

Public Document Pack



SUPPLEMENTARY AGENDA 1

Dear Councillor

POLICY, RESOURCES & ECONOMIC DEVELOPMENT COMMITTEE - WEDNESDAY, 10TH JULY, 2019

I am now able to enclose, for consideration at next Wednesday, 10th July, 2019 meeting of the Policy, Resources & Economic Development Committee, the following reports that were unavailable when the agenda was printed.

Agenda No	Item
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| 18. | <u>Local Development Plan Update</u> (Pages 3 - 20) |
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Yours sincerely

Interim Chief Executive

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Summary of representations received in response to the Brentwood Pre-Submission Local Plan (Regulation 19)

Consultation on the Brentwood Pre-Submission Local Plan took place between February and March 2019. Please note that the below summaries are not an exhaustive list of the representations received in response to the Plan but provide a flavour of the comments. These are primarily focused on objections that are being considered as part of submission material, and whether these can be resolved by either minor amendments to the Plan and/or Statements of Common Ground (SoCG) between the Council and the relevant body/company to outline methods of resolution.

A response from the Council is not yet provided, which will be included as part of the submission materials.

1. Statutory consultee representations summary

Consultee	Support / Object	Summary
Anglian Water	Support	<ul style="list-style-type: none"> Suggest strengthening/ clarification of policy wordings for SP01, BE18.
Basildon Borough Council	Object	<ul style="list-style-type: none"> Majority of evidence were not published during much of the Plan preparation, creating a lack of transparency. Not all information has been provided to justify the allocation of Dunton Hills Garden Village (DHGV). Unsure how the Plan has been informed by previous input, which led to question of the Plan's effectiveness at tackling strategic, cross-boundary issues. Objectively assessed housing need should use 2014-based CLG Household Projections according to Government's latest response, which would increase the housing target and decrease the Plan's flexibility within its land supply. PC02 and PC03 makes the assumption that there are no capacity issues for existing infrastructure, or any needs for supporting infrastructure to be provided and this will make the policy ineffective, unjustified. PC02 and PC03 should be amended to incorporate a staggered delivery target for new employment land to coordinate the phased release of new and expanded employment land to ensure it can be linked to specific and necessary upgrades to supporting infrastructure. HP07 should provide for 6 pitches as the target instead of 5. The Plan should also acknowledge in supporting text how it will address any unmet needs from Greater Essex authorities. PC08 and Figure 7.7: no evidence as to what assessments have been carried out to determine the likely impact of installing new District Centres in West Horndon or DHGV. Not acceptable that designation of a District/Local

Consultee	Support / Object	Summary
		<p>Centre at DHGV is delegated to South Brentwood Masterplan as this should remain a function of Policy. Should test cross-boundary impacts of installing new District Centre close to existing nearby centre i.e. Laindon.</p> <ul style="list-style-type: none"> • Four reasonable site alternatives in the Central Brentwood Corridor have been disregarded (SA table 5.2). The Plan should select sites within the Central Brentwood Growth Corridor that provide opportunity for extensions to towns and villages. • Sustainability Appraisal should be reviewed to test an alternative strategy. • BE11 and the land allocations should have been informed by highway modelling that tests highway mitigation solutions to mitigate impact caused by development. Supporting text should include reference that local authorities have secured additional testing within the Lower Thames Crossing modelling being undertaken by Highways England. • Clarify within R01 and its supporting text whether the Green Infrastructure proposed to amount to 50% of the land area is a permanent resource or whether the projected growth in the area beyond the plan-period would need to utilise any of the green infrastructure for growth. If the latter, the percentage should be adjusted accordingly. • Unclear why Dunton parcel was assessed as 'moderate to high' rather than 'high' contribution to Green Belt. The Plan should demonstrate in more detail, through a tool such as a Topic Paper, how its site selection choices have been informed by the Green Belt Study 2018 and should any inconsistencies occur the Plan's land use allocations and justification should be changed. • The measures set out in the Joint Dunton Area Landscape Corridor Design Options 2017 should be acknowledged in Paragraph 9.36 and incorporated into Policy R01(II) to make it more justified and effective. • SP04 and R01: The Plan should be modified to recognise that some impacts are likely to be cross-boundary and additional provisions should be incorporated into SP04 and R01(I) that will support using S106/CIL arising from development in Brentwood Borough to be used for investment outside the Brentwood Borough. • A criterion should be added into Policy R01(II) under a new heading "Collaborative Approach" that will make it a requirement for neighbouring authorities to be engaged during the detailed design stages of DHGV to ensure strategic and cross boundary impacts are managed effectively during implementation.

Consultee	Support / Object	Summary
c2c	Support	<ul style="list-style-type: none"> Mentions that Trenitalia (their parent company) is currently developing an Outline Business Case for the Department for Transport for an investment in ETCS Level 2. Requests that ASELA's application to central government for a Growth Deal include their scheme.
Castle Point Borough Council	Support	
Chelmsford City Council	Support	
Civil Aviation Authority	No response	
The Environment Agency	Support	<ul style="list-style-type: none"> Advise that supporting text can be enhanced in BE18 and NE06.
Epping Forest District Council	No response	<ul style="list-style-type: none"> Will go through SoCG.
Essex Wildlife Trust	<p>Object: SP01 E10, E11, R01(II), R02, R03, R04&05, R06, R16 &17, R18, R21, R24, R25, R26. 9.20,</p> <p>Support: 3.19, SP03, BE08, BE18, BE19, 9.23.</p>	<ul style="list-style-type: none"> Object to policies E10, E11, R01, R02, R03, R04&05, R06, R16 &17, R18, R21, R24, R25, R26 lacks a commitment to deliver biodiversity net gain. R24: Policy wording omits to mention the need to avoid impacts on Bre57 Furze Wood LoWS R03 (i): The caveat "where appropriate" in the above statement should be deleted. SP01 must take full account of opportunities to incorporate biodiversity in developments. Amend to include biodiversity. Support policies SP03, BE08, BE18, BE19 but suggest some wordings amended.
London Borough of Havering	Object	<ul style="list-style-type: none"> Object to Policy R01 DHGV and suggest policy wording to be amended to reflect that the scale of the proposal and the traffic it will generate is likely to have significant adverse traffic and environmental impacts for the wider area (including Havering) and these need to be considered and mitigated. Object to site E11 Brentwood Enterprise Park, Policy E11 and Policy PC03 Employment Land Allocations. Request Brentwood to demonstrate why the proposal is compliant with the National Planning Policy Framework and provide explicit commentary on the likely significant implications of the proposal for the wider strategic highway network including Havering. Suggest the Plan should highlight the joint working including the work of the A127 Task Force group in lobbying for improvements to the A127 Corridor wants to address issues through a SoCG or MoU.
Highways	Object Policy E11	<ul style="list-style-type: none"> Concerns regarding the impacts of all Local

Consultee	Support / Object	Summary
England	Object Policy R01 (II) Object BE11 Object BE16	<p>Plan development sites on the Strategic Road Network (SRN).</p> <ul style="list-style-type: none"> Although policies BE11 and BE16 addresses mitigating any significant impacts the policies should be changed to require development to mitigate the impacts of the full Local Plan rather than individual developments. Both policy R01 (II) (Dunton Hills) and policy E11 (Brentwood Enterprise Park) imply that these developments will be assessed in isolation but it is recommended that they be assessed as part of the Local Plan context as a whole. Policies R01 (II) and E11 will have an impact on the M25 J29. Highways England looks forward to continued engagement in addressing potential impacts on J29 and the Lower Thames Crossing.
Historic England		<ul style="list-style-type: none"> Refers to previous consultation responses regarding historic assets located in/in proximity to proposed sites.
Mayor of London	Support	
Mid and South Essex STP (NHS)	Support	<ul style="list-style-type: none"> Request removal of any reference to additional GPs as this does not reflect their current strategies. Use term 'workforce' instead of 'GP'.
National Grid	Support	<ul style="list-style-type: none"> Highlights sites that are crossed or closed to their assets included.
Natural England	Support BE18, NE01, NE02, R01(I)	
Police and Fire	Support	
Sport England	Object Policy R03 Object R19 Support Policy R01 (II) Object Policy R01(I) Support Para 9.23 Support Policy NE10 Object Policy PC15 Support Policy PC14 Support Policy HP13 Object Policy BE23 Support Policy BE22 Support Policy BE18 Support Policy SP03 Support Para 3.18 Support Para 3.17	<ul style="list-style-type: none"> Objects to those policies which do not protect existing playing fields / does not specifically outline the mitigation measures to prevent the loss of playing fields. Supports Policy R01 (II) especially in relation to Green Infrastructure; Sports, Recreational, Leisure and Public Open Space; Sustainable Travel; and Social Infrastructure. Objects to R01 (I) as it does not state within the policy that once the Golf Course Needs Assessment has been completed that if a deficit is identified that steps will be taken to retain/replace the loss of the golf course. Supports Policy NE10 exception for building / structures for outdoor sports in the Green Belt. Supports policies which promote health and wellbeing, active travel, and the protection or enhancement of open spaces and/or playing fields.
Southend-on-Sea	Support	

Consultee	Support / Object	Summary
Borough Council		
Thames Water	Support	<ul style="list-style-type: none"> • Requests that SP01 and SP04 policy wordings to be amended. • Highlights sites where wastewater capacity may be unable to support development.
Thurrock Council	Object Duty to Cooperate	<ul style="list-style-type: none"> • Not fully complied with regard to evidence base. • Lack of response and agreed outputs for evidence regarding Dunton HGV. • Confirm OAN re: 2014 population projections; other spatial strategies need consideration; justification of Dunton HGV and need for alternatives such as West Horndon; transport and other infrastructure; South Essex Joint Strategic Plan (JSP) and JSP evidence.
	Object	<ul style="list-style-type: none"> • More evidence required. • updated SHMA use the 2014-based household projections; assess the various spatial growth options; more fully developed transport evidence base with costing and phasing. • Update Infrastructure Delivery Plan (IDP) with costs, phasing, delivery and viability.
	SP02	<ul style="list-style-type: none"> • Amend to commit to triggers for plan review to make plan in line with JSP.
	Settlement hierarchy	<ul style="list-style-type: none"> • Needs evidence base and reference to it.
	Section 3.6	<ul style="list-style-type: none"> • Identify cross-boundary issues and how addressed by JSP with supportive Statements of Common Ground.
	Object: Withdraw Plan, Spatial Strategy driving factors	<ul style="list-style-type: none"> • Needs more evidence; major revision and consultation, should take account of the JSP and its evidence. • Use 2014 housing projections; plan for higher housing target; greater contingency buffer; review SA; update technical evidence and amend plan.
	Local housing need	<ul style="list-style-type: none"> • Brentwood should consider South Essex SHMA.
	SP02 Managing Growth	<ul style="list-style-type: none"> • Use 2014 housing projections; plan for higher housing target; greater contingency buffer; review SA; update technical evidence and amend plan.
	Transport and Connectivity	<ul style="list-style-type: none"> • More fully developed evidence base: cumulative site specific with mitigation costs and phasing; update IDP.
	Object: Withdraw Plan, R01 Dunton Hills GV	<ul style="list-style-type: none"> • Major revision of evidence base to test other spatial options in light of JSP; consult under DtC.
Object: Withdraw Plan, Delete site E11	<ul style="list-style-type: none"> • Green Belt, unsustainable; should reflect JSP. 	
Transport for London	Support	
Transport for London -	Support	<ul style="list-style-type: none"> • Suggests an increase in density and housing provision on their site R10 (Brentwood Station

Consultee	Support / Object	Summary
Commercial Development		area), as well as increased density on other sites in Brentwood Town Centre and other sustainable locations.
West Horndon Parish Council	Support R02 Object to R01	<ul style="list-style-type: none"> • Support R02 West Horndon Industrial Estates. • Object to R01 DHGV as site is in flood risk area. • Evidence Base: The Transport Assessment is not robust, not NPPF compliant; IDP headline figures not credible; SFRA Level 2 is absent; the SA fails to consider sites of lower flood risk. • Plan fails DtC as previous comments by the Parish Council not addressed. • Sustainable Transport Measures are not effective, no cycling routes identified, no assessment of train accessibility. • Question deliverability of Plan with regards to transport measures and mitigations • Request linkage between DHGV and WH must accommodate non-vehicular modes.
Other Parish Councils expressed concerns about local infrastructure. For Blackmore PC see under 3. Resident main issues summary		

2. Land promoters representations summary

The following table sets out a summary of responses from those promoting land (landowners, developers, agents etc). These have been restricted to allocations proposed in the Pre-Submission Local Plan. It should be noted that representations were received regarding other sites not proposed.

Allocations owned by Brentwood Borough Council have not received a response from the Council as landowner on the basis that the Council is author of the Local Plan. Therefore, these are listed as “N/A” with regard to landowner comments.

Site	Summary
R01: Dunton Hills Garden Village	<p>CEG</p> <ul style="list-style-type: none"> • Supports strategic allocation. • Should not describe Dunton as meeting majority of Brentwood’s housing, it will be 35% over the plan period. Should state it is significant. • Clarity should be provided on how the strategic aims and objectives inform Policy R01. • Policy wording in relation to heritage assets seems onerous. • Reference to Green Belt should be removed from paragraph 9.23. • Dwelling numbers should be presented as a minimum. • Object to prescriptive wording of requiring a co-located early years and childcare nursery with primary schools. Should state ‘preferably co-located’. • Object to green and blue infrastructure requirement being set out as a minimum figure. • Reference to district centre should not be restricted to retail. • Visual corridors should be referred to instead of landscape corridors. • Object to the prescriptive requirement to integrate the listed farmstead. • Sustainable travel needs to reference virtual mobility. Also should refer to transport improvements rather than mitigations. • Feel some flexibility may be required in relation to delivery of affordable housing and phasing of infrastructure provision. <p>Crest Nicholson & Bellway</p> <ul style="list-style-type: none"> • Identification of strategic site is supported. • Would support improved integration with Basildon Borough alongside a landscape solution. This would assist in developing Dunton and west Basildon. • DHGV policy would benefit from being shortened and simplified. • Policy should include a clause to ensure a no ransom position and the main developer builds roads up to land being promoted by Crest Nicholson and Bellway. <p>Meadow House</p> <ul style="list-style-type: none"> • Support allocation. • Site comprises land adjoining A127/A128 junction. • Keen to work with the Planning Authority and DHGV promoter in bringing forward land for development. • No formal agreement with CEG which questions the deliverability of the overall allocation.
R02: Land at West Horndon Industrial Estate	<p>Hermes Investment</p> <ul style="list-style-type: none"> • General support for plan and policies. • Indicated 2,700sqm of retail and non-retail space could be created in new village centre.

Site	Summary
	<ul style="list-style-type: none"> Current layout proposals amount to 750 dwellings well in excess of 580 dwellings set out in Policy R02. Feel that the net developable area set out in the plan is too low, should be 15ha not 10ha. <p>Minority landowner</p> <ul style="list-style-type: none"> Support the allocation. Control land to the east of the allocation. Could accommodate approx. 70 dwellings.
R03: Land North of Shenfield	<p>Countryside Properties</p> <ul style="list-style-type: none"> Of the understanding that the majority of the primary facilities (primary school, childcare nursery, care home, self-build and custom build) will be provided within the main portion of the allocated area to the south of Chelmsford Road. The plan identifies 2ha of employment land specifically on land north of Chelmsford Road. Consider that this would not be deliverable. Instead consider a smaller portion could deliver non-b class employment/commercial uses or alternatively well designed residential to meet the aspirations of defining a key gateway. Recommend that reference to 2ha employment land and key gateway is removed from Policy R03. New wording is suggested. Policy wording in relation to quantum should be changed from 'around' to 'at least'. <p>Croudace</p> <ul style="list-style-type: none"> Support allocation. Question the need for a 2FE Primary School. Earlier work by Shenfield High School and others indicated a need for a 1FE Primary School. Primary school should be located on the existing Shenfield High School playing field to the north of Alexander Lane. Suggest amendment to self and custom build requirement so that it is 'up to 5%'. Support the other requirements of policy. <p>Redrow</p> <ul style="list-style-type: none"> Intending for homes to be delivered within the 5-year period. Reserve right to submit a planning application prior to the adoption of the Local Plan. Concerned that the plan does not include a policy expressly changing Green Belt boundaries with justification. <p>Brentwood Borough Council</p> <ul style="list-style-type: none"> N/A
R04 and R05: Ford Headquarters and Council Depot, Warley	<p>Ford</p> <ul style="list-style-type: none"> Support in principle for allocations. Deliverability for the site should be amended to years 1-5 rather than years 9-17. Contend that the Council depot is not immediately deliverable, sites should be separate allocations. Object to retention of 2ha employment land set out in policy. Challenge the inclusion of requirement for 60 bed care home and 5% self and custom build. Contend that the quantum of development (473 dwellings) can be accommodated on site. <p>Brentwood Borough Council</p> <ul style="list-style-type: none"> N/A.
R06: Land off Nags Head Lane,	<p>Crest Nicholson</p> <ul style="list-style-type: none"> Support allocation.

Site	Summary
Brentwood	<ul style="list-style-type: none"> Consider that the site could be delivered earlier than stated in the plan. Site could deliver 150 dwellings which is more than 125 dwellings set out in the plan. Object to the plan on this basis.
R07: Sow and Grow Nursery, Pilgrims Hatch	<p>Landowner</p> <ul style="list-style-type: none"> Support the allocation. Consider the whole site to the south of the trackway to be previously developed land. Two elements of the site to come forward separately. Land owned by the Armiger Family comprises timber yard, garden centre and some residential dwellings. This could comprise 42 dwellings. Land owned by Mrs Dunbar is a northern parcel which could comprise 5 dwellings accessed via private driveway. Trackway which separates the two parcels is not within the ownership of the site promoters and is required for access to allotments to the rear of the site. The Armiger Family have deferred further pre-app discussions until the adoption of the Local Plan.
R08: Land at Mascalls Lane, Warley	<p>Stonebond Properties</p> <ul style="list-style-type: none"> Site can be delivered in 1-2 years. Policy wording mentions that the site is within a Critical Drainage Area, this appears to be incorrect and should be amended.
R09: Land off Warley Hill	<p>Essex Partnership University NHS Foundation Trust</p> <ul style="list-style-type: none"> Support proposed allocation and agree with proposed requirements set out within Policy R09.
R10: Brentwood Railway Station car park	<p>Solum</p> <ul style="list-style-type: none"> Support allocation. Site allocation plan does not include the full extent of the Station car park (i.e. Network Rail's ownership). Plan should be amended; 100 dwellings represents an ineffective use of land. A figure of 150 dwellings would be more appropriate; Anticipated that the site could be delivered earlier than stated in the plan (i.e. 2029/30) and should be amended to 2024; Request that the requirement for open space is removed as the site shape does not lend itself to delivering this. <p>Transport for London</p> <ul style="list-style-type: none"> TfL are a significant landowner of the site; Supports principle of allocating the site; Draft allocation does not include a section of car park towards the east; Current proposals for 100 dwellings represent 104dpa. Draft Brentwood Town Centre Design Guide identifies that up to 405dpa is suitable around key transport nodes. The indicative dwelling numbers should be revised in line with this. This would also be in line with proposed densities at William Hunter Way car park; High level feasibility studies indicate that a decked design could be suitable.
R11: Westbury Road car park	<p>Brentwood Borough Council</p> <ul style="list-style-type: none"> N/A

Site	Summary
R12: Land at Hunter House, Brentwood	No comments received
R13: Chatham Way car park	Brentwood Borough Council <ul style="list-style-type: none"> • N/A
R14: William Hunter Way car park	Brentwood Borough Council <ul style="list-style-type: none"> • N/A
R15: Wates Way Industrial Estate, Brentwood	Lidl GB Ltd <ul style="list-style-type: none"> • Will be submitting an application after the close of consultation. • Application to be hybrid with the food store submitted in full and residential element in outline. • Will promote C2 or C3 use for the residential element. • C3 could generate 60 units and C2 80 units. • Advise that the policy wording is revised from 'around 80 dwellings' to 'up to 80 dwellings'.
R16 and R17: Land off Doddinghurst Road, Brentwood/Pilgrims Hatch	Countryside Properties <ul style="list-style-type: none"> • Support allocation. • Site can deliver 250 dwellings, more than the 200 dwellings set out within the plan. • Disagree with assumed trajectory for delivery of the site (2023/24 to 2026/27). Can be delivered in 5 year period. • Unjustified changed in policy wording concerning access. Now states just via Doddinghurst Road, whereas previously it also included Karen Close and Russell Close (for site R17). Policy should be amended to allow for flexibility in access arrangements.
R18: Land off Crescent Drive, Shenfield	Fairview New Homes <ul style="list-style-type: none"> • Support site allocation. • Does not consider the policy provision for public open space to be sound. This is due to the topography of the site not being suited to providing usable open space.
R19: Land at Priests Lane, Shenfield	Ursuline Sisters <ul style="list-style-type: none"> • Policy R19 should be amended to demonstrate that the site can accommodate 130 dwellings. Minority landowner <ul style="list-style-type: none"> • Allocation comprises two sites which have been merged. • The large-scale policy requirements cannot be applied to our landownership which is a smaller site. • Would expect our landownership (which is smaller than the Ursuline Sisters) to be a continuation of those on the adjoining Bishops Walk estate (i.e. 4 & 5 bed homes). • Traffic calming measures referred to in policy should not apply our landownership and only the land promoted by the Ursuline Sisters. • Would not be able to deliver a care home on our landownership. • Our landownership has never had public access and so policy requirement should only apply to Ursuline Sisters land. • Understood that the Ursuline Sisters are able to provide land for the Endeavour School expansion. This should not be a restriction on our

Site	Summary
	<p>landownership.</p> <ul style="list-style-type: none"> • Our land is in flood zone 1 and therefore unlikely to flood.
R20: The Eagle and Child Public House, Shenfield	<p>The Courage Family</p> <ul style="list-style-type: none"> • Support for the proposed allocation of the site for residential development. • It is located within the development boundary of Shenfield and comprises previously developed land. • Site is sustainable having good public transport links, good connections with the local highway network, well supported by community facilities such as schools and healthcare providers, and local retail provision; site has a low probability of flooding; site is deliverable; new residential dwellings can be delivered within the first five years of the new Local Plan.
R21: Land South of Ingatestone	<p>Redrow</p> <ul style="list-style-type: none"> • No specific comments on site allocation policy; • Made representations on Policies BE04, BE10, Be16, BE18, BE20, BE22, HP06, NE03, NE12, NE13, SP01, SP02, SP03, SP04, SP06. <p>Go Homes</p> <ul style="list-style-type: none"> • No comments received
R22: Land adjacent to the A12 Ingatestone	<p>Cala Homes</p> <ul style="list-style-type: none"> • Support the allocation. • Planning application is now being prepared and pre-app meeting to take place in near future. • Housing mix policy should be implemented in a flexible manner. • Policy requiring meeting minimum national space standards should be deleted in the absence of appropriate local evidence. • Policy setting out the need for Green Belt release sites to provide significant community benefits should be deleted.
R23: Brizes Corner Field	<p>Stonebond Properties</p> <ul style="list-style-type: none"> • Site can deliver 28 dwellings which is higher than the 23 dwellings set out in the policy. • The allocated area could be increased to provide a modest increase in the developable area in association with compensatory open space and structural landscaping. • If a larger area is developed this could achieve 45 dwellings. • Expected that development could commence in 2020/21 and completed within two years of the plan adoption. Should amend the trajectory accordingly.
R24: Land off Stocks Lane, Kelvedon Hatch	<p>Stonebond Properties</p> <ul style="list-style-type: none"> • Site can deliver 45 dwellings which is higher than the 30 dwellings set out in the policy. • Access arrangements are incorrect, should state Stocks Lane not Blackmore Road. • Expected that development could commence in 2020/21 and be completed within two years of the plan being adopted. Should amend trajectory reported in the Plan.
R25: Land north of Woollard Way, Blackmore	<p>Constable Homes</p> <ul style="list-style-type: none"> • Support allocation. • Object to the reduction in dwelling yield for the site which is not justified. Site could deliver upwards of 50 dwellings. Previous iterations of the LDP set out the site could deliver 56 dwellings. • Policy wording in relation to a minimum of 25% dwellings for people with

Site	Summary
	<p>a strong local connection should be clearer and only apply to affordable not market housing.</p> <ul style="list-style-type: none"> • Also not clear if by meeting 25% that Policy HP05 requirement for 35% affordable housing would not then need to be met. • Policy also has no mechanism to make units available for people outside the local area in the event no local people come forwards.
<p>R26: Land north of Orchard Piece, Blackmore</p>	<p>Crest Nicholson</p> <ul style="list-style-type: none"> • Support allocation. • Reduction in quantum of development is not justified. Incidents of surface water flooding stated to justify reduction only apply to land off site to the east. Request that wording of policy is amended to state 'circa 40 units'. • Supportive of the principles of policy requirement to provide 25% of dwellings for local people. Concerns with the clarity and enforceability of this. • There is no definition of the type or tenure of affordable housing that the 25% should comprise, further clarity again is required. • If there is no interest from local people for these units they could be provided to alternative occupiers, secured by S106.
<p>E08: Land adjacent to A12 and slip road, Ingatestone</p>	<p>Simons Developments</p> <ul style="list-style-type: none"> • Support the allocation. • Support the flexibility for type of employment uses that can be delivered on the site. • Do not consider the wording for the amount and type of development is sound. Should be amended to include 'other uses (outside of Class B)...'
<p>E10: Codham Hall Farm</p>	<p>S&J Padfield Estates</p> <ul style="list-style-type: none"> • Not clear if employment and landscaping areas, which are shown with different red line boundaries are both proposed to be removed from the Green Belt. Contend that they should both be. • Wording of policy should be clear that the allocation is for existing employment use. • Could be a requirement for an enhanced access through Codham Hall Farm to Brentwood Enterprise Park to the south as a result of the Lower Thames Crossing proposals.
<p>E11: Brentwood Enterprise Park</p>	<p>St Modwen</p> <ul style="list-style-type: none"> • Support principle of Policy E11. • Policy wording for Public Right of Way needs to be more flexible to allow for diversions. • Policy wording on infrastructure should be 'where appropriate' currently too prescriptive. • Delivery of appropriate sustainable transport links should be attributed to the whole southern growth corridor and delivered by the LPA not just St Modwen as implied in policy. • Delivery trajectory should be changed to 1-15 years rather than 5-15 years. • Site likely to deliver 2,000 jobs, converse to economic evidence which states the site could deliver approx. 4,000 jobs. • Access into the site should be considered achievable along with Lower Thames Crossing proposals which are likely to affect J29 M25. • Additional land around J29 should be identified for Green Belt release in the LDP to accommodate land and works needed in relation to Lower Thames Crossing.

Site	Summary
	<ul style="list-style-type: none"> Looking to submit an application in time of EiP of the LDP.
E12: Childerditch Industrial Estate	<p>Childerditch Properties</p> <ul style="list-style-type: none"> Support the allocation. The existing site comprises 35 units, proposed extension and redevelopment of site could accommodate 50 units. Expected that development will commence on site within the first few years of the plan period. Support principle of policy requirement to improve walking and cycling links but only within landownership area, this extends to Little Warley Hall Lane, this criterion should be removed. Do not consider that improvements to the A127 junction would be necessary.
E13: East Horndon Hall	<p>MM Properties</p> <ul style="list-style-type: none"> Strongly support site E13. Site makes a significant contribution to the provision of new employment floorspace in Brentwood, is deliverable and appropriate to be released from the Green Belt. However, the draft wording of Policy E13 is not clear which part of the site the 5.5ha of employment land relates and whether this comprises additional employment land or whether it should include existing business uses within the red line area. Moreover, the extent of the developable area and floorspace should include the existing garden centre and East Horndon Hall, previously developed sites, and the additional floorspace.

3. Resident main issues representations summary

There have been representations made (support or object) on almost every section of the Pre-Submission Local Plan (Regulation 19), and in particular every proposed site allocation. The summaries below are a selection of those elements of the plan that have received the most objections.

Part of Plan	Consultee	Summary
Policy SP01: Sustainable Development	Blackmore residents and Blackmore Village Heritage Association	<ul style="list-style-type: none"> No clear strategy for villages in the north of the borough. BBC has not fully consulted with or considered the development of Epping Forest DC and Chelmsford City Council. More reasonable options should have been considered with regard to sites. More consideration of brownfield needed.

Part of Plan	Consultee	Summary
		<ul style="list-style-type: none"> Infrastructure not sufficient for proposed development. Will have a great impact on existing residents.
Policy SP02: Managing Growth	Blackmore residents and Blackmore Village Heritage Association	<ul style="list-style-type: none"> No clear strategy for villages in the north of the borough. BBC has not fully consulted with or considered the development of Epping Forest DC and Chelmsford City Council. More reasonable options should have been considered with regard to sites. More consideration of brownfield needed. Infrastructure not sufficient for proposed development. Will have a great impact on existing residents.
SP04: Developer Contributions	Agents/landowners/developers	<ul style="list-style-type: none"> Need to ensure that contributions required are clear and don't impact on viability of development.
Policy HP01: Housing Mix	Residents (many of the comments on this policy are from agents/developers)	<ul style="list-style-type: none"> Proportion of self build plots is too high. Proportion of self build plots is too low. Clarification of accessibility needs. How is policy applied to strategic sites where phasing could mean separation of types/sizes of homes. Needs to take into account local area/sub area need.
Policy SP05 Affordable Housing	Residents (many of the comments on this policy are from agents/developers)	<ul style="list-style-type: none"> Need to raise level of affordable homes Needs to relate to viability more clearly
PC03: Employment Land Allocations	Many of the comments on this policy are from agents/developers	<ul style="list-style-type: none"> Needs stronger policy resistance to loss of employment land.
Policy NE06: Flood Risk	Residents Blackmore Residents and Blackmore Village Heritage Association	<ul style="list-style-type: none"> Site specific concerns over flood risk, in particular surface water flood risk. Specific concern over flooding, particularly surface water flooding, in sites R25 and R26 in Blackmore. Previous flooding in area experienced.
Policy NE09: Green Belt Policy NE13: Site allocations in the Green Belt	Residents Blackmore Residents and Blackmore Village Heritage Association	<ul style="list-style-type: none"> Site specific concerns over impact of development on Green Belt. Specific concern over loss of Green Belt, particularly in sites R25 and R26 in Blackmore. Should use brown field sites first.
Dunton Hills Garden Village Strategic Allocation	Residents West Horndon Parish Council and Dunton Community Association	<ul style="list-style-type: none"> Access should be defined. Poses flood risk to area. Capacity of railway is not sufficient for new village.

Part of Plan	Consultee	Summary
(DHGV): Policy R01 (I): Strategic Allocation; R01 (II): Spatial Design; R01 (III): Delivery and Management	(many of the comments on this policy are from Agents/developers)	<ul style="list-style-type: none"> • Impact on roads and other infrastructure will be too great, especially in Basildon. • Proposed village size is too big. Out of balance with development in the borough. • Shouldn't be building on Green Belt. • Impacts too great – on flooding, wildlife, agriculture. • Will impact on Dunton Waylets. • Impacts with Thurrock Council proposed development, lack of joined up thinking. • Needs public transport links with stations and other built up areas. • Need to consider viability of all infrastructure requirements. • Predicted speed to build out rates is too high and unrealistic. • Need to consider bridle ways and sport facilities. • Need to consider improvement to wildlife habitat, effective water management, habitat connectivity, access to natural green spaces.
Site R19: Land at Priests Lane	Residents; Priests Lane Neighbourhood Residents Association	<ul style="list-style-type: none"> • No technical basis to support plan. • Councils consultation and decisions are inconsistent and not evidence based. • Failure to preserve a Protected Open Urban Space, previously a school playing field. • Site is a potential flooding hotspot, previous development was rejected on this basis. • Traffic analysis is insufficient and based on cherry-picked and flawed data sets. • Detailed technical evidence demonstrating the access from Priests Lane to the site doesn't meet road design guidelines and is unsafe, has been ignored.
Sites R25: Land North of Woollard Way	Blackmore residents and Blackmore Village Heritage Association	<ul style="list-style-type: none"> • The principle of residential development off of Red Rose Lane is wrong, Blackmore is an isolated village with modest services and infrastructure (the school and preschool is full, the doctors surgery in Doddinghurst is already over subscribed, inadequate bus service, narrow lanes and already dangerous parking, sewerage system is overloaded already etc). • There are more suitable and or sustainable locations, eg urban extensions of Brentwood (eg Honeypot Lane), and the locations in Blackmore so not promote sustainable development. • BBC has not demonstrated that there are other brownfield sites that are available and which should take priority over the

Part of Plan	Consultee	Summary
		<p>Greenfield/Green Belt land off of Red Rose Lane.</p> <ul style="list-style-type: none"> • BBC has failed to demonstrate that the required housing could not be met by increasing housing density on other (allocated) sites. • There has been no 'housing needs survey' to demonstrate why Blackmore village is included in the LDP. • The access off/from Red Rose Lane is entirely unsuitable for this volume of traffic movements. • The entire village is prone to severe flooding, and sites R25 and R26 are both liable to flood. Building on this land will only increase the flood risk elsewhere in the village. • Both fields (R25 and R26) are teeming with wildlife – hundreds of birds nest in the hedgerows within and around the fields. We have photographic evidence (stills and videos) of certain protected species (bats, Barn Owls, Great Crested Newts).
Site R26: Land North of Orchard Piece	Blackmore residents and Blackmore Village Heritage Association	<ul style="list-style-type: none"> • The principle of residential development off of Red Rose Lane is wrong, Blackmore is an isolated village with modest services and infrastructure (the school and preschool is full, the doctors surgery in Doddinghurst is already over subscribed, inadequate bus service, narrow lanes and already dangerous parking, sewerage system is overloaded already etc). • There are more suitable and or sustainable locations, eg urban extensions of Brentwood (eg Honeypt Lane), and the locations in Blackmore so not promote sustainable development. • BBC has not demonstrated that there are other brownfield sites that are available and which should take priority over the Greenfield/Green Belt land off of Red Rose Lane. • BBC has failed to demonstrate that the required housing could not be met by increasing housing density on other (allocated) sites. • There has been no 'housing needs survey' to demonstrate why Blackmore village is included in the LDP. • The access off/from Red,Rose Lane is entirely unsuitable for this volume of traffic movements. • The entire village is prone to severe flooding, and sites R25 and R26 are both liable to flood. Building on this land will

Part of Plan	Consultee	Summary
		<p>only increase the flood risk elsewhere in the village.</p> <ul style="list-style-type: none"> Both fields (R25 and R26) are teeming with wildlife – hundreds of birds nest in the hedgerows within and around the fields. We have photographic evidence (stills and videos) of certain protected species (bats, Barn Owls, Great Crested Newts).
Policy E11: Brentwood Enterprise Park	Dunton Community Association	<ul style="list-style-type: none"> Need to retain existing bridle way on bridge. Proposal is inappropriate in a site which had refusal for smaller temporary buildings previous. Would significantly impact on critical Green Belt, gap between Basildon and Havering. Would frustrate the objectives of Thames Chase Community Forest. Overdevelopment in the A127 corridor.
Appendix 1: Local Development Plan Housing Trajectory	Residents	<ul style="list-style-type: none"> General comments regarding whether the trajectory for the strategic sites is realistic and should be revisited. Housing trajectory is overly optimistic.

END

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