved service and connections. The Council will encourage improvements to the public realm surrounding Brentwood and Shenfield stations, and look to improve access and parking provision. For this reason a suitable site will be sought to provide a 'Park & Walk' facility in Shenfield, potentially leaving existing car parks around Shenfield Station available for redevelopment (see site allocations reasonable alternatives). The most appropriate location for a Park & Ride site is to the north-east of Shenfield due to quick vehicle access to the A12 and approx 10 min walking time via Alexander Lane to Shenfield Station. However, Alexander Lane itself is not suitable for vehicles to access a site. Therefore, vehicle access from Chelmsford Road (A1023) may be required. Figure 3.4 illustrates this proposal, showing the area of search for a suitable site and potential access arrangements.

Figure 3.4: Shenfield Park & Walk



Evidence

- Active Travel Strategy* Department of Health and Department for Transport, 2010
- Essex Local Transport Plan 2011*
- Manual for Streets* Department for Transport, Communities and Local Government 2007
- Infrastructure Delivery Plan* (forthcoming)
- Shenfield Parking Study Steer Davies Gleave, December 2009

National Policy

Active Travel Strategy (Dept of Health and Dept for Transport, 2010)

NPPF paragraph 29: *The transport system needs to be balanced in favour of sustainable transport modes, giving people a real choice about how they travel.*

NPPF paragraph 34: *Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimized.*

NPPF paragraph 35: *Plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Development should be located and designed where practical to*

- *accommodate the efficient delivery of goods and supplies; give priority to pedestrian and cycle movements, and have access to high quality public transport facilities;*
- *create safe and secure layouts which minimise conflicts between traffic and cyclists or pedestrians, avoiding street clutter and where appropriate establishing home zones;*
- *incorporate facilities for charging plug-in and other ultra-low emission vehicles; and*
- *consider the needs of people with disabilities by all modes of transport*

Consultation

Feedback from the Issues and Options and Your Neighbourhood consultations in 2009 and 2011 highlights the need for a more comprehensive cycle network in the Borough and improved public transport in rural areas.

Target

An increase in % of trips by walking and cycling

An increase in % of trips by public transport

A fall in % of trips by private car

Indicator

Data on modal split

Delivery

Through the development management process

By liaison and working with Essex County Council as transport and highway authority

By supporting Rural Transport initiatives

Through specific projects, such as the provision of cycle racks

CIL (pending adoption of Infrastructure Delivery Plan and Charging Schedule)

Initiatives identified by the health and wellbeing boards

Policy CP14: Sustainable Construction and Energy

The Council will require all development proposals, including the conversion or re-use of existing buildings, to:

- a. **maximise the principles of energy conservation and efficiency in the design, massing, siting, orientation, layout and use of materials**

- b. incorporate water conservation measures and suitable Sustainable Urban Drainage Systems (SuDs), such as green roofs and rainwater attenuation measures, particularly in critical drainage areas**
- c. submit a Water Sustainability Assessment**

The Council will expect

- d. all residential development to achieve a minimum Code for Sustainable Homes (or the equivalent standard) Level 3, rising in line with the increases to Part L of the Building Regulations; and**
- e. all new commercial development of more than a 1000m² to achieve a minimum BREEAM 'Very Good' rating (or the equivalent replacement standard), rising in line with the increases to Part L of the Building Regulations.**
- f. Major schemes to incorporate the use of renewable and low carbon technology**

Where it is not possible to meet these standards, applicants must demonstrate compelling reasons why achieving the sustainability standards outlined above for residential and non residential developments would not be technically feasible or economically viable.

Renewable Energy Schemes

Proposals for renewable, low carbon or decentralised energy schemes will be supported provided they can demonstrate that they will not result in unacceptable harm to the local environment, including cumulative and visual impacts which cannot be satisfactorily addressed. Renewable and low carbon energy development proposals located within the Green Belt will need to demonstrate very special circumstances and that harm to the Green Belt is outweighed by the added environmental benefits of development.

Allowable Solutions

Where on-site provision of renewable technologies is not appropriate, new development can meet the requirements through off-site provision by making 'allowable solutions contributions'. These funds will then be used for energy efficiency and energy generation initiatives or other measure(s) required to offset the environmental impact of the development.

Alternative Approach

To require proposals to achieve higher standards, eg Code for Sustainable Homes Level 4 and BREEM Excellent.

Set a target that requires development above a certain size to provide a minimum percentage (say 15%) of predicted energy requirements from decentralised or low carbon sources.

Reason for rejection

This approach would be justified on environmental grounds, but may be harder to deliver in practice. The Council is in the process of gathering local evidence regarding the scope for renewable energy. Once this is available, it may provide a basis for a target for the provision of renewable energy.

Justification

Climate Change and Emissions

3.61 Climate change is recognised as a significant environmental challenge. The burning of fossil fuels (oil, coal and gas) releases greenhouse gases into the atmosphere, particularly carbon dioxide (CO₂), and is the main cause of climate change. Most sources of energy, domestic, industrial or transport are fossil fuel based.

3.62 Ignoring climate change could have severe adverse economic, social and environmental consequences. Brentwood residents are likely to experience increased frequency and severity of flooding, water shortages, hotter summers, rising energy costs and increased risk of damage to homes, health and infrastructure. We need to plan for development that will help slow the rate of, and be resilient to the effects of, climate change by minimising our carbon emissions.

3.63 Among the practical benefits of reducing dependency on fossil fuels are fuel security, thermal comfort (for example, warmer homes that are cheaper and easier to heat) and less pollution. The policy aims to ensure that the Borough's built environment can mitigate and adapt to climate change, influence the quality of development proposals and promote energy efficiency and sustainable sources of energy supply. The policy sets out a supportive framework for delivering low and zero carbon energy infrastructure which will assist Brentwood in reducing CO₂ emissions and in moving towards a low carbon economy.

3.64 The Climate Change Act (2008) legislates for a 34% reduction in greenhouse gas emissions against 1990 levels by 2020, and an 80% reduction by 2050. Incorporating renewable energy generation and energy efficiency measures into new development will be essential in order to achieve these targets. The Council's Environmental Policy (December 2009) acknowledges that its operations have an impact on our local and global environment and sets out actions to manage and monitor our environmental impacts. In 2007, the Council signed the Nottingham Declaration on Climate Change, a commitment to reduce its own emissions and encourage all sectors of the local community to do so.

Renewable Energy and Low Carbon Development

3.65 The National Planning Policy Framework positively encourages an increase in the use and supply of renewable energy and low carbon development. The UK Renewable Energy Strategy (2009) includes the UK's legally binding renewable energy target of 15% by 2020, as part of a wider suite of strategies within the UK Low Carbon Transition Plan. The Council will

therefore encourage suitable renewable energy technologies, including micro-generation, as stipulated in the Department of Energy and Climate Change East of England Renewable and Low Carbon Energy Capacity 2011 Study. The majority of the Borough lies within the Green Belt therefore renewable energy development proposals will need to demonstrate that harm to the Green Belt is outweighed by the wider benefits of the development.

3.66 From 2013, the European Performance Building Directive-2 (EPBD) will establish minimum energy performance requirements for all heating, cooling, ventilation, hot water and lighting demands from new buildings. A significant proportion of residual regulated energy will come from renewable energy sources provided either on site or nearby.

3.67 The Government aims to ensure all new homes are zero carbon by 2016 and 2019 for new non-domestic buildings. Improvements in resource efficiency will be made further through Part L Building Regulations. Progress towards 'zero carbon' development will be made through progressive tightening of the Building Regulations. Over time these changes will replace the energy related elements of the Code for Sustainable Homes standards and the Building Research Establishment Environmental Assessment Method (BREEAM) standards for non-domestic buildings. Developing in accordance with the nationally recognised Code for Sustainable Homes and BREEAM will ensure developments demonstrate a commitment to sustainable development in practice and enable the carbon compliance target to be met. The Code for Sustainable Homes is the Government's adopted rating system for the design and construction of new homes. BREEAM is a national sustainable design and construction standard and an environmental assessment for all other types of developments. Both ensure low environmental impact buildings by requiring developments to include energy and water efficiency measures, climate change adaptation measures and use of less polluting materials.

Allowable Solutions

3.68 As part of the Government's policy for achieving zero carbon performance, the policy seeks to establish realistic limits for carbon compliance (on site carbon target for buildings) and allows for the full zero carbon standard to be achieved through the use of "allowable solutions". These are envisaged as mainly near site or off site carbon saving projects which would compensate for carbon emissions reductions that are difficult to achieve on site. Local authorities could explore opportunities for using carbon offset funds and community energy funds as a way of delivering the concept of allowable solutions in their areas.

Sustainable Design and Construction

3.69 Consideration of sustainable design and construction issues should take place at the earliest possible stage in the development process. This will provide the greatest opportunities for a well designed and constructed development and at the same time enable costs to be minimised. Therefore the Local Planning Authority and developer should consider sustainable construction issues in pre-application discussions. Necessary policy requirements should be captured within a sustainability statement, which can

form part of the design and access statement. The need for such a statement should also be discussed at the pre-application stage.

Water Conservation

3.70 *Brentwood Scoping and Outline Water Cycle Study 2011* identifies the Borough as lying within an area of Serious Water Stress. Having a semi-arid climate and succession of dry winters, has led to groundwater levels within Brentwood being susceptible to multi-season droughts. The quality of the Borough's watercourses is generally poor, while sewerage infrastructure in the north of the Borough is operating at full capacity. The study recommends requiring all new developments to submit a water sustainability assessment and developers to demonstrate that they will achieve the water consumption Level 3/4 of the Code for Sustainable Homes for all residential developments and for non residential developments to achieve BREEAM 'Very Good' standard for water consumption targets.

3.71 Legislation, policy and technology is continually changing in this area. Therefore the Council will review and update this Policy as and when required.

Evidence

East of England Renewable and Low Carbon Energy Capacity Study (2011)

Brentwood Scoping and Outline Water Cycle Study (2011)

Brentwood Council's Environmental Policy (December 2009)

Good Practice Guidance: Sustainable Design and Construction (Cross Sector Group on Sustainable Design and Construction, August 2012)

National Policy

UK Renewable Energy Study

NPPF paragraph 6 states that the purpose of the planning system is to contribute to the achievement of sustainable development.

NPPF paragraph 7 defines three dimensions to sustainable development and points out that the planning system needs to perform an environmental role which contributes to protecting and enhancing our natural, built and historic environment, and to help improve biodiversity, use natural resources prudently, minimise waste and pollution and mitigate and adapt to climate change including moving to a low carbon economy.

NPPF paragraph 93: planning plays a key role in helping shape places to secure radical reductions in greenhouse gas emissions, minimising vulnerability, providing resilience to the impacts of climate change, and supporting the delivery of renewable and low carbon energy and associated infrastructure.

NPPF paragraph 95: local planning authorities should plan for new development in locations and ways which reduce greenhouse gas emissions, support energy efficiency improvements to existing buildings and when setting local requirements for a building sustainability, do so in a way consistent with the Government's zero carbon buildings policy and adopt nationally described standards.

NPPF paragraph 96: in determining planning applications, local planning authorities should expect new development to comply with adopted Local Plan policies on local requirements for decentralised energy supply unless it can be demonstrated by the applicant, having regard to the type of development involved and its design, that this is not feasible or viable and take account of landform, layout, building orientation, massing and landscaping to minimise energy consumption.

NPPF paragraph 97: local planning authorities should design their policies to maximise renewable and low carbon energy development while ensuring that adverse impacts are addressed satisfactorily, including cumulative landscape and visual impacts, consider identifying suitable areas for renewable and local carbon energy sources, and supporting infrastructure, and support community led initiatives.

NPPF paragraph 91: when located in the Green Belt, elements of many renewable projects will comprise inappropriate development. In such cases developers will need to demonstrate very special circumstances if projects are to proceed. Such very special circumstances may include the wider environmental benefits associated with increased production of energy from renewable sources.

Policy CP15: High Quality Design

The Council will require all new development to be high quality and well designed in its own right. New development should acknowledge and be sympathetic to its context, reinforcing local distinctiveness and sense of place. All development proposals must be fit for their purpose, appropriate for and responsive to their site and setting, be adaptable and responsive for long term use and create successful relationships with existing development.

Layout, density, design and landscaping should contribute positively towards the creation of high quality, attractive development where people choose to live, work and visit, by making places that are legible with a mix of uses where appropriate, and safer by design. Requirements, including parking, cycling and recycling facilities, green space and landscaping must form an integral part of the design process.

All new development must be based on a thorough site and context appraisal which demonstrates how the above criteria will be met.

Further detailed criteria for specific development proposals are set out in subsequent policies.

Alternative Approach

A policy combining design of new development and the public realm.

Reason for rejection: Separate policies (CP15 Design and CP16 Public Realm) have been put forward in order to more clearly separate the two issues. Creating a high quality public realm is a specific aim in the Brentwood Town Centre Regeneration Strategy. Design and the public realm are

important issues in their own right and therefore the Council considers it makes sense to include a separate policy in the Plan.

Justification

3.72 An important part of making high quality places is to ensure that new buildings are well designed. This means making buildings attractive in their own right, appropriate in their setting and fit for purpose. The Borough's good quality and distinctive character needs to be reinforced by any new development proposal. It is also important that buildings are designed in an adaptable way to ensure flexibility in their potential use and function.

Evidence

Essex Design Guide (2005, to be updated late 2013)

Urban Place Supplement SPD (2007)

Brentwood Town Centre Regeneration Strategy (2010)

Design Council Cobe Panel Review Brentwood Local Plan Workshop (2012)

The Sign of a Good Place to Live, Building for Life 12 (2012, Building for Life Partnership)

National Policy

Creating a high quality built environment is a key part of the social role in the central NPPF aim to achieve (NPPF paragraph 7)

NPPF paragraphs 56-68 'Requiring Good Design':

Good design is a key aspect of sustainable development, is indivisible from good planning, and should contribute positively to making places better for people.

It is important to plan positively for the achievement of high quality and inclusive design for all development, including individual buildings, public and private spaces and wider area development schemes.

Planning policies and decisions should ensure developments are visually attractive as a result of good architecture and appropriate landscaping.

Local planning authorities should consider using design codes where they could help deliver high quality outcomes. However, design policies should avoid unnecessary prescription or detail and should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally.⁶⁰ Planning policies and decisions should not attempt to impose architectural styles or particular tastes and they should not stifle innovation, originality or initiative through unsubstantiated requirements to conform to certain development forms or styles. It is, however, proper to seek to promote or reinforce local distinctiveness.

Although visual appearance and the architecture of individual buildings are very important factors, securing high quality and inclusive design goes beyond aesthetic considerations. Therefore, planning policies and decisions should address the connections between people and places and the integration of new development.

In determining applications, great weight should be given to outstanding or innovative designs which help raise the standard of design more generally in the area.

Local planning authorities should have local design review arrangements in place to provide assessment and support to ensure high standards of design.

They should also when appropriate refer major projects for a national design review.

In general, early engagement on design produces the greatest benefits. In assessing applications, local planning authorities should have regard to the recommendations from the design review panel.

Target

High quality and innovative building design that is sympathetic to its context and reinforces local distinctiveness

Indicator

Policy usage as monitored in the Council's Authority Monitoring Report

Delivery

Planning applications to include site and context appraisals

Pre-application discussions

Design briefs

Design Review Arrangements

Policy CP16: Enjoyable and Quality Public Realm

The Council will require the layout and design of all new development to create well designed high quality places, where people enjoy living, working and visiting. New development must be based on a thorough site and context appraisal and be sensitive to its context incorporating:

- a. legible and well planned routes, enhancing linkages between buildings and spaces**
- b. high quality, well designed blocks and spaces to an appropriate scale**
- c. integrated residential, commercial and community activity**
- d. safe, convivial public spaces and pedestrian routes**
- e. clearly defined public and private spaces**
- f. attractive buildings and landscaped spaces that integrate into existing neighbourhoods**

Alternative approach

A policy combining design of new development and the public realm.

Reason for rejection: Separate policies (CP15 Design and CP16 Public Realm) have been put forward in order to more clearly separate the two issues. Creating a high quality public realm is a specific aim in the Brentwood Town Centre Regeneration Strategy. Design and the public realm are important issues in their own right and therefore the Council considers it makes sense to include a separate policy in the Plan.

Justification

3.73 Also known as public space or public domain, the public realm comprises features such as streets, paths, squares and urban green spaces. The success of places is ultimately judged by how enjoyable they are to use or visit. In the public realm the space between buildings matters as much as the buildings themselves. How buildings and adjacent spaces function and relate to each other has a strong bearing on how safe, convenient and attractive a place looks and feels as a whole. These qualities matter in development of all sizes.

3.74 Successful development will connect people and places, integrating a high quality environment with local distinctive character. Opportunities to reconnect key spaces in the Borough's urban areas will be encouraged, providing a public realm for everyone that is safe, pedestrian-friendly and encourages walking and cycling. Well designed public realm is fundamental to health and well-being. Applying the principles of this policy will help ensure that new development positively enhances the public realm, securing improvements where needed for the Plan period and beyond.

Evidence

Urban Place Supplement SPD (2007)

Manual for Streets (2007, Department for Transport/Communities and Local Government)

Brentwood Town Centre Regeneration Strategy (2010)

Street Materials Guide: Design and Good Practice (2012, Essex County Council)

Design Council Cobe Panel Review Brentwood Local Plan Workshop (2012)

National Policy

Creating a high quality built environment is a key part of the social role in the requirement to contribute to the achievement of sustainable development (NPPF paragraph 7)

NPPF paragraph 58: *Planning Policies and decisions should ensure developments:*

- *establish a strong sense of place, using streetscapes and buildings to create attractive and comfortable places to live, work and visit*
- *optimise the potential of the site to accommodate development, create and sustain an appropriate mix of uses (including incorporation of green and other public space as part of developments) and support local facilities and transport networks*

- *respond to local character and history, and reflect the identity of local surroundings and materials, while not preventing or discouraging appropriate innovation*
- *create safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion*

NPPF paragraph 69: *Planning can play an important role in facilitating social interaction and creating healthy, inclusive communities. Planning policies should aim to achieve places which promote safe and accessible developments, containing clear and legible pedestrian routes and high quality public space.*

NPPF paragraph 70: *To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:*

- *plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;*
- *take account of and support local strategies to improve health, social and cultural well-being for all, and deliver sufficient community and cultural facilities and services to meet local needs.*

Target

New development positively enhances the public realm.

Indicator

Monitoring policy usage.

Delivery

Developer contributions, CIL, IDP.

Design Review

Working in Partnership with other bodies whose activities affect the public realm, such as the Highways Agency and Brentwood Renaissance.

Policy CP17: Provision of Infrastructure and Community Facilities

The Borough Council will require all new development to meet on and off-site infrastructure requirements necessary to support development proposals and mitigate their impacts.

Planning obligations secured through Section 106 agreements, will be used to provide necessary site related infrastructure requirements such as new access arrangements, provision of open space and other community infrastructure, local highway/transportation mitigation and environmental enhancements.

Necessary off-site infrastructure will continue to be secured through the pooling of contributions secured through Planning Obligations and, once adopted, according to the Borough Council's Community Infrastructure Levy (CIL) Charging Schedule.

Alternative Approach

Continue to collect contributions through Section 106 agreements and not implement CIL.

Reason for rejection: Choosing not to implement CIL is not the preferred option as relying solely on Section 106 Planning Obligations would make it very difficult for the Council to plan for and deliver infrastructure the Borough needs.

Justification

3.75 The term 'infrastructure' covers a wide range of services and facilities required to support new development which includes community infrastructure and services. All development, regardless of size and scale, places additional demands on services and facilities which will affect their ability to meet the needs of the community. Timely delivery of necessary infrastructure that supports and mitigates the impact of new development is therefore essential to support the Borough Council's preferred Spatial Strategy.

3.76 Planning Obligations will include specific infrastructure requirements made necessary by individual developments. Section 216 of the Planning Act (2008) sets out the broad types of infrastructure which CIL can be used for. This includes transport facilities, flood defences, schools, medical facilities, recreational facilities, open spaces and affordable housing. Further information regarding requirements will be set out in the Council's Infrastructure Delivery Plan.

3.77 The Council's preferred approach is to draw up a CIL Charging Schedule. Until this is adopted, the Borough Council will assess all development proposals and seek the provision of, or contributions to, necessary on or off-site infrastructure to be secured through planning obligations.

3.78 Infrastructure includes, but is not limited to, the following examples:

- Utilities and Waste – water supply, foul water sewerage, waste and recycling, energy generation, telecommunications and broadband
- Transport – highway, rail, bus, pedestrian and cycle network
- Social and Community – hospital, GP, dentist, children's centres, schools, further education, emergency services, libraries, youth centres, leisure centres, community halls, local convenience store, theatres, public realm, public house

- Green Infrastructure – waterways, parks, natural and semi natural spaces, outdoor sports facilities, allotments, play areas, wildlife corridors/footpaths, green roofs

Evidence

Infrastructure Delivery Plan (forthcoming)

National Policy

NPPF paragraph 21 states “*Planning policies should recognise and seek to address potential barriers to investment, including a poor environment or any lack of infrastructure*” and identify priority areas for infrastructure provision.

The Local Plan should set out strategic priorities for

- *the provision of infrastructure for transport, telecommunications, waste management, water supply, wastewater, flood risk and coastal change management, and the provision of minerals and energy (including heat)*
- *the provision of health, security, community and cultural infrastructure and other local facilities (NPPF paragraph 156)*

“Local authorities should work with neighbouring authorities and transport providers to develop strategies for the provision of viable infrastructure necessary to support sustainable development” (NPPF paragraph 31)

“Local planning authorities should not refuse planning permission for buildings or infrastructure which promote high levels of sustainability because of concerns about incompatibility with an existing townscape, if those concerns have been mitigated by good design.” (NPPF paragraph 65)

“Planning has a key role in supporting... the delivery of renewable and low carbon energy and associated infrastructure.” (NPPF paragraph 93)

Local Plans should:

- *“promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.” (NPPF paragraph 28)*
- *“plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;” (NPPF paragraph 70)*
- *“ensure an integrated approach to considering the location of housing, economic uses and community facilities and services.” (NPPF paragraph 70)*

Target

Secure developer contributions in line with Infrastructure Development Plan

Indicator

Development Monitoring

Delivery

CIL

Chapter 4: Development Management Policies

4.2 This section of the Plan deals with fundamental aspects of development planning in the Borough, and contains Policies which seek to achieve the Strategic Objectives of the Plan and provides a detailed suite of Development Management policies which support the Spatial Strategy and Core Policies of the Plan. The Council seeks to promote and secure sustainable development. This means directing development to locations which are supported, or capable of being supported, by effective transport provision, leisure, community and other essential services, while minimising harm to the environment and protecting the Green Belt.

Managing Growth

Strategic Objective 1

Direct development growth to the existing urban areas of Brentwood, Shenfield and West Horndon in locations well served by existing and proposed local services and facilities.

Strategic Objective 2

Manage development growth to that capable of being accommodated by existing or proposed infrastructure, services and facilities.

Policy DM1: General Development Criteria

Proposals for development will be expected to meet the following criteria:

- a. have no adverse effect on visual amenity, the character or appearance of the surrounding area**
- b. provide satisfactory means of access to the site for vehicles, cyclists and pedestrians and parking and servicing arrangements**
- c. ensure the transport network can satisfactorily accommodate the travel demand generated and traffic generation would not give rise to adverse highway conditions or highway safety concerns or unacceptable loss of amenity by reason of number or size of vehicles**
- d. have no adverse effect on health, the environment or amenity due to the release of pollutants to land, water or air (light, noise pollution, fumes, vibration, smells, smoke, ash, dust and grit)**
- e. cause no unacceptable effects on adjoining sites, property or their occupiers through excessive noise, activity or vehicle**

movements; overlooking or visual intrusion; harm to or loss of outlook, privacy or daylight/sunlight enjoyed by occupiers of nearby properties

- f. take full account of opportunities to incorporate biodiversity in and around developments**
- g. when considering the impact of development on the significance of a designated heritage asset, greater weight should be given to the assets conservation**
- h. result in no net loss of residential units**

In exceptional circumstances, where the Council considers the need for the development outweighs any harm caused, the council will require suitable compensatory measures, either on-site or off-site.

Proposals for uses within or near residential areas which may give rise to unacceptable levels of pollutants will need to be accompanied by an environmental statement, including details of suitable abatement measures, in order to assess their likely effects on residents. Where effects are judged unacceptable and cannot be addressed through sensitive siting or pollution abatement technology permission will be refused.

Alternative Approach

1. To have no policy and rely instead on the National Planning Policy Framework and ad hoc consideration of proposals on a case by case basis.

Reason for rejection: The Council believes the preferred approach will provide a more transparent, consistent and fairer basis for considering planning proposals than having no policy.

2. To include criteria in the preferred policy in other policies in the plan.

Reason for rejection: Previous experience has shown an approach similar to the preferred policy to be effective although this approach might be equally effective.

Justification

4.3 New development should make a positive contribution to the quality of the environment and Borough. This policy is intended to help achieve this.

4.4 Development should not harm the amenities of occupiers in nearby properties. Therefore, protecting the privacy and amenity space of nearby properties by avoiding excessive overlooking or loss of light resulting from new development are key considerations. New developments should be sympathetic to the character and form of neighbouring properties and surroundings ensuring they are not overbearing and do not look out of place.

4.5 In light of the imperative to deliver sustainable development, the Borough Council expects development to adopt environmental best practice and pollution prevention measures in relation to groundwater, drainage, lighting, noise, impacts on health, the environment and amenity to avoid, address or mitigate adverse impacts that might otherwise arise. It will be important therefore that all development proposals take into account the environmental impact of proposed activities at an early stage in the planning process and incorporate measures needed to address this.

4.6 In order for a scheme to be acceptable, development will be required to make satisfactory arrangements for vehicular, cycle and pedestrian access into the site and for parking and servicing within the site. Any traffic generated by the development should be capable of being satisfactorily accommodated by the transport network and not give rise to unacceptable highway conditions, safety and amenity concerns as a result of the number or size of vehicles.

4.7 Changes of use from residential, especially within or adjoining commercial centres, can involve the loss of smaller accommodation, for example flats above shops and small terraced units, which make a valuable contribution to the housing stock offering housing choice and affordability and responding to demographic change, notably a fall in the average household size. Such locations are sustainable being near services, facilities within walking distance and public transport. A residential presence in commercial areas maintains activity after shops and offices close, enhances community safety and retains the mixed-use feel of shopping areas. Making the best use of existing housing helps resist pressure to release additional land from the Green Belt. The Council therefore aims to retain existing dwellings and resist their loss. Similarly, the Council will seek to retain community facilities and services where needed, or secure their replacement, to at least an equivalent standard and convenience.

Evidence

Brentwood Borough *Annual Monitoring Reports*

Annual Monitoring of previous policy usage shows a criteria based policy along the lines being proposed to be extremely helpful in guiding the appraisal of and decisions on development proposals.

National Policy

NPPF, paragraph 120: Planning policies “*should ensure that new development is appropriate for its location. The effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed*”

Planning policies and decisions should aim to:

- *avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development;*
- *recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established; and*

- *identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason. (NPPF paragraph 123)*
- *promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship". (NPPF, paragraph 28) and guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs" (paragraph 70)*

Consultation

Responses highlight the importance of managing development to minimise any harm that might be associated with it, such as traffic impact or amenity issues.

Target

No net loss of residential units

Indicator

Planning permissions/conversions/change of use for existing residential properties

Delivery

Development Management

Policy DM2: Effective Site Planning

Planning permission will be granted for development proposals only where the planning and design of buildings and spaces:

- a) **arrange access points, routes within the site, public and private spaces, building forms and ancillary functions in an efficient, safe, workable, spatially coherent and attractive manner**
- b) **incorporate existing site features of value**
- c) **design-out opportunities for crime and anti-social behaviour**
- d) **safeguard the amenities of occupiers or any nearby properties by ensuring that their character and appearance is sensitive to the context and surroundings**

Alternative Approach

Incorporate site planning context within a design and/or public realm policy.

Reason for rejection: Site planning is included as a separate Development Management Policy to highlight its importance in order to ensure development proposals address the need to create links with adjoining sites, incorporate features of value and design-out crime. Creating a high quality public realm is a specific aim in *Brentwood Town Centre Regeneration Strategy* and this is reflected in the Plan with the inclusion of separate specific policies.

Justification

4.8 Site planning is at the heart of good design and making successful places. A primary consideration when site planning is the nature and function of the spaces between buildings. However small, sites should be well connected, safe and properly landscaped. Public and private spaces should be clearly differentiated.

4.9 Site planning should incorporate existing site features such as trees and ponds and built-forms of value. Spaces that are safe and welcoming in the long-term depend on eliminating the opportunity for anti-social activity through the placing of building fronts and treatment of spaces. Site planning should ensure that buildings relate successfully to one another and have no adverse impact on the amenity of occupiers.

Evidence

Essex Design Guide (2005, to be updated late 2013)

Urban Place Supplement SPD (2007)

Brentwood Town Centre Regeneration Strategy (2010)

Design Council Cobe Panel Review Brentwood Local Plan Workshop (2012)

The Sign of a Good Place to Live, Building for Life 12 (2012, Building for Life Partnership)

National Policy

Creating a high quality built environment is a key part of the social role in the requirement to contribute to achieving of sustainable development (NPPF paragraph 7)

NPPF paragraphs 56-68 'Requiring Good Design'

"Planning can play an important role in facilitating social interaction and creating healthy, inclusive communities. Planning policies should aim to achieve places which promote safe and accessible developments, containing clear and legible pedestrian routes and high quality public space..." (NPPF paragraph 69)

"To deliver the social, recreational and cultural facilities and services the community needs, planning policies and decisions should:

- *plan positively for the provision and use of shared space, community facilities (such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship) and other local services to enhance the sustainability of communities and residential environments;*
- *take account of and support local strategies to improve health, social and cultural well-being for all, and deliver sufficient community and cultural facilities and services to meet local needs."*

(NPPF paragraph 70)

Policy DM3: Residential Density

Proposals for new residential development should take a design led approach to density which ensures schemes are sympathetic to local character and make efficient use of land.

Residential densities will be expected to be 30 dwellings per hectare net or higher unless the special character of the surrounding area suggests that such densities would be inappropriate.

Higher densities, generally above 65 dwellings per hectare net, will be expected in town and district centres or other locations with good public transport accessibility.

Alternative Approach

1. To set no minimum density and instead have a policy to secure a design led approach which seeks to achieve efficient use of land on a case by case basis.

Reason for rejection: Achieving the Council's housing aspirations as set out in this plan, both numerically and in terms of dwelling size, type and affordability, will require developers to use land efficiently. There is a risk that by setting no minimum density this may not happen. As a consequence more land would be needed to provide the same number of homes than would otherwise be the case. Relying solely on a design led approach is riskier than specifying minimum densities which would apply in most circumstances under the preferred option and make it more likely that the plan will deliver housing requirements.

2. To have no policy on density

Reason for rejection: The same concerns that apply to Alternative 1 apply here only more strongly.

Justification

4.10 Efficient land use is essential in a Borough like Brentwood where land is scarce, and enables new homes to be provided without encroaching on the countryside. Good design makes it possible to develop in a way that is sympathetic to local character, uses land efficiently and creates or maintains a high quality living and working environment. The right density will depend on the scheme, dwelling mix, site characteristics and location.

4.11 The Council considers it reasonable to expect proposals to achieve densities of at least 30 dwellings per hectare except where this would harm the special character of an area, have an adverse transport impact or cause harm to residential amenities. Densities of 65 dwellings to the hectare or more will generally be expected in locations with good public transport accessibility.

4.12 To determine how much land is required to meet housing requirements, consideration has been given to the number of homes a given area can sustainably accommodate based on site and location characteristics. Efficient

land use is critical to the delivery of this plan. Without it there will be more pressure to release Green Belt to accommodate new development or, alternatively, the number of new homes delivered will fall short of that planned and what would otherwise have been provided.

National Policy

NPPF, Paragraph 47: *Local Planning authorities should set out their own approach to housing density to reflect local circumstances.*

Evidence

Strategic Housing Land Availability Assessment (2011), see density matrix assumptions

Urban Place Supplement SPD, BBC, (design guidance prepared by Essex CC)

BBC Site Allocations technical paper (forthcoming)

BBC Residential Land Monitor

Target

Policy requirements met

Schemes developed in accordance with Essex CC Urban Place Supplement design principles

Indicator

% of developments in line with this policy

Delivery

Allocations

Development management decisions

Proposals reflect *Urban Place Supplement* design principles

Policy DM4: Telephone Exchange

Redevelopment proposals for the Telephone Exchange shall include a mix of uses including residential with leisure/recreation and/or commercial office uses.

Alternative Approach

To have no policy. While redevelopment or refurbishment of this site is a long term objective, deliverability constraints mean this may be unachievable within the plan period.

Justification

4.13 The existing Telephone Exchange serving the area is on brownfield land in Brentwood town centre. Due to its height, the building is prominent. It is also visually unattractive and underused. Redevelopment here would provide an opportunity to utilise the site more efficiently and contribute towards the Borough's development needs. A well-designed proposal would

significantly enhance the character of the surroundings and adjacent Conservation Area.

National Policy

NPPF paragraph 20: *in drawing up Local Plans, local planning authorities should: identify priority areas for economic regeneration, infrastructure provision and environmental enhancement.*

NPPF paragraph 137: *local planning authorities should look for opportunities for new development within Conservation Areas and World Heritage Sites and within the setting of heritage assets to enhance or better reveal their significance.*

Target

Appropriate future use, sympathetic refurbishment or redevelopment of Telephone Exchange site providing for the needs of Brentwood Town Centre and enhancing the neighbouring Conservation Area.

Indicator

Development Management decisions made regarding site.

Delivery

Pre-application discussions with officers, members, landowner and developers.

Involvement of town centre partners such as Brentwood Renaissance.

Economic Prosperity

Strategic Objective 3

Foster a prosperous, vibrant and diverse local economy by attracting new commercial investment in order to maintain high and stable levels of economic and employment growth

Strategic Objective 4

Expand and enhance Brentwood Town Centre's retail offer, in particular, opportunities for high quality niche shopping

Strategic Objective 5

Promote and encourage the continued regeneration of Brentwood Town Centre to provide high quality public realm and mixed use developments

Strategic Objective 6

Optimise the social and economic benefits that arise from Crossrail for the benefit of residents and visitors to the Borough

4.14 This Plan aims to facilitate local economic development by providing additional employment land, supporting job creation and responding to business needs. In line with the Corporate Plan, the emphasis will be on encouraging high value business and a discerning approach to economic growth. This recognises the Borough's land constraints and need to maintain the high quality environment which makes it a popular destination for business, workers and residents. Spatial Policy S3 sets out land and job growth requirements.

4.15 The following Development Management policies set out the means by which economic prosperity and growth will be achieved through protecting existing employment land and premises and allocating and encouraging provision of new sites. Policies should be read in conjunction with Spatial Policy S3 and Core Policies *CP11 Strong and Competitive Economy* and *CP12 Thriving Town Centres*.

Policy DM5: Employment Development Criteria

Development for employment uses (Class B1, B2 or B8) will be encouraged provided it satisfies all the following criteria:

The proposal should:

- a. be of a scale and nature appropriate to the locality**
- b. provide appropriate landscaping and screening**
- c. be accessible by public transport, walking and cycling**
- d. ensure vehicular access avoids residential streets and country lanes, and the proposal does not give rise to significant traffic movements within rural areas**

- e. **be easily accessible to main arterial routes (A127, A12, M25) with appropriate parking provision**
- f. **where a significant amount of movement is generated, development proposals should be accompanied by a Transport Assessment in accordance with Policy CP12**

Alternative Approach

No alternative policy has been identified. The Council considers the preferred approach to be essential in order to deliver sustainable development.

Justification

4.16 All new employment proposals, both within and outside allocated employment areas, will need to comply with the criteria set out in this policy to protect the amenities of residents and other sensitive uses within the vicinity of the developments. In particular, the transport impacts of all proposals will need to be assessed to ensure that vehicular access and traffic generation do not result in unacceptable levels of traffic and congestion on unsuitable roads or within environmentally sensitive areas.

4.17 Employment sites can generate a large amount of movement for both vehicles and people. Where this is likely to occur, a Travel Plan will be required. To avoid any overspill of parked cars to surrounding residential streets or country lanes a satisfactory level of parking provision will need to be provided on site.

Evidence

Employment Land Review (2010)

Heart of Essex Economic Futures Study (2012)

National Policy

NPPF Paragraphs 18-22: Building a strong, competitive economy set out guidance on encouraging economic growth.

NPPF Paragraph 36: “...All developments which generate significant amounts of movement should be required to provide a Travel Plan.”

Policy DM6: Areas Allocated for General Employment and Office Development

Within those areas allocated for general employment and office development listed below and on the Policies Map, the Council will seek to achieve and retain a wide range of employment opportunities. Planning permission will be refused for the redevelopment or change of use of business, offices, general industry and distribution sites or premises for non-Class B uses as defined by the Use Classes Order 1987 (as amended) unless:

- a. **the proposal is for other non-residential uses that provide significant employment with no reasonable prospect of locating**

elsewhere in the Borough, and there is no identified need for the site or buildings for Class B uses

- b. the proposal is wholly for affordable housing, the site is vacant and development would not prejudice continuation of adjacent employment uses**
- c. the proposal is for any other use and the application is supported by a statement of efforts made to secure re-use for Class B1-B8 or similar uses and other non-residential use that provides employment, which evidence demonstrates there is no realistic prospect of the site or buildings being used or re-used, including through redevelopment, for these purposes**
- d. the site or buildings would be physically unsuitable for re-use for Class B1-B8 or similar use, even after adaptation (including sub-division into smaller units), refurbishment or redevelopment, in terms of siting, design, access, layout and relationship to neighbouring buildings and uses.**

Preferred Allocations		
Site	Area (ha)	Notes
New employment land allocations		
Brentwood Enterprise Park (M25 works site) (101A)	23.41	New employment allocation – brownfield site in Green Belt
Brentwood Enterprise Park (land at Codham Hall) (101B)	4.04	Existing employment uses on site, allocate land for employment to regularise uses.
Mountnessing Roundabout site (former scrapyards) (107)	2.6	New employment allocation – brownfield site in Green Belt (existing planning permission for hotel/leisure)
West Horndon strategic allocation	5 (approx)	New employment land as part of West Horndon strategic allocation
The Old Pump Works, Great Warley Street (108)	0.79	Existing office development completed post 2005 Plan. Allocate in this Plan for employment.
Existing allocated employment land		
Town Hall, Brentwood (110)	1.09	Allocated employment-offices in Local Plan (2005)
Childerditch Industrial Estate (112)	11.25	Allocated employment-general in Local Plan (2005)
Hallsford Bridge Industrial Estate (113)	3.41	Allocated employment-general in Local Plan (2005)
Hubert Road Industrial Estate (114)	4.76	Allocated employment-general in Local Plan (2005)
Hutton Industrial Estate (045)	10.48	Allocated employment-general in Local Plan (2005)
Upminster Trading Park (111)	2.6	Allocated employment-general in Local Plan (2005) (not on Policies Map, but included in Policy E1)

Brook Street employment area (115)	1.25	Allocated employment-general in Local Plan (2005)
Warley Business Park (116)	3.22	Allocated employment-offices in Local Plan (2005)
Ford Offices, Eagle Way, Brentwood (117)	5.45	Allocated employment-offices in Local Plan (2005)
BT Offices, London Road, Brentwood (118)	3.5	Allocated employment-offices in Local Plan (2005)
OCE offices, Chatham Way, Brentwood (119)	0.45	Allocated employment-offices in Local Plan (2005)
47-57 Crown Street (120)	0.12	Allocated employment-offices in Local Plan (2005)
Mellon House, Berkley House and 1-28 Moores Place, Brentwood (121)	0.52	Allocated employment-offices in Local Plan (2005)
1-7 & 16-26 St Thomas Road, Brentwood (122)	0.22	Allocated employment-offices in Local Plan (2005)
7-9 Shenfield Road, Brentwood (123)	0.06	Allocated employment-offices in Local Plan (2005)
38 Ingrave Road, Brentwood (adjacent to Town Hall) (124)	0.07	Allocated employment-offices in Local Plan (2005)
North House, Ongar Road, Brentwood (125)	0.18	Allocated employment-offices in Local Plan (2005)

Alternative Approach

1. Allow for a market led approach with different types of uses on B-use land, such as leisure or entertainment uses that also create employment.

Reason for rejection: The Borough's land use is constrained by the need to protect the Green Belt, quality of the area and surrounding countryside. This means that employment land for B-Class uses needs to be protected. Evidence suggests there is most scope to secure future economic growth in office-based sectors. Therefore the need to protect allocated floorspace is even more important. This policy position aims to protect B-Use land unless criterion can be proved.

2. Provide growth by relying solely on intensifying and/or redeveloping existing employment sites and allocations.

Reason for rejection: This would approach would make it harder to deliver required growth in job numbers and additional employment land.

Alternative Allocations

Some sites identified as employment allocations could be considered for alternative uses. Were alternatives considered more appropriate this could have potential effects on housing and economic growth over the plan period, both positive and negative. The table below sets out options.

Site	Reasonable Alternative	Reason
Former A12 works site (106)	Employment	Site once used as a works site for A12 improvements.

		Currently site has large area of hardstanding (brownfield in Green Belt). Site could provide for employment uses.
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Justification

4.18 A thriving and entrepreneurial business community is vital for the success of the Borough's economy. Therefore, in areas allocated for general employment and office development on the Policies Map, the presumption is that existing uses will be retained, and that proposals entailing loss of employment premises and sites without replacement will be resisted. The Council will work with businesses within these areas to encourage them to adapt and respond to changing economic conditions in order to support business growth and ensure continuing economic vitality.

4.19 Within the central areas of Brentwood and Shenfield, and former M25 Works Site, areas are identified where further Class B1 office development will be permitted, including mixed-use developments. However, such areas are considered unsuitable for other types of development which could generate employment, in view of the nature of these areas, which include shops, community facilities, leisure uses and housing.

4.20 Where an application is made under clause (c) the applicant should provide information regarding:

- Length of time the property has been unused for employment purposes.
- Period during which it has been actively marketed for such purposes, which includes the possibility of redevelopment and provides evidence of marketing (not normally less than 24 months). Evidence should show where the property has been marketed including publications and property journals as well as clear advertisement on site.
- Prices at which the land and buildings have been marketed during this period, which should reflect similar property in the locality.
- A list of all expressions of interest during this period.
- An evaluation of why it is considered that the property has failed to attract interest from potential occupiers or for redevelopment for B Class use.

4.21 Estimated capacity is based on calculating on employment density by sector type as set out in the *Heart of Essex Economic Futures Study*.

Evidence

Employment Land Review (2010)

Heart of Essex Economic Futures Study (2012)

National Policy

NPPF Paragraph 160: *Local planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area. To achieve this, they should:*

- *work together with county and neighbouring authorities and with Local Enterprise Partnerships to prepare and maintain a robust evidence base to understand both existing business needs and likely changes in the market; and*
- *work closely with the business community to understand their changing needs and identify and address barriers to investment, including a lack of housing, infrastructure or viability.*

NPPF Paragraph 161: *Local planning authorities should use this evidence base to assess:*

- *the needs for land or floorspace for economic development, including both the quantitative and qualitative needs for all foreseeable types of economic activity over the plan period, including for retail and leisure development;*
- *the existing and future supply of land available for economic development and its sufficiency and suitability to meet the identified needs. Reviews of land available for economic development should be undertaken at the same time as, or combined with, Strategic Housing Land Availability Assessments and should include a reappraisal of the suitability of previously allocated land;*

Paragraphs 22 *Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose. Land allocations should be regularly reviewed. Where there is no reasonable prospect of the site being used for the allocated employment use, applications for alternative use of land or buildings should be treated on their merits having regard to market signals and the relative need for different land uses to support sustainable local communities.*

Policy DM7: Land at Mountnessing Roundabout (Former Scrapyrd), Roman Road

Land at Mountnessing Roundabout (site ref: 107), as set out on the Policies Map, is allocated for employment development (Use Classes B1, B2 and B8) according to the following criteria:

Employment uses and jobs provided on site are consistent with the economic strategy set out within this Plan, and support the vitality and viability of Brentwood Town Centre and other Borough centres.

Development is of a high design standard, meeting aspirations to enhance this location as a key gateway to Brentwood.

Landscaping and planting should be used to create a buffer and provide improved visual amenity between the site and surrounding land, minimising any amenity impacts.

Development proposals should be accompanied by a Transport Assessment in accordance with Policy CP13 (Sustainable Transport)

Alternative Approach

A hotel and leisure use.

Reason for rejection: The preferred approach focusing on B1, B2 and B8 is intended to facilitate provision of new jobs and business in the Borough. However, this offers a good location for a hotel and related leisure use and the site currently has planning permission for a hotel. This approach may therefore be equally worth consideration.

Justification

4.22 Land at Mountnessing roundabout is previously developed and has a current planning permission to provide jobs for hotel/leisure use. It is considered that this site would be appropriate to provide employment floorspace which in turn would contribute towards economic growth, new business and new jobs in the Borough. This location is a key gateway to Brentwood from the A12 (Junction 12). It provides excellent transport links via the highways network and is accessible by public transport to both Brentwood Town Centre and Shenfield Station.

Policy DM8: Supporting the Rural Economy

The Council will seek to develop a sustainable rural economy by supporting appropriate, small scale rural enterprise. Proposals to diversify the range of economic activities on a farm or in a rural area will be supported where proposals:

- a. benefit the local community and do not adversely affect quality of life or the amenity of local residents**
- b. conserve and enhance local character and maintain the openness of Green Belt**
- c. are consistent in scale and environmental impact with their rural location**
- d. have no detrimental impact on existing village shops and business**
- e. demonstrate traffic generation can be satisfactorily be accommodated by the existing or planned local road network, ensuring access arrangements are acceptable to the scale and type of development with no adverse effect on highway safety**
- f. have no unacceptable effect on water quality or flooding, watercourses, biodiversity or important wildlife habitats**

Alternative Approach

No alternative policy has been identified. The Council considers the preferred approach essential in order to deliver sustainable development.

Justification

4.23 The Council recognises it can be beneficial for farms to diversify use of land and buildings for other suitable activities or development. These might include converting redundant barns for B1 business use or workshops, storage, farm shops, bed and breakfast, energy crops, or acceptable sport and leisure uses like campsites. These can be important in supplementing agricultural business income to ensure long-term viability and, alongside suitable small-scale rural enterprise and provide rural job opportunities. Suitable uses will allow more efficient use of buildings and land while fitting in with farming practices, rural surroundings and maintaining openness of the Green Belt.

4.24 Farm shops are well used in the Borough and by residents living nearby and play a significant role within the local convenience goods shopping hierarchy. Farm shops provide home grown and local produce, support local agriculture and provide sustainable, healthy alternatives to supermarkets by reducing food miles and providing access to fresh, seasonal produce. The Council supports this form of farm diversification provided facilities are appropriate to their rural location and would not lead to unrelated business in the countryside or unacceptable levels of activity in the Green Belt.

4.25 Council policy seeks to protect and enhance local retail patterns, including safeguarding traditional village shops and facilities in order to retain important rural services where they can best serve the local community. Rural infrastructure such as local roads should not be unacceptably affected by traffic generation as a result of diversification.

4.26 The design and construction of new rural development must be of high quality and sympathetic to local character. Proposals may be required to safeguard the employment function of the development from other uses through planning conditions/planning gain mechanisms.

Evidence

Employment Land Review (2010)

Heart of Essex Economic Futures Study (2012)

Retail Study Appendix (Survey of shopping behaviour) (2011)

National Policy

Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development. To promote a strong rural economy, local and neighbourhood plans should:

- *Support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings;*

- *Promote the development and diversification of agricultural and other land-based rural businesses;*
- *Support sustainable rural tourism and leisure development that benefit businesses in rural areas, communities and visitors, and which respect the character of the countryside. This should include supporting the provision and expansion of tourist and visitor facilities in appropriate locations where identified needs are not met by existing facilities in rural service centres; and*
- *Promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship.”*

(NPPF Paragraph 28)

Paragraph 25 of the NPPF sets out that the “*sequential approach should not be applied to applications for small scale rural offices or other small scale rural development.*”

Policy DM9: New Retail and Commercial Leisure Development

To provide a sustainable network of local shopping and leisure provision, retail and commercial leisure development will be encouraged in the Borough’s Primary Shopping Areas, as set out in Core Policy CP12 and shown on the Policies Map. Provision for new leisure and retail is set out below.

Retail allocations		
Site	Area (ha)	Background
William Hunter Way car park site, Brentwood	1.3	Permission for mixed use development (retail/leisure/car parking/residential)
Baytree Centre, Brentwood	1.34	Opportunity for redevelopment of existing centre to provide net retail floorspace increase with residential units above
West Horndon opportunity area	-	Provision of retail to meet local needs as part of mixed-use development (strategic allocation)

To facilitate consumer choice and strengthen vitality, viability and accessibility, proposed development should:

- a. be appropriate in scale and character to the local area**
- b. be based on the sequential approach in accordance with national policy guidance**
- c. have no detrimental impact on the vitality and viability of the centre or other centres nearby**
- d. be easily accessible by public transport, foot and cycle**
- e. be fully integrated with the existing shopping area**

- f. contribute to an area's attractiveness, accessibility and vibrancy by providing a range of shops to meet local needs**
- g. provide opportunities for small, independent 'niche' shops**
- h. not result in subdivision of an existing large retail unit**
- i. if in Brentwood Town Centre, comply with guidance set out in the Brentwood Town Centre Shopfront Guidance SPD**

Proposals for retail and commercial leisure development outside the Borough's Primary Shopping Areas over 2,500 square metres will not be permitted unless an accompanying impact assessment can satisfactorily demonstrate that:

- j. the proposal would have no adverse impact on existing centres**
- k. associated travel demand can be satisfactorily accommodated by the transport network**
- l. the proposal does not give rise to any detrimental impact on amenities in the surrounding area**
- m. travel by more sustainable forms of transport than the private car will be achieved**

Alternative Approach

Alternative site options are considered on page X. Otherwise no alternative policy has been identified. The Council considers the preferred approach essential in order to deliver sustainable development.

Justification

4.27 The Borough's main shopping centres are both vital and viable according to *Brentwood Retail and Commercial Leisure Study (2011)*. Surrounding centres outside Brentwood continually seek to improve their offer, either through new floorspace or improvements to shopping environments. In order to compete, Brentwood Town Centre will need to build on existing strengths, notably its distinctive offer, an attractive and high quality shopping environment, 'niche' independent shops, convenience goods retailing, services, and evening entertainment such as cafes, bars and restaurants. Other Borough centres will need to develop in ways that maintain their attraction and encourage residents and workers to shop locally in a convenient, accessible and pleasant environment.

4.28 As set out in *Policy CP12 Thriving Town and Local Centres*, the Borough's Primary Shopping Areas are:

Town Centres:	Brentwood Town Centre Shenfield, Hutton Road
Village Centre:	Ingatstone High Street

In addition, local shops and shopping parades in smaller centres provide key services to their local communities. These are defined as:

Shopping Parades: Small local shops and/or shopping parades serving local communities. Typically, these might include a small supermarket, newsagent, Post Office, pharmacy.

4.29 In line with national guidance the Council aims to support the viability and vitality of existing shopping centres by directing new retail provision here and encouraging new investment and improvements. To ensure the Borough's shopping centres continue to thrive in future, a sequential approach will be adopted with regard to the location of new retail provision which reflects the hierarchy of centres set out in Policy S1 and Policy C12. Any new major retail provision will only be permitted within those areas allocated for shopping purposes.

4.30 The Council seeks to retain existing large retail units. These should not be subdivided as they can be a major driver of footfall. Subdivision would reduce the ability to attract major retailers, potentially increasing pressure for out-of-town retail floorspace which in turn would undermine town centre viability.

Evidence

Shopfront Guidance for Brentwood Town Centre SPD (2010)

Retail and Commercial Leisure Study (2011)

National Policy

NPPF paragraphs 23-27 set out the national framework for shaping town centre policies. Relevant extracts include:

“Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, local planning authorities should:

- *Recognise town centres as the heart of their communities and pursue policies that support their vitality and viability;*
- *Define a network and hierarchy of centres that is resilient to anticipated future economic changes;*
- *Promote competitive town centres that provide customer choice and a diverse retail offer and which reflect the individuality of town centres;*
- *Allocate a range of suitable sites to meet the scale and type of retail, leisure, commercial, office, tourism, cultural, community and residential development needed in town centres. It is important that needs for retail, leisure, office and other main town centre uses are met in full and are not compromised by limited site availability. Local planning authorities should therefore undertake an assessment of the need to expand town centres to ensure a sufficient supply of sustainable sites;*
- *Allocate appropriate edge of centre sites for main town centre uses that are well connected to the town centre where suitable and viable town*

centre sites are not available. If sufficient edge of centre sites cannot be identified, set policies for meeting the identified needs on other accessible locations that are well connected to the town centre;

- *Set policies for the consideration of proposals for main town centre uses which cannot be accommodated in or adjacent to town centres*
- *Recognise that residential development can play an important role in ensuring the vitality of town centres and set out policies to encourage residential development on appropriate sites; and*
- *Where town centres are in decline, local planning authorities should plan positively for their future to encourage economic activity.”*

(NPPF Paragraph 23)

Policy DM10: Non-Retail Uses

Primary and Secondary frontages are set out in the Borough’s Primary Shopping Areas as shown on the Policies Map. Uses within these areas are as follows:

PRIMARY FRONTAGES

Proposals for retail development will be permitted within the Primary Frontage of Brentwood Town Centre. Further change of use within ground floor Class A1 premises to other Class A uses of the Use Classes Order will not be permitted.

SECONDARY FRONTAGES AND SHOPPING PARADES

Within ground floor premises in Brentwood Town Centre Secondary Frontage, Shenfield, Ingatestone and Local Shopping Parades, further A2, A3, A4 or A5 use will only be permitted where the proposal:

- a. **would result in no more than two adjacent non-retail uses**
- b. **would result in no more than 40% of total units being used for non-retail uses**
- c. **would not prejudice the effective use of upper floors**
- d. **would not irreversibly preclude options to return property back to retail use**
- e. **retains a shopfront with windows and entrances which relate well to design of buildings and street-scene, complying with shopfront guidance where relevant**
- f. **demonstrates any potential related problems, such as noise and smell, can be overcome satisfactorily to protect amenities of surrounding residents. Details of extraction, filtration, refrigeration or air conditioning units should be submitted with any application.**

Change of use to any other non-retail uses will not be permitted.

Alternative Approach

To not restrict non-retail uses in Borough Primary Shopping Areas through using Primary and Secondary Frontages.

Reason for rejection: The Council recognises that it is important to retain a mix of uses in Town Centres and Primary Shopping Areas, as the NPPF advises. Were non-retail uses not restricted then there is a risk that they would displace retail units. This Policy aims to strike a balance between uses and therefore retain retail units where possible. Primary and Secondary Frontages are used to manage different areas depending on the importance of keeping retail.

Justification

4.31 In order to retain and enhance the attractiveness and competitiveness of the Borough's shopping centres and to meet local shopping needs, it is important to maintain a range of shopping facilities. To avoid an over-concentration of non-retail uses within Borough centres this policy aims to strike a balance between competing uses, ensure a broad range of shopping opportunities, provide for a reasonable dispersal of uses throughout the centre and integrate non-retail uses into the general shopping environment.

4.32 A Primary Frontage is identified in Brentwood Town Centre as the Borough's main focus for retail. This is to ensure retail uses are maintained in the High Street. Secondary frontages allow for more flexibility of use, although a certain amount of retail should be retained. These are shown on the Policies Map for the Borough's Primary Shopping Areas of Brentwood, Shenfield and Ingatestone. Local shops and parades are also included in criterion for Secondary Frontages to ensure a good mix of retail is retained.

4.33 Local shopping parades and individual shops within residential areas provide for the day-to-day needs of local communities. Such facilities are often valued by elderly people and those without access to private transport who often rely on facilities being available locally. These facilities provide a convenient and sustainable choice within walking distance.

4.34 Retail uses compete with a range of other uses for a presence within town centre shop frontages. Some uses, such as building societies, banks, estate agents, restaurants, takeaways etc, are beneficial since they attract people into the centre for services and entertainment and are often linked to a shopping trip. Restaurants, takeaways and public houses contribute to the attractiveness and vitality of an area, providing variety and activity during and outside normal business hours. However, too great a concentration of these uses can undermine the primary role of the town centre for retailing, leading to a reduction in the range and choice of goods available and potentially isolating some retailers from the main shopper/pedestrian flows upon which they depend. It is important therefore to avoid an over-concentration of non-retail uses, take care over their location and siting and ensure they incorporate window displays to overcome potential problems associated with the creation of "dead frontages".

4.35 Proposals in Brentwood Town Centre should be in line with the adopted Shopfront Guidance SPD, designed to a high standard while retaining shopfronts.

4.36 Restaurants, public houses and takeaways can adversely affect neighbouring residents, due to late opening hours, noise, smell, litter and other anti-social behaviour. Core Policy CP12 sets expectations for after-hours uses and the wider night time economy in Borough centres. In order to best manage competing uses proposals will need to clearly set out how potential problems can be satisfactorily overcome. Planning conditions may also be used to manage this.

4.37 Feedback from consultation with the local community highlights the need to better manage the evening economy, encourage 'family friendly' venues with a diverse range of shops and complementary mix of cultural, leisure and residential uses.

Evidence

Retail and Commercial Leisure Study (2011)

National Policy

NPPF paragraphs 23-27 set out the national framework for shaping town centre policies. Relevant extracts include:

"Planning policies should be positive, promote competitive town centre environments and set out policies for the management and growth of centres over the plan period. In drawing up Local Plans, local planning authorities should: define the extent of town centres and primary shopping areas, based on a clear definition of primary and secondary frontages in designated centres, and set policies that make clear which uses will be permitted in such locations."

(NPPF Paragraph 23)

Target

Retain an appropriate balance of retail units within the Borough's shopping areas to keep them healthy, vital and viable

Indicator

Number of permissions granted for non retail uses beyond the thresholds
Monitoring use of policy to be published in the Council's AMR

Delivery

Development Management decisions

Environmental Protection and Enhancement

This section of the plan sets out development management policies relating to the Green Belt, countryside and the historic and natural environment.

Strategic Objective 7

Safeguard the Green Belt and protect and enhance valuable landscapes and the natural and historic environment

Policy DM11: New Development in the Green Belt

Within the Green Belt, as defined on the Policies Map, changes of use of land, the construction of new buildings or extension or re-use of existing buildings for purposes other than those considered appropriate in the Green Belt will be refused planning permission except in very special circumstances. In assessing proposals for new development in the Green Belt the Council will have regard to the following:

- a. the objective of maintaining the openness, function and permanence of the Green Belt**
- b. the protection of the general character and appearance of the rural area**
- c. the effect of the proposal on public rights of way**
- d. whether the proposal will diminish or support people's quiet enjoyment of the countryside**
- e. the need to preserve or enhance existing landscape and ecological features**

Proposals for small scale buildings and facilities required for outdoor sport and recreation will need to demonstrate a justifiable need for such buildings and facilities. Any ancillary social facilities provided as part of the development should be incidental to the primary use of the site, restricted in size and solely for use of persons participating in the recreational activity on the site and shall be permanently retained as such.

The expansion or intensification (including extensions) of existing inappropriate development within the Green Belt will be refused. The replacement of existing buildings may be allowed provided the visual mass of the new building does not exceed the mass of existing buildings and the proposal would not lead to an expansion or intensification of activity on the site.

Extension of a domestic curtilage into the Green Belt will not be permitted.

(This policy is not intended to relate to uses created via the re-use of rural buildings.)

Alternative Approach

To rely solely upon National Planning Policy Framework on the Green Belt.

The preferred policy sets out a detailed approach to new developments in the Green Belt. The National Planning Policy Framework stresses the great importance of Green Belts and their essential characteristics of openness and permanence. The National Planning Policy Framework is clear that the construction of new buildings is inappropriate in the Green Belt and sets out what the exceptions are. The protection of Green Belt land is strongly supported by the Borough residents who in consultations have identified the protection of the Green Belt as their top priority. This is reflected by the Council's commitment in this Plan's strategic objective SO7 which aims to safeguard the Green Belt.

Justification

4.38 Brentwood Borough lies entirely within the Metropolitan Green Belt and has largely done so since the outer boundary was first defined in the County of Essex Development Plan, approved in 1957. A review in 1976 extended the Green Belt to cover the northern part of the Borough.

4.39 Green Belt policy aims to prevent urban sprawl by keeping land permanently open. The essential characteristics of Green Belts are their openness and permanence. The sensitive wedge of open countryside in which Brentwood is situated is a good example of the Green Belt's success in halting London's outward spread and protecting the character and setting of Brentwood town. Proximity to the city and attractive countryside means that the Borough experiences considerable development pressure.

4.40 Uses which are appropriate in the Green Belt include agriculture and forestry buildings, appropriate facilities for outdoor sport outdoor recreation and cemeteries as long as these preserves the openness of the Green Belt. The Council will encourage the beneficial use of the Green Belt, through opportunities to improve access, outdoor sport and recreation; retain and enhance landscapes, visual amenity and biodiversity; or improve damaged and derelict land.

Evidence

Forthcoming Green Belt and landscape sensitivity study

Historic policy usage

In consultations, Borough residents have indicated protection of the Green Belt as their top priority.

National Policy

NPPF paragraph 79 states that the essential characteristics of Green Belts are their openness and permanence.

NPPF paragraph 87 states that inappropriate development is by definition harmful to the Green Belt and should not be approved except in very special circumstances.

NPPF paragraph 88 sets out when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm is clearly outweighed by other considerations.

NPPF paragraph 89 advises that the construction of new buildings inside Green Belt is inappropriate unless it is for:

- *buildings for agriculture and forestry;*
- *provision of appropriate facilities for outdoor sport, outdoor recreation and for cemeteries, as long as it preserves the openness of the Green Belt and does not conflict with the purposes of including land within it;*
- *the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces;*
- *limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan;*
- *or limited infilling or the partial or complete redevelopment of previously developed sites (brownfield land), whether redundant or in continuing use (excluding temporary buildings), which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development.*

NPPF paragraph 123 sets out that planning policies and decisions should identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason.

Target

Maintain the extent, character and openness of the Borough's countryside by restricting inappropriate development in the Green Belt while facilitating positive stewardship management and use.

Indicator

Number of permissions granted contrary to Green Belt policy.

Delivery

Development Management decisions based on Green Belt policy and boundaries defined on the Policies Map.

Policy DM12: Established areas of development

Within established areas of frontage ribbon development included within the Green Belt listed below, planning permission for change of use to residential, new residential development on genuine infill plots, replacement of existing dwellings, or extensions to existing dwellings will be allowed subject to criteria set down in other policies in this plan being satisfied. Relevant frontages are:

169-293 Chelmsford Road; 39-47, 51-109 Coxtie Green Road; 1-19 Bellhouse Lane; Between Coppersfield And Greenoaks, Doddinghurst Road (Parkwood); 1-13 (Excluding 2), 21-56 (Excluding 24, 26) Nags Head Lane; The Thorns/The Briars, Ongar Road; 54-88 Billericay Road; 554-664 Rayleigh Road.

Alternative Approach

To rely solely upon the National Planning Policy Framework.

The alternative approach is not considered to provide enough detail on this important issue. The preferred approach supports the aims of national Green Belt policy to prevent urban sprawl by keeping land permanently open and provides exact locations where limited infilling is acceptable.

Justification

4.41 Within the Green Belt there are many established clusters of dwellings. Continuing pressure exists for "infill" development to take place between existing dwellings. If this pressure were acceded to, the character of the Green Belt within and around these areas would be irrevocably damaged over time. The Council will, therefore, continue to resist strongly pressure to allow new development in those established clusters. However, there are a very few limited, well defined areas within the Green Belt where tight knit frontage ribbon development already exists which is sufficiently urban in character to allow some relaxation of Green Belt policy. Outside these defined areas, residential development will be permitted only in accordance with other policies in this Plan.

Evidence

In consultations, Borough residents have indicated protection of the Green Belt as their top priority.

National Policy

NPPF paragraph 79: the essential characteristics of Green Belts are their openness and permanence and describes their fundamental role in preventing the urban sprawl by keeping land permanently open.

NPPF paragraph 87: inappropriate development is by definition harmful to the Green Belt and should not be approved except in very special circumstances.

NPPF paragraph 88: when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm is clearly outweighed by other considerations.

NPPF paragraph 89 - see previous page

Target

Appropriate residential development within established areas of development within the Green Belt.

Indicator

Permissions for new residential development in the Green Belt, including new build, conversions and extensions.

Delivery

Development Management decisions based on Green Belt policy and boundaries defined on the Policies Map.

Policy DM13: Extensions to Dwellings in the Green Belt

Proposals to extend dwellings within the Green Belt (other than those identified in Policy DM12 above) will be permitted in very special circumstances provided all the following criteria are met:

- a. the existing dwelling is lawful, permanent, designed and originally constructed for residential use**
- b. the total size of the dwelling as extended (including conservatories) does not exceed the original habitable floor space by more than 30%**
- c. the design of the extension is appropriate to the host building and its setting and does not harm the openness or function of the Green Belt**

Extensions to replacement dwellings will only be permitted where the habitable floor space of the replacement dwelling and the total habitable floor space of any extensions permitted together with that applied for would not be greater than 30% above the original habitable floor area of the previous dwelling which had been replaced.

Where appropriate, a condition will be imposed to prevent this habitable floor space limitation from being exceeded through the implementation of permitted development rights.

Extension of a dwelling resulting, under Policy DM16 f, from the conversion of a rural building will not be permitted

Alternative Approach

To rely solely upon National Planning Policy Framework

It is considered that the alternative approach would not provide enough detail on this important matter. The preferred option sets out detailed criteria on the appropriate size and scale of extensions to dwellings in the Green Belt. It supports the aims of national Green Belt policy that an extension of a building is appropriate development provided this does not result in a disproportionate addition over and above the size of the original building.

Justification

4.42 Existing dwellings in the Green Belt benefit from the same permitted development rights as dwellings elsewhere (provided permitted development rights have not been removed). Extensions to properties can, however, lead to

urbanisation, increases in population and activity in the Green Belt, and a loss of small dwellings. This policy therefore seeks to minimise harm caused to the Green Belt that might otherwise result from disproportionate additions and by resisting the loss of smaller dwellings, help maintain a choice of dwelling sizes in the Borough.

4.43 The policy reference to “original” means the dwelling as existing on 1 July 1948 even if the original dwelling has since been replaced. Where no dwelling existed on the date then “original” means the dwelling as first built. Extensions will only be allowed under the policy where the dwelling proposed to be extended remains intact on site. For the purposes of calculating floor space, gross internal measurements are used in all cases. This means measuring from the inside of external walls and includes the area of internal partitions, but excludes any stairwell area above ground floor.

4.44 Where new dwellings are permitted in the Green Belt on grounds of very special circumstances the Council will consider removing permitted development rights for extensions and outbuildings to prevent future additions where these cumulatively would add to the impact of the development on the Green Belt. Proposals to extend or erect outbuildings to such dwellings will not be permitted.

Evidence

The protection of the Green Belt has been identified by Borough residents in consultations as their top priority.

Forthcoming Study

National Policy

NPPF paragraph 89: the local planning authority should regard the construction of new buildings as inappropriate in Green Belt and sets out the exceptions to this, one of them being the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building.

Target

Restrict the size of residential extensions in the Green Belt to no more than 30% of the original habitable floorspace.

Indicator

Number of permissions for residential extensions above 30% limit.

Delivery

Development Management decisions based on Green Belt policy and boundaries defined on the Policies Map.

Policy DM14: Replacement Dwellings in the Green Belt

Outside settlements and established areas of development listed above in Core Policy CP10 Green Belt and Policy DM12, the replacement or substantial rebuilding of permanently occupied dwellings will only be allowed subject to the following criteria:

- a. where the existing dwelling has not been previously extended or where it has been extended by less than 30% above the original habitable floor space:

The floor space of the replacement dwelling will be no larger than 30% above the original habitable floor space, or

- b. where the existing dwelling has been extended by more than 30% above the original habitable floor space:

the floor space of the replacement dwelling will be no larger than the existing habitable floor space

- c. the visual mass of the replacement dwelling should be no greater than that of the existing dwelling
- d. Where the existing dwelling is a bungalow it should be replaced by a bungalow
- e. any replacement dwelling will be expected to be located in the position of the existing dwelling except where the local planning authority considers an alternative siting to be more appropriate in green belt or amenity terms

Applications will be considered against criteria set out in Policy DM11

Where appropriate, a condition will be imposed removing permitted development rights to extend the building, use the roof space for habitable purposes and erect walls, fences or further out-buildings

Alternative Approach

To rely solely upon National Planning Policy Framework.

It is considered that the alternative approach would not provide enough detail on this important issue. The preferred option sets out detailed criteria about appropriate replacement dwellings in the Green Belt. It supports the aims of national Green Belt policy that the replacement of building, provided the new building is in the same use and not materially larger than the one it replaces.

Justification

4.45 Criteria for replacement dwellings and substantial rebuilds set out in the policy are necessary to limit the amount of urbanisation that takes place in the Green Belt through increased occupancy potential and the inevitable visual impact resulting from redevelopment and the use of modern building materials.

4.46 The floorspace of replacement dwellings in the Green Belt may be up to 30% greater than the original habitable floorspace. Subsequent further extensions to a replacement dwelling will only be allowed where this additional 30% was not provided to the full at the time the replacement dwelling was built. This allowance provides the opportunity to design a building that meets

the aspirations for more accommodation while ensuring the overall visual mass is no greater than that of the original dwelling. The presumption that bungalows will be replaced by bungalows should help minimise the impact on the Green Belt and assist in the provision of accessible property in the Borough.

4.47 In the interests of amenity, certain permitted development rights will, where appropriate, be removed by a condition attached to the permission. These might cover the erection of walls/fences and outbuildings. When property is rebuilt, the investment involved is very likely to spread into the renewal of boundary treatment and the provision of garages or other measures which could have a strongly urbanising effect if not controlled.

4.48 In order to retain the integrity of the criteria applied to the re-use of rural buildings, the replacement of a dwelling formed under *Policy DM16 Re-use and Residential Conversions of Rural Buildings* will not be permitted.

Evidence

The protection of the Green Belt has been identified by the Borough residents in consultations as their top priority.

Loss of bungalows through replacement or extension means this type of housing which can meet the needs of some older people and those with a mobility disability, is becoming increasingly rare.

National Policy

NPPF paragraph 79 - the essential characteristics of Green Belts are their openness and permanence.

NPPF paragraph 87 - inappropriate development is by definition harmful to the Green Belt and should not be approved except in very special circumstances.

NPPF paragraph 88 - when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness and any other harm is clearly outweighed by other considerations.

NPPF paragraph 89 - the local authority should regard the construction of new buildings as inappropriate in Green Belt and sets out the exceptions to this, one of which is the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces.

Target

Restrict the size of replacement homes in the Green Belt to no more than 30% above the original habitable floorspace.

Indicator

Number of permissions for replacement homes above 30% limit.

Delivery

Development Management decisions based on Green Belt policy and boundaries defined on the Policies Map.

Policy DM15: Agricultural Workers Dwellings

A. New Dwellings

Planning permission will only be granted for a new agricultural, horticultural, forestry worker's dwelling where:

- i. evidence has been submitted to the satisfaction of the Borough Council that there is an agricultural need for a permanent dwelling in that location**
- ii. there are no suitable dwellings available or could be made available in the locality to meet the needs of the agricultural holding**
- iii. the size and accommodation levels to be included in the proposed dwelling is commensurate with the needs of the holding**
- iv. the development is in all other respects acceptable against other relevant policies in the plan**

Conditions will be attached to any permission limiting the occupancy to that required for the holding concerned or other agricultural use nearby.

B. Removal of Occupancy Conditions on Existing Dwellings

Planning permission will be granted for the removal of a restrictive agricultural worker occupancy concerned or other agricultural use nearby where.

- v. it can be evidenced that there is no long-term need for an agricultural worker's dwelling in the locality; and**
- vi. in accordance with criterion v. as a minimum, comprehensive evidence is submitted with the application that shows to the satisfaction of the Borough Council that the property has been publicised for 12 months in the relevant trade press for sale and let to other relevant interests in the locality at a price to reflect the occupancy condition, an on site advertisement has been put up and confirmation of a lack of interest.**

The occupancy condition will not be removed within 10 years of the completion of the dwelling.

Alternative Approach

To rely upon the National Planning Policy Framework.

It is considered that this alternative approach would be less effective as the National Planning Policy Framework guidance on the provision of agricultural workers dwellings is not prescriptive enough. Therefore a more detailed policy with criteria setting out when planning permission will be granted is needed on this important issue.

Justification

4.49 It is recognised that in some limited circumstances there may be a need generated for new dwellings to solely serve workers engaged in agriculture, forestry and other rural activities. Section A of the policy provides criteria whereby proposals for new agricultural workers dwellings will be assessed.

4.50 In addition, changes in the scale and character of agricultural and forestry activities could affect the longer-term requirements for dwellings in the countryside where these were made subject to an agricultural worker occupancy condition at the time planning permission was granted. In such cases, it is recognised that it would fulfil no purpose to keep such dwellings vacant, or that existing occupiers should be obliged to remain in occupation simply by virtue of a planning condition that has outlived its usefulness. Nevertheless, the Borough Council will expect applications for the removal of an occupancy condition to demonstrate convincingly there is no long-term need for an agricultural dwelling in the locality.

4.51 Moreover, the Borough Council will also bear in mind that such dwellings could well be used by agricultural and forestry workers seeking accommodation within the wider surrounding area. In this regard the Council will need to be assured that the availability of a dwelling tied to an occupancy condition has been effectively marketed to likely interested parties in the area concerned, and that no real interest has been shown regarding purchase or occupation of the dwelling by the local agricultural community.

4.52 As part of the evidence required, the applicant will be expected to provide details of their instructions to estate agents, and the response to that advertising, that:

- the property has been on the market for rent or sale for at least two years and advertised continuously in that period at a price that reflects the occupancy condition. The advertising should be within both local newspapers and at least two national farmer magazines e.g. Farmer's Weekly
- the property has been offered both for sale and to rent on the same basis as above to all farmers and horticulturists in the locality (i.e. having holdings within a two mile radius of the dwelling)

4.53 In addition, the policy will be applied to applications for the removal of occupancy conditions from dwellings associated with stables or other rural dwellings which are subject to occupancy conditions.

Evidence

Development monitoring

National Policy

NPPF paragraph 55 sets out that local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances

such as the need to for a rural worker to live permanently at or near their place of work in the countryside

Target

Maintain the extent, character and openness of the Borough's countryside by restricting inappropriate development in the Green Belt.

Indicator

Number of planning permissions granted contrary to this policy

Delivery

Development Management decisions based on Green Belt policy and boundaries defined on the Policies Map.

Policy DM16: Re-use and Residential Conversions of Rural Buildings

Permission will be granted for the re-use, conversion or adaptation of rural buildings for employment, tourism, leisure or community or residential use provided the development proposal meets all the following criteria:

- a. **the impact on the openness or function of the Green Belt from the proposed use is not materially greater than the original or current lawful use**
- b. **the applicant can demonstrate that the building is of permanent and substantial construction and capable of conversion without major or complete reconstruction and without major alteration to its external appearance. Conditions may be imposed upon any planning permission for proposed structural changes to secure an improvement in the appearance of the building and its immediate surroundings**
- c. **the new use should not require extension of the building or additional open elements which might conflict with the openness and function of the Green Belt**
- d. **the proposal would not harm the character and appearance of the surrounding countryside, landscape value or wildlife interests**
- e. **the use would be unlikely to give rise to future requirements for further substantial areas of open land and operational development to be added to the re-used building and its immediate surroundings for inappropriate development.**
- f. **With regard to changes of use or conversion to residential**
 - i) **the location is suitable for housing;**
 - ii) **the applicant is able to demonstrate that every reasonable effort has been made to secure a suitable business re-use by**

submitting evidence of comprehensive marketing and advertising over a 12 month period; or

iii) the residential use is a subordinate part of a scheme for business re-use; or

iv) the use is essential to enable a farm or forestry worker to live at or near their place of work

In the case of either (i) or (ii) above, the following two criteria must also be met:

A) the building proposed for conversion must be located within or directly adjoining a small group of buildings, and

B) the building must be capable of conversion without resulting in unacceptably intrusive domestic elements such as new curtilages, garaging, sheds, walling/fences, clothes lines, play equipment, domestic storage and hardstandings. The proposed re-use should not have an unacceptable detrimental impact on the fabric and character of the building due to unsympathetic changes to, or the introduction of, features such as windows, door openings and chimneys.

In the case of traditional rural buildings, the proposed use must be compatible with the historic character and structural integrity of the building.

Where appropriate, conditions will be imposed removing permitted development rights to extend the property, alter the external appearance, construct buildings or structures (including walls/fences) within the curtilage, and change the use.

Permission will not be granted for the re-use of an agricultural building erected under Class A of Part 6 of Schedule 2 of the General Permitted Development Order as amended within 10 years of its substantial completion.

Alternative Approach

An alternative policy approach would be to have two separate policies on the re-use of rural buildings and residential conversions.

Reason for rejection: It is considered that a single policy on the re-use and residential conversions of rural buildings provides a more comprehensive approach.

Justification

4.54 The re-use and adaptation of existing rural buildings can play an important role in meeting the needs of rural areas for employment, tourism, leisure or community uses. In addition, the re-use of rural buildings for commercial development can support the rural economy by providing employment for local people thus contributing to the objective of sustaining

vital rural communities. Some buildings are also suitable for business connected with tourism, while community uses can make a valuable contribution to local communities in appropriate locations.

4.55 The Council is committed to supporting a rural prosperous economy and this approach is in line with national policy. This policy should be read in conjunction with Policy DM8 *Supporting the Rural Economy*.

4.56 Residential re-use is a concern due to the large number of properties involved, loss of rural business premises for which there may be a need in future but which may be uneconomic or otherwise hard to replace, the impact on the rural character of the Green Belt and the need to facilitate new housing within or well connected to existing settlements. The Council will generally apply a presumption in favour of employment generating uses. Residential conversions will only be permitted where every reasonable effort has been made to secure a suitable business use, or the residential use is a subordinate part of a business re-use, or the use is required for an agricultural or forestry worker. Residential conversions may be appropriate in certain circumstances including where they are adjacent to, or within, existing groups of buildings. A financial contribution will be sought by the Council towards the provision of affordable housing elsewhere within the respective Parish.

4.57 In the case of traditional rural buildings, the proposed use must secure its historic fabric and integrity and in the case of listed buildings will need to comply with Policy DM20. It is essential to ensure that a residentially converted rural building does not have the appearance of a new dwelling or set a precedent for new residential development in the Green Belt. The building must be capable of conversion without the creation of a residential curtilage having a harmful effect on the building and the surrounding countryside due to the unacceptable intrusiveness of increased activity and domestic additions such as garaging, sheds, clothes lines, play equipment, walls and fences, patios and hardstandings.

Evidence

Essex Rural Strategy (2009)

National Policy

NPPF paragraph 28 highlights the need for planning policies to support economic growth in rural areas and for local plans to support the sustainable growth and expansion of all types of business and enterprise in rural areas, both through conversion of existing buildings and well designed new buildings.

NPPF paragraph 79 states that the essential characteristics of Green Belts are their openness and permanence.

NPPF paragraph 89 advises that the construction of new buildings inside Green Belt is inappropriate unless it is for the extension or alteration of a building provided that it does not result in disproportionate additions over and above the size of the original building; the replacement of a building, provided the new building is in the same use and not materially larger than the one it replaces.

NPPF paragraph 90 indicates forms of development that are appropriate in Green Belt provided they preserve the openness of the Green Belt and do not conflict with the purposes of including land in Green Belt and one of these is the re-use of buildings provided that the buildings are of permanent and substantial construction.

NPPF paragraph 55 advises against the development of isolated homes in the countryside unless there are special circumstances.

Target

Maintain the extent, character and openness of the Borough's countryside by restricting inappropriate development in the Green Belt.

Beneficial re-use of rural buildings for appropriate business use, in order to support the rural economy.

Restrict the re-use of rural buildings for residential purposes.

Indicator

Number of planning permissions granted for residential re-use of rural buildings.

Delivery

Development Management decisions based on Green Belt policy and boundaries defined on the Policies Map.

Policy DM17: Wildlife and Nature Conservation

Permission will not be granted for development that would have a detrimental impact, directly or indirectly upon features of nature conservation importance, unless it can be demonstrated that the justification for the development outweighs their importance for nature conservation or amenity value.

Where development is permitted, the Council will require appropriate mitigation and compensatory measures to be provided. Such features include but are not limited to:

- i) Hedgerows and field walls**
- ii) Trees, woodlands, plantations and shelter belts**
- iii) River corridors**
- iv) Wetlands, ponds and reservoirs**
- v) Other locally important habitats**

Proposals should promote the enhancement, restoration and, where appropriate, creation of new habitats.

Development that would affect a habitat or species identified in the Essex Biodiversity Action Plan and/or Local Wildlife Site Review will only be permitted where the Council is satisfied that it would have no unacceptable impact on that habitat or species.

Alternative Approach

No alternative policy has been identified.

Justification

4.58 The Council is committed to the protection and enhancement of the natural environment. The National Planning Policy Framework provides strong support for the protection, conservation and management of the Borough's natural assets and landscape character. It recognises the intrinsic character and beauty of the countryside as a core planning principle, whether that countryside is specifically designated or not. This Policy should be read in conjunction with *CP9 Protecting the historic, natural environment and landscape character* and policy *DM18 Landscape Protection and Woodland Management*.

4.59 The Council has a duty under the Natural Environment and Rural Communities (NERC) Act 2006 and the Wildlife and Countryside Act 1981 to have regard to biodiversity conservation and the positive conservation management (PCM) of Local Wildlife Sites (LoWS) within the Borough. *Brentwood Local Wildlife Site Review (2012)* identifies networks of LoWS and the diverse assemblage of ecologically important sites within the Borough.

4.60 Where appropriate, all proposals must conform to *Essex Biodiversity Action Plan*, which provides district-wide targets and outlines habitats of special local significance. Within Brentwood, the latter can be categorised into commons, public and private woodlands, tree belts, lowland grassland, lakes and ponds, hedgerows and a number of protected lanes.

4.61 The replanting of native species will be encouraged to allow ecological networks to remain functional and to prevent trees and woodlands becoming isolated within the landscape. The Council will also promote the retention of natural and semi-natural vegetation and the limitation of activities that are harmful to wildlife and its habitats.

4.62 Where appropriate the Council will consider the use of conditions and/or planning obligations to provide appropriate compensatory measures.

Evidence

Essex Local Wildlife Sites Review (2012)

Essex Biodiversity Action Plan 2010-2020

Essex Biodiversity Project

Biodiversity 2020: A Strategy for England's Wildlife and Ecosystem Services (Defra, 2011)

The Natural Choice: Securing the Value of Nature - The Natural Environment White Paper – (HM Government, 2011)

Planning for a Healthy Environment – Good Practice Guidance for Green Infrastructure and Biodiversity (Town and County Planning Association and The Wildlife Trusts July 2012)

Feedback from Borough residents during the 2009 Issues and Options and 2011 neighbourhood consultations showed strong support for protecting wildlife and their habitats,

National Policy

NPPF paragraph 17 recognises the intrinsic character and beauty of the countryside as a core planning principle.

NPPF paragraph 109 sets out that the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, recognising the wider benefits of ecosystem services; minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

NPPF paragraph 113 states that local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives appropriate weight to their importance and the contribution that they make to wider ecological networks.

NPPF paragraph 117 sets out that planning policies should minimise impacts on biodiversity and plan for biodiversity at a landscape-scale across local authority boundaries; by identifying and mapping components of the local ecological networks, including the hierarchy of international, national and locally designated sites of importance for biodiversity, wildlife corridors and stepping stones that connect them and areas identified by local partnerships for habitat restoration or creation.

Planning policies should promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan.

NPPF paragraph 118: when determining planning applications, local planning authorities should aim to conserve and enhance biodiversity by applying the following principles:

- *if significant harm resulting from a development cannot be avoided (through locating on an alternative site with less harmful impacts), adequately mitigated, or, as a last resort, compensated for, then planning permission should be refused;*
- *proposed development on land within or outside a Site of Special Scientific Interest likely to have an adverse effect on a Site of Special Scientific Interest (either individually or in combination with other developments) should not normally be permitted.*
- *where an adverse effect on the site's notified special interest features is likely, an exception should only be made where the benefits of the development, at this site, clearly outweigh both the impacts that it is likely to have on the features of the site that make it of special scientific interest and any broader impacts on the national network of Sites of Special Scientific Interest; development proposals where the primary objective is to conserve or enhance biodiversity should be permitted;*

- *opportunities to incorporate biodiversity in and around developments should be encouraged;*
- *planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats.*

Policy DM18: Landscape Protection and Woodland Management

Development will not be permitted where it would have a detrimental effect on, or result in the loss of, significant landscape heritage or a feature of ecological importance, including trees, woodlands or hedgerows.

Where appropriate development proposals will be required to be accompanied by:

- a. An ecological survey as required by the nature and scale of the proposal**
- b. A landscape scheme detailing new planting requirements and where appropriate, replacement trees of a value commensurate or greater to that which is lost, boundary treatments and proposals for ecological enhancement**
- c. An arboricultural assessment detailing the measures to protect and/or justification for the removal of any trees or hedgerows during onsite construction**
- d. Details of landscaping maintenance arrangements**
- e. A method statement for any land raising and/or dispersal of excavated or dredged materials**

Areas of landscape, biodiversity and geodiversity interest and local distinctiveness within the Borough will be protected from harm and their retention, enhancement and restoration will be encouraged. Where feasible, proposals should promote the use of trees, hedges, wildlife gardens, allotments, ponds, green roofs/walls, roosting boxes and wider habitat creation.

In exceptional circumstances, where the landscape, biodiversity, social or economic benefits of a proposal are considered to outweigh the loss of a feature, impact on landscape character, or existing habitat, development may be permitted subject to adequate compensatory measures being implemented.

Alternative Approach

No alternative has been identified, The Council is committed to protecting the Borough's landscapes and this is reflected in strategic objective SO7 protect and enhance valuable landscapes and natural and historic environment.

Justification

4.63 Brentwood has many historic and important landscapes recognised for their special cultural, horticultural, historic and landscape qualities. These include the Forest of Writtle in the Mill Green area, a designated Ancient Landscape; Sites of Special Scientific Interest, such as Curtis Mill Green, and The Coppice, Kelvedon Hatch which contain important ecological features; and Registered Gardens and Parks of Special Historic Interest at Warley Place, Weald Park and Thorndon Park. The National Planning Policy Framework provides strong support for protecting and enhancing valued landscapes. It recognises the intrinsic character and beauty of the countryside as a core planning principle. This Policy should be read in conjunction with Policy *CP9 Protecting the historic, natural environment and landscape character*.

4.64 Essex Wildlife Trust has identified seven 'Living Landscapes' areas either wholly or partly within the Borough. They are Thorndon Woods, Havering and Brentwood Ridge, Ramsden Heath and Woods, Writtle Forest, Upper Roding: Abbess to M25, Lower Roding: M25 to Chigwell and Ingrebourne Valley. The Council is supportive of the 'Living Landscapes' development and vision to restore and reconnect our wildlife habitats so species and people can move through a wildlife rich countryside. It recognises the benefits of 'Living Landscapes' for the landscape, biodiversity and its residents.

4.65 The Government signed the European Landscape Convention in 2006. The Convention aims to encourage public authorities within member states to adopt policies and measures for the protection, management and planning of all landscapes, both outstanding and ordinary, that determine the quality of people's living environment. The Convention encourages local authorities to introduce exemplary and long-lasting policies or measures to protect, manage and plan landscapes.

4.66 Proposals should have regard to the *Mid Essex Landscape Character Assessment* which provides a comprehensive Brentwood Borough assessment of landscape character with detailed profiles containing the key characteristics, character description, visual characteristics, historic land use, ecological features, key planning and land management issues, sensitivities to change, proposed landscape strategy objectives, suggested landscape and land management planning guidelines.

4.67 Landscaping proposals, both hard and soft, must form an integral part of development proposals. The Council will seek appropriate conditions and/or planning obligations to secure the implementation of landscaping schemes and the replacement of trees, hedgerows or the protection of natural features during the course of development. Payment for the maintenance and management of new landscaping may be sought and controlled via a planning obligation.

4.68 The Borough contains a large number of woodlands of various types, sizes and functions. Most are important for their ecological value, some for their recreational uses, timber production, historical significance or visual

impact, or a combination of these. It is essential to preserve woodlands for the benefit of present and future generations, but to retain, and where possible enhance, their value they need to be properly managed. Activities within woodlands likely to have a damaging effect on the flora and fauna of such areas will be discouraged.

4.69 Advice is available to woodland owners from the Essex Farming and Wildlife Advisory Group, Essex County Council, Thames Chase Project Team or the Forestry Commission as to the most appropriate management of their sites. Woodland management must comply with the UK Forestry Standard and follow practices laid down in the Forestry Commission's Environmental Guidelines. In any new woodland planting scheme, the Council will seek the planting of tree and shrub species suited to the sites and aims of the scheme. Where conservation is the primary objective, there will be a presumption in favour of native species. The Forestry Commission is the Statutory Authority with powers to provide grant aid and issue Felling Licences. The Forestry Commission is also charged with the administration of the Environmental Impact Assessment (Forestry) Regulations (1999).

4.70 Trees and hedgerows are protected in the Town and Country Planning Act 1990, the Tree Regulations 2012 and Hedgerow Regulations 1997. The Council understands that the contribution that trees, either as woodland or individual specimens and hedgerows, make to the landscape is significant. In particular the range of benefits for wildlife and people they provide as well as helping mitigate the effects of climate change is also recognised.

Evidence

Essex Local Wildlife Sites Review, 2012
Essex Biodiversity Action Plan
Essex Biodiversity Project
Essex Wildlife Trust 'Living Landscapes'
Mid Essex Landscape Assessment, 2006
Thames Chase Plan, 2000

National Policy

NPPF paragraph 17 recognises the intrinsic character and beauty of the countryside as a core planning principle.

NPPF paragraph 109: the planning system should contribute to and enhance the natural and local environment by protecting and enhancing valued landscapes, recognising the wider benefits of ecosystem services; minimising impacts on biodiversity and providing net gains in biodiversity where possible, contributing to the Government's commitment to halt the overall decline in biodiversity, including by establishing coherent ecological networks that are more resilient to current and future pressures.

NPPF paragraph 113: local planning authorities should set criteria based policies against which proposals for any development on or affecting protected wildlife or landscape areas will be judged. Distinctions should be made between the hierarchy of international, national and locally designated sites, so that protection is commensurate with their status and gives

appropriate weight to their importance and the contribution that they make to wider ecological networks.

NPPF paragraph 117: planning policies should minimise impacts on biodiversity and promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan.

NPPF paragraph 118: when determining planning applications, local planning authorities should aim to conserve and enhance biodiversity. Planning permission should be refused for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.

Target

Preserve and enhance the natural and historic environment, biodiversity and character of the Borough.

To prevent the loss of preserved trees.

Indicator

Number of preserved trees lost through development proposals.

Delivery

Development Management decisions

Consultation with Brentwood arboriculture team on planning applications, Brentwood Countryside Management Service.

Policy DM19: Thames Chase Trust Community Forest

The Council supports the development of Thames Chase Community Forest within that part of the Borough as identified on the Policies Map. Through the Thames Chase Plan, the Council will encourage:

- a. Reclamation of derelict land to beneficial uses**
- b. Protection and management of wildlife habitats including habitat creation**
- c. Provision for outdoor recreation and tourism**
- d. Traditional landscape enhancement**
- e. Protection of the best and most versatile agricultural land**

Implementation will be effected in conjunction with Brentwood Countryside Management Service and local landowners. Any development proposals within the Community Forest area will be expected to make a positive contribution towards its implementation and comply with the policies contained in this plan. Within the Green

Belt, proposals will also need to comply with criteria set out in Green Belt Policies.

Alternative Approach

To combine this policy with *DM18 Landscape Protection and Woodland Management*.

It is considered that this alternative policy option would not provide enough detail to support the development of the Thames Chase Community Forest and the objectives of the Thames Chase Plan.

Justification

4.71 Thames Chase is a community forest of 9842 hectares located in 47 sites in London and Essex. One of 12 Community Forests established nationally since 1990, the forest covers over 500 hectares of woodland, common and recreational land within Brentwood Borough. Extended in 1999, the Forest now incorporates Thorndon and Hartswood Sites of Special Scientific Interest (SSSI) and Warley Place Nature Reserve.

4.72 Centred round regeneration, quality green space creation, management and community engagement, the Community Forest Concept has increased woodland coverage from 9% to 15% locally, and secured funding to create over 330 hectares of new green space provision. Wider work involves extensive tree planting within the Borough, opportunities for sport and recreation, wildlife conservation, agricultural and timber production.

4.73 The Thames Chase Plan provides a green framework for supporting Woodland Grant Scheme applications and enhancing the local environment, including through landscaping, conservation works and upgrading of footpaths or bridleways. Such benefits are welcome provided uses are consistent with wider Green Belt Objectives since they would not be considered as a justification for allowing inappropriate development in the Green Belt, ie development that would otherwise be unacceptable.

Evidence

Thames Chase Plan (2000)

National Policy

NPPF paragraph 92 reiterates the importance of community forests as invaluable in that they can improve the environment around towns, upgrade the landscape and provide for recreation and wildlife. Development proposals within Community Forests in the Green Belt should be subject to the normal policies controlling development in Green Belts.

Target

To support the development of Thames Chase Community Forest

Indicator

Number of planning permissions granted contrary to this policy which would result in an adverse effect on Thames Chase Community Forest

Delivery

Development management decisions, Brentwood Countryside Management Service and working in partnership with Thames Chase Trust.

Policy DM20: Listed Buildings

Proposals for development affecting or within the vicinity of a listed building will only be permitted where these are sympathetic to its character and setting.

Proposals for the alteration or extension of listed buildings will be accompanied by a statement of significance, and an assessment of the impact of the works upon that significance. The application will include full details of the siting, design, access arrangements and external appearance of the development, so that it is possible to assess whether the proposal is sympathetic to the building's character and appearance, and whether features of special architectural or historic interest are preserved, restored or complemented.

Development involving the partial demolition and full demolition of a listed building will only be permitted in exceptional circumstances if, where relevant, the following criteria are met:

- a. The building cannot be used for its existing, previous or original purpose or function**
- b. The historic character or appearance of the main building would be restored or improved by the demolition of a curtilage building(s)**
- c. Substantial benefits to the community would derive from the nature, form and function of the proposed development**
- d. Demolition would not result in the creation of a long-term cleared site to the detriment of adjacent listed buildings**

Where development is authorised subject to the above criteria, permission will be subject to agreement that any consequential demolition shall not be carried out until all relevant details of the proposed development have been approved and a contract has been entered into for its subsequent execution.

Changes of use of listed buildings and any associated works of alteration, including external illumination, may be permitted where this would contribute economically towards the restoration, retention or maintenance of the listed building and/or group of buildings, without such development adversely affecting the historic, spatial or structural integrity of the building or its setting.

Alternative Approach

No alternative policy has been identified.

The Planning (Listed Buildings in Conservation Areas) Act 1990 provides a statutory background for the protection of the historic environment. The National Planning Policy Framework makes it clear that heritage assets are an irreplaceable resource and should be conserved in a manner appropriate to their significance. Local Plans should include a positive strategy for the conservation and enjoyment of the historic environment.

Justification

4.74 The Council is committed to protecting and enhancing its valuable historic environment and this is reflected in this Plan's strategic objective. This policy should be read in conjunction with Policy *CP9: Protecting the Historic and Natural Environment and Landscape Character*.

4.75 Works such as the demolition, alterations (both internal and external) or extensions that would affect a Listed Building's character will require Listed Building Consent. Proposals affecting Listed Buildings should refer directly to the statutory list of Buildings of Special Architectural or Historic Interest (www.english-heritage.org.uk). Under the Planning (Listed Buildings and Conservation Areas) Act 1990 owners have a responsibility to look after Listed Buildings in order to prevent deterioration and damage. The Council will intervene, where necessary, by issuing an Urgent Works or Repairs Notice.

4.76 In addition to its statutory duties, the Council will apply similar levels of protection to its locally designated heritage assets to ensure a high standard of design for all new development affecting the character or setting of its built, natural and historic environment. The Council intends to compile a Local List of buildings which contribute positively to the character of the area due to their townscape value and merit, type of construction, architectural quality or historic association. Whether a building is Locally Listed will be a material consideration in determining planning applications in order to retain important original features and fabric, and control alteration or extension to maintain the character of the buildings in recognition of their contribution to local distinctiveness, sense of place, identity and character.

4.77 The National Planning Policy Framework promotes the use of heritage assets for viable uses consistent with their conservation and the positive contribution that they can make towards economic vitality. Changes of use of a Listed Building need to be compatible with the building's character and within the Green Belt should not have an adverse impact on Green Belt objectives, such as openness and permanence or otherwise detract from rural character and amenity of the countryside. Proposals for the change of use of a Listed Building in the Green Belt will also be assessed against Policies *DM11 New Development in the Green Belt*, *DM13 Extension to Dwellings in the Green Belt* and *DM16 Re-use and Residential Conversions of Rural Buildings*. Proposals will take a practical approach towards the alteration of Listed Buildings to comply with the Disability Discrimination Act 2005 and subsequent amendments, provided that alterations are sympathetic and ensure the building's special interest remains unharmed. Applicants should refer to the English Heritage *Easy Access to Historic Buildings* (2004) as a basis for practical guidance.

Evidence

Conservation Area Appraisals
The National Heritage List for England
Planning (Listed Buildings and Conservation Areas) Act 1990
Historic Environment Records

National Policy

NPPF paragraph 128: in determining applications, local planning authorities should require an applicant to describe the significance of heritage assets affected, including any contribution made by their setting. The level of detail should be proportionate to the assets' importance and no more than is sufficient to understand the potential impact of the proposal on their significance. As a minimum the relevant historic environment record should have been consulted and heritage assets assessed using appropriate expertise where necessary.

NPPF paragraph 131: when local authorities determine planning applications, they should take account of the desirability of sustaining and enhancing the significance of heritage assets and putting them to viable uses consistent with their conservation; the positive contribution that conservation of heritage assets can make to sustainable communities including their economic vitality; and the desirability of new development making a positive contribution to local character and distinctiveness.

NPPF paragraph 132: when considering the impact of a proposed development on the significance of a designated heritage asset, great weight should be given to the asset's conservation. The more important the asset, the greater the weight should be. Significance can be harmed or lost through alteration or destruction of the heritage asset or development within its setting. As heritage assets are irreplaceable, any harm or loss should require clear and convincing justification.

NPPF paragraph 133: where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: the nature of the heritage asset prevents all reasonable uses of the site; and no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and the harm or loss is outweighed by the benefit of bringing the site back into use.

NPPF paragraph 134: where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

NPPF paragraph 135: the effect of an application on the significance of a non-designated heritage asset should be taken into account in determining the application. In weighing applications that affect directly or indirectly non-designated heritage assets, a balanced judgement will be required having

regard to the scale of any harm or loss and the significance of the heritage asset.

NPPF paragraph 136: local planning authorities should not permit loss of the whole or part of a heritage asset without taking all reasonable steps to ensure the new development will proceed after the loss has occurred.

NPPF paragraph 141: information about the significance of the historic environment gathered as part of plan-making or development management should be publicly accessible. LPAs should require developers to record and advance understanding of the significance of any heritage assets to be lost (wholly or in part) in a manner proportionate to their importance and the impact, and to make this evidence (and any archive generated) publicly accessible. However, the ability to record evidence of our past should not be a factor in deciding whether such loss should be permitted.

Target

To maintain the Borough's listed buildings.

Indicator

Number of consents for demolition of a listed building
Number of listed buildings on the county Heritage at Risk Register

Delivery

Development Management decisions
Draw up a local list of buildings of special historic or local interest

Policy DM21: Preservation and Enhancement of Conservation Areas

Buildings or parts of buildings, open spaces, trees, vistas or other features which make a positive contribution to the character, appearance or significance of the area should be retained or enhanced. All development (or redevelopment) will only be permitted where the Council is satisfied that:

- a. Development does not adversely affect the streetscape, skyline or significant views**
- b. The development is proportional in scale, and complementary in design, with the adjoining buildings and wider area**
- c. Where any or part demolition is proposed, the structure makes no material contribution to the character or appearance of the area or the structure is considered to make a negative contribution to the appearance of the conservation area**
- d. Where a change of use is proposed, there will be no adverse effect on the appearance or setting of the building**
- e. Where an alteration is proposed, it is appropriate and sympathetic in design, scale, materials and colour to the rest of the building**

Proposals for any scheme designated within a Conservation Area must include a historic and architectural evaluation within the Design and Access Statement. The level of detail provided should be proportionate to the importance of the heritage asset. Proposals will be expected to be of a high quality design and detailed information will be required.

Outline planning permission will not be given for new buildings in a Conservation Area.

Alternative Approach

No alternative policy approach has been identified.

The Council has a duty to conserve and enhance the significance, character and appearance of the borough's historic environment when carrying out its statutory functions and through the planning system. In accordance with government policy this preferred option acknowledges the presumption in favour of the conservation of designated heritage assets.

Justification

4.78 Brentwood has a rich and varied cultural heritage, with 13 designated Conservation Areas within the Borough. These are defined under Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990, as "Areas of Special Architectural or Historic Interest the character or appearance of which it is desirable to preserve or enhance". Conservation Areas are shown on the Policies Map. This policy should be read in conjunction with *Policy CP9: Protecting the Historic and Natural Environment and Landscape Character*.

4.79 In accordance with the Borough's Conservation Area Appraisals, the Council will seek to promote high quality new development of exceptional design that makes a positive contribution to local character and respects the historic context. Development proposals in a Conservation Area should make reference to the relevant conservation area appraisal.

4.80 Applicants should provide an assessment of the significance of the heritage asset affected, together with a schedule of works analysing the impact of the proposal on the form, fabric and setting of the asset and any features of historic or architectural interest. Where appropriate, this may be set out in the Design and Access Statement. The National Planning Policy Framework is clear that when considering the impact of a proposed development on the significance of a designated heritage asset the more important the asset, the greater the weight should be given. Early engagement with the Council's Historic Buildings Advisor is encouraged through pre-application consultation.

4.81 There will be a presumption against the demolition of buildings or other features that positively contribute to the character or appearance of a Conservation Area, in the absence of detailed and acceptable proposals for replacement development. Use of non-traditional materials, where inappropriate, will not be permitted on, or in proximity to, Listed Buildings or in Conservation Areas. For advice on this matter, applicants should consult local

expertise and refer to published guidance, such as *Valuing Places: Good Practice in Conservation Areas* (2011) by English Heritage.

4.82 In order to ensure a high standard of design and materials, detailed schemes rather than outline applications will be required.

Evidence

Conservation Area Appraisals

National Policy

NPPF paragraph 137 - Local planning authorities should look for opportunities for new development within Conservation Areas to enhance or better reveal their significance. Proposals that preserve those elements of the setting that make a positive contribution to or better reveal the significance of the asset should be treated favourably.

NPPF paragraph 138 - not all elements of a Conservation Area will necessarily contribute to its significance. Loss of a building (or other element) which makes a positive contribution to the significance of the Conservation Area should be treated either as substantial harm under paragraph 133 or less than substantial harm under paragraph 134, as appropriate, taking into account the relative significance of the element affected and its contribution to the significance of the Conservation Area as a whole.

NPPF paragraph 133 states where a proposed development will lead to substantial harm to or total loss of significance of a designated heritage asset, local planning authorities should refuse consent, unless it can be demonstrated that the substantial harm or loss is necessary to achieve substantial public benefits that outweigh that harm or loss, or all of the following apply: the nature of the heritage asset prevents all reasonable uses of the site; and no viable use of the heritage asset itself can be found in the medium term through appropriate marketing that will enable its conservation; and conservation by grant-funding or some form of charitable or public ownership is demonstrably not possible; and the harm or loss is outweighed by the benefit of bringing the site back into use.

NPPF paragraph 134 where a development proposal will lead to less than substantial harm to the significance of a designated heritage asset, this harm should be weighed against the public benefits of the proposal, including securing its optimum viable use.

Target

For all Conservation Areas to have an appraisal

Indicator

Number of Conservation Areas covered by appraisals and management plans.

Number of Conservation Areas on the County Heritage at Risk Register.

Delivery

Development Management Decisions

Complete programme to undertake an Appraisal and Management Plan for each Conservation Area

Consult and implement Appraisal and Management Plan recommendations

Policy DM22: Ancient Monuments and Archaeological Remains

Planning permission will be refused for development which would adversely affect a Scheduled Monument, or other locally or nationally important sites and monuments, or their settings.

A full Archaeological Assessment must be included with any planning application affecting areas of known or suspected archaeological importance to ensure that provision is made for the preservation of important archaeological remains.

Where proposals affect archaeological sites and other designated assets, preference will be given to preservation in situ unless it can be shown that archaeological mitigation through recording, assessment, analysis report and deposition of archive is more appropriate.

Any development that may affect archaeological remains will need to demonstrate the likely impact upon the remains and the proposed mitigation to reduce that impact.

The desirability of preserving Scheduled Monument or their equivalent and its setting is a material consideration in the determination of planning applications.

Alternative Approach

No alternative approach has been identified.

Justification

4.83 Heritage assets are defined by their historic, archaeological, architectural or artistic significance. As a finite and non-renewable resource, archaeology can become highly fragile and vulnerable to damage or destruction. The Council will adopt a presumption against proposals which would harm the setting of archaeological remains of national or local importance, whether scheduled or not.

4.84 In cases where development will impact upon sites of known archaeological interest or potential, the results of a field evaluation/assessment will be necessary prior to the determination of the application. Applicants will be required to arrange for an archaeological investigation setting out appropriate measures of protection, management or mitigation including excavations and recording prior to development.

4.85 Within Brentwood, there are 636 sites of known archaeological interest. Of these, 12 sites are protected as designated Scheduled Monuments, maintained by the Secretary of State under Section 1 of the Ancient Monuments and Archaeological Areas Act 1979, ensuring ultimate responsibility for the preservation, treatment, repair and use of each

monument. For applications affecting a scheduled monument and its setting, early stage consultation with English Heritage will be required to gain scheduled monument consent. For non-statutory historic environment assets applicants should consult the Council and as appropriate, Essex County Council Historic Environment advisors, regarding the nature, setting and management of the borough's historic environment.

Archaeological Heritage

4.86 The historic environment of Brentwood has developed through a history of human activity that spans over 450,000 years. Much of the resource lies hidden beneath the ground in the form of highly sensitive and non-renewable archaeological deposits. Other elements such as the historic landscape, the pattern of field, farms, woods and historic settlements which characterise the Borough are a highly visible record of millennia of agriculture, industry, settlement and commerce. Brentwood has a large number of sites of archaeological importance that are worthy of preservation for the future.

Evidence

The National Heritage List for England

Historic Environment Records

Designated Scheduled Monuments, maintained by Secretary of State under Section 1 of the Ancient Monuments and Archaeological Areas Act 1979

National Policy

NPPF paragraph 128 sets out where a site on which development is proposed includes or has the potential to include heritage assets with archaeological interest, local planning authorities should require developers to submit an appropriate desk-based assessment and, where necessary, a field evaluation.

NPPF paragraph 139 - non-designated heritage assets of archaeological interest that are demonstrably of equivalent significance to scheduled monuments, should be considered subject to the policies for designated heritage assets.

Sustainable Communities

Strategic Objective

Plan for housing that meets the needs of the Borough's population and contributes to creating inclusive, balanced, sustainable communities

4.87 This section of the plan deals with new housing and how this can be provided in a way which meets local needs, both now and in the future, and contributes to creating inclusive, balanced, sustainable communities.

Communities comprising a mix of services and housing types will generally:

- *support a wider range of social and community infrastructure such as schools, nurseries and shops*
- *encourage stability and community cohesion allowing residents to move but remain in the same area*
- *foster community spirit by an increased sense of belonging, identity and pride of place*
- *reduce the social isolation of a particular age group such older or younger people*
- *create a more diverse and inclusive community than one dominated by a single accommodation type*

4.88 The Council's Corporate Plan identifies Housing, Health and Wellbeing as a Corporate priority. This seeks to "*broaden the range of housing in the borough to meet the needs of our population now and in the future*" and "*Manage our housing differently to recognise council housing as a valuable and limited resource for those in greatest need.*"

4.89 In light of the above, a new Housing Strategy for the Borough is being drawn up. This will identify issues, priorities and actions. Emerging priorities for 2013-2016 are as follows:

- *Managing Housing Demand*
- *Meeting Housing Need*
- *Securing a supply of Housing to meet a range of needs*
- *Well managed homes*
- *Housing Support for vulnerable and older people*

(Draft Housing Strategy 2013-2016)

Policy DM23 Housing Land Allocations – Major Sites

The following sites (with potential capacity for 10 or more homes) are allocated for housing development over the period 2015 to 2030, as identified on the Policies Map. Estimated capacity is based on density categories set out in the SHLAA and subsequent analysis. For brownfield sites in urban areas this density is maximised to make most efficient use of land. Where indicated, a mix of uses, including residential may be sought or appropriate. Further detail, including smaller site allocations, is given in Appendix 2.

- 1 Land north of Highwood Close, Brentwood (001A) – (20 dwellings)
- 2 Wates Way Industrial Estate, Ongar Road, Brentwood (003) – (128 dwellings)
- 3 Essex County Fire Brigade HQ, Rayleigh Road, Brentwood (005) – (101 dwellings)
- 4 Land adj. Adult Education Centre, Rayleigh Road, Hutton (006) – (11 dwellings)
- 5 Land between Tendring Court and Tillingham Bold, Woodland Avenue, Hutton (007) – (10 dwellings)
- 6 Land rear of 10-20 Orchard Lane, Pilgrims Hatch (011) – (19 dwellings)
- 7 Garage courts adj. 49 Lavender Avenue, Pilgrims Hatch (012) – (15 dwellings)
- 8 Warley Training Centre, Essex Way, Warley (013B) – (53 dwellings)
- 9 Westbury Road Car Park, Westbury Road, Brentwood (039) – (22 Dwellings)
- 10 Chatham Way/Crown Street Car Park, Brentwood (040) – (26 Dwellings)
- 11 Land at Hunter House, Western Road, Brentwood (041) – (22 Dwellings)
- 12 Garages adj. 25 King Georges Road, Pilgrims Hatch (054) – (10 dwellings)
- 13 Council Depot, The Drive, Warley (081) – (137 dwellings)
- 14 The Baytree Centre, Brentwood (100) – (201 dwellings)
- 15 Land at Brookfield Close, Hutton (131B) – (13 dwellings)
- 16 Land at Maple Close, Brentwood (133) – (14 dwellings)
- 17 Woodlands, School Road, Kelvedon Hatch (009) – (12 dwellings)
- 18 Land at Bell Mead, Ingatestone (042) – (16 dwellings)
- 19 Former Landings Surgery, Outings Lane, Doddington (043) – (11 dwellings)

20 Sow & Grow Nursery, Ongar Road, Pilgrims Hatch (010) – (48 dwellings)

21 Ingatestone Garden Centre, Roman Road, Ingatestone (128) – (130 dwellings)

22 West Horndon Strategic Allocation (020, 021 & 037) – (1,500 dwellings)

Proposals for housing submitted on these allocations in accordance with the phasing indicated, will be approved where the proposed scheme is in accordance with other relevant policies of the Plan. An application for an allocation in advance of its phasing will only be approved where:

- **early release would not prejudice the delivery of other allocated sites phased in an earlier time period**
- **the site is required now to maintain a five year supply of deliverable sites and**
- **Infrastructure requirements of the development can be fully and satisfactorily addressed**

Alternative Approach

To allocate fewer sites and place more reliance on windfalls to deliver new homes.

Reason for rejection: historically, a significant number of homes have been built on windfall sites (ie previously unidentified sites) in Brentwood Borough and are expected to continue to do so in future. This approach may make it harder to manage delivery in line with the spatial strategy. There would also be less scope for windfall sites to make up for allocations which do not come forward (ie provide contingency).

Alternative Allocations

Some sites currently in other uses could be considered suitable to provide for residential use in addition to or instead of sites set out in Policy DM23. Were alternatives considered more appropriate (through further assessment) this could have potential effects on housing and economic growth over the plan period, both positive and negative. The table below sets out options.

Site	Reasonable Alternative	Reason
Brentwood railway station car park (002)	Residential	Part of the existing station car park may be appropriate for residential development provided the issue of car parking is considered. Brownfield site assessed to be suitable in SHLAA.
Land rear of The Bull public house, Brook Street Brentwood (004)	Residential	Brownfield site assessed to be suitable in SHLAA.
Land at Priests Lane,	Residential with	Existing protected urban open space

Brentwood (044)	public green space	but private land shut of from public use. Further assessment needed to look at whether this might be appropriate to provide some residential with retention of some green space for the public.
Former Elliot's night club, West Horndon (048)	Employment or Residential	Brownfield site in Green Belt.
Land west of Warley Hill, Pastoral Way, Warley (083)	Healthcare with residential	NHS owned land that could provide expanded healthcare facilities with potential for some market housing.
Land at Crescent Road, Brentwood (084)	Residential with public green space	Existing protected urban open space but private land shut of from public use. Further assessment needed to look at whether this might be appropriate to provide some residential with retention of some green space for the public.
<i>West Horndon opportunity area</i>		
Land East of Thorndon Avenue, West Horndon (038)	Mixed-use with residential	Alternative options may be suitable in order to provide for growth opportunities at West Horndon in line with Policy CP4.
Land East of West Horndon, South of Station Road (126)	Mixed-use with residential	
<i>Other sites (various)</i>		
Council owned garage sites	Residential	A review of garage sites owned by Brentwood Borough Council is currently underway. The outcome of this review may suggest sites suitable for redevelopment. Most sites will be in residential areas, meaning residential redevelopment may be appropriate.
Council owned older persons housing (sheltered housing) sites	Provision of older persons housing with new residential	A review of Older Persons Housing in the Borough is due to take place in 2013. The outcome of this review may suggest sites could be redeveloped to make more efficient use of brownfield land to meet the needs of older people while providing additional market/affordable housing.

Justification

4.90 The Council needs to allocate land in order to facilitate the provision of new homes in line with its proposed spatial strategy, housing figure and distribution of residential development as set out in policies S1 and S2 of this plan.

4.91 Comprehensive assessments of potential sites have been carried out by the Council, independent technical specialists and other bodies. *Brentwood Strategic Housing Land Availability Assessment* (SHLAA, 2010) has been the main source of potential housing sites to be considered for

allocation. Sites in the SHLAA and identified subsequently are derived from various sources including:

- Sites submitted by land-owners and developers;
- Sites proposed by parish councils and members of the public; and
- Other sites known or owned by the Council.

Basis for site selection

4.92 To determine which land to allocate sites have been assessed against criteria, including (but not limited to) the following:

- ability to deliver the overall spatial strategy and vision
- whether sites are suitable for housing
- accessibility – to public transport, services and facilities
- infrastructure provision
- impact on the Green Belt, landscape, visual amenity, heritage, transport and environmental quality including wildlife, flood-risk, air and water pollution
- impact on highways
- whether the site is likely to come forward over the plan period

4.93 A Sustainability Appraisal carried out for each site, together with technical analysis and modeling, has enabled the Council to reach an informed judgment on the above and related matters. Previous unimplemented allocations have been reviewed.

Estimated Capacity

4.94 An estimate of how many dwellings each site should accommodate has been made by adopting a density and developable area based on location, area characteristics and site circumstances. This is broadly consistent with Policy DM3 (Residential Density). Site constraints eg topography and potential or desirability for mixed use are also taken into account. Site density details for each site are set out in Appendix 2.

4.95 Sites 1 through 16 as set out in Policy DM23 above are within the Brentwood urban area. This is brownfield land where it is necessary to maximise density in order to use land efficiently and reduce pressure to release greenfield sites. Sites 17 to 19 are brownfield sites in villages outside Brentwood.

4.96 Sites 20 and 21 are brownfield land in Green Belt, connected to (or very close to) urban areas. These need to provide for an appropriate level of residential density across the site to efficiently make use of allocated land. If not allocated it is likely planning permission would be granted using NPPF

criteria, provided there is no greater impact on the openness of the Green Belt. This would likely result in small scale residential development using the existing building footprint. If this were the case then more Green Belt sites would be required to meet housing need, potentially greenfield Green Belt land. Allocating these brownfield Green Belt sites for larger residential provision utilises land more efficiently and provide sustainable urban extensions without use of greenfield land.

4.97 The West Horndon Strategic Allocation (site 22) is made up of three sites. These are the two existing industrial estates and adjoining greenfield Green Belt land to the north. More details are set out in Policy CP4.

Phasing

4.98 For each allocated site the Council has estimated when it is likely to come forward over the lifetime of the Plan. Delivery ultimately depends upon external factors such as finance availability house builders, mortgage availability for purchasers, and landowners' aspirations. A housing trajectory for all site allocations is set out in Appendix 3.

Evidence

SHLAA

Site assessment pro-formas – these assess each site against a consistent and comprehensive range of criteria

SA/SEA

Modelling work – forthcoming

Green Belt and Landscape Sensitivity Assessment – forthcoming

Water Cycle Study & Strategic Flood Risk Assessment, 2011

National Policy

NPPF Core Principle, paragraph 17: *Allocations of land for development should prefer land of lesser environmental value, where consistent with other policies in this Framework; and encourage the effective use of land by reusing land that has been previously developed (brownfield land), provided that it is not of high environmental value.*

NPPF paragraph 47: *To boost significantly the supply of housing, local planning authorities should:*

- *ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period; and*
- *Identify key sites which are critical to the delivery of the housing strategy over the plan period; and identify a supply of specific, developable¹² sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15*

- *for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period*

NPPF, Paragraph 157: *Local Plans should allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate.*

Target

Successful realisation of development on identified sites in line with policy.

Indicator

Permissions, Starts and Completions measured against housing trajectory
End user surveys (for major sites)

Delivery

IDP, Housebuilders, RSLs

Policy DM24: Affordable Housing

In new developments comprising 15 dwellings or more, or on sites of 0.66 hectares or more in the Brentwood urban area, at least 35% of dwellings within the development shall be affordable. In developments with fewer than 15 dwellings provision should be made for:

- At least four affordable homes on sites which have 12 to 14 dwellings**
- At least three affordable homes on sites of 10 or 11 dwellings**
- At least two affordable homes on sites of 8 or 9 dwellings**
- At least one affordable home on sites of 5 to 7 dwellings**
- On sites of 1 to 4 dwellings, either provision on site or a financial contribution for each new dwelling towards the provision of affordable housing elsewhere in the Borough**

The tenure of the affordable housing shall be provided in agreement with the Council and shall be provided to eligible households whose needs the Council agrees are not met by the market.

In agreement with the Council, the affordable housing will:

- Meet the needs of eligible households including availability at a cost low enough for them to afford, determined with regard to local incomes and local house prices**
- Include provision for the home to remain at an affordable price for future eligible households or for the subsidy to be recycled for alternative affordable housing provision**

- h. Promote social inclusion with affordable housing dispersed throughout the site rather than grouped in one area and designed to be indistinguishable from market housing**

Where development viability is compromised, the developer must provide evidence why targets cannot be met and the Council will negotiate with the developer to establish a level of affordable housing provision that is achievable.

Alternative Approach

Alternative Policy 1: set a 35% target for housing in all new developments to be affordable regardless of location.

Reason for rejection: a blanket target may be difficult to achieve due to a lack of public funding and failure to take into account the relationship between location and viability. The preferred policy will enable a more targeted approach taking into account location and site characteristics.

Alternative Policy 2: set minimum threshold(s) below which no contribution will be sought. This could be higher in urban areas and lower in rural areas.

Reason for rejection: The Borough has a high level of housing need. Not setting minimum thresholds should ensure all new housing development makes some contribution to providing affordable housing, therefore, the preferred approach will be more effective at addressing need.

Justification

4.99 A growing number of households in the Borough cannot afford to buy or rent on the open market. House prices in Brentwood are among the highest in Essex.

4.100 The Council's Housing team monitor purchase and rental prices. This provides a reasonable basis on which to gauge affordability on a rolling basis. Figures show that the lowest priced 3 bedroom houses available as at July 2012 range from £175,000 for second hand to £341,667 for new build. This is beyond what the majority of those who work in the Borough can afford.

4.101 For the purposes of this policy affordable housing is defined as housing that can be accessed by people who cannot afford to rent or buy on the open market and where measures are in place to retain this housing, or secure its replacement, in perpetuity.

4.102 A shortage of affordable housing leads to overcrowding, poor health, inability to achieve a decent standard of living and personal aspirations such as living independently, having children, being part of the family or social network of choice – all factors that contribute to the sustainability of neighbourhoods.

4.103 Between 2001 and 2010 19% of homes built in the Borough were affordable homes. This is less than might otherwise have been achieved were there no minimum thresholds. Requiring developers to provide some

affordable housing whenever a new home is built, while recognising viability varies depending on site size and location, will increase the scope for providing affordable homes.

4.104 So that new housing contributes towards the creation of sustainable, inclusive communities, there will be a presumption that affordable housing should be provided on site. The Council recognises, however, there may be circumstances where provision off site or a contribution in lieu of provision may be acceptable.

4.105 Brentwood's *Strategic Housing Market Assessment* (January 2010) highlights a role for intermediate housing in the Borough alongside social rented housing. The SHMA forecasts Brentwood's housing requirement to 2026 as follows: 29.6% Social Rent, 65.5% Intermediate (part rent/shared ownership) and 4.9% Market. (LCB Strategic Housing Market Assessment, Figures 123, 137 and 136). Practical and policy considerations, notably limited public funds and the desirability of achieving a mix of tenures and extending choice, make provision on this scale unrealistic. There continues to be a strong demand for market housing which will need to be built in order to deliver affordable housing. Therefore the policy aims to maximise affordable housing provision, including both rented and shared equity/ownership schemes, taking into account viability and wider policy considerations. The proposed policy will be considered in light of the new SHMA findings, when available, and if necessary amended.

4.106 A study commissioned by the Council on residential site viability looked at the economics of future residential development under a range of scenarios for different size of scheme, type of site, location and economic conditions. The study recommends for sites above 15 dwellings a Borough-wide affordable housing target of at least 35%, based on a higher proportion of intermediate, rather than social rented tenures (*Viability Assessment For London Commuter Belt (East)/M11 Sub Region*, 2010). Viability tends to fall on smaller sites of five or more dwellings where a maximum of 30% is more achievable. The study notes that higher density development is more viable in Brentwood, compared with elsewhere in the Borough, with the optimum development density, at 35% affordable housing, in the region of 50 to 70 dwellings per hectare.

4.107 As well as meeting the housing needs of those who can neither afford to buy or rent on the open market nor qualify for social housing, providing affordable intermediate housing increases the scope for social housing to be released for others. Where intermediate rented products are priced too high, some households allocated social housing who can potentially afford alternative intermediate products if appropriately priced. The national letting database (CORE) for intermediate housing sales shows that a proportion of households who buy shared ownership can also afford open market prices. CORE also shows that a proportion of affordable housing is let to households who can afford more than social rents.

4.108 With regard to thresholds, on general development sites (15-250 dwellings) the 2010 Viability Assessment recommends a single Borough-wide

affordable housing target of up to 35% on sites above 15 units on the basis that this is applied flexibly and from a realistic perspective taking into account market conditions, value areas, density and other planning and infrastructure requirements.

4.109 The assessment notes that in comparison with other local authority areas in the sub region higher density development is relatively more viable in Brentwood. Higher density developments typically incorporate a higher number of 1 and 2 bedroom units which would be consistent with the 35% policy target recommended for general development sites.

4.110 Outside the Brentwood urban area, the Viability Assessment recommends retaining the existing five unit threshold. It notes that 30% affordable housing is likely to be achievable on low density (30 dph) schemes, reducing to 20% affordable housing on schemes developed at 50-70 dph. Were any policy on sites below 15 units to be introduced in the Brentwood urban area, this should be flexible enough to ensure that sites of this size continue to come forward for residential development given that such sites have not previously been expected to provide affordable housing in this location.

Evidence

Viability Assessment For London Commuter Belt (East)/M11 Sub Region, 2010

Housing Strategy – forthcoming

Outline Affordability Ratios 2012 are shown in the table below.

Tenure	Annual Rents				
	1 Bed Flat	2 Bed Flat	2 Bed House	3 Bed House	4 Bed House
Private Rent	£ 6,120	£ 8,256	£ 9,300	£ 10,896	£ 16,404
Social Rent	£ 3,900	£ 4,416	£ 4,728	£ 5,724	£ 7,284
Local Housing Allowance Rate (Highest)	£ 6,600	£ 8,340	£ 8,340	£ 10,200	£ 14,340
80% of Market Rent	£ 4,896	£ 6,612	£ 7,440	£ 8,724	£ 13,116
Median Annual Average Income	£ 22,356	£ 22,356	£ 22,356	£ 22,356	£ 22,356
% of Annual Income on Housing Costs					
Private Rent	27%	37%	42%	49%	73%
Social Rent	17%	20%	21%	26%	33%
80% of Market Rent	22%	30%	33%	39%	59%

Source: Brentwood Council 2012

In Brentwood, the average home cost £342,000 in November 2011 compared with £248,000 for Essex and £241,000 for the UK (BBC figures based on Land Registry data). With an average weekly wage of £531 this leaves an estimated ratio of house prices to estimated household income in excess of 6:1. An analysis of local house price figures show that the lowest priced three bedroom houses available as at July 2012 range from £175,000 for second hand to £341,667 for new build.

Strategic Housing Market Assessment 2010 and Update (forthcoming - 2013)

Brentwood five year housing supply assessment 2012 to 2017, 2012

Brentwood Allocations Policy 2007

Brentwood Homelessness Strategy 2008 to 2013 2008

Brentwood Strategic Housing Land Availability Assessment (SHLAA) 2011

CLG Housing Statistics: Dwelling Stock by Tenure and District 2011

Brentwood Annual Monitoring Report 2010/11 2011

House Price Index, Land Registry

A plain English guide to the Localism Act 2012, Communities and Local Government

Greater Essex Demographic Forecasts, Essex Planning Officers Association 2012

Essex County Council – Adult Social Care Market Position Statement 2012

Analysis of past completions (as recorded in annual monitoring reports and housing trajectory).

National Policy

NPPF, paragraph 47 – *To boost significantly the supply of housing, local planning authorities should:*

- *use their evidence base to ensure that their Local Plan meets the full, objectively assessed needs for market and affordable housing in the housing market area, as far as is consistent with the policies set out in this Framework, including identifying key sites which are critical to the delivery of the housing strategy over the plan period*
- *for market and affordable housing, illustrate the expected rate of housing delivery through a housing trajectory for the plan period and set out a housing implementation strategy for the full range of housing describing how they will maintain delivery of a five-year supply of housing land to meet their housing target*

NPPF, Paragraph 50: *Local Planning Authorities should, where they have identified that affordable housing is needed, set policies for meeting this need on site, unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified (for example to improve or make more effective use of the existing housing stock) and the agreed approach contributes to the objective of creating mixed and balanced communities. Such policies should be sufficiently flexible to take account of changing market conditions over time.*

Localism Act 2011

This gives Local Authorities greater freedom to set their own policies to determine who can access the waiting list for social housing in their area. There remains a duty to ensure social housing goes to the most vulnerable in society and those who need it most. However, the legislation allows for

qualification criteria to be set locally. The council can also set rents at 'affordable' levels at up to 80% of market rent which will influence accessibility.

Welfare Reform Act 2012

From April 2013, tenants of working age who receive Housing Benefit will have this reduced if they have one or more spare bedrooms. The reduction is expected to be 14% for one extra bedroom and 25% for two extra bedrooms or more. In addition, a Housing Benefit 'cap' will be introduced which limits the amount of Housing Benefit payable for accommodation with the stated intention of reducing rental levels.

The local impact of these changes is yet to be analysed fully but it is likely to have a significant effect both on under occupancy within the Council's own housing stock and the extent to which letting to tenants in receipt of Housing Benefit within the private sector remains viable.

Target

A borough wide target of 30% of new homes to be affordable. Site specific delivery in line with policy and housing trajectory

Indicator

Regular monitoring of planning permissions, starts and completions of new housing by type and tenure of new affordable housing units built taking into account site size and location.

Delivery

Developer contributions (S106 or equivalent)

Development management decisions.

Working in partnership with community stakeholders, developers, landowners, planning applicants, Registered Social Landlords and other Affordable Housing Providers and the Homes and Communities Agency

Local Investment Plan.

BBC Housing Strategy (forthcoming)

RSLs

Housebuilders

Policy DM25: Affordable rural housing

In very special circumstances the development of small scale low cost rural housing may be permitted in the Green Belt where all the following criteria are met:

- a. The site is within or adjacent to a settlement**
- b. The site is accessible to a range of local services, such as shops, primary schools, healthcare and public transport**
- c. There is a demonstrable local need within the village settlement that cannot be met another way**

- d. Homes provided are 100% affordable unless it can be demonstrated that an element of market housing is necessary to deliver a significant amount of affordable housing**
- e. The housing is provided for people with a strong and demonstrable local connection**
- f. Safeguards are in place to ensure homes remain affordable in perpetuity**
- g. The development is small-scale, does not exceed that required to meet current need and respects the character of the settlement and surrounding landscape**

A person with a strong local connection should meet the following criteria:

- i. Existing local residents requiring separate accommodation**
- ii. Close relatives of existing local residents who have a demonstrable need to either support or be supported by them**
- iii. People whose work provides an important and necessary local service**

In the context of this policy "local" means a parish or ward, or in exceptional circumstances, adjacent parishes or wards.

Alternative Approach

To have no policy on rural affordable housing but take decisions in light of national policy

Reason for rejection: a local policy will assist prospective applicants to understand the kind of schemes the Council considers acceptable.

Justification

4.111 Sometimes a need for affordable housing in a rural location exists that cannot be met on a previously developed site within an existing village boundary. Any site released under this policy would be an exception to Green Belt policies. All rural affordable housing proposals should be supported by a local housing needs survey conducted at parish or neighbourhood level. The survey should provide evidence on the number, type and size of homes needed. Preference will be given to sites with good access to local facilities and the ability to travel by non-car modes.

4.112 For rural housing the effect of higher prices on homes in rural areas is that low income households are squeezed out of the market unless there is a ring fenced supply of affordable homes. Right to buy has eroded this supply (*Taylor Review of Local Economy and Affordable Housing*). A characteristic of Brentwood is that it comprises distinct rural and urban communities. This effect is compounded by lower than average salaries for local workers in traditional rural industries. Retaining these households is important as benefits

extend to local labour force retention, maintaining sustainable rural communities and family and community networks and providing informal care and support. Addressing these factors will be crucial for the Council to deliver its Place and Prosperity ambitions.

Evidence

Affordable Housing Viability Assessment (2010)

Brentwood Housing Strategy - forthcoming

Taylor Review of Local Economy and Affordable Housing, CLG, 2008

Strategic Housing Market Assessment (SHMA) - forthcoming

National Policy

NPPF Paragraph 54: *In rural areas, exercising the duty to cooperate with neighbouring authorities, local planning authorities should be responsive to local circumstances and plan housing development to reflect local needs, particularly for affordable housing, including through rural exception sites where appropriate. Local planning authorities should in particular consider whether allowing some market housing would facilitate the provision of significant additional affordable housing to meet local needs.*

NPPF Paragraph 55 *To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Local planning authorities should avoid new isolated homes in the countryside unless there are special circumstances.*

Target

Provision in line with policy

Indicator

Development Monitoring

Delivery

Development management decisions

The Council working with other bodies, eg Parish Councils, RSLs and rural enablers.

Policy DM26: Specialist Housing

Proposals for specialist residential and supported accommodation will be permitted where the following criteria are met:

- a. the proposal has all necessary facilities close by such as shops, public transport, health and leisure facilities and, where appropriate, employment and day centres**
- b. the proposal would not result in the over concentration of residential homes in any individual street**
- c. evidence is provided demonstrating the suitability of the premises to meet the particular needs of the group to be housed**

- d. where appropriate the scheme shall provide sufficient integrated accommodation to allow for the level of support required for the client group for whom the scheme is intended
- e. the proposal provides appropriate landscaping and amenity space

Where appropriate, a condition will be imposed restricting occupation to persons requiring supported accommodation.

Alternative Approach

1. To have no policy on specialist housing

Reason for rejection: Although there is now more emphasis placed on supporting people in their homes than previously there continues to be a need for specialist accommodation to address the needs of the growing number of frail elderly people and other groups requiring supported accommodation whose needs are not met by mainstream housing.

2. To cover the issue within another policy, eg affordable housing or a housing mix policy

Reason for rejection: Specialist housing can be market or affordable housing – both types exist and are likely to be needed in future.

Justification

4.113 This policy is intended to support the provision of specialist accommodation in the Borough. Reflecting national trends, the Borough's population is ageing. Just under a fifth of the population is over 65 and more than a quarter of households contain someone of this age – these proportions are projected to increase. There appears to be a general desire among older people to remain in their own home for as long as possible. Part of the response to an ageing population is to provide choice so that should people wish to move they can find somewhere which suits their needs and aspirations. Older people generally remain fit and active longer than they did in the past, however, particular types of accommodation and support will be required in order to meet the needs of a growing number of frail elderly people. Other groups with specific needs also require specialist accommodation. Providing a greater range of housing within the borough will assist more people to continue living locally and free up housing for others.

4.114 With regard to supported housing, the Strategic Housing Market Assessment notes that the Borough has a small oversupply at present but that "supply is in line with need by 2025". The SHMA also notes that much of this supply (in Brentwood and other areas) fails to meet the decent homes standard or DDA/equality compliance regulations.

4.115 It is important to ensure that people living in residential homes and other specialist accommodation are part of the community where they live and have access to facilities, like shops, healthcare and public transport. At the same time, it is best to avoid having too many specialist residential schemes

in one street since this may adversely affect the balance of the community and put pressure on local services. In determining whether there is a need for a particular type of specialist housing the Council will have regard to up to date information on local need and provision, such as that collated by the County Council, local health practitioners and the findings of the new SHMA due later in 2013.

Evidence

ONS 2010 based sub-national population projections

CLG Household Projections

2011 Census

Brentwood Older Person's Housing Strategy (forthcoming)

County Council

SHMA – 2010 and forthcoming update.

Ongoing work in relation to the Health and Wellbeing agenda (NHS Commissioning Partnerships).

Consultation Feedback

Consultation responses highlight the importance of considering the needs of older people, especially with regard to provision of housing, services and public transport.

National Policy

The NPPF, paragraph 50 requires local authorities to plan to meet the needs of different groups, including older people and those with disabilities and “create sustainable, inclusive and mixed communities.”

NPPF, Paragraph 171: *Local planning authorities should work with public health leads and health organisations to understand and take account of the health status and needs of the local population.*

Target

Provision in line with policy

Indicator

Development monitoring

Delivery

Development management decisions.

Policy DM27: Mixed Use Development

Major development proposals within Brentwood town centre, Borough district centres at Shenfield Hutton Road, Ingatestone High Street and Warley Hill Brentwood station area, as defined on Policies Map, will be required to provide an appropriate mix of uses. Proposed development should:

- a. contain an appropriate mix of ground floor uses such as A1, A2, A3, A4, A5 of Use Classes Order 1987 (as amended) with active

street frontages and complimented by B1 and D1 where appropriate

- b. ensure main pedestrian entrances enable access to all accommodation from public space**
- c. demonstrate potential commercial related problems, such as noise and smell, will be overcome satisfactorily to protect amenities of surrounding residents (existing and proposed)**

Mixed use development will be sought except where:

- a) proposed development makes efficient use of the site, is considered to be of sufficient density and has active street frontages that make a multiple use impractical or undesirable**
- b) access to more than one use is physically impossible**
- c) overall balance of uses in the immediate area or street is considered sufficient to ensure economic variety and diversity**

Planning permission will not be granted for change of use which results in an unacceptable mix of uses or the loss of a use that will have the same effect.

Alternative Approach

1. To have no mixed use policy and assume mixed use schemes are proposed regardless.

Reason for rejection: Without a policy it is more likely that single use schemes would come forward. This would make harder to sustain a good balance of uses. Over time the sustainability and vibrancy of areas may suffer as a consequence.

2. To have a policy setting out the mix for each site.

Reason for rejection

While this may be done for some sites, it would be impractical for all of them.

Justification

4.116 The benefits of mixed use are widely recognised. Locating a variety of land uses close together, such as retail, employment, leisure and residential, contributes to the vitality and vibrancy of centres, reduces the need to travel and enhances community safety. Improving links between homes, businesses, local shops, community and leisure facilities can bring jobs and essential services closer to where people live and vice versa. As well as being more convenient, mixed use can deliver local economic benefits.

4.117 The nature of mixed-use development varies depending on location. The variety of uses increase and physical distribution of uses becomes more concentrated closer to Brentwood town centre. This is also true to a lesser extent in the Borough's district shopping centres. In these areas the mix of uses will be assessed at a local level within a street or locality. In Brentwood

town centre the mix of uses will be addressed on individual sites. In all cases, successful mixed-use development depends on the complementary nature of uses within the development itself and its immediate surroundings. Residential development can also give rise to demand for additional community facilities. For example, a community hall, medical facilities, education or local shopping provision may be required, or improvements to existing provision made, to meet the needs of new and existing residents.

4.118 For the purposes of this policy, definitions of major development as set out in DCLG statistical returns are used, such as 10 net residential units and above, 1,000 sqm of floorspace (of whatever use), or sites in excess of 1 ha.

National Policy

NPPF Core Principle, paragraph 17: *Planning should promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production)."*

NPPF Paragraph 37: *Planning policies should aim for a balance of land uses within their area so that people can be encouraged to minimise journey lengths for employment, shopping, leisure, education and other activities.*

NPPF Paragraph 38: *For larger scale residential developments in particular, planning policies should promote a mix of uses in order to provide opportunities to undertake day-to-day activities including work on site.*

Target

Appropriate mix of uses within Borough's main centres providing homes, jobs and local needs

Indicator

Vital and viable urban areas performing well

Delivery

Pre-application discussion and Development Management

Policy DM28: Gypsy and Traveller Provision

Provision will be made within the Borough to meet the need for 44 permanent Gypsy and Traveller Pitches to 2030.

The Council will identify Gypsy and Traveller sites to meet this provision, through a combination of allocations to ensure a five year land supply is maintained throughout the plan period, and the grant of planning permissions in accordance with the following criteria:

- a. **The site does not give rise to unacceptable harm to the Green Belt**
- b. **The site is well related to existing communities and accessible to local services and facilities, such as shops, primary and secondary schools, healthcare and public transport**

- c. The site is serviced by a suitable access road
- d. The location would not result in unacceptable living conditions for its occupants
- e. The proposed accommodation would not harm the character and/or appearance of the area and/or result in unacceptable visual impact
- f. The site is located, designed and landscaped to minimise any impact on the environment

The Council proposes to allocate the following five sites to provide for 20 pitches to be distributed as follows:

Site	Address	Number of pitches
Deep Dell Park (Willow Farm)	Stock Road, Ingatestone	7
Hope Farm	Horsemanside, Navestock	3
Rye Etch	Mill Lane, Navestock	3
Tree Tops	Curtis Mill Lane, Navestock	3
Roman Triangle	Roman Rd, Mountnessing	4

West Horndon is identified as a broad location for further provision to be planned as an integrated way as part of a mixed use development (See West Horndon Core Policy). The level of provision is subject to the findings of the forthcoming GTAA but in the first instance estimated to be 14 pitches.

Alternative Approach

To allocate 15 years' worth of pitches at the start of the plan period.

Reason for rejection: This approach may be difficult to achieve in practice given the Borough's lack of suitable locations for traveller site. A combination of site allocations and identifying a broad location is considered a pragmatic approach that will provide for the needs of Gypsies and Travellers over the plan period.

Justification

4.119 The Borough Council has a duty to identify land to meet the local needs of Gypsies and Travellers. Around 80 per cent of land in Brentwood lies within Green Belt where development is strictly controlled. Elsewhere, there is a lack of available land within the built up area. This limits options available for providing new pitches in suitable locations.

4.120 The preferred approach aims to ensure that the target for pitch provision will be met throughout the plan period through allocations, maintaining a five year land supply and identifying a broad location for further provision.

4.121 The proposed target is based initially on the former *East of England Plan* revised figure but in the next iteration of this plan the intention is to set a new target and plan provision, derived from an updated needs assessment. The *East of England Plan* required the Borough to provide an additional 24 pitches between 2006 and 2021 bringing the total number of permanent authorised pitches in the Borough to 34.

4.122 As of July 2013 authorised sites within the Borough provide for an estimated 30 pitches, two thirds of these pitches on sites with temporary permission; 10 on sites with permanent permission. There remains a need for an additional 24 pitches with permanent permission up to 2021 and a further 10 pitches up to 2030, bringing the total number of pitches to 44. The level of provision is calculated by applying a 3% annual compound increase as recommended by the former regional plan.

4.123 To meet needs over the plan period the policy proposes in the first instance to allocate for permanent use a number of existing temporary sites and secondly to guide future provision through identifying a broad location. The latter is intended to address remaining needs for the plan period. The scale of this allocation will be informed by an updated assessment, currently underway, which will in turn inform an updated target. Generic criteria are proposed for considering future planning applications and allocations.

4.124 It should be noted that while there was a later GTAA in 2009, this was not subject to rigorous testing through examination as was the previous GTAA which informed regional policy. It is therefore considered less robust and has not been used as a basis for calculating future provision.

Evidence

East of England Plan revised policy H3 (now revoked)

Essex GTAA, Fordham 2009.

Brentwood Gypsy and Traveller Accommodation Needs Assessment (forthcoming).

Annual Monitoring Report, 2011-12

CLG bi-annual caravan count

Former District Pitch Requirements set out in RSS Policy H3 and Essex GTAA 2009											
Policy H3						Essex GTAA					
Authorised Pitches in 2006	Additional Pitches 2006-2011	Minimum Pitches 2011	Additional Pitches 2011-2021	Minimum Pitches at 2021	Total Requirement 2006-2021	Total at 2008	Requirement 2008-2013	Total Pitches 2013	Requirement 2013-2021	Total Pitches 2021	Total Requirement 2008-2021
10	15	25	9	34	24	32	24	57	6	63	30

National Policy

Planning Policy for Traveller Sites, Paragraph 3: *The Government's overarching aim is to ensure fair and equal treatment for travellers, in a way that facilitates the traditional and nomadic way of life of travellers while respecting the interests of the settled community.*

Planning Policy for Traveller Sites, Paragraph 8: *Local planning authorities should set pitch targets for gypsies and travellers and plot targets for travelling showpeople which address the likely permanent and transit site accommodation needs of travellers in their area, working collaboratively with neighbouring local planning authorities.*

Planning Policy for Traveller Sites, Paragraph 9: *Local planning authorities should, in producing their Local Plan:*

- *identify and update annually a supply of deliverable sites sufficient for five years' worth of sites against locally set targets*
- *identify a supply of specific, developable sites or broad locations for growth, for years six to ten and, where possible, for years 11-15*
- *consider producing joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area (local planning authorities have a duty to cooperate on planning issues that cross administrative boundaries)*
- *relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density*
- *protect local amenity and environment*

Planning Policy for Traveller Sites, Paragraph 10: *Criteria should be set to guide land allocations where there is identified need. Where there is no identified need, criteria-based policies should provide a basis for decisions in case applications nevertheless come forward. Criteria based policies should be fair and facilitate the traditional and nomadic life of travellers while respecting the interests of the settled community.*

Target

To achieve a total 44 permanent pitches in the Borough between 2015 and 2030 or such figure as agreed by the Council following an up-to-date needs assessment.

To maintain a five year supply of pitches throughout the plan period

Indicator

CLG bi-annual caravan count

Monitoring planning permissions

Delivery

Development management decisions

Policy DM29: Accessible, Adaptable Development

All development should deliver an inclusive, accessible environment throughout. Housing development should meet Lifetime Homes Standard with a minimum of 5% of new dwellings on developments of 20 dwellings or more built to full wheelchair standards.

Development proposals should be accompanied by a design and access statement setting out how the principles of inclusive design, and adaptability, including the specific needs of disabled people, have been integrated into the proposed development.

Alternative Approach

No alternative policy has been identified. The Council considers the policy to be essential in order to deliver sustainable development

Justification

4.125 Flexible, adaptable and with convenient features, Lifetime Homes are designed to meet the changing needs of different occupiers at different stages of their lives. Lifetime Homes enable elderly people to stay in their home for longer, are convenient for parents with small children and provide better access for disabled people than mainstream housing. Given that the Borough's population is ageing and the vast majority of existing housing comprises mainly older, inaccessible properties we must ensure all new homes are accessible with a proportion of new homes built to full wheelchair standard.

Evidence

Housing Stock Condition Survey 2004

Lifetime Homes Standards – Initially developed by the Joseph Rowntree Foundation and Habinteg Housing Association the standards were updated in 2010 by The Foundation for Lifetime Homes and Neighbourhoods (comprising Age UK, TCPA, and Habinteg) see www.lifetimehomes.org.uk

Essex County Council Older Person's Housing Strategy (2007)

Lifetime Homes Standards – Initially developed by the Joseph Rowntree Foundation and Habinteg Housing Association the standards were updated in

2010 by The Foundation for Lifetime Homes and Neighbourhoods (comprising Age UK, TCPA, and Habinteg) see www.lifetimehomes.org.uk

Updated SHMA (forthcoming).

National Policy

NPPF paragraph 50: *To deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities, local planning authorities should:*

- *plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community (such as, but not limited to, families with children, older people, people with disabilities, service families and people wishing to build their own homes);*
- *identify the size, type, tenure and range of housing that is required in particular locations, reflecting local demand;*

NPPF Glossary, page 54: Older people's housing needs “*can encompass accessible, adaptable general needs housing for those looking to downsize from family housing and the full range of retirement and specialised housing for those with support or care needs.*”

Target

To increase the number of homes and other properties in the Borough that meet accessibility standards.

Indicator

Monitoring policy usage

Delivery

Development Management Decisions

Quality of Life & Community Infrastructure

4.126 This section of the Plan deals with the provision of community infrastructure and measures necessary to ensure that new development is delivered sustainably in accordance with the Plan's Vision, Strategic Objectives and Core Policies, without harm to visual and residential amenity, or the wider environment.

Strategic Objective 9

Protect and nurture existing leisure, cultural and recreational assets such as the Borough's Country Parks for residents and visitors to the Borough and promote and enhance social inclusion, health and well being.

Strategic Objective 10

Improve public transport, cycling and walking facilities and encourage sustainable transport choices.

Strategic Objective 11

Secure the delivery of essential infrastructure, including transportation schemes and community facilities in order to support new development growth throughout its delivery

Policy DM30: Provision of Open Space in New Development

New development proposals are expected to provide functional on-site open space and/or recreational amenities or where appropriate, financial contributions towards new or improved facilities nearby. The amount and type of provision required will be determined according to the size, nature and location of the proposal; quantity and type of open space needed; and existing provision accessible to the proposal. All payments will be in line with the Council's Core Policy CP17 Provision of Infrastructure and Community Facilities.

A commuted sum will only be accepted for:

- a. proposals where strategic open space requirements cannot be met within the site**
- b. local and strategic open space in developments of single person households or of dwellings for the elderly (where however some compensating increase in private amenity space may be required)**
- c. a town centre location within Brentwood or where it is justified by an outstanding urban design approach based on site constraints and opportunities**

All open space provision should be fully equipped to meet the needs of users as agreed by the Borough Council, reflecting acceptable distance and minimum size criteria for different types of open space as set out in

the Council's Open Space Standards (Set out in paragraphs 4.139 and 4.140 below). Maintenance Plans should be submitted at planning application stage for all new facilities provided for exercise or recreation purposes. This is to secure quality over the long term and clarify responsibilities from the outset.

Alternative Approach

To combine this policy with *DM31 Protection and Enhancement of Open Space, Community, Sport and Recreational Facilities*.

Provision of open space in new development is an important issue in its own right. A detailed policy is needed to set out requirements expected of new developments regarding the provision of open space.

Justification

4.127 Access to good quality open space is essential for health and well-being. Residents' ability to access local open space across the Borough varies. Brentwood Open Space, Sport and Recreational Facilities Assessment (2007) identifies a lack in provision in some areas for certain types of open space. Provision with new development is therefore particularly important in areas where a deficiency has been identified or where new development would give rise to a deficiency.

4.128 The proportion of any site to be set aside (or the contribution to be made for off-site provision) will be assessed with regard to the extent, nature, quality and accessibility of existing provision, the suitability of the site and form of the proposed development.

4.129 On larger residential and/or commercial schemes of 50 units and above, the Council will seek at least 15% of the site to be set aside for public open space. Developments providing specialised accommodation for the elderly, such as sheltered housing, will only require the provision of private amenity space as part of the site.

4.130 In some central urban locations site constraints may make new provision difficult, in which case a contribution towards providing or enhancing open space facilities nearby may be acceptable. Open space should, however, form an integral part of large scale redevelopment proposals.

4.131 The Council will require a contribution towards the laying out, provision and future maintenance of play equipment, where open space is provided as part of the overall development. An Infrastructure Delivery Plan and CiL Charging Schedule, under preparation, will provide further detail on arrangements for securing commuted payments and ongoing maintenance through planning obligations, in line with Core Policy *CP17 Provision of Infrastructure and Community Facilities*.

Evidence

Survey and Assessment of Needs and Audit of Open Space, Sport and Recreation Facilities in Brentwood Borough (PMP, 2007)

Brentwood Open Space Strategy 2008-2018

Brentwood Play Area Strategy 2007-2010 – New Strategy anticipated Autumn 2013

National Policy

NPPF paragraph 57: *it is important to plan positively for the achievement of high quality and inclusive design for all development, including buildings, public and private spaces and wider area development schemes.*

NPPF paragraph 69: *The planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Planning policies and decisions, in turn, should aim to achieve places which promote:*

- *opportunities for meetings between members of the community who might not otherwise come into contact with each other*
- *safe and accessible environments where crime and disorder, and the fear of crime, do not undermine quality of life or community cohesion, and*
- *safe and accessible developments, containing clear and legible pedestrian routes, and high quality public space, which encourage the active and continual use of public areas.*

NPPF paragraph 73: *access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust, up-to-date assessments of the needs for open space, sports and recreation facilities and opportunities for new provision.*

Target

In larger residential or commercial schemes 15% of site set aside for public open space.

Qualitative and Quantitative improvement in provision in areas of deficiency, maintain or enhance quality of provision elsewhere

Indicator

Amount and type of open space provided in the Borough relative to guidelines/requirements set out in Open Space Standards (Appendix X).

Open space provision in major development

Delivery

Pre-application discussions

Development Management decisions

Infrastructure Delivery Plan

CiL / Developer Contributions

Policy DM31: Protection and Enhancement of Open Space, Community, Sport and Recreational Facilities

Within the built up areas of Brentwood Borough, permission will not be granted for development of land allocated on the Policies Map as

protected Open Space, Local Green Space or other previously undeveloped land, unless it can be demonstrated:

- i) that alternative and improved provision can be created in a location well related to the functional requirements of the relocated use and existing and future users**
- ii) the proposal would relate to the enhancement of the open space, contributing to both the character and amenity of the area**
- iii) the provision of new open space creates no additional displacement within the Green Belt**

All proposals including the designation of new Local Green Space and landscaping must be accompanied by a maintenance plan to ensure long-term quality and scheme viability.

There will be a presumption against any development that involves the loss of open space, community, sport, recreation or play facilities, including allotments, except where it can be demonstrated that there is an excess of provision, or where alternative facilities of equal or better quality and convenience will be provided as part of the development.

Where appropriate, the Council will seek provision of community and recreational facilities through the acquisition of land, joint use of existing facilities or by entering into negotiation with private landowners.

Alternative Approach

No alternative has been identified.

Justification

4.132 Brentwood's existing sport, leisure, public and private open spaces, including allotments, within the Borough, are important, valued assets serving communities in which they are located and visitors. This is reflected in the strategic objective *SO9 Protect and nurture existing leisure, cultural and recreational assets*. This policy is concerned with ensuring good provision of high quality, accessible open space to meet the needs of the local community.

4.133 Set entirely within the Metropolitan Green Belt, Brentwood has direct access, via the rights of way network, to extensive open areas for informal recreation. Country Parks including Hutton, South Weald and Thorndon provide 324 hectares of informal open space, together with other publicly accessible playing fields, parks, woodlands and wider sporting facilities. The Council aims to retain and enhance existing facilities unless a case can be made for alternative provision to be provided which is equivalent or better in terms of the type of open space, accessibility, quality and convenience.

4.134 *Brentwood Open Space, Sport and Recreational Facilities Assessment* (2007) assesses provision and needs and identifies potential for enhancement, new provision and access to public open spaces such as:

parks, play provision for children, allotments and natural and semi-natural green spaces. Borough wide provision is generally good, however, the assessment identifies gaps in provision for some open space types at a more local level.

4.135 With regard to accessible natural greenspace, Borough residents are generally well served. Areas less well served include the northeast of Ingatestone, parts of Hutton Mount, the west of Brentwood and Doddinghurst.

4.136 *Brentwood Open Space Strategy* identifies a strong provision of formal open space within the Borough, in particular in Pilgrims Hatch, Warley, Hutton North, Ingatestone and Fryerning areas. The study notes there is under provision in central Brentwood, Hutton Mount and Hutton Ward.

4.137 For outdoor sports, Brentwood is well provided for with all residents being within a fifteen minute drive (6 km) of a sports facility. However despite this reasonable provision of outdoor sports facilities, according to *Essex Joint Strategic Needs Assessment* (2012) only one in five Brentwood Borough adults is doing enough physical activity to benefit their health and just over one out of five adults in the borough are obese. This highlights the importance of providing facilities that are attractive, accessible and convenient and effective maintenance plans for the long term.

4.138 Brentwood Open Space, Sport and Recreational Facilities Assessment (2007) identifies an inadequate provision of children's play space across the Borough, which falls below the local recommended standard, at 0.08 ha per 1,000 population. Provision of new children's play spaces will be encouraged particularly within the residential areas of Ingrave, Ingatestone, Pilgrim's Hatch, Doddinghurst, central Shenfield and Hutton Mount.

4.139 All proposals, where appropriate, will be required to comply with the Council's open space standards. These take account of recommendations in *Brentwood Survey and Assessment of Needs and Audit of Open Space, Sport and Recreation Facilities* (2007), *Brentwood Open Space Strategy* (2008-2018) and *Children's Play Strategy* (2010). Standards are as follows:

- Outdoor Sport – 3.15 ha (per 1000 population)
- Children's Playing Space – Between 0.13 – 0.17 ha per 1000 population
- Allotments and Community Gardens – 0.18 per ha per 1000 population

4.140 With regard to Children's Play Space, the Council will seek proposals which meet the Fields in Trust (formerly National Playing Fields Association) minimum standards as follows:

Local Area for Play (LAP)

- Characteristics: Small, low-key games area
- LAP area: Walking Distance (100m) / Minimum Size (100 sqm)

Local Equipped Area for Play (LEAP)

- Characteristics: Five types of play equipment and a small games area
- LEAP area: Walking Distance (400m) / Minimum Size (400 sqm)

Neighbourhood Equipped Area for Play (NEAP)

- Characteristics: Eight types of play equipment with opportunities for ball games or wheeled activities
- NEAP area: Walking Distance (100m) / Minimum Size (1000 sqm)

4.141 The creation of new LEAPs will be prioritised at the Newham Estate, in line with the Borough's Play Area Strategy.

Evidence

Analysis of Accessible Natural Greenspace Provision for Essex, Natural England, Essex Wildlife Trust, 2009

Survey and Assessment of Needs and Audit of Open Space, Sport and Recreation Facilities in Brentwood Borough, PMP, 2007

Brentwood Open Space Strategy 2008-2018

Brentwood Play Area Strategy 2007-2010

Brentwood Local Wildlife Sites Review, Essex Wildlife Trust, 2012

Mid Essex Landscape Character Assessment 2006

National Policy

NPPF paragraph 73: *Access to high quality open spaces and opportunities for sport and recreation can make an important contribution to the health and well-being of communities. Planning policies should be based on robust, up-to-date assessments of the need for open space, sports and recreation facilities and opportunities for new provision. Assessments should identify specific needs and quantitative or qualitative deficits or surpluses of open space, sports and recreational facilities in the local area. Information gained should be used to determine what open space, sports and recreational provision are required.*

NPPF paragraph 74: *existing open space, sports and recreational buildings and land, including playing fields, should not be built on unless an assessment has been undertaken which has clearly shown the open space, buildings or land to be surplus to requirements; or the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable location; or the development is for alternative sports and recreational provision, the needs for which clearly outweigh the loss.*

NPPF paragraph 76: *local communities through local plans should be able to identify for special protection green areas of particular importance to them. By designating land as Local Green Space local communities will be able to rule out new development other than in very special circumstances. Identifying*

land as Local Green Space should therefore be consistent with the local planning of sustainable development and complement investment in sufficient homes, jobs and other essential services. Local Green Spaces should be capable of enduring beyond the end of the plan period.

NPPF paragraph 77: the Local Green Space designation should only be used where the green space is in reasonably close proximity to the community it serves; where the green area is demonstrably special to a local community and holds a particular local significance, for example because of its beauty, historic significance, recreational value (including as a playing field), tranquillity or richness of its wildlife; and where the green area concerned is local in character and is not an extensive tract of land.

Target

Maintain local community facilities and secure equal or better facilities, in terms of quality and convenience, where proposals result in the loss of existing facilities

Maximise the provision of accessible good quality open space

No net loss of open space

Indicator

Number of permissions for redevelopment or change of use resulting in the loss of existing local community facilities.

% of eligible open spaces managed to Green Flag award Standard

Delivery

Development management decisions

Brentwood Countryside Management Service and Essex County Council
Country Parks Service

CIL - Private sector financial contributions

IDP - Delivery in line with open space standards

Designate new Local Green Space

Policy DM32: Provision of Green Infrastructure

Development should adopt an integrated approach towards the provision of green infrastructure which enhances the Borough's network of multi functional green space including open space, sport, recreational and play opportunities, flood storage, green roofs, habitat creation, footpaths, bridleways and cycleways, food growing and climate change mitigation.

New development will be expected to contribute to the Borough's green infrastructure and where possible enhance and protect the existing network of green links, open spaces and sports facilities, and secure additional provision where deficiencies are identified.

An alternative policy approach would be to combine this policy with *DM31 Protection and Enhancement of Open Space, Community, Sport and Recreational Facilities*.

Protection and Enhancement of Open Space, Community, Sport and Recreational Facilities and Provision of Green Infrastructure are considered important issues in their own right. Therefore it makes sense to include separate policies in the Plan.

Justification

4.142 'Green infrastructure' is a term that refers to the network of multi-functional green space, urban and rural, which is capable of delivering a wide range of environmental and quality of life benefits for local communities.

4.143 The Borough has numerous wildlife sites, open spaces and outdoor recreational facilities. Appropriate access to, and linkages between, these assets need to be maximised. Formal and informal open space provision varies between areas and the quality and accessibility of green spaces differs. There is a need to better link these to improve their wider use and value. Existing green infrastructure should be protected and enhanced and where opportunities arise, eg in conjunction with new development, additional provision made.

4.144 It is vital that the right infrastructure is in place to support future growth in the Borough, and this includes green infrastructure. There is a growing and compelling body of evidence substantiating the potential for green infrastructure to contribute to the economic, social and environmental well being of individuals and society. It can help facilitate high quality accessible landscapes, and bring the natural world into every neighbourhood, providing benefits for individuals, community health and wellbeing.

4.145 Brentwood Health and Wellbeing Board works to promote the health and wellbeing of Brentwood's communities. As such the Policy will focus on protecting, and improving access to, outdoor sports and recreational facilities and accessible greenspace along with the provision of new facilities where needed.

4.146 It is widely acknowledged that green infrastructure and open space has a major role to play in mitigating against and adapting to climate change, for example, urban cooling, encouraging sustainable travel choices and flood alleviation. Through the provision of green corridors the policy can help overcome habitat fragmentation and improve the ability of the natural environment to adapt to climate change and habitat loss by improving ecological connectivity.

4.147 The Council will promote local food growing by encouraging development proposals to include spaces for residents to grow their own food, safeguarding allotments and encouraging community gardens for food growing. Promoting local food growing in the Borough will have many benefits for residents. It will reduce the carbon footprint of food production by minimising CO₂ emissions from transporting food and be beneficial for air

quality by helping to reduce pollution. It supports healthy living by enabling residents make more sustainable food choices, protects local ecosystems and fosters community spirit and enterprise. The wider benefits of growing produce are identified in *Brentwood Open Space, Sport and Recreational Facilities Assessment* (2007) which highlights that providing opportunities for people to grow their own food contributes to sustainability, health and social inclusion.

Evidence

Survey and Assessment of Needs and Audit of Open Space, Sport and Recreation Facilities in Brentwood Borough, PMP, 2007

Brentwood Open Space Strategy 2008-2018

Brentwood Play Area Strategy 2007-2010 and Updated Strategy (forthcoming)

Essex Local Wildlife Sites Review 2012

Mid Essex Landscape Character Assessment 2006

Essex Joint Strategic Needs Assessment, August, 2012

The Natural Choice: Securing the Value of Nature - The Natural Environment White Paper, HM Government, 2011

Planning for a Healthy Environment – Good Practice Guidance for Green Infrastructure and Biodiversity, Town and County Planning Association and The Wildlife Trusts, July 2012

National Policy

The Natural Choice: Securing the Value of Nature - The Natural Environment White Paper (HM Government, 2011) identifies green infrastructure as the living network of green spaces, water and other environmental features in both urban and rural areas. Green infrastructure provides the critical ecological links between town and country. It should be recognised as an essential asset in developing communities, is an effective tool in managing environmental risks and provides diverse benefits for people and wildlife.

NPPF Paragraph 17 Core Principle: *Planning should promote mixed use developments, and encourage multiple benefits from the use of land in urban and rural areas, recognising that some open land can perform many functions (such as for wildlife, recreation, flood risk mitigation, carbon storage, or food production).*

NPPF paragraph 99: *Local Plans should take account of climate change over the longer term, including factors such as flood risk, coastal change, water supply and changes to biodiversity and landscape. New development should be planned to avoid increased vulnerability to the range of impacts arising from climate change. When new development is brought forward in areas which are vulnerable, care should be taken to ensure that risks can be managed through suitable adaptation measures, including through the planning of green infrastructure.*

NPPF paragraph 114 *local planning authorities should set out a strategic approach in their Local Plans, planning positively for the creation, protection,*

enhancement and management of networks of biodiversity and green infrastructure.

Target

Maintenance of open space safeguarded through Allocations and Development Management policies

Indicator

Additional open space provided through new development

Additions and losses to the Green Infrastructure Network, measured by area

Amount of developer contributions used to support green infrastructure

Public open spaces and Rights of Way lost, improved and created

Number of parks eligible for Green Flag award

SUDS developed

Delivery

Development Management decisions based on this policy

Site Allocations in this Plan will be used to promote areas and development sites where the Council will expect elements of green infrastructure to be established or maintained.

CIL and Infrastructure Delivery Plan

Working with others such as Essex Wildlife Trust and Local Nature Partnership

Policy DM33: Air Quality

The Borough Council will promote measures to improve air quality, particularly within designated Air Quality Management Areas and will expect development proposals to reduce sources of air pollution. Where the Borough Council considers that air quality objectives are likely to be prejudiced or proposals fall within an Air Quality Management Area, applicants will be required to submit a detailed air quality assessment which sets out the impact the proposed development would have upon air quality. Planning permission will not be granted for development where there is likely to be a significant adverse impact on air quality.

Air Quality Management Areas are shown on the Policies Map.

Alternative Approach

No alternative has been identified to this policy.

National policy requires planning to contribute towards preventing unacceptable levels of air pollution and planning policies to be compliant with EU and national objectives for pollutants and take into account local Air Quality Management Areas. Therefore in order to comply with national policy it is considered necessary to require air quality assessments and refuse planning permission for development proposals which would have a detrimental impact on local air quality. This will help to meet air quality objectives and improve air quality.

Justification

4.148 All types of air pollution have the potential to harm the natural environment and human health. The Borough Council has a responsibility for monitoring air quality within their area and where air pollution exceeds national standards, can designate Air Quality Management Areas (AQMA). When an AQMA is designated, the Borough Council will produce an Air Quality Action Plan, which sets out what the Borough Council intends to do about poor air quality. Within Brentwood Borough, there are problems with air pollution, particularly transport generated emissions. There are currently seven AQMAs.

4.149 The Borough Council will seek to ensure that new development, particularly commercial, industrial and traffic generating uses do not result in unacceptable levels of air pollution. Developers should arrange pre-application discussions with the Borough Council Planning Services to ensure that air quality issues will be addressed when designing their proposals.

4.150 The Council promotes the use of renewable energy technologies to help tackle climate change, as set out in policy *CP14 Sustainable Construction and Energy*. Where biomass or CHP is proposed, the Council will require an emissions assessment prior to submission of a planning application. The emissions assessment must demonstrate that the plant would not significantly contribute to the deterioration of local air quality. The assessment must also demonstrate that other forms of renewable technology have been compared and assessed for their impact on local air quality.

Evidence

Air Quality Action Plan, Brentwood Borough Council, 2008

Regular reviews and assessments of air quality against standards and objectives in the National Air Quality Strategy

National Policy

NPPF paragraph 109: *The planning system should contribute to and enhance the natural and local environment by preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution.*

NPPF paragraph 124: *Planning policies should sustain compliance with and contribute towards EU limit values or national objectives for pollutants, taking into account the presence of Air Quality Management Areas and the cumulative impacts on air quality from individual sites in local areas. Planning decisions should ensure that any new development in Air Quality Management Areas is consistent with the local air quality action plan.*

Target

To improve air quality

To meet or exceed air quality objectives set out in Brentwood Borough Air Quality Action Plan

Indicator

Air quality monitoring data

Number of planning permissions granted for development where there is significant adverse impact upon air quality in an Air Quality Management Area

Delivery

Air Quality Assessments

Development Management decisions ensuring new development does not have an adverse impact on Air Quality Management Areas and is consistent with the local air quality action plan and consulting Environmental Health on relevant planning applications

Adoption of measures, such as Green Travel Plans

IDP and CIL

Policy DM34: Floodlighting and Illumination

Development proposals involving floodlighting or any other means of illumination (other than advertisements) will only be permitted where the scheme:

- a. is appropriate for the intended use**
- b. is energy efficiency efficient**
- c. provides the minimum level of light necessary to achieve its purpose**
- d. minimises losses to the night sky and does not give rise to any increase in sky glow**
- e. ensures the appearance of the installation when unlit is acceptable**

Proposals must demonstrate adequate protection from glare and light spill, particularly in sensitive locations, such as residential areas, sites of nature conservation interest, and have no adverse effect on amenity, highway safety, landscape or historic character.

Applicants will need to submit a full lighting strategy, proportionate to their application, specifying details of lights, their power and type, overall level and distribution of illumination and times of operation. Conditions may be imposed to restrict lighting levels and hours of use or require measures to be taken to minimise adverse effects.

Alternative Approach

No alternative policy has been identified.

The National Planning Policy Framework is clear that planning policy should limit the impact of light pollution from artificial light on local amenity,

intrinsically dark landscapes and nature conservation. The preferred option provides a detailed approach for achieving this.

Justification

4.151 External lighting can contribute to a healthy, safe environment, enhance the appearance of buildings and extend hours of operation of some activities eg sports. Insensitive or excessive illumination can, however, have a harmful impact on the local area and on the enjoyment of the night sky, particularly in open countryside. Excessive lighting can be detrimental to residential amenity, health and, in some circumstances, can be a statutory nuisance. Light pollution represents a wasteful use of energy, contrary to the aims of sustainable development.

4.152 Local residents place a high value on being able to see the night sky and avoid unnecessary lighting (*Brentwood Neighbourhood Consultation 2011*). Proposals for lighting or floodlighting of buildings, sport, leisure or other facilities should therefore take into account their effect on the character and amenity of the surrounding area and the effect of lighting in terms of sky glow, glare and light trespass, effect on wildlife; and any possible disturbance arising from the associated use.

4.153 Proposals should be unobtrusive in terms of the light source and distribution of light, the aura created by the overall illumination and appearance of any structures upon which lights are mounted.

4.154 Where appropriate, the Council will control the location, form, timing and level of all external lighting and illumination.

4.155 Applicants should refer to the Institute of Lighting Engineers' guidance when considering the development and installation of lighting schemes. The Council will require a lighting strategy to accompany all full planning applications.

4.156 Lighting installations on Listed Buildings that materially affect their character, or illumination of some types of outdoor advertisements, will also require consent.

Evidence

Light pollution in Essex has increased since 1993; only 1% of Essex is classified as having 'dark skies' by the Campaign to Protect Rural England, *State of Essex Evidence Paper, 2010*, Integrated County Strategy Working Group

National Policy

NPPF paragraph 120 *to prevent unacceptable risks from pollution and land instability, planning policies and decisions should ensure that new development is appropriate for its location. The effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed development to adverse effects from pollution, should be taken into account.*

NPPF paragraph 125: *by encouraging good design, planning policies and decisions should limit the impact of light pollution from artificial light on local amenity, intrinsically dark landscapes and nature conservation.*

NPPF Glossary, Annex 2: *Pollution can arise from a range of emissions, including smoke, fumes, gases, dust, steam, odour, noise and light.*

Target

To protect amenity and the natural environment from light pollution.

Indicator

Development granted contrary to advice.

Delivery

Development Management

Liaising with other bodies, eg Highways Agency

Policy DM35: Flood Risk

The Council will work in partnership with the Environment Agency to manage and mitigate flood risk.

All development proposals in areas at risk of flooding will need to submit a Flood Risk Assessment (FRA) in accordance with Sustainable Drainage Policy DM37, commensurate with the scale of the flood risk and recognising all likely sources of flooding.

In areas designated as functional flood plains, development will only be permitted in wholly exceptional circumstances, and then, only if:

- a. **Proposals are located in the lowest appropriate flood risk zone with regard to guidance set in the Brentwood Strategic Flood Risk Assessment as part of the sequential test**
- b. **The development would not constrain the natural function of the flood plain, either by impeding flow or reducing storage capacity**
- c. **The development is constructed so as to remain operational even at times of flood through resistant and resilient design**
- d. **The applicant has contacted the sewerage provider to assess the capacity of the receiving foul sewer network and the need to contribute to any additional off site connections for the development**

Where development is permitted within flood risk areas it must demonstrate that, where required, it will reduce fluvial and surface water flood risk and manage residual risks through appropriate flood mitigation measures.

Alternative Approach

No alternative has been identified.

The preferred approach addresses key issues around flood risk management and draws on a robust evidence base while meeting Government requirements for the future protection of people and buildings from flood risk and this preferred option will support growth and new development

Justification

4.157 Incidences of flooding have grown regionally as a result of increased development on flood plains, the use of impermeable surfacing, obsolete infrastructure and incidences of high rainfall, which are forecast to increase in number and intensity as a result of climate change. Developing inappropriately in areas at risk from flooding, can put property and lives at risk and therefore this policy seeks to ensure this does not happen.

4.158 *The South Essex Catchment Flood Management Plan (CFMP)* notes that flood risk in Brentwood is not extensive and largely limited to areas in very close proximity to local watercourses. Most flooding within the Borough is the result of rapid surface water runoff and ponding in areas with low lying roads. The Sequential Test applies a hierarchical approach to avoiding and managing flood risk. In the first instance, this aims to locate development in a way that avoids flood risk to people and property, and manage any residual risk, taking account of the impacts of climate change.

4.159 *Brentwood Strategic Flood Risk Assessment (SFRA, 2010)* maps flood risk zones in the Borough, with surface water flooding shown most notably on the A12 North West of Brentwood and on roads around Ingatestone. Incidences of fluvial (river) flooding are recorded along the eastern boundary of the River Wid and from Stondon Hall Brook and the River Roding to the North of the Borough. Areas at risk of fluvial flooding in the Borough are mainly rural, and include low lying areas south of the A127 west and east of West Horndon.

4.160 Where a site-specific Flood Risk Assessment an FRA is required this should be approved by the Environment Agency in line with criteria set by the National Planning Policy Framework. Development should be guided towards areas of lower flood risk through application of the Sequential Test and where applicable, an Exception Test will be required. The assessment will show the risk to the site in greater detail and advise on mitigation measures necessary.

4.161 Developers are encouraged to refer to the Environment Agency's Flood Risk Standing Advice for planning applicants and early pre-application discussion with the Council and the Environment Agency is advised.

Evidence

Strategic Flood Risk Assessment Level 1 (Entec, 2010)
South Essex Catchment Flood Management Plan

National Policy

NPPF paragraph 100 - *Inappropriate development in areas at risk of flooding should be avoided by directing development away from areas at highest risk, but where development is necessary, making it safe without increasing flood risk elsewhere. Local Plans should apply a sequential, risk-based approach to*

the location of development to avoid where possible flood risk to people and property and manage any residual risk, taking account of the impacts of climate change, by:

- *applying the Sequential Test;*
- *if necessary, applying the Exception Test;*
- *safeguarding land from development that is required for current and future flood management;*
- *using opportunities offered by new development to reduce the causes and impacts of flooding; and*
- *where climate change is expected to increase flood risk so that some existing development may not be sustainable in the long-term, seeking opportunities to facilitate the relocation of development, including housing, to more sustainable locations.*

NPPF paragraph 101 - *The aim of the Sequential Test is to steer new development to areas with the lowest probability of flooding. Development should not be allocated or permitted if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding. The Strategic Flood Risk Assessment will provide the basis for applying this test. A sequential approach should be used in areas known to be at risk from any form of flooding.*

Target

No new development to be at risk from flooding or to increase the risk of flooding

Indicator

Number of planning permissions granted contrary to the advice of the Environment Agency.

Delivery

Development Management decisions

Developers following Environment Agency's Flood Risk Standing Advice

Environment Agency

Policy DM36: Sustainable Drainage

All developments should incorporate appropriate Sustainable Drainage Systems (SuDS) for the disposal of surface water, in order to avoid any increase in flood risk or adverse impact on water quality.

Applications should meet the following standards:

- a. **Quantity – on brownfield developments SuDS features will be required so as to achieve a reduction from the existing runoff rate but must at least, result in no net additional increase in runoff rates.**
- b. **Sites over 0.25 hectares in Flood Zone 1 will be required to submit a drainage impact assessment. Larger sites over 1 hectare in Zone**

1 or all schemes in Flood Zone 2 and 3 must be accompanied by a Flood Risk Assessment (FRA).

- c. Quality - the design must follow the SuDS surface water management train, maximise source control, provide the relevant number of 'treatment stages' and identify how the 'first flush' will be dealt with, where feasible, through appropriate attenuation measures.**
- d. Amenity and biodiversity – SuDS should be sensitively designed and located to promote improved biodiversity, an enhanced landscape and good quality spaces that benefit public amenities in the area.**
- e. Redeveloped brownfield sites should disconnect any surface water drainage from the foul network.**

The preferred hierarchy of managing surface water drainage from any development is through infiltration measures, secondly attenuation and discharge to watercourses, and if these cannot be met, through discharge to surface water only sewers.

When discharging surface water to a public sewer, developers will be required to provide evidence that capacity exists in the public sewerage network to serve their development.

Alternative Approach

To have a policy setting out less stringent standards on SuDS.

The alternative approach is considered less effective in delivering the solutions the Borough needs to provide sustainable drainage which ensures new development does not cause flooding elsewhere, place further strain on the sewerage network or result in poor water quality. The preferred option is a comprehensive approach which ensures that all developments incorporate SuDs in line with a drainage hierarchy.

Justification

4.162 Sustainable Drainage Systems (SuDS) are the primary means by which increased surface run-off can be mitigated. They can manage runoff flow rates to reduce the impact of urbanisation on flooding, protect or enhance water quality and provide a multi-functional use of land to deliver biodiversity, landscape and public amenity aspirations. They do this by dealing with runoff and pollution as close as possible to its source and protect water resources from point pollution. SuDs allow new development in areas where existing drainage systems are close to full capacity, thereby enabling development within existing urban areas.

4.163 Wherever possible, sustainable drainage systems techniques must be utilised to dispose of surface rainwater so that it is retained either on-site or within the immediate area, reducing the existing rate of run-off. Such systems may include surface water storage areas, flow limiting devices and infiltration

areas or soakaways. This approach is commonly known as the 'surface water management train' or 'source-to stream'.

4.164 Brentwood Borough *Strategic Flood Risk Assessment* (SFRA) recommends all sites in Flood Zone 1 over 0.25 hectares, be supported by a drainage impact assessment and for applications greater than 1 hectare, and all development within Flood Zones 2 and 3, be accompanied by a Flood Risk Assessment (FRA). *Brentwood Scoping and Outline Water Cycle Study* 2011 recommends post development rates of runoff should not exceed pre-development runoff rates on all brownfield sites.

4.165 The Environment Agency introduced a new classification system in 2011 enabled by The European Water Framework Directive. This system allows for more rigorous and accurate assessment of water quality. Some water bodies will never achieve good ecological status, however, because they have been physically altered for a specific use, such as navigation, recreation, water storage or flood protection

4.166 The Flood and Water Management Act 2010 designates Essex County Council as the Lead Local Flood Authority and regional SuDS approval body. The mechanism for this process will be established between Brentwood Borough Council and the County Council. Applicants will need to prove compliance with the above drainage hierarchy as set out in the policy and ensure sustainable drainage has been adequately utilised, taking into account potential land contamination issues and protection of existing water quality, in line with the National Planning Policy Framework.

4.167 The applicability of SuDS techniques for use on potential development sites will depend upon proposed and existing land-uses influencing the volume of water required to be attenuated, catchment characteristics and the underlying site geology. Developers are encouraged to refer to *Brentwood Strategic Flood Risk Assessment* (which maps areas with potential for SuDS) and guidance provided by the Construction Industry Research and Information Association (CIRIA) for design criteria, technical feasibility and to ensure the future sustainability of the borough's drainage system. These include a *SuDS Manual* (C697) (2007); *Interim Code of Practice for Sustainable Drainage Systems* (2004) and *the use of SuDS in high density development – Guidance Manual* (SR666) by HR Wallingford (2005). The Environment Agency may also provide advice for larger development sites.

Evidence

Strategic Flood Risk Assessment Level 1 (2011, Entec)

Brentwood Scoping and Outline Water Cycle Study (2011, Entec)

European Water Framework Directive

Flood and Water Management Act 2010

National Policy

NPPF paragraph 94 *Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk, coastal change and water supply and demand considerations.*

NPPF paragraph 109: The planning system: should contribute to and enhance the natural and local environment by protecting and enhancing soils and by preventing new and existing development from contributing to or being put at unacceptable risk from or being adversely affected by unacceptable levels of water pollution.

Target

All planning applications to include SuDs where appropriate unless there are practical reasons for not doing so.

Indicator

Number of planning applications including the installation of SuDs

Delivery

Development Management decisions

Environment Agency

CIL, IDP

Policy DM37: Contaminated Land and Hazardous Substances

Development proposals involving the use, movement or storage of hazardous substances will only be permitted within Employment Areas and planning permission will only be granted for development on, or near to land which is suspected to be contaminated, where the Borough Council is satisfied that:

- a. **There will be no threat to the health of future users or occupiers of the site or neighbouring land**
- b. **There will be no adverse impact on the environment and quality of local groundwater or surface water quality**
- c. **There would be no unacceptable adverse impacts on property**

The Borough Council will require applicants proposing development on or near known or potentially contaminated land to submit a detailed site investigation and risk assessment and to identify any remedial measures that need to be carried out (including remedial treatment and monitoring arrangements).

Planning permission will be refused for development on sites that lie near or adjacent to a hazardous substance site or notifiable installation, if the safety of the future occupiers of the development could be adversely affected by the normal permitted operations of the existing uses.

Alternative Approach

No alternative has been identified.

Legislative requirements such as the Planning (Hazardous Substances) Regulations 1992 require local authorities to ensure that land use policies maintain and secure appropriate distances between where hazardous

substances are used or stored and residential areas. The Environmental Protection Act 1990 requires local authorities to identify contaminated land and ensure it is managed in an appropriate manner.

Justification

4.168 The Borough Council wishes to ensure that sustainable development is achieved primarily through the regeneration and the redevelopment of previously developed sites. When considering the development of such sites the Borough Council will consider the risk of pollution arising from contamination and the impact on human health, property and the wider environment. Contamination is not, however, restricted to previously developed land but also occurs on greenfield sites and can arise from natural sources as well as from human activities. Where sites are known to be contaminated or where contamination is subsequently discovered, the Borough Council will require any planning application to be accompanied by a detailed report appraising the levels and extent of contamination together with measures that will mitigate the contamination.

4.169 The Planning (Hazardous Substances) Act 1990 aims to prevent major accidents and limit the consequences of such accidents. In considering any planning applications for development which may involve hazardous substances the Council will therefore need to be completely satisfied that the proposal will not constitute a hazard to existing communities or the local environment. Similarly, existing consents will be an important consideration in the determination of sensitive uses such as housing. In appropriate cases the Council will therefore consult and liaise with the Health and Safety Executive to minimise potential risks.

4.170 Hazardous substances are defined by the Planning (Hazardous Substances) Regulations 1992. The Borough Council is required to ensure that land use policies maintain and secure appropriate distances between establishments where hazardous substances are present and residential areas, areas of public use and areas of national sensitivity or interest. The Borough Council considers that it would be inappropriate to locate new development on or near to establishments where hazardous substances are present where this would harm public safety.

4.171 Similarly, it would be inappropriate to grant planning permission for development proposals to expand existing sites handling or processing hazardous substances where this would harm public safety. Should a developer have reason to believe a development site is contaminated then they must consult the Borough Council as early as possible before an application is submitted.

4.172 Certain sites and pipelines are designated as notifiable installations by virtue of the quantities of hazardous substance stored or used. Where development is proposed within the consultation distance of notifiable installations, the Borough Council is required to consult the Health and Safety Executive on the suitability of that development in relation to the risks that the notifiable installation might pose to the surrounding population.

Evidence

Brentwood Contaminated Land Strategy (2000)

Environmental Health Records/Database

Planning (Hazardous Substances) Act 1990

Planning (Hazardous Substances) Regulations 1992

Contaminated Land Regulations 2000

Environmental Impact Assessment Regulations 2011

Environmental Protection Act 1990

National Policy

NPPF paragraph 109: *the planning system should enhance the natural and local environment by protecting and enhancing soils, preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability and remediating contaminated land and unstable land where appropriate.*

NPPF paragraph 110: *In preparing plans to meet development needs, the aim should be to minimise pollution and other adverse effects on the local and natural environment.*

NPPF paragraph 121: *planning policies and decisions should ensure that •the site is suitable for its new use taking account of ground conditions and land instability, including from natural hazards or former activities such as mining, pollution arising from previous uses and any proposals for mitigation including land remediation or impacts on the natural environment arising from that remediation;*

- after remediation, as a minimum, land should not be capable of being determined as contaminated land under Part IIA of the Environmental Protection Act 1990; and*

- adequate site investigation information, prepared by a competent person, is presented.*

Target

For all development proposals relating to contaminated land to submit a detailed site investigation and risk assessment including remedial treatment

Indicator

Number of planning applications including remediation of contaminated land

Delivery

Environmental Impact Assessments, site investigations and risk assessment, development management decisions, environmental health, private sector, Health and Safety Executive

Policy DM38: Parking

The Council will refer developers to the latest Vehicle Parking Standards adopted by Brentwood Borough Council. Schemes should comply with design standards and provision levels for uses and transport modes specified. The level of parking provision required will depend on the location, type and intensity of use.

Alternative approach

1. To have no policy

Reason for rejection: Consultation feedback shows that parking is a major issue for residents and business

2. To cover the issue under a broader transport policy.

Reason for rejection: None. This approach may be equally effective.

Justification

4.173 It is important that appropriate parking standards are applied at all developments. For residential uses, a minimum of one car parking space should be provided for each 1-bedroom dwelling or two car parking spaces for each dwelling of 2 or more bedrooms, in addition to 0.25 spaces per dwelling for visitors. A lower standard may be acceptable or required where there is a high level of access to services, such as a town centre location. Cycle parking will be required for all developments. Adequate provision must be made for disabled and motorcycle parking.

4.174 Brentwood Borough Council adopted Essex Planning Officers Association vehicle parking standards as a Supplementary Planning Document (SPD) in March 2011 and will expect these standards to apply until such time as they are revoked or superseded by other standards.

4.175 For non-residential uses maximum parking standards will be applied for cars with minimum standards for cycles, powered two wheelers and disabled.

National Policy

If setting local parking standards NPPF Paragraph 39 advises local planning authorities to take into account:

- *the accessibility of the development*
- *the type, mix and use of development*
- *the availability of and opportunities for public transport*
- *local car ownership levels, and*
- *an overall need to reduce the use of high-emission vehicles*

NPPF Paragraph 40: *local authorities should seek to improve the quality of parking in town centres so that it is convenient, safe and secure, including appropriate provision for motorcycles. They should set appropriate parking*

charges that do not undermine the vitality of town centres. Parking enforcement should be proportionate.

Evidence

Consultation feedback.

A number of respondents to the 2011 Your Neighbourhood Consultation noted a lack of parking, parking control or the cost of parking as an issue for them. (Report on Neighbourhood Consultation Findings, 2011, Brentwood Borough Council).

Target

Provision in line with adopted standards

Indicator

Monitoring car parking provision by type and size of scheme

Delivery

Development Management Decisions
CIL, IDP

Policy DM39: Changes of Use or New Buildings for Institutional Purposes

Redevelopment, change of use or new buildings for Institutional Purposes will be permitted where the Borough Council is satisfied that:

- a. **The proposal is in close proximity to appropriate social facilities**
- b. **The site is easily accessible by public transport, walking and cycling**
- c. **The proposal will not have unacceptable adverse impacts on the transport network and parking provision is adequate**
- d. **The type, scale and character of the proposed development would be appropriate in the context of the surrounding area.**

Alternative Approach

No alternative has been identified.

Justification

4.176 An important element of creating sustainable communities is the provision of institutional uses such as schools, medical centres, hospitals and places of worship close to where people live and work. By their nature institutional uses can generate considerable traffic and other activity. The siting of such a facility, therefore, needs to be carefully considered in terms of impact on the transport network and on neighbouring properties. Any site should be easily accessible, particularly by public transport, walking and cycling. Residents or users of such buildings may benefit from being near social or community facilities, eg. shops, post office, medical facilities, and community halls.

4.126 As with other development or changes of use, there should be no loss of existing residential accommodation.

Evidence

Forthcoming modelling

Infrastructure Delivery Plan.

Strategic Housing Market Assessment (forthcoming, with Braintree, Colchester, Chelmsford, Maldon).

Joint Health & Wellbeing Strategy for Essex 2013-2018, Essex Health & Wellbeing Board

National Policy

NPPF paragraph 72: *The Government attaches great importance to ensuring that a sufficient choice of school places is available to meet the needs of existing and new communities. Local planning authorities should take a proactive, positive and collaborative approach to meeting this requirement, and to development that will widen choice in education.*

NPPF paragraph 156: *Local Plans should include strategic policies to deliver the provision of health, security, community and cultural infrastructure and other local facilities.*

NPPF paragraph 171: *Local planning authorities should work with public health leads and health organisations to understand and take account of the health status and needs of the local population (such as for sports, recreation and places of worship), including expected future changes, and any information about relevant barriers to improving health and well-being.*

Target

Policy requirements met

Indicator

Monitoring policy usage and completions

Delivery

Development Management Decisions

IDP and CiL

Liaising with providers, such as schools, Essex CC, Brentwood Health and Wellbeing Board, Clinical Commissioning Partnership

Policy DM40: Supporting high quality communications infrastructure

Planning permission will be granted or prior approval given for essential telecommunication masts, equipment and associated development provided:

- a. **they are sited and designed in a manner that respects the character and appearance of the area and is not harmful to visual amenity**
- b. **evidence is provided to demonstrate, to the Borough Council's satisfaction, that the possibility of mast or site sharing has been fully explored**
- c. **evidence is provided to show, to the Borough Council's satisfaction, that there are no suitable alternative sites for telecommunications development available in the locality including the erection of antennae on existing buildings or other suitable structures**
- d. **evidence is provided to confirm that the proposals conform to the latest national/international guidelines on radiation protection and would cause no harm to highway safety**

Alternative Approach

1. To cover the issues within an overarching infrastructure policy

Reason for rejection: Telecommunications is a rapidly changing industry and likely to be of growing significance. It therefore warrants a separate policy, however the issues could be equally well covered in an overarching policy.

2. To have no policy and rely solely on national policy to guide decisions.

Reason for rejection: The Council supports well-designed and located high quality communications infrastructure and this policy is intended to facilitate provision in line with this aspiration.

Justification

4.177 The Borough Council recognises the growing importance of modern, effective telecommunications systems to serve local business and communities and their crucial role in the national and local economy. There is a Borough wide commitment to securing rural broadband. However, by its nature, telecommunications development has the potential to have a significant impact on the environment and raises issues of visual and residential amenity. Mast and site sharing, using existing buildings and structures and a design led approach, disguising equipment where necessary, can help address these concerns.

4.178 The objective of this policy is to ensure the right balance is struck between providing essential telecommunications infrastructure and protecting the environment and local amenity. Planning applications must be accompanied by detailed supplementary information which provides the technical justification for the proposed development including the area of search, details of any consultation undertaken, the proposed structure and measures to minimise its visual impact.

4.179 Although the impact from telecommunications equipment on health is a source of public concern, the Government has indicated that the planning system is not the place to determine health safeguards. However, the Borough Council will nevertheless require all applicants to demonstrate their proposed installation complies with the latest national and international guidelines. This currently requires applicants to demonstrate they comply with the International Commission of Non-Ionizing Radiation Protection (ICNIRP) which should take into account the cumulative impact of all operators' equipment located on the mast/site.

Evidence

Superfast Essex Bridging the Digital Divide, Essex Rural Broadband Partnership, Essex County Council, 2011

National Policy

NPPF, paragraph 43: *In preparing Local Plans, local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband. They should aim to keep the numbers of radio and telecommunications masts and the sites for such installations to a minimum consistent with the efficient operation of the network. Existing masts, buildings and other structures should be used, unless the need for a new site has been justified. Where new sites are required, equipment should be sympathetically designed and camouflaged where appropriate.*

Britain's Superfast Broadband Future, Department for Business, Innovation and Skills, 2010

Target

Provision of communications infrastructure in line with policy

Indicator

Development monitoring (policy usage)

Delivery

Development Management Decisions

Infrastructure Delivery Plan and CIL (forthcoming)

Integrated County Strategy

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Appendix 1: Retail hierarchy

Town Centre	Brentwood town centre (to include Warley Hill, Brentwood Station area)	
District Shopping Centres	Shenfield, Hutton Road	
	Ingatestone High Street	
Local Shops and Parades	Blackmore village centre	Blackmore
	245-267 Ongar Road	Brentwood
	Brook Street Post Office	
	Church Lane	Doddinghurst
	Doddinghurst Post Office, Doddinghurst Road	
	Herongate Post Office, Brentwood Road	Herongate
	1-23 Eastham Crescent	
	200-216 Rayleigh Road	Hutton
	60-74 Woodland Avenue	
	Hanging Hill Lane Post Office, Hanging Hill Lane	
	Blackmore Road	Kelvedon Hatch
	Kelvedon Common Post Office, Church Road	
	Danes Way/Hatch Road	
	2-8 Harewood Road	Pilgrims Hatch
	245-267 Ongar Road	
	Stondon Post Office, Ongar Road	Stondon Massey
	The Keys, Eagle Way	Warley
1-7 Chafford Gardens		
179-189 Thorndon Avenue	West Horndon	

Appendix 2: Preferred housing allocations and small sites allowance 2015 – 2030

Site name	Site ref	Area (ha)	Grid ref (X/Y)	Ward	Parish	Ownership	Use	Approx dwellings	Density	SHLAA ref	Source / Notes
Brentwood Urban Area											
Land north of Highwood Close, Brentwood	001A	0.47	558646 / 194725	Brentwood West	N/A	Brentwood Borough Council	Housing	38	80dph	G160	Current housing allocation in Replacement Local Plan (2005), SHLAA (Urban Capacity Study)
Wates Way Industrial Estate, Ongar Road, Brentwood	003	0.96	559598 / 194116	Brentwood North	N/A	Cadena Group (agent: JTS Partnership)	Mixed-use	128	Approx 130dph	N/A	Discussions with landowners/agents (12/06069/PREAPP, 13/06056/PREAPP)
Essex County Fire Brigade HQ, Rayleigh Road, Brentwood	005	1.26	562123 / 195021	Hutton Central	N/A	Essex Fire and Rescue Service	Housing	101	80dph	B218	SHLAA (Urban Capacity Study and call for sites)
Land adjacent Adult Education Centre, Rayleigh Road, Hutton	006	0.14	561963 / 195183	Hutton North	N/A	Essex County Council	Housing	11	80dph	B094	SHLAA (Urban Capacity Study)
Land between Tendring Court and Tillingham Bold, Woodland Avenue, Hutton	007	0.1	562876 / 195728	Hutton North	N/A	Not known	Housing	10	100dph	B096	SHLAA (Urban Capacity Study)
Land rear of 10-20 Orchard Lane, Pilgrims Hatch	011	0.24	557745 / 195887	Pilgrims Hatch	N/A	Not known	Housing	19	80dph	B025	SHLAA (Urban Capacity Study)
Garage courts adjacent 49 Lavender Avenue, Pilgrims Hatch	012	0.19	559016 / 195493	Pilgrims Hatch	N/A	Brentwood Borough Council	Housing	15	80dph	B142	SHLAA (Urban Capacity Study)

Warley Training Centre, Essex Way, Warley	013B	0.66	559175 / 191820	Warley	N/A	Brentwood Borough Council	Housing	38	60dph	N/A	Council asset review
Westbury Road Car Park, Westbury Road, Brentwood	039	0.27	559129 / 193612	Brentwood West	N/A	Brentwood Borough Council	Housing	22	80dph	N/A	Previous Urban Capacity Study site, discounted for Replacement Local Plan allocations
Chatham Way/Crown Street Car Park, Brentwood	040	0.33	559332 / 193635	Brentwood South	N/A	Brentwood Borough Council	Housing with pocket park	26	80dph	N/A	Previous Urban Capacity Study site, discounted for Replacement Local Plan allocations
Land at Hunter House, Western Road, Brentwood	041	0.22	559203 / 193756	Brentwood North	N/A	Consortium of landowners (Cleminson family)	Mixed-use	22	100dph	N/A	Discussion with landowners (12/06032/PREAPP)
Garages adjacent 25 Kings George's Road, Pilgrims Hatch	054	0.12	558581 / 195280	Pilgrims Hatch	N/A	Brentwood Borough Council	Housing	10	80dph	B186	SHLAA (Urban Capacity Study)
Council Depot, The Drive, Warley	081	1.71	559493 / 191716	Warley	N/A	Brentwood Borough Council	Housing	137	80dph	N/A	Council asset review (Corporate Plan 2013-2016)
Baytree Centre, Brentwood	100	1.34	559487 / 193693	Brentwood South	N/A	Westbrook Properties	Mixed-use	201	150dph	N/A	Discussion with landowner (13/06040/PREAPP)
Land at Brookfield Close, Hutton	131B	0.16	562526 / 195020	Hutton Central	N/A	Brentwood Borough Council	Housing	13	80dph	N/A	Council asset - subject to review of Council owned garages in the Borough
Land at Maple Close, Brentwood	133	0.17	560759 / 193190	Brentwood South	N/A	Brentwood Borough Council	Housing	14	80dph	N/A	Council asset - subject to review of Council owned garages in the Borough (does not include community centre)
							Sub Total:	805			

Brownfield Land in Villages outside Brentwood Urban Area											
Woodlands, School Road, Kelvedon Hatch	009	0.25	557216 / 198983	Brizes & Doddinghurst	Kelvedon Hatch	Not known	Housing	12	50dph	B166	SHLAA (Urban Capacity Study)
Land at Bell Mead, Ingatestone	042	0.22	565008 / 199395	Ingatestone, Fryerning & Mountnessing	Ingatestone and Fryerning	Brentwood Borough Council	Housing	16	Approx 75dph	G101	Council asset review
Former Landings Surgery, Outings Lane, Doddinghurst	043	0.27	558631 / 199572	Brizes & Doddinghurst	Doddinghurst	Surgery Practice Manager	Housing	11	40dph	B007	SHLAA (Urban Capacity Study), planning applications (12/01280/OUT, 13/00008/OUT)
								Sub Total:	39		
Brownfield Land in Green Belt											
Sow & Grow Nursery, Ongar Road, Pilgrims Hatch	010	1.20	558089 / 194859	Pilgrims Hatch	N/A	Mr & Mrs Armiger	Housing	48	40dph	B213	SHLAA (Call for Sites)
Ingatestone Garden Centre, Roman Road, Ingatestone	128	3.25	563757 / 198174	Ingatestone, Fryerning & Mountnessing	Mountnessing	Mr Andrew Harding (agent: Robinson Escott Planning)	Housing	130	40dph	N/A	Email dated 05.04.13
								Sub Total:	178		
West Horndon Strategic Allocation (1,500 dwellings)											
West Horndon Industrial Estate, Childerditch Lane, West Horndon	020	6.39	561696 / 188031	Herongate, Ingrave & West Horndon	West Horndon	Threadneedle Property Investments [agent: Barton Willmore]	Strategic mixed-use allocation	250		B189	SHLAA (Urban Capacity Study), discussion with developer (13/06008/PREAPP)
Horndon Industrial Estate, Station Road, West Horndon	021	9.84	562121 / 188152	Herongate, Ingrave & West Horndon	West Horndon	Hansteen Land Holdings [agent: McGough Planning]	Strategic mixed-use allocation	250		N/A, part of B188	Discussion with landowners (12/06173/PREAPP)

						Consultants]					
Land West of Thorndon Avenue, West Horndon	037A	8.42	562330 / 188419	Herongate, Ingrave & West Horndon	West Horndon	EA Strategic Land have option (agent: Icen Projects)	Strategic mixed-use allocation	1000		G018	SHLAA (Call for Sites), discussion with developer (12/06157/PREAPP) Not all of 037B is to be allocated
	037B	35.8	562101 / 188840								

Sub Total: 1,500

Small Site Allowance (9 units and under) (allowance made for 67 dwellings made up of the following small sites)											
Site on corner of High Street / Western Road, Brentwood (Former Napier Arms)	046	0.05	559141 / 193675	Brentwood West	N/A	Essex County Council	Mixed-use	6	120dph	N/A	LDP MWG request to include
Land between 12-13 Magdalen Gardens, Hutton	049	0.1	563332 / 195026	Hutton East	N/A	Brentwood Borough Council	Housing	8	80dph	B101	SHLAA (Urban Capacity Study)
Land rear of 146-148 Hatch Road, Pilgrims Hatch	053	0.18	558608 / 195880	Pilgrims Hatch	N/A	Not known	Housing	9	50dph	B031	SHLAA (Urban Capacity Study)
Land at Fielding Way, Hutton (rear of Rayleigh Road shopping parade)	093	0.12	562476 / 195228	Hutton North	N/A	Brentwood Borough Council	Housing	10	80dph	N/A	Council asset review

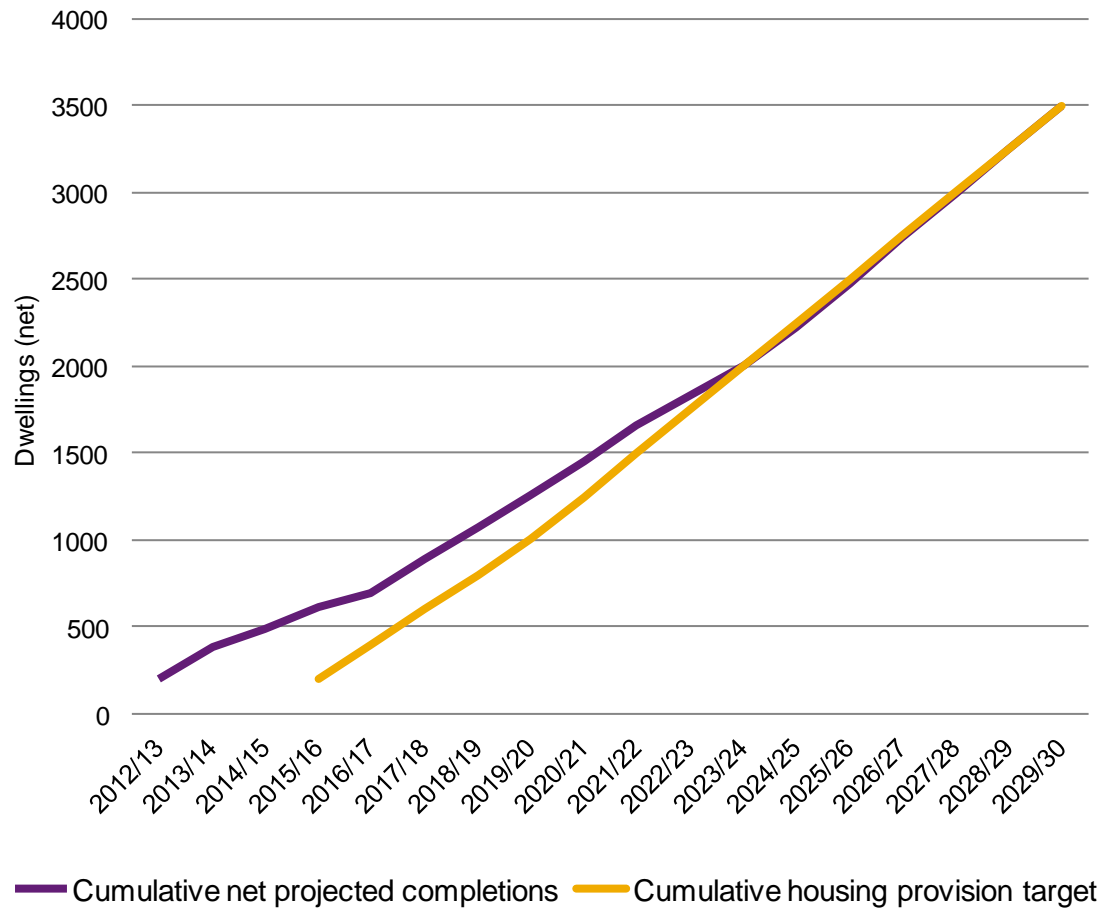
Hutton Village Dental Practice, 217 Rayleigh Road, Hutton	096	0.03	562876 / 195320	Hutton East	N/A	Hutton Village Dental Practice	Housing	2	60dph	N/A	Council Asset Review - future use of Hutton Parish Hall (ref: 047)
Land at Albany Road, Pilgrims Hatch	132A	0.07	558915 / 195428	Pilgrims Hatch	N/A	Brentwood Borough Council	Housing	6	80dph	N/A	Council asset - subject to review of Council owned garages in the Borough (site north of Albany Road)
	132B	0.08	558961 / 195399	Pilgrims Hatch	N/A	Brentwood Borough Council	Housing	6	80dph	N/A	Council asset - subject to review of Council owned garages in the Borough (site south of Albany Road)
Land at Gloucester Road, Pilgrims Hatch, Brentwood	134	0.1	558505 / 195727	Pilgrims Hatch	N/A	Brentwood Borough Council	Housing	8	80dph	N/A	Council asset - subject to review of Council owned garages in the Borough
Land at Hutton Drive (rear of Tower House), Hutton	135	0.07	562459 / 194948	Hutton Central	N/A	Brentwood Borough Council	Housing	6	80dph	N/A	Council asset - subject to review of Council owned garages in the Borough
Land at Church Crescent, Mountnessing	136	0.05	563157 / 197779	Ingatestone, Fryerning & Mountnessing	Mountnessing	Brentwood Borough Council	Housing	4	80dph	N/A	Council asset - subject to review of Council owned garages in the Borough
Land at Broomwood Gardens, Pilgrims Hatch	137A	0.03	558282 / 195239	Pilgrims Hatch	N/A	Brentwood Borough Council	Housing	2	80dph	N/A	Council asset - subject to review of Council owned garages in the Borough

Sub Total: 67

Windfall Allowance											
Windfall assumption (20 units per year over 15 year period = 300 units)								300			
Extant Planning Permissions (April 2012)											
Sites not completed with Planning Permission (details in 2011/12 AMR & Five Year Housing Supply 2012-2017)								589			
Total all sites & permissions											

Total 3,478

Appendix 3 Housing Trajectory



Appendix 3 (continued) Housing Trajectory

	Five Year Supply (2012 - 2017)																	
	2012/13	2013/14	2014/15	2015/16	2016/17	2017/18	2018/19	2019/20	2020/21	2021/22	2022/23	2023/24	2024/25	2025/26	2026/27	2027/28	2028/29	2029/30
Net projected completions	199	186	107	123	78	202	180	180	198	206	175	168	226	251	257	256	251	257
Cumulative net projected completions	199	385	492	615	693	895	1075	1255	1453	1659	1834	2002	2228	2479	2736	2992	3243	3500
Average annual housing provision target	130	130	130	200	200	200	200	200	250	250	250	250	250	250	250	250	250	250
Cumulative housing provision target				200	400	600	800	1000	1250	1500	1750	2000	2250	2500	2750	3000	3250	3500
Total net completions compared cumulative rate	199	385	492	415	293	295	275	255	203	159	84	2	-22	-21	-14	-8	-7	0
Annual requirement taking account of past/projected	194	195	201	206	216	217	220	225	227	230	238	250	254	255	255	254	257	0

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