



# Agenda

## Extraordinary Council

Wednesday, 23 March 2022 at 7.00 pm  
Council Chamber, Town Hall, Ingrave Road, Brentwood,  
Essex CM15 8AY

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### Membership (Quorum – 10 )

Cllrs Ms Sanders (Mayor), Reed (Deputy Mayor), Aspinell, Barber, Barrett, Dr Barrett, Bridge, J Cloke, S Cloke, Cuthbert, Mrs Davies, Fryd, Mrs Fulcher, Gelderbloem, Haigh, Heard, Hirst, Mrs Hones, Hossack, Jakobsson, Kendall, Laplain, Lewis, McLaren, Mynott, Naylor, Nolan, Parker, Mrs Pearson, Poppy, Mrs Pound, Russell, Tanner, Tierney, Wagland, White and Wiles

*Members are respectfully summoned to attend the above meeting to transact the business set out below.*

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### Agenda

Item	Item	Wards(s) Affected	Page No
	<b>Live broadcast</b>		
	<b>Live broadcast</b>		
	<a href="#">Live broadcast to start at 7pm and available for repeat viewing.</a>		
	<b>Contents</b>		
1.	<b>Apologies for Absence</b>		
2.	<b>Declaration of Interest</b>		
3.	<b>Brentwood Local Plan 2016-2033: Adoption</b>	All Wards	5 - 982
4.	<b>Urgent Business</b>		
	To consider any matter which, by reason of special		

circumstances to be specified in the minutes of the meeting, the Mayor considers should be considered at the meeting as a matter of urgency.

A handwritten signature in black ink, appearing to read 'J. Stephenson', is centered on a light blue rectangular background.

Jonathan Stephenson  
Chief Executive

Town Hall  
Brentwood, Essex  
08.03.2022

## Information for Members

Please note the changes in blue apply to remote meetings

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### Introduction

The Government has enacted The Local Authorities and Police and Crime Panels (Coronavirus) (Flexibility of Local Authority Police and Crime Panel Meetings) (England and Wales) Regulations 2020 no 392 (the Regulations) which came into force on the 4 April 2020 and will remain in force until the 7 May 2021.

The Council will hold Committee meetings remotely and enable the public to participate by streaming those meetings that are open to the public.

Only those Committee meetings where the public have a right to speak will the facility be available to enable them to participate where the technology is not available for them to exercise this right then their participation will be by written communication read out at the remote meeting.

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### Substitutes

The names of substitutes shall be announced at the start of the meeting by the Chair and the substitution shall cease at the end of the meeting.

Where substitution is permitted, substitutes for quasi judicial/regulatory committees must be drawn from Members who have received training in quasi- judicial/regulatory decision making. If a casual vacancy occurs on a quasi judicial/regulatory committee it will not be filled until the nominated member has been trained.

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### Rights to Attend and Speak

Any member may remotely attend any Committee to which these rules apply.

Any Members may attend any Committee to which these procedure rules apply.

A Member who is not a member of the Committee may speak at the meeting. The Member may speak at the Chair's discretion, it being the expectation that a Member will be allowed to speak on a ward matter.

Members requiring further information, or with specific questions, are asked to raise these with the appropriate officer at least two working days before the meeting.


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### Point of Order/ Personal explanation/ Point of Information

Point of Order	Personal Explanation	Point of Information or clarification
A member may raise a point of order at any time. The Mayor will hear them immediately. A point of order may only relate to an alleged breach of these Procedure Rules or the law. The Member must indicate the rule or law and the way in which they consider it has been broken. The ruling of the Mayor on the point of order will be final.	A member may make a personal explanation at any time. A personal explanation must relate to some material part of an earlier speech by the member which may appear to have been misunderstood in the present debate, or outside of the meeting. The ruling of the Mayor on the admissibility of a personal explanation will be final.	A point of information or clarification must relate to the matter being debated. If a Member wishes to raise a point of information, he/she must first seek the permission of the Mayor. The Member must specify the nature of the information he/she wishes to provide and its importance to the current debate, If the Mayor gives his/her permission, the Member will give the additional information succinctly. Points of Information or clarification should be used in exceptional circumstances and should not be used to interrupt other speakers or to make a further speech when he/she has already spoken during the debate. The ruling of the Mayor on the admissibility of a point of information or clarification will be final.

** Access to Information and Meetings**

You have the right to **remotely** attend all meetings of the Council and Committees. You also have the right to see the agenda, which will be published no later than 5 working days before the meeting, and minutes once they are published. Dates of the meetings are available at [www.brentwood.gov.uk](http://www.brentwood.gov.uk).

** Guidelines on filming, photography, recording and use of social media at council and committee meetings**

**The Council will be holding remote Committee meetings and will make these accessible to the public remotely by being recorded and streamed. Whilst the Regulations apply the following paragraphs will not apply to the meetings of the Council.**


The council welcomes the filming, photography, recording and use of social media at council and committee meetings as a means of reporting on its proceedings because it helps to make the council more transparent and accountable to its local communities.

Where members of the public use a laptop, tablet device, smart phone or similar devices to make recordings, these devices must be set to 'silent' mode to avoid interrupting proceedings of the council or committee.

If you wish to record the proceedings of a meeting and have any special requirements or are intending to bring in large equipment then please contact the Communications Team before the meeting.

The use of flash photography or additional lighting may be allowed provided it has been discussed prior to the meeting and agreement reached to ensure that it will not disrupt proceedings.

The Chair of the meeting may terminate or suspend filming, photography, recording and use of social media if any of these activities, in their opinion, are disrupting proceedings at the meeting.

** Private Session**

Occasionally meetings will need to discuss some of its business in private. This can only happen on a limited range of issues, which are set by law. When a Committee does so, you will be asked to leave the meeting.

**The Chair or Clerk to the Committee will disconnect all persons who should leave the meeting prior to continuing there will be a short break to ensure that this has happened.**

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** Access**

**The Council will provide remote access for public participation by the meeting be accessible.**

There is wheelchair access to the meeting venue from the Main Entrance. If you do wish to attend this meeting, please contact the clerk should you have specific accessibility needs. There is an induction loop in the meeting room.

** Evacuation Procedures**

**This procedure does not apply whilst using remote meetings**

Evacuate the building using the nearest available exit and congregate at the assembly point in the Car Park.

# Agenda Item 3

<b>Committee(s):</b> Extraordinary Council	<b>Date:</b> 23 March 2022
<b>Subject:</b> Brentwood Local Plan 2016-2033: Adoption	<b>Wards Affected:</b> All
<b>Report of:</b> Phil Drane, Corporate Director (Planning & Economy)	<b>Public</b>
<b>Report Author/s:</b> Name: Jonathan Quilter, Corporate Manager (Strategic Planning) Telephone: 01277 312735 E-mail: jonathan.quilter@brentwood.gov.uk	<b>For Decision</b>

## Summary

The Brentwood Local Plan 2016-2033 is a vitally important document that provides a framework to guide future development in the borough to 2033. The plan sets out an overarching vision and strategic objectives underpinned by policies to manage growth consistent with our “borough of villages” character. It is the blueprint to help physically deliver the council’s corporate priorities and objectives.

The National Planning Policy Framework requires local planning authorities to produce a local plan for their area. The Council has prepared a new plan having undertaken various stages of public consultation through the plan-making process.

The preparation stage of the plan-making process took place between 2009 and 2019, with several Regulation 18 consultations and publication of the plan at Regulation 19 in 2018 followed by further consultation in 2019. The examination stage began in February 2020 when the plan was submitted to the Planning Inspectorate. The examination included hearing sessions held in December 2020, February, March and July 2021. This was followed by a consultation on Potential Main Modifications. The appointed planning inspectors have completed the examination stage by concluding that the plan and modifications recommended in their final report satisfies the requirements of legal compliance and is sound. This means that the council is now able to progress to the final stage of the plan-making process: adoption.

This report recommends that the council adopt the local plan with the main modifications recommended by the inspectors and additional modifications. In addition, there are several other recommendations related to the need to endorse accompanying material as part of the adoption process. One of the required modifications is that the council needs to immediately begin a partial review and update of the plan to account for longer-term growth needs. The timeframes for undertaking this review need to be considered alongside supporting planning policy documents as part of the council’s Local Development Scheme.

## Recommendations

**Members are asked to:**

- R1. Adopt the Brentwood Local Plan 2016-2033 (Appendix A), which incorporates the Main Modifications recommended by the Planning Inspectors (Appendix C) and Additional Modifications (Appendix D). In doing so, this will replace the Brentwood Replacement Local Plan (2005).**
- R2. Subject to recommendation 1, that the council endorses the updated Policies Map (Appendix G) in line with the proposed changes (Appendices E and F), which are necessary to give effect to the policies of the adopted Local Plan as modified, and that the Policies Map be published alongside the Brentwood Local Plan 2016-2033.**
- R3. Subject to recommendation 1, delegate authority to the Corporate Director of Planning and Economy, in consultation with the Leader of the Council and Chief Executive, to make any minor non-material corrections as additional modifications to the adopted Brentwood Local Plan 2016-2033 as considered necessary ahead of publication and publicity in accordance with the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended).**
- R4. Subject to recommendation 1, endorse that work begin on a Partial Review and Update of the Brentwood Local Plan 2016-2033, as required in the Main Modifications, and that the council's Local Development Scheme is revised and presented to a future meeting of the Policy, Resources and Economic Development Committee.**

## Main Report

### **Introduction and Background**

- 1. The National Planning Policy Framework (NPPF) requires local planning authorities to produce a Local Plan for their area (Chapter 3 “plan-making”). Brentwood Borough Council has prepared a new Local Development Plan (Brentwood Local Plan 2016-2033 – “local plan” or “the plan”), having undertaken various stages of public consultation as part of the plan-making process. The plan sets out the long-term vision for how and where the borough will grow over the next 15-years, meeting local needs consistent with its unique character (the “borough of villages” and transport/transit corridor-led growth).
- 2. The Local Plan is a vitally important document that provides a framework to guide future development in the borough to 2033. It sets out a spatial strategy and policies for managing development and supporting infrastructure to meet

the environmental, social and economic opportunities and challenges facing the area. The plan helps to shape the place.

3. The local plan seeks to deliver at least 7,752 new homes and 5,000 jobs through the provision of 46.64 hectares of new employment land as well as retail and other uses. Its strategy and underpinning policies balance the need for growth in a constrained, high-quality environment with the essential requirement to protect and enhance the borough's highly valued assets, character and identity.

#### **Plan-making process (preparation, examination and adoption stages)**

4. There are three distinct and sequential stages in the statutory plan-making process under Part 2 of the Planning and Compulsory Purchase Act 2004 ("the 2004 Act"). These are:
  - a) Preparation stage, which ends when the local planning authority submits the Local Plan to the Secretary of State for independent examination.
  - b) Examination stage, where a planning inspector determines whether the submitted plan is sound and legally compliant. This ends when the inspector delivers their final report to the local planning authority.
  - c) Adoption stage, when the local planning authority decides whether to accept the recommendation made by the inspector in their final report.
5. Work on the local plan commenced in 2009, informed by other stages prior to this and after the adoption of the current Brentwood Replacement Local Plan in 2005. The plan has been subject to nine public consultations: Issues and Options (2009); Neighbourhood Consultation (2011); Preferred Options (2013); Strategic Growth Options (2015); Draft Local Plan (2016); Preferred Site Allocations (2018); Pre-Submission and subsequent Addendum of Focussed Changes (2019); and Main Modifications (2021). Following submission, the plan has been independently examined and is supported by an extensive evidence base.
6. Preparation stage of the plan-making process took place with consultation required under Regulation 18 of the Town and Country Planning (Local Planning) Regulations 2012. The Pre-Submission Local Plan (Regulation 19) was approved by Extraordinary Council on 8 November 2018 (Item No. 181) and published for consultation in February 2019. An Addendum of Focussed Changes to the plan was published for consultation in October 2019 and subsequently approved to be submitted with the pre-submission plan by Ordinary Council on 22 January 2020 (Item No. 333).

7. Examination stage of the plan-making process began on 14 February 2020 when the local plan was submitted to the Planning Inspectorate. The now Secretary of State for Levelling Up, Housing and Communities appointed planning inspectors Yvonne Wright BSc (Hons) Dip TP DMS MSc MRTPI and Mike Worden BA (Hons) Dip TP MRTPI, to conduct an independent examination into the legal compliance and soundness of the plan. Examination hearings were held in December 2020, February, March and July 2021. An overview of examination timeframes and key figures is set out in Appendix N.
8. In response to issues raised by the inspectors' during the examination period, the council consulted on the potential modifications to the plan, necessary in order for it to be sound. Consultation on the Potential Main Modifications took place between 30 September and 11 November 2021.
9. Several further additional modifications to the plan were also prepared and made available for information purposes during the consultation. The inspectors' did not require these to be subject to public consultation as they do not alter the soundness of any policies or allocations. An updated schedule of additional modifications has been prepared since the consultation and is set out in Appendix D.
10. Approximately 1,362 duly made representations were received from 352 respondents to the modifications consultation. These included statutory bodies such as Essex County Council, National Highways, Natural England and Sport England, local organisations, and site promoters/developers. Further details of the consultation and matters raised in representations are contained within the 'Schedule of Potential Main Modifications Consultation Feedback Report' (Appendix K).
11. The representations to the modifications consultation have been published and shared with the inspectors' in full. The inspectors' considered the representations alongside the key issues they identified during the examination period. This helped them reach their conclusion, shared with us in their final report.
12. The inspectors' final report was received on 23 February 2022 (Appendix B). The 'Overall Conclusion and Recommendation' (paragraphs 363-364 of the report) was that:
  - a) "363. The Plan has a number of deficiencies in respect of soundness and legal compliance for the reasons set out above, which mean that we recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.



- b) 364. The Council has requested that we recommend MMs to make the Plan sound and legally compliant and capable of adoption. We conclude that the duty to cooperate has been met and that with the recommended MMs set out in the Appendix, the Brentwood Local Plan Pre-Submission Document and the Addendum of Focussed Changes to the Pre-Submission Local Plan, satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.”
13. The main modifications all concern matters that were discussed during the examination hearing sessions. The inspectors’ have recommended the inclusion of these modifications to the plan after considering all the representations made in response to consultation on them. The main modifications are appended to the inspectors’ final report (Appendix C) and summarised below. In some cases, the inspectors’ have amended their detailed wording and/or added consequential modifications where necessary.
14. The main modifications can be summarised as follows:
- a) Clarifying which existing development plan policies are superseded;
  - b) Clarifying which policies are strategic;
  - c) Merging policies to clearly set out the spatial strategy;
  - d) Inserting new policies on the settlement hierarchy and the need for an immediate plan update;
  - e) Amending the stepped housing requirement;
  - f) Deleting, merging and amending development management policies including on Green Belt, heritage, transport and design;
  - g) Amending the site allocation policies to remove ambiguity and clarify development requirements;
  - h) Updating the housing supply figures and housing trajectory to reflect the evidence;
  - i) Deleting housing allocations that have gained planning permission;
  - j) Amending the Gypsy and Traveller policies;
  - k) Replacing the monitoring framework; and

- l) Several other modifications to ensure that the plan is positively prepared, justified, effective and consistent with national policy.
15. The further modifications made by the inspectors' since the consultation on the Schedule of Potential Main Modifications included:
- a) MM10: Policy MG06 Local Plan Review and Update - amended wording of the policy to add 'Update' to accord with national policy and ensure it is justified, as it is clear an update is necessary. A consequential change was also made to MM116: List of strategic and non-strategic policies;
  - b) MM51: Policy BE16 Conservation and Enhancement of Historic Environment - revised in relation to non-designated heritage assets to ensure consistency with national policy;
  - c) MM57: Policy MG01 Spatial Strategy - employment requirement range adjusted from "33.76 to 45.96ha" to "38.41 to 50.61ha" to reflect revised evidence presented during the examination;
  - d) MM74: Policy NE01 Protecting and Enhancing the Natural Environment - revised so that it effectively reflects the Essex coast recreational disturbance avoidance and mitigation strategy (RAMS) requirements, clarifies that a small part of the borough is within the Epping Forest Special Area of Conservation Zone of Influence, and removed reference to the Habitats Directive;
  - e) MM85: Policy R01(II) Spatial Design of Dunton Hills Garden Village - revised to clarify that reference to public rights of way is to the network, which should be retained and enhanced. Also removed criterion 3 relating to the timing of education provision to make this effective and justified, as confirmed by Essex County Council; and
  - f) MM119: New main modification inserting appendix to local plan which lists plans and policies to be superseded. This was made public prior to the first hearing session and discussed during the examination. Necessary to add as appendix to the plan as this is a legal requirement. The addition does not undermine the participatory process.
16. The adoption stage of the plan-making process can now be achieved because the local plan is deemed to be sound with modifications. The proposed adoption version of the plan incorporating main modifications (Appendix C) and additional modifications (Appendix D) has been produced (Appendix A). 'Additional Modifications' are changes to the plan that (when taken together) do

not materially affect the policies that would be set out in the plan if it was adopted with the main modifications.

17. As such, additional modifications are not subject to the formal examination process and are limited to minor clarifications, updating references, and the corrections of factual, grammatical, and typographical errors.

### **Policies map**

18. The council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. At submission the council was required to provide a submission policies map showing the changes to the then adopted and current policies map (2005) that would result from the proposals in the submitted local plan. The submission policies map comprised the set of plans identified as 'Proposed Changes to Policies Map' (Appendix E).
19. The policies map is not part of the local plan to be adopted, nor was it formally examined by the inspectors'. As such, it is not within the inspectors' remit to recommend main modifications to the policies map. However, some of the main modifications require consequential changes to the policies map. If the local plan is adopted, in order to comply with the legislation and give effect to the plan's policies, the council will need to update the adopted policies map to include all the changes proposed in the 'Proposed Changes to Policies Map' (Appendix E) and the further changes published alongside the main modifications in the 'Proposed Changes to the Submitted Policies Map' (Appendix F).

### **Partial review and update of the local plan**

20. Main modification 10 (MM10) sets out that the Council needs to immediately begin a partial review and update of the local plan to account for longer-term growth needs towards the end of the plan period and beyond (inserting new Policy MG06). To define what partial means, a scope will need to be set to define what parts of the plan are to be updated. This has been partly confirmed by the agreed wording of the new policy in terms of identifying sites to meet housing needs and identifying necessary highways and transport infrastructure to support this growth. However, it could also include an update to fast-changing subjects such as environmental and sustainability ambitions, as some other local planning authorities have included in their reviews.
21. The timeframes for undertaking this update are specified in the agreed new policy wording to commence immediately upon the adoption of the plan with submission of the update for examination within 28-months. If the plan is

adopted this would mean that submission of the update should take place by 31 July 2024. This will need to be confirmed and considered alongside supporting planning policy documents, such as progressing the adoption of a Community Infrastructure Levy (CIL) for the borough. Therefore, the council's Local Development Scheme (LDS) should be updated and brought to members for approval in due course. The local development scheme sets out the planning policy framework for the borough, highlighting planning policy related documents to be prepared alongside the local plan and their timeframes for completion. It is proposed to report a revised local development scheme to members in summer 2022.

### **Preparation of new Supplementary Planning Documents**

22. The council is currently preparing a new Supplementary Planning Document (SPD) for the detailed design guidance at Dunton Hills Garden Village, which will provide further detail on the interpretation and implementation of related policies in the local plan. SPDs cannot introduce new planning policies into the plan but are a 'material consideration' for planning decision-making. The Dunton Hills Garden Village Design Guidance SPD has been subject to public consultation and subject to the adoption of the local plan, will be brought to members for approval in summer 2022.
23. The need for any additional SPDs to support the local plan will be considered and reflected in an updated local development scheme. As above, it is proposed that a revised LDS will be brought to members in summer 2022 also.

### **Issue, Options and Analysis of Options**

24. The examination stage of the plan-making process concluded when the inspectors' sent their final report to the council. The inspectors' conclusion that the plan with modifications is sound means that the local plan is capable of adoption. The council has now reached adoption stage and has a binary choice: either (option 1) resolve to adopt the plan with the main modifications recommended by the inspectors' and additional modifications; or (option 2) decide not to adopt the plan.
25. The Council cannot adopt the plan unless it does so in accordance with the inspectors' recommendation. The inspectors' have concluded that all the recommended main modifications are necessary to make the plan legally sound. As such, the council is not permitted to adopt the plan without some or all the main modifications, or with alternative modifications. The council is not empowered to amend or materially change the plan and in effect the main modifications in the inspectors' final report are 'binding' on the council.

26. At this stage of the process, Government guidance on plan-making is clear on the expectation of the council, stating *“While the local planning authority is not legally required to adopt its local plan following examination, it will have been through a significant process locally to engage communities and other interests in discussions about the future of the area, and it is to be expected that the authority will proceed quickly with adopting a plan that has been found sound.”*<sup>1</sup>

27. A summary of the two options is set out below:

**Option 1 (this is the recommended option)**

28. Adopt the local plan (and agree to make the necessary alterations to the adopted policies map) with the main modifications recommended by the inspectors’ and additional modifications that (taken together) do not materially affect the policies in the local plan with the main modifications.

29. Adopting the local plan will ensure that the council has an up-to-date strategic planning framework for the borough that provides more control and certainty at the planning application stage and protects communities from speculative applications. It will also assist in the delivery of the council’s corporate objectives, including climate change and placemaking ambitions, and support job creation and regeneration.

30. Having an up-to-date local plan also provides many other benefits, such as:

- a) Long-term strategy that will ensure local needs for new homes, employment, shops, open space and supporting infrastructure, are met in a sustainable and appropriate manner (i.e. consistent with local character and directed towards sustainable locations);
- b) Certainty for local communities, service providers, businesses and investors as to where and when development will be provided and where development will be restricted;
- c) Clear strategic policy framework in which Neighbourhood Plans can be prepared;
- d) Sufficient housing land supply on deliverable sites to demonstrate at least five years of supply and identify further sites for the remainder of the plan period to 2033, reducing the likelihood of development that is

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<sup>1</sup> Planning Practice Guidance Paragraph: 058, Reference ID: 61-058-20190315

contrary to up-to-date planning policies being overturned on appeal, with consequent financial benefits;

- e) Strengthens the council's position in bidding for external resources from Government and other agencies;
  - f) Increased housing completions and commercial development will enable the council and partners to benefit from developer contributions towards new infrastructure and growth through Section 106 agreements, council tax and business rates; and
  - g) Minimises the need for separate viability assessments to be considered at the planning application stage, as planning applications that fully comply with the local plan should be assumed to be viable.
31. Once the plan is adopted, it will become part of the statutory Development Plan for the council's administrative area alongside the:
- a) Essex Minerals Local Plan (2014);
  - b) Essex and Southend-on-Sea Waste Local Plan (2017); and
  - c) Any 'made' (adopted) Neighbourhood Plans.
32. As per section 38(6) of the Planning and Compulsory Purchase Act 2004, planning applications must be determined in accordance with the development plan unless material considerations indicate otherwise.
33. Once adopted, the plan will replace in their entirety the policies and Proposals (Policies) Map of the Brentwood Replacement Local Plan (August 2005).

## **Option 2**

34. Not adopt the local plan (and associated Policies Map) as modified in accordance with the Inspectors' Report.
35. The local plan can only be adopted with all the Main Modifications recommended by the Inspectors'. Not adopting the plan would mean that the existing out of date local plan policies would remain. The council would not have robust and up to date policies to implement placemaking and climate change ambitions and would likely face an increasing number of speculative planning applications and appeals, and this would incur significant costs. The resources incurred to prepare this plan would have been largely wasted.

36. A decision not to adopt the plan would cause concern and likely intervention by the Secretary of State, as well as legal challenges by site promoters. In November 2017 the council received a letter from the Secretary of State for the then Ministry of Housing, Communities and Local Government regarding the threat of Government intervention in the Brentwood plan-making process. The council responded in January 2018 with details of the exceptional circumstances for why plan-making is particularly difficult in the borough, such as substantially increased (and changing) housing needs; 89% of the borough being within London's Metropolitan Green Belt; and infrastructure capacity issues. In addition, progress made on strategic planning across South Essex displayed the council's commitment to joint working so that wider aims for housing delivery and infrastructure investment could be achieved. In March 2018 the Secretary of State confirmed that the council's plan-making process would not be intervened, but that the Government would be monitoring progress. Officers have remained in regular contact with officials from the now Department for Levelling Up, Housing and Communities. Discussions have indicated that departures from the council's Local Development Scheme (local plan timetable) would not be viewed favourably and increase the likelihood of intervention. A decision not to adopt a plan that has been examined and deemed to be sound would almost certainly provoke an intervention by the Secretary of State.

### **Reasons for Recommendation**

37. Adopting the local plan will ensure that the council has an up-to-date strategic planning framework for the borough. This will provide more control and certainty through planning decision-making and protect communities from speculative applications. The plan will provide a blueprint for the borough's future and be a key delivery vehicle for the council's corporate objectives, helping to grow the economy, protect the environment, develop communities, improve housing, and deliver an effective and efficient council.
38. Adopting the plan will require endorsement of the accompanying policies map. To comply with the legislation and give effect to the plan's policies, the council will need to update the adopted policies map to include all the changes proposed and the further changes published alongside the main modifications.
39. If the plan is adopted, a glossier final version will be required for practical use, both online and hard copy. Therefore, delegation of authority is sought for any minor typo and/or graphic design amendments before the document is published.
40. Work to progress an update and review of the local plan should start immediately in line with required modifications to Policy MG06. Timeframes for

necessary stages of the update and review process will need to be considered alongside other priorities, such as introducing a Community Infrastructure Levy for the borough, and brought to a future meeting of the Policy, Resources and Economic Development Committee to approve an updated programme of works in a revised Local Development Scheme.

## **Consultation**

41. The local plan has been subject to extensive public consultation over several years. This has been undertaken in accordance with regulations (for example Regulations 18 and 19 consultation and through the examination), and the council's adopted Statement of Community Involvement (SCI).
42. Following adoption of the plan, the council will notify those who have made representations (along with other persons and organisations on the local plan consultation portal database) that the plan has been adopted and make the adoption documents available in accordance with Regulations 26 and 25.
43. As soon as reasonably practicable after adoption of the local plan, other regulations in the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended) and The Planning and Compulsory Purchase Act 2004 (as amended) require the council to make available:
  - a) The Local Plan;
  - b) An Adoption Statement;
  - c) The Sustainability Report; and
  - d) Details of where the Local Plan is available for inspection and the places and times at which the document can be inspected.
44. The council is also required to send the Adoption Statement (Appendix H) to anyone who requested to be kept notified of the local plan adoption, and the Secretary of State for Levelling Up, Housing and Communities.

## **References to Corporate Plan**

45. The local plan is a key delivery vehicle for the council's objectives set out within the Corporate Strategy 2020-2025. The plan's policies contribute towards key priorities to grow the economy, protect the environment, develop communities, improve housing and delivering an effective and efficient council.



46. Linked to these key priorities are the council's underpinning strategies across service areas. Many of these have or are being prepared alongside the local plan, such as the Economic Development Strategy, Environment Strategy, Corporate Asset Strategy, Leisure Strategy, Housing Strategy, and Parking Strategy. New strategies or future reviews will need to consider the local plan's strategic objectives and policies.

## **Implications**

### **Financial Implications**

**Name/Title: Jacqueline Van Mellaerts, Corporate Director (Finance & Resources) and Section 151 Officer**

**Tel/Email: 01277 312500/jacqueline.vanmellaerts@brentwood.gov.uk**

47. The adoption process itself does not carry significant costs and will be met within existing budgets.
48. A decision not to adopt the local plan would mean the resources used to prepare this plan would have been largely wasted. The Council must exercise its plan-making powers lawfully with regard to its general duty to act in the public interest, its fiduciary duties and in a manner which accords with the statutory purpose of the powers. It is also a statutory requirement to maintain an up-to-date development plan, and not adopting the plan would have other indirect financial implications, including defending an increasing number of planning appeals and potential losses of relevant developer contributions.
49. If the council was faced with one or more legal challenges to the local plan after its adoption, defending these would need to be funded and may impact on the resources available for other service delivery.
50. The increased housing completions and commercial development set out in the local plan will enable the council to benefit from developer contributions towards new infrastructure and growth through for example Section 106 agreements, council tax and business rates.

### **Legal Implications**

**Name & Title: Amanda Julian, Corporate Director (Law & Governance) and Monitoring Officer**

**Tel & Email: 01277 312500/amanda.julian@brentwood.gov.uk**

51. The Planning and Compulsory Purchase Act 2004, as amended ("the 2004 Act") requires local planning authorities to prepare local plans, which must be kept under review and revised as necessary. The Town and Country Planning (Local Planning) (England) Regulations 2012, as amended ("the 2012

Regulations”) set out the procedures to be followed in the preparation of such plans.

52. Pursuant to section 23 of the 2004 Act, the local planning authority may only adopt a submitted Development Plan Document (such as the local plan) in accordance with the inspectors’ recommendations, as recorded in the final report on the examination delivered to the local planning authority in accordance with section 20 of the Act. The decision to adopt under section 23(3)(b) must be taken by Full Council.
53. However, it should be noted that the powers conferred on the local planning authority by section 23(3) are discretionary in nature. The council must exercise its discretionary plan-making powers under Part 2 of the 2004 Act lawfully, in accordance with its general duty to act in the public interest, its fiduciary duties, and in a manner that gives effect to and does not defeat the statutory purpose of its power.
54. Any decision not to adopt the local plan in accordance with the inspectors’ recommendation will be amenable to judicial review. Leaving aside intervention by the Secretary of State (which is addressed below), if the council decides not to adopt the local plan it is very likely that the promoters of sites allocated for development in the plan will seek to challenge the lawfulness of the council’s decision by way of an application for judicial review.
55. The Secretary of State has the power to intervene in plan-making, this includes the plan be submitted to the Secretary of State for approval (sections 21 to 21A of the 2004 Act). Recent experience elsewhere, including South Oxfordshire District Council, indicates that a decision not to adopt the Local Plan under section 23 will almost certainly provoke an intervention by the Secretary of State. Section 27(5) empowers the Secretary of State to (a) approve the Local Plan with main modifications recommended by the inspectors’, or (b) direct the council to consider adopting the local plan by resolution of the authority.
56. Following adoption, the council will need to comply with the requirements of the 2012 Regulations to make adoption documents available and to notify persons who asked to be notified (and other consultees) as soon as reasonably practicable. On adoption of the local plan, any person aggrieved may, under Section 113 of the 2004 Act, make an application to the High Court to legally challenge the plan. This application must be made during the six-week period starting with the date of adoption. The High Court may quash the plan wholly, or in part.
57. The inspectors’ final report confirms their conclusion that the plan satisfies the legal requirements within section 20(5)(a) of the 2004 Act. The examination

was conducted in an extremely thorough and considered manner by the appointed planning inspectors'. If a legal challenge is made, the council would robustly defend the plan and its validity. Officers consider that the risk of a successful challenge is low.

### **Economic Implications**

**Name/Title: Phil Drane, Corporate Director (Planning and Economy)**

**Tel/Email: 01277 312500/philip.drane@brentwood.gov.uk**

58. The plan sets out a spatial strategy for how economic growth needs will be met over the next 15-years, including the delivery of new jobs and homes. It is important that the plan is in place to drive economic growth consistent with the Corporate Strategy 2020-2025 and Economic Development Strategy 2021-2025.
59. The plan proposes new employment land allocations, in most cases to be released from the Green Belt in line with the overall strategy for growth, and alongside new housing allocations. The allocation of this land is critical if the council is to meet local development needs and fulfil the corporate priority to grow the economy. Specifically, adoption of the plan will confirm allocation of strategic development sites at Brentwood Enterprise Park (second largest new employment site in Essex) and Dunton Hills Garden Village (first garden settlement in South Essex with new homes and employment), among other development. If the plan is not adopted this land will not be allocated, remaining within Green Belt and resulting in policy non-compliance for related planning applications.

### **Equality and Diversity Implications**

**Name/Title: Kim Anderson, Corporate Manager (Communities, Leisure & Health)**

**Tel/Email: 01277 312500/kim.anderson@brentwood.gov.uk**

60. The Public Sector Equality Duty applies to the council when it makes decisions. The duty requires us to have regard to the need to:
  - a) Eliminate unlawful discrimination, harassment and victimisation and other behaviour prohibited by the Act. In summary, the Act makes discrimination etc. on the grounds of a protected characteristic unlawful
  - b) Advance equality of opportunity between people who share a protected characteristic and those who do not.
  - c) Foster good relations between people who share a protected characteristic and those who do not including tackling prejudice and promoting understanding.

- d) The protected characteristics are age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership, race, religion or belief, gender, and sexual orientation. The Act states that 'marriage and civil partnership' is not a relevant protected characteristic for b. or c., although it is relevant for a.
61. The proposals in this report will not have a disproportionately adverse impact on any people with a particular characteristic. The Equality Act 2010 places a statutory duty on the council to ensure that when considering any new or reviewed strategy, policy, plan, project, service or procedure the impacts on particular groups, including those within the workforce and customer/public groups, have been considered. An Equality Impact Assessment (EqIA) has been undertaken at previous stages of plan preparation. This assessment is a process designed to ensure that a policy, project or scheme does not discriminate against any disadvantaged or vulnerable people. The plan's policies have been assessed accordingly. An updated version of the EqIA has been prepared considering more recent changes to the plan (Appendix L).

**Other Implications** (where significant) – i.e. Health and Safety, Asset Management, Risk Management, Section 17 – Crime & Disorder, Sustainability, ICT.

### **Climate change and sustainability**

62. A Sustainability Appraisal (SA) must be undertaken at each key stage of plan preparation. An SA Addendum for the Potential Main Modifications was produced and made available for consultation. That concluded that, having accounted for the potential modifications, the conclusions of the SA Report (October 2019), in respect of the effects of the local plan as a whole, broadly hold true for ten of the twelve SA topics. There were two instances of needing to adjust the conclusion:
- a) Housing: The effect of potential modifications was to worsen the performance of the local plan, relative to its performance at the time of submission. Specifically, whilst the SA Report concluded significant positive effects (i.e. at submission a housing supply was identified across the whole plan period), this changed to uncertain negative effects (i.e. the inspectors' concluded that the housing supply would not cover the whole plan period, and so a review was needed); and
  - b) Landscape: The effect of potential modifications was to improve the performance of the local plan, relative to its performance at the time of submission. Specifically, whilst the SA Report concluded significant negative effects, this changed to moderate negative effects.

63. An SA Adoption Statement has also been produced in accordance with the Environment Assessment of Plans and Programmes Regulations 2004 (Appendix I). The purpose of this Adoption Statement is to outline how the Strategic Environmental Assessment (SEA) process has informed and influenced the local plan development process, and to demonstrate how consultation on the SEA has been taken into account.

### **Environment**

64. A Habitats Regulations Assessment (HRA) has been undertaken at all key stages, including main modifications and this concluded that these will not result in Likely Significant Effects on the Epping Forest Special Area of Conservation and Essex coastal European sites. An HRA adoption statement (Appendix J) has been produced, which provides an overview of how the preparation of the local plan has been informed by HRAs throughout each stage.

### **Health**

65. The local plan is accompanied by a Health Impact Assessment (HIA) (Appendix M). An HIA is undertaken to identify the potential health consequences of a proposal on a specific population and/or community; maximise the positive health benefits; and minimise potential adverse effects on health and inequalities. The HIA demonstrates at a local level the impacts that development can have on health and wellbeing, and where there are opportunities to enhance health gains and mitigate against negative impacts. The HIA has informed the preparation of the plan up to this stage and led to recommendation that the process be further embedded into the planning decision-making process.

### **Risk management**

66. The risk of not having an up-to-date local plan is an identified risk on the council's Strategic Risk Register. The risk or uncertain event is the failure to adopt a plan in line with national policy. The cause of the risk is the lack of local planning policies to plan and manage development. Implications and updates from this strategic risk are reported to Audit & Scrutiny Committee regularly as part of corporate risk management.
67. The main identified consequences for which the risk score is based are planning applications being judged solely against national policy "in favour of sustainable development" and/or unplanned development. This is to set out the corporate position that planning decisions should be made locally and consistent with up-to-date local policy.

68. The current risk score as of January 2022 (before the inspectors' final report had been received) is 15 or "very high", made up of likelihood 3 and impact 5. This score has remained the same for several years. The score would likely decrease now because of the inspectors' final report and conclusion that the plan is sound subject to modifications. If the plan is adopted the risk score will reduce to 5 or "medium", made up of likelihood reducing to 1 and impact remaining at 5. This would be in line with the target score reported in the strategic risk register, i.e. the score following completion of all further actions, such as adoption of the plan. If the plan were not adopted the risk would remain at very high and be likely to increase given the threat of unplanned development and Government intervention.

### **Asset management**

69. The council is landowner of some of the site allocations in the local plan. Future redevelopment or change of use proposals for these sites (or other land) will need to consider the plan's policies. This would be relevant for the council, Brentwood Development Partnership, Seven Arches Investments Limited (SAIL), or other relevant bodies/partners. To date emerging planning policies have been considered from the outset through the development of options.

### **Background Papers**

- Item 333, Ordinary Council, 22 January 2020, Brentwood Local Development Plan: Addendum of Focussed Changes to the Pre-Submission Local Plan (Regulation 19)
- Item 181, Extraordinary Council, 8 November 2018, Brentwood Local Development Plan: Publication (Regulation 19)
- Local Plan Examination webpages (including document library): <https://www.brentwood.gov.uk/local-plan-examination>

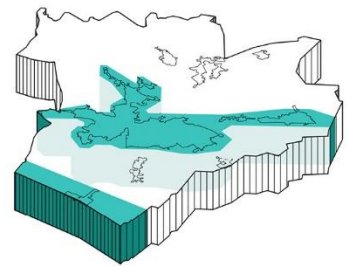
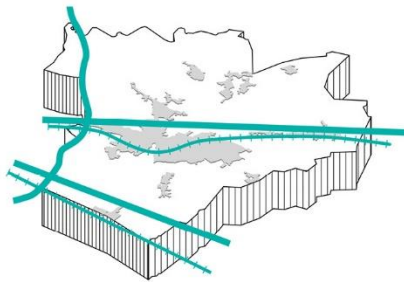
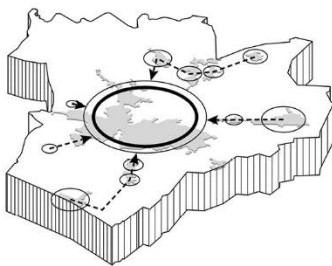
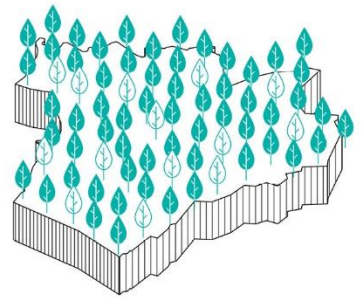
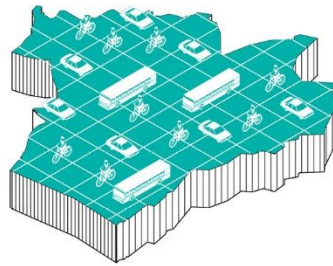
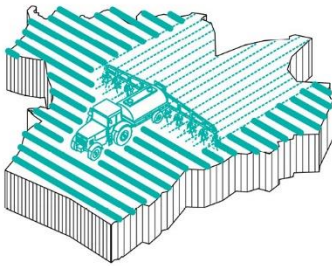
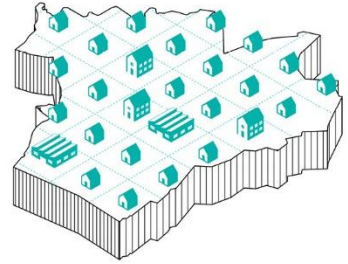
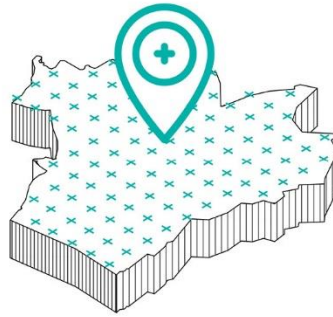
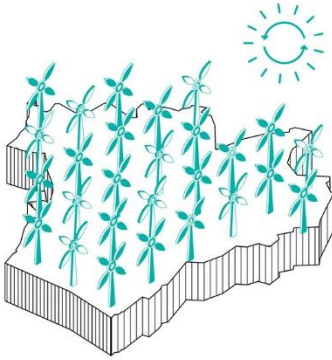
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- Appendix D: Schedule of Additional Modifications
- Appendix E: Proposed Changes to the Policies Map (February 2020)
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- Appendix J: Habitat Regulations Assessment Adoption Statement (February 2022)
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- Appendix N: Local Development Plan Examination by Numbers (February 2022)

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**BRENTWOOD LOCAL PLAN**

**2016 - 2033**



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POLICY BE05: Sustainable Drainage

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STRATEGIC POLICY BE06: Communications Infrastructure  
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### Transport Infrastructure

STRATEGIC POLICY BE08: Strategic Transport Infrastructure  
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# 01



## Introduction

### Brentwood Local Plan 2016-33

- 1.1 This Local Plan presents Brentwood Borough Council’s vision for how the borough will develop over the next 17 years, from 2016 to 2033. It outlines the Council’s strategic priorities and sets out a Spatial Strategy and supporting policies for achieving this vision.
- 1.2 The Plan identifies locations to deliver local housing needs and supporting infrastructure, such as employment, retail, leisure, community and transport. It allocates land for appropriate development, sets out strategic planning policies and an overall strategy to guide decisions on the location, pattern, scale, and quality of development and/or changes in the way land and buildings are used.
- 1.3 Policies and proposals set out in this document are also illustrated on the Brentwood Policies Map. The map identifies areas of opportunity within the borough for employment and housing, as well as important local assets that will be protected and, where possible, enhanced.

### Plan Period and Review

- 1.4 The Plan period is from 2016 to 2033 inclusive. Considering the lead-up to adoption, this will ensure the period shall be for a minimum of 15 years. Nevertheless, the Local Plan will not

remain a static document and will, in line with the legal requirement set out in Regulation 10A of the Town and Country Planning (Local Planning) (England) Regulations 2012 (as amended), be reviewed at least every five years to ensure it is still delivering on its strategic priorities in the best way possible.

## Duty to Cooperate

- 1.5 Brentwood Borough Council has a duty to engage constructively, actively and on an ongoing basis with neighbouring local planning authorities, the County Council and other statutory public bodies to ensure strategic issues that may impact the wider area are considered. This includes cross boundary issues such as transport, flooding, and environmental impacts.
- 1.6 This legal requirement was set out in Section 110 of the Localism Act 2011 and the further amendment of section 33A of the Planning and Compulsory Purchase Act 2004. Maintaining effective cooperation is also reinforced by the NPPF (2021, paragraphs 24-27), which calls for one or more 'Statements of Common Ground' to be prepared and maintained on cross-boundary matters being addressed and progress in cooperating to address these.
- 1.7 The Council is committed to cooperate with neighbouring authorities and key organisations on strategic planning issues. Since January 2018, a Memorandum of Understanding was signed between Basildon, Brentwood, Castle Point, Essex County, Rochford, Southend-on-Sea and Thurrock Councils – forming the Association of South Essex Local Authorities (ASELA), which agreed to jointly work on 'place vision' for the region. This new venture will continue to look across borough boundaries. This work is progressing at early stages and Brentwood Borough Council is committed to engaging with partners as discussions and evidence gathering progresses through the plan-making process.
- 1.8 In addition, the Council will continue to have regards to neighbouring authority plans, Essex County Council plans, and strategies of other relevant bodies.

## Sustainability Appraisal

- 1.9 A Sustainability Appraisal (SA) has been carried out at key stages in the plan-making process, in line with the Environmental Assessment of Plans and Programmes Regulations 2004. The Sustainability Appraisal recommendations at each stage have informed the production of this Local Plan.
- 1.10 The SA considered potential impacts of the Plan on economic, social and environmental considerations and how they can be mitigated. It also considered several reasonable alternatives to ensure Brentwood's growth strategy is sound.

# Habitats Regulation Assessment

- 1.11 In accordance with Regulation 63 of the Conservation of Habitats and Species Regulations 2017, a Habitats Regulation Assessment (HRA) screening has been undertaken to determine whether the Local Plan is likely, either alone or in combination with other plans and projects, to have a significant adverse impact on internationally important habitat sites.
- 1.12 To assess the in-combination impacts of new development, a need to prepare a Recreational disturbance Avoidance and Mitigation Strategy (RAMS) has been identified for the internationally important designated wildlife sites on the coast. A RAMS has been prepared (January 2019) to deliver strategic mitigation to avoid impacts on these sites from residential development within the evidenced Zone of Influence, with a view to subsequent adoption of a Supplementary Planning Document (SPD) by the Council to secure per dwelling developer contributions. Residential development that is likely to adversely affect the integrity of Habitats (European) Sites, is required to either contribute towards mitigation measures identified in the RAMS or, in exceptional circumstances, identify and deliver bespoke mitigation measures (in perpetuity) to ensure compliance with the Habitat Regulations. Mitigation is needed because these impacts, in combination with other plans and projects, cannot be ruled out and a strategic approach is advised by Natural England.
- 1.13 Similar work assessing in-combination impacts on the Epping Forest is being considered by the Council and partners.

## Planning Policy Context

- 1.14 The Local Plan has been prepared in line with the relevant Acts (Planning and Compulsory Purchase Act 2004, the Localism Act 2011, and the Town and Country Planning (Local Planning) Regulations 2012. It also takes account of the National Planning Policy Framework (2021), Planning Practice Guidance and national planning policies (Planning Policy for Traveller Sites 2015).
- 1.15 This Local Plan must be read as a whole. Proposals will be considered against all relevant policies set out in this Plan. Additionally, this Local Plan will sit alongside other key policy documents that currently exist or that may come forward during the lifespan of the Plan, which together will form the borough's development framework and be used to make decisions on planning applications:
- a. Essex County Council plans, such as transport strategies, education plans, economic growth priorities, and minerals & waste policy;
  - b. Future neighbourhood plans, which will provide more detailed planning policies to help shape the development of specific neighbourhoods; and
  - c. Future sub-regional plans, such as the South Essex Joint Strategic Plan.

## Minerals Local Plan

- 1.16 Essex County Council is the Minerals Planning Authority for the Borough. The County Council is responsible for preparing planning policies and assessing applications for mineral development. The Essex Minerals Local Plan (2014) forms part of the statutory Development Plan and should be read alongside the Brentwood Local Plan. The role of the Minerals Local Plan is to ensure a steady and adequate supply of mineral resources to facilitate development over the Plan period and beyond.
- 1.17 There are currently no active quarry sites in Brentwood. However, there are unworked sand and gravel deposits which are subject to a Minerals Safeguarding policy within the Essex Minerals Local Plan 2014. The safeguarding policy requires that Essex County Council, as minerals planning authority, be consulted on development proposals covering five hectares or more within the sand and gravel Minerals Safeguarding Area. The aim of minerals safeguarding is to ensure that mineral resources are not needlessly sterilised by non-mineral development by ensuring their prior extraction, where this is viable, before the non-mineral development is implemented.
- 1.18 Requirements of the Minerals Local Plan need to be considered where a development falls within a Minerals Safeguarding Area. The Minerals Local Plan also designates Mineral Consultation Areas at a distance of 250m around active quarries, mineral infrastructure and mineral deposits permitted for extraction. Essex County Council must be consulted on all non-mineral related development proposed within these Consultation Areas.

## Waste Local Plan

- 1.19 Essex County Council is also the Waste Planning Authority for the Borough. Essex County Council provides waste disposal infrastructure to ensure waste generated by households, and other wastes collected by Councils in Essex, is effectively managed. Brentwood borough is the Waste Collection Authority and is responsible for the collection of this municipal waste<sup>1</sup>.
- 1.20 The County Council is responsible for preparing planning policies and assessing applications for waste management development. It noted that the delivery of local plans which increase residential development, through both infilling and major developments, will impact on waste management systems on a number of levels as the resultant population growth will lead to an increase in waste arisings which require handling and disposal.
- 1.21 The Essex and Southend-on-Sea Waste Local Plan was adopted in July 2017 forming part of the statutory Development Plan and should be read alongside the Brentwood Local Plan. The Waste Local Plan covers the period 2017 to 2032. It sets out where and how waste management developments can occur and contains the policies against which waste management planning applications are assessed.
- 1.22 The Essex and Southend-on-Sea Waste Local Plan does not propose any new waste development in Brentwood. However, the Waste Local Plan does identify a number of areas

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<sup>1</sup> Municipal waste includes household waste and any other wastes collected by, or on behalf, of councils.

of search across the county where the Waste Planning Authority may support development outside of allocated waste sites. These areas of search are all existing industrial estates, and any waste use proposed on these estates will be required to be in keeping with existing development. The Waste Local Plan seeks to focus any new proposals for waste management facilities, which support local housing and economic growth, within these areas of search before other locations are considered. Two are proposed for Brentwood Borough, at Childerditch Industrial Estate and West Horndon Industrial Estate.

- 1.23 In addition, the Municipal Waste Strategy (2017-2032) is in the process of being updated and ECC is in consultation with the Essex districts, including Brentwood. The major waste treatment infrastructure currently in place for managing Local Authority Collected Municipal Waste has been equipped to accommodate the anticipated waste growth levels resulting from the proposed Local Plan growth. The strategy will review current sites (smaller waste facilities and recycling centres for household waste) and may result in changes to their location, rationalisation, and/or increased capacity. A review of existing and potential facilities will be taking place during the first five-year local plan period to determine requirements in the 10-15 year period. This is likely to result in a need to extend or expand this infrastructure offer to meet local needs. However, at this stage it is not possible to determine what these needs are.
- 1.24 The Plan also designates Waste Consultation Areas at a distance of 250m around permitted and allocated waste management facilities, extending to 400m in the case of Waste Recycling Centres. Essex County Council must be consulted on all non-waste related development within these areas to ensure that the proposed development would not adversely impact on their existing or future operation.

## South Essex Joint Strategic Plan

- 1.25 In Summer 2017, the Leaders and Chief Executives of South Essex – Basildon, Brentwood, Castle Point, Rochford, Southend-on-Sea, Thurrock and Essex County Council – embarked on a process to develop a long-term growth ambition that would underpin strategic spatial, infrastructure and economic priorities across the sub-region. The ‘South Essex 2050 Ambition’ is now being taken forward through a number of workstreams, including a spatial strategy delivered through a Joint Strategic Plan (JSP).
- 1.26 In January 2018, the authorities formed the Association of South Essex Local Authorities (ASELA) to ensure that implementation of the ambition has strong leadership and is managed on a truly collaborative basis.
- 1.27 A key task arising from the new joint working arrangements is the preparation of a Joint Strategic Plan. There is an ambition for this to deliver the homes and jobs needed in South Essex through partnership working, not just at a local level, but also with government, to bring forward the strategic infrastructure improvements to transport, education, health and green infrastructure that are needed to support growth.
- 1.28 Work on the Joint Strategic Plan is at an early stage with adoption expected in 2020. The Brentwood Local Plan will contribute towards some of the growth requirements early in that Plan. However, following the adoption of the Joint Strategic Plan it may be necessary to review the Brentwood Local Plan, at least in parts, to ensure any opportunities for further

growth and infrastructure provision in the Borough identified in the Joint Strategic Plan can be realised.

## Local Enterprise Partnership

- 1.29 The South East Local Enterprise Partnership (LEP) is the business-led, public/private body established to drive economic growth across Essex, Kent and East Sussex. Whilst the LEP has no statutory land use planning powers, it is responsible for determining local economic priorities and undertaking activities to encourage economic growth and local job creation. The Council will continue to work with the LEP and partners to realise economic growth potentials in the borough.

## Strategic and Non-strategic Policies

- 1.30 Chapter 3 sets out the borough priorities emanating from the Council's Corporate Plan as well as a number of supporting studies, spatial challenges and opportunities which formed key considerations and drivers in deriving the borough's spatial development strategy. The borough's priorities are consolidated into four strategic objectives. Figure 1.1 – Document Structure, illustrates how the policies relate to each of the strategic objectives to help Brentwood address its strategic priorities and meet these objectives.
- 1.31 Appendix 2 lists all policies and highlights those that are strategic as well as how they relate to the strategic objectives.
- 1.32 Chapters 4 to 8 set out the Local Plan policies under five thematic topics (Managing Growth, Resilient Built Environment, Housing Provision, Prosperous Communities, and Natural Environment). Each of these chapters is sub-divided into sub-themes and each sub-section begins with the strategic policies with the prefix 'Strategic'. Non-strategic policies follow these and provide more details on various development management matters.
- 1.33 There are currently three Neighbourhood Plans under development. Further information about these can be found on the Council webpages<sup>2</sup>. These are required to be consistent with, and help support the delivery of strategic policies set out in this Local Plan.

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<sup>2</sup> <https://www.brentwood.gov.uk/-/neighbourhood-planning>



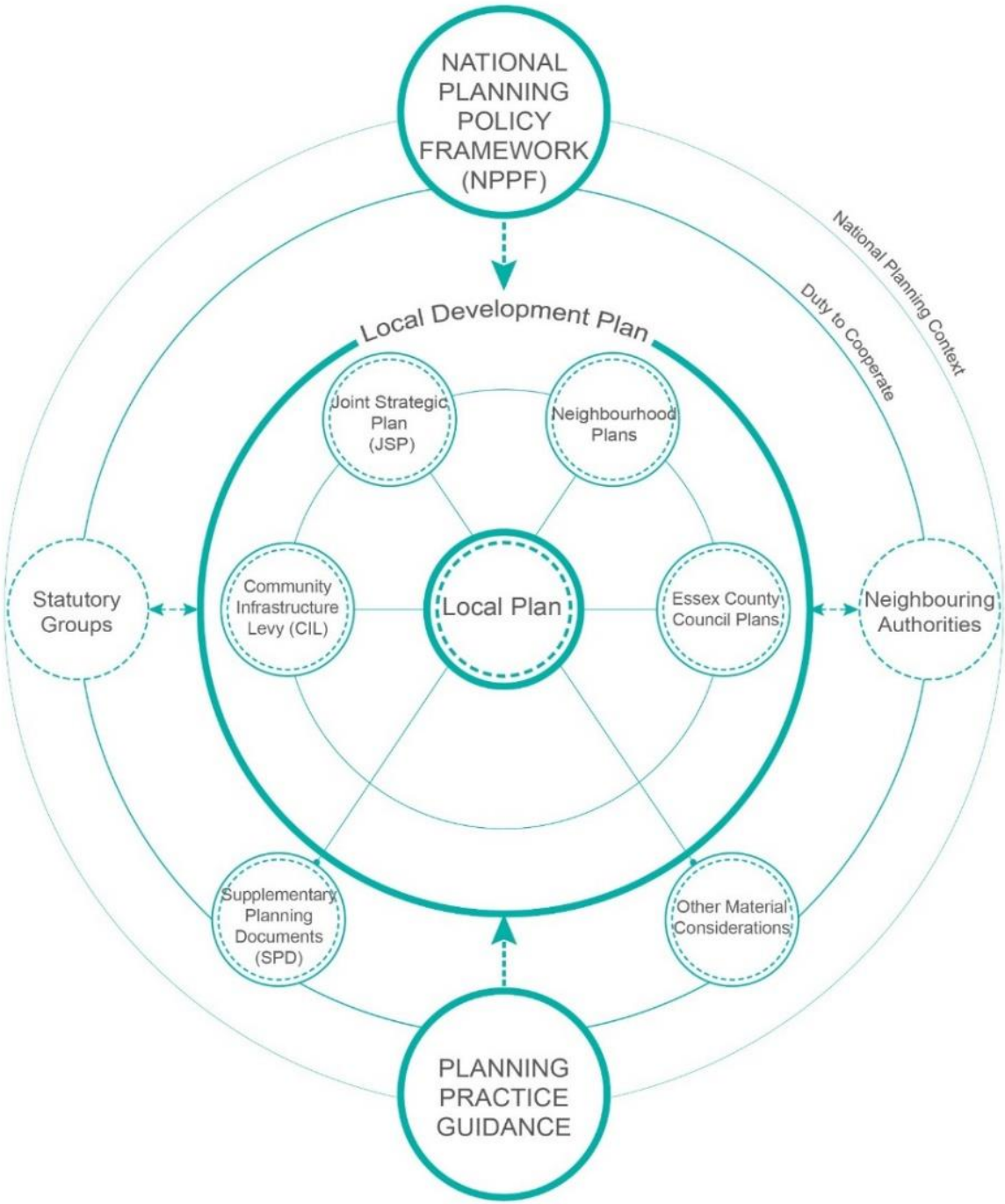


Figure 1.2: Local Plan Policy Context

# 02



## Borough of Villages

### Introduction to the Borough profile

- 2.1 The following paragraphs set out the context of the Borough and the key issues that should be addressed when planning for its future. Illustrative infographics summarising some of the key issues are provided at the end of the chapter in Figure 2.4 (parts 1 & 2).
- 2.2 The supporting document 'Brentwood Borough Profile' further details the borough context, providing a baseline study of key borough characteristics, which can be viewed online at [www.brentwood.gov.uk/localplan](http://www.brentwood.gov.uk/localplan).

### Location

- 2.3 Located in the south-west of the county of Essex and east of Greater London, Brentwood Borough is set within the Essex Countryside. The borough has easy access to the countryside as well as to London, along established road and rail networks. Our location offers the best of both worlds, making Brentwood an attractive place to live, work and visit.
- 2.4 Being set within London's Metropolitan Green Belt poses some development constraints. However, it also sets a foundation for a creative and innovative response to sustainable development where the principles of 'designing and building with nature' can be embedded to create and enhance neighbourhoods that deliver health and well-being for all.

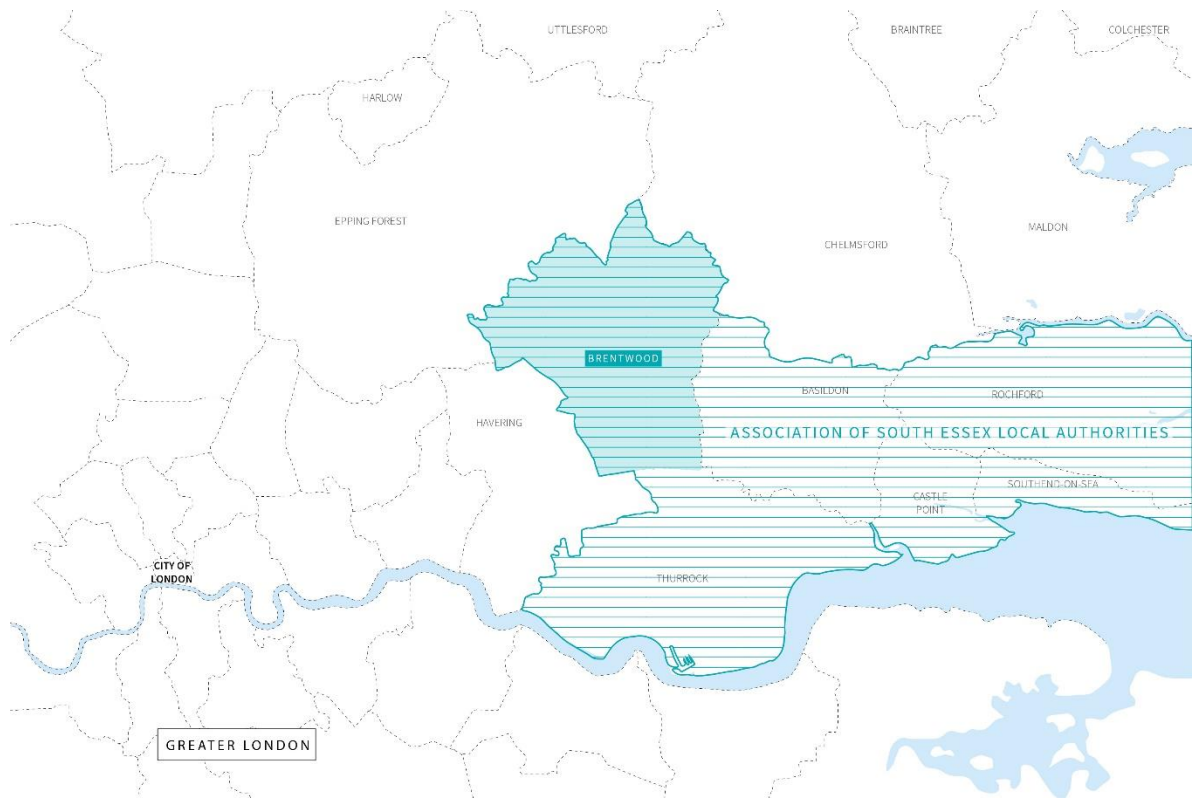


Figure 2.1: Brentwood Borough Location

## Origin

- 2.5 Brentwood's hamlet origins can be traced back to the 11<sup>th</sup> Century, with its name (Burnt Wood) signifying the clearings made by fire of the Great Forest of Essex. Administratively, Brentwood evolved as a Parish, later as the Brentwood Urban District. Brentwood's development was due mainly to its position on the higher grounds in the parish, at the junction of the main London to Colchester road and the Ongar-Tilbury Road.
- 2.6 St. Osyth's abbey, Lord of the manor of Costed was licensed to hold the first market and fair here in 1227. The market grew in prominence due to its convenient location, and Brentwood as a 'market town' started to evolve. The urban district was eventually abolished by the Local Government Act 1972, as the district grew to encompass the nearby parishes of Ingatestone, Mountnessing, Doddinghurst and others. It gained borough status in March 1993, characterised by the suburban core of Brentwood and Shenfield surrounded by a series of villages, thereby giving rise to its dominant character as a 'Borough of Villages'
- 2.7 From its hamlet to market town origins, Brentwood is today considered an attractive residential borough with a short commute to London or Chelmsford and is also home to a number of notable industries.

# Our Story

## Transport and Travel

- 2.8 Brentwood Borough 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 (air quality) and local economic performance.
- 2.9 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 dominate as a mobility mode to access nearby services, employment and leisure facilities. Therefore, the delivery and encouragement of sustainable transport alternatives is essential.
- 2.10 There are four rail stations in the borough: Brentwood, Shenfield, Ingatestone, and West Horndon. Brentwood station is located on the Great Eastern Mainline, served by both TfL rail services to London Liverpool Street and Greater Anglia services to Southend Victoria and London. Shenfield is a major interchange for the Great Eastern Main to London Liverpool Street and East Anglia. Ingatestone station is also on the Great Eastern Mainline, with a slightly less frequent service. West Horndon station is on the London-Tilbury-Southend Line to London Fenchurch Street. The Elizabeth Line will soon serve Brentwood and Shenfield stations; it will provide the borough with an improved train service, including increased capacity, station improvements and new direct links through central London, to Heathrow Airport and Reading.
- 2.11 Bus services generally start and terminate in Brentwood Town Centre with links to other parts of the borough and other places outside the borough. However, bus services in more rural areas are limited, particularly at off-peak times.

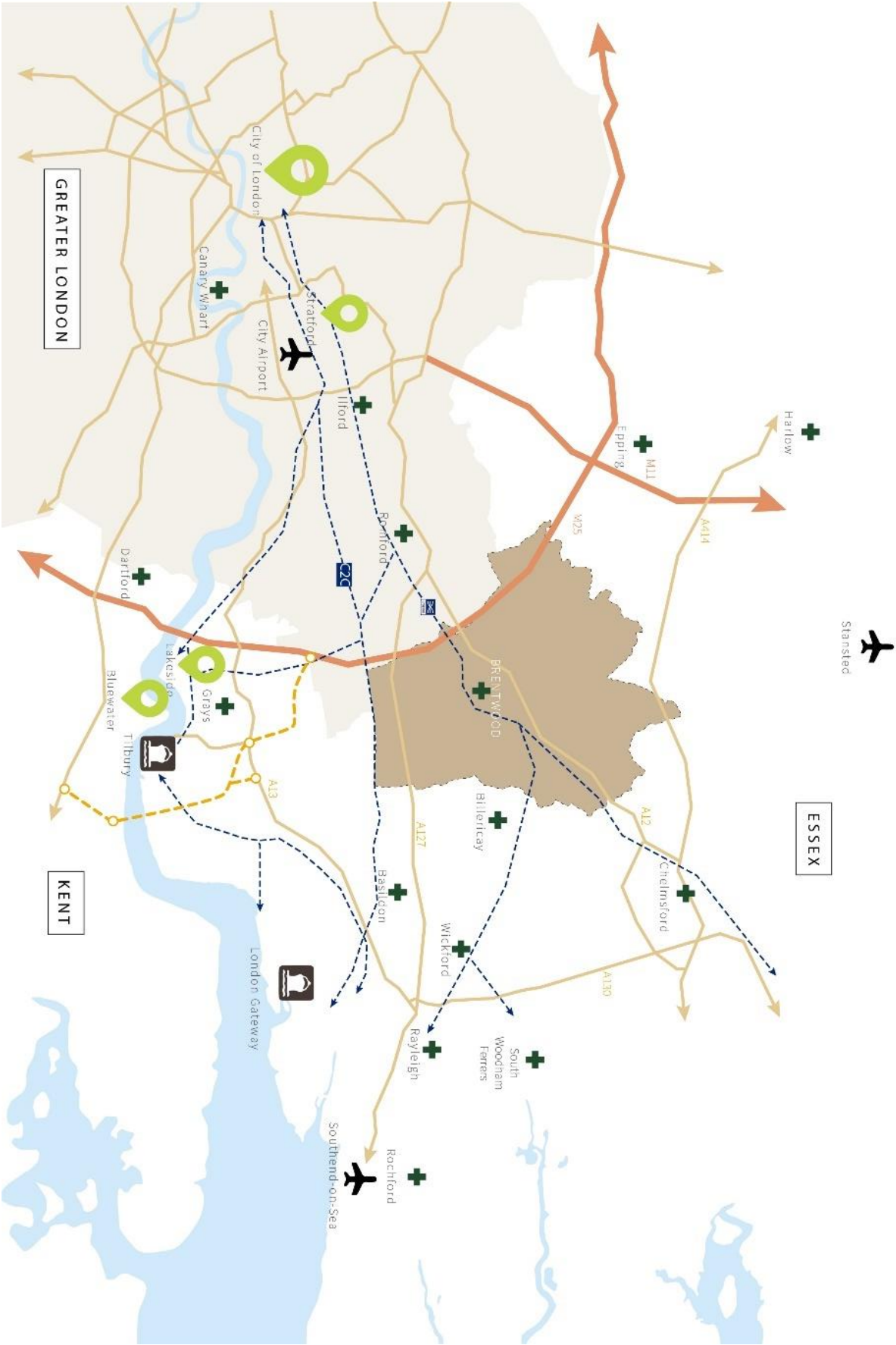


Figure 2.2: Regional Context

- 2.12 The percentage of those who cycle to work is below the national average, but more people walk to work than average. Some cycle routes flow through the borough, but these can sometimes be disconnected. Encouraging sustainable travel patterns is of key importance.

## Population and Housing

- 2.13 The population in 2011 was 73,601 (Census), of which approximately 70% live in the Brentwood urban area. The 2014 mid-year population estimate shows that this has increased to 75,600.
- 2.14 The proportion of the population from minority ethnic groups in the borough is well below average for the Eastern of England, and England as a whole. The largest non-white minority ethnic group is made up of people of Asian origin.
- 2.15 Brentwood is one of the most affluent areas in England, within the least deprived 10% of the country.
- 2.16 There are just over 32,000 homes in Brentwood Borough. The main property type is detached and semi-detached houses, which makes up almost 63% total stock compared to the national average of 53%. The main property size is 3-bedrooms (35%), followed by 2-bedrooms (25%) and 4-bedroom homes (23%).
- 2.17 House prices in the borough are very high in comparison with the rest of Essex. This can cause issues preventing people from buying homes with entry level housing often too expensive for many newly forming households and the need for a significant deposit.

## Economy and Employment

- 2.18 Brentwood Borough has a successful and buoyant local economy, providing for over 30,000 jobs. Banking and finance are 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.
- 2.19 Office employment areas are mainly located within the Brentwood Town Centre, Brentwood station area and Warley Business Park.
- 2.20 Despite the borough's rural character employment in agriculture is below the national average. Manufacturing sector is also under represented.
- 2.21 Three quarters of the borough population is of working age (16-65). 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.
- 2.22 Average weekly wages for those who live here but work elsewhere are higher than for 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.

## Retail and Shopping

- 2.23 Brentwood Borough offers a wide range of retail and commercial leisure facilities. The main shopping area, Brentwood Town Centre, is centred on the High Street. The Town Centre provides a range of retail, restaurants and cafes, including a quality independent niche shopping offer.
- 2.24 District Shopping Centres at Shenfield Hutton Road, Ingatestone High Street, Warley Hill (Brentwood Station), 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.

## Sport and Leisure

- 2.25 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.
- 2.26 Brentwood Leisure Centre and Shenfield Sports Centre, along with privately run sports and leisure facilities, are the focus for indoor sport and recreation. In addition, excellent sporting facilities are provided at several schools and can be accessed for public use.

## Heritage, Natural and Built Environment

- 2.27 The borough has significant built and natural heritage. It has over 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 location for residents, businesses and visitors.
- 2.28 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.
- 2.29 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.
- 2.30 Agricultural land grades describe the non-urban areas of the borough as Good to Moderate with a few areas as Very Good within the northern areas of the borough<sup>3</sup>.

<sup>3</sup> Natural England Digital Map ALC008 (2011) Eastern Region Agricultural Land Classification. Available at: <http://publications.naturalengland.org.uk/publication/127056?category=5954148537204736>

- 2.31 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.

## Arts and Community

- 2.32 Brentwood Borough has a strong and dedicated arts community. There are over 70 arts organisations and societies delivering arts events throughout the year. Participation numbers in the borough are high with many people regularly taking part in an arts activity in their leisure time.
- 2.33 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.
- 2.34 There are nine Parish Councils covering much of the borough's rural areas. However, the majority of the population live in unparished areas, such as the Brentwood Urban Area.

## Health and Well-being

- 2.35 Health is defined as a state of complete physical, mental and social well-being and not merely the absence of disease or infirmity. The Council is working with partners to achieve a healthier Brentwood, so that people can enjoy good health and a sound and vigorous mentality.
- 2.36 The health of Brentwood Borough residents is generally better than the England average according to Public Health England. Life expectancy is above average. Levels of obesity, diabetes and drug misuse are below the national average.
- 2.37 Brentwood residents have to travel outside the borough to access main hospital facilities including accident and emergency. However, the borough benefits from a small NHS community hospital in Brentwood and other private medical facilities. GP surgeries are generally at capacity. NHS England has identified an additional need for additional workforce to increase capacity to accommodate future development. Further details can be found in the most up-to-date strategy documents from NHS England include The Five Year Forward View and the NHS Long Term Plan, the emerging STP Estates Strategy and the Essex Health Places Advice Note for planners, developers and designers.
- 2.38 Basildon & Brentwood Clinical Commissioning Group (CCG) are responsible for planning, designing, buying and performance managing NHS services in the area. This includes a wide range of services such as most planned hospital care, rehabilitation care, urgent and community care, community health services and mental health and learning disability services.



## Education and Schools

- 2.39 Borough residents have higher than average levels of educational attainment when compared to both the rest of England and East of England. The borough has higher than average levels of school pupils achieving five good GCSEs and proportion of population with degree level education or equivalent. There is a lower than average proportion of population with no qualifications.
- 2.40 The borough has many well performing schools and colleges. Essex County Council is the local education authority although many schools are now self-governing, managing their own budgets and employing their own staff. There are also several independent or private schools in the borough. As academy schools are being encouraged, it will be important to work with partners to ensure adequate education provision is available to existing and future local residents.
- 2.41 In terms of Early Years and Childcare, in general Brentwood has a diverse range of provision to a high quality, however data suggests a large majority of areas are reaching maximum capacity and with the introduction of the Extended Funding Entitlement in 2017, childcare choices are limited and new provision will be needed with the additional developments planned. Primary schools in the borough are generally at capacity, particularly within the Brentwood Urban Area, and some have limited physical space to expand. Secondary schools are generally performing with spare capacity. All secondary schools within Brentwood have 6th form provision, learner's wishing to study vocational subjects travel to South Essex College (Thurrock/Basildon), Chelmsford College, with a further cohort travelling into Havering.
- 2.42 In respect of Special Education Needs (SEN), it is not possible to provide for every need within each District. Each special school is regarded as a regional centre of excellence for their type of need and children attend from a wider geographical area. In Brentwood, Endeavour School is a special school for children aged 5 years to 16 years with moderate learning difficulties and complex needs and is the only special school in Brentwood. ECC commissions places for local children with an Education Health and Care Plan at this school. ECC has developed specially resourced provision for children with speech and language difficulties within West Horndon Primary School in the Borough.

## Utilities, Telecoms and Media

- 2.43 Power, gas and water networks will need to be considered when planning the borough's future. The Council is working with energy and water providers as part of the plan-making process. In addition, new development will require connections to telecoms and broadband networks.
- 2.44 Broadband internet connection and superfast speeds have become an essential everyday utility for homes and businesses across the country. Coverage in Brentwood varies between urban and rural areas. Essex County Council has committed to a significant broadband infrastructure upgrade with telecoms partners. Broadband speed is an important issue for the UK economy and international competition.

## Green Belt

2.45 All of the borough's countryside lies within Metropolitan Green Belt of London. That equates to 89% of the borough, the sixth highest in England by percentage of total area. This helps protect much of the high-quality agricultural land and countryside. However, it also constrains development opportunities, making it difficult to meet development needs in full.



Figure 2.3: Metropolitan Green Belt (Part 1 of 2)

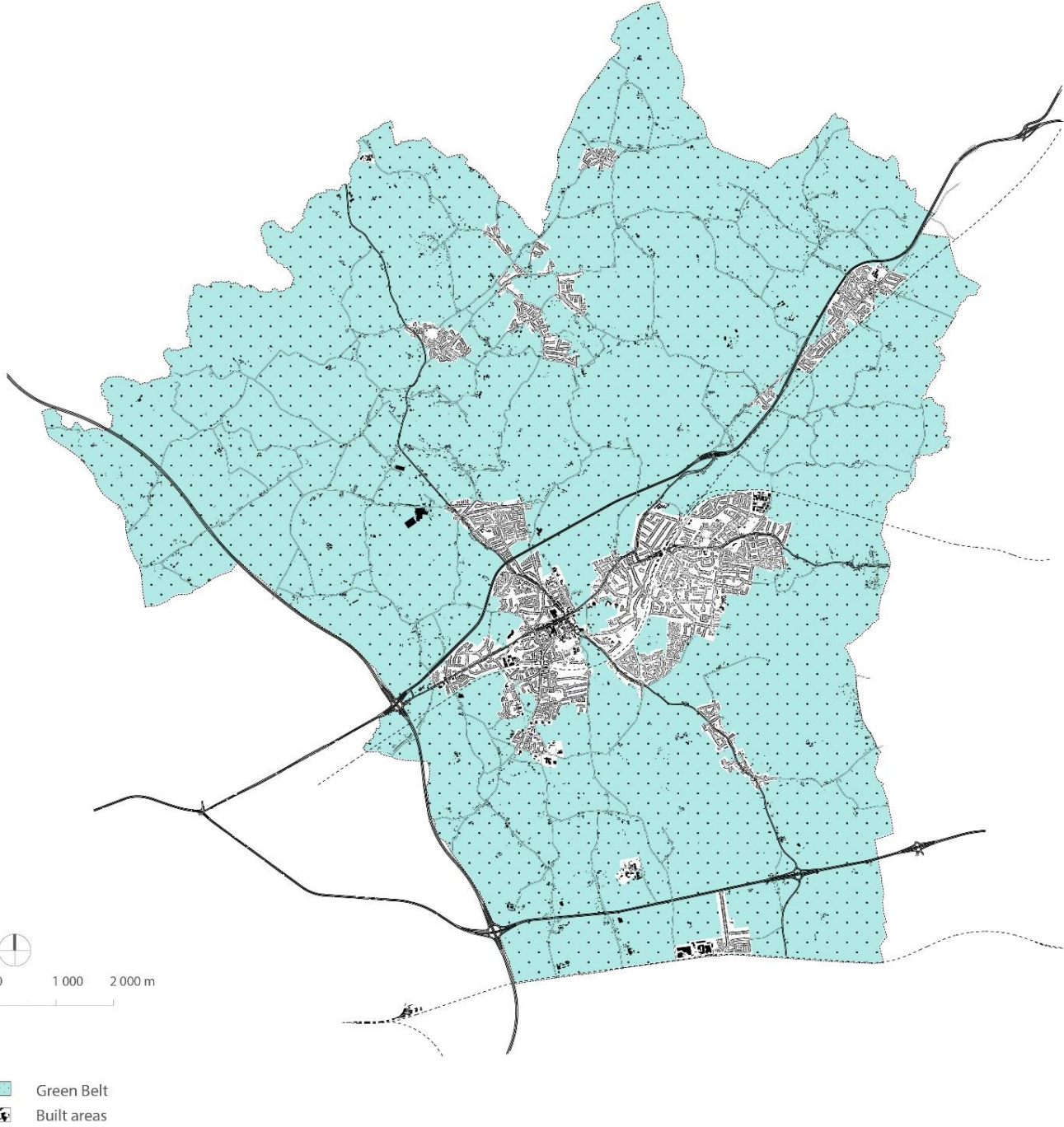
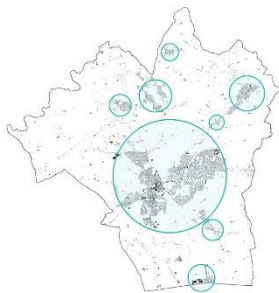


Figure 2.3: Metropolitan Green Belt (Part 2 of 2)



Just 20 miles north-east of Central London and a stones throw from the M25, Brentwood is ideally located, offering the best of both worlds between excellent transport links and quality environment



At the heart of the borough is the market town of Brentwood and its wider urban area, surrounded by villages set amongst attractive natural landscape of the Essex countryside

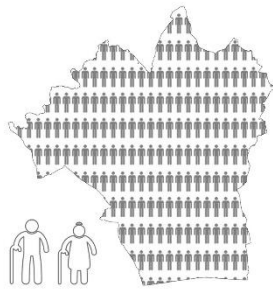


Over 85% of the borough is within London's Metropolitan Green Belt



The borough has a rich tapestry of built and natural assets, including two Country Parks, 13 Conservation Areas covering 600 ha, and over 500 Listed Buildings.

Figure 2.4: Our Story (Part 1 of 2)



The borough's population is over 73,600 with a significant retired population - an ageing population trend projected to continue



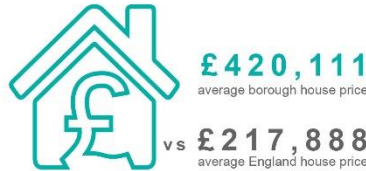
The health of people in Brentwood is generally better than the England average. Deprivation is lower than average, however about 10.8% children live in poverty. Life expectancy for both men and women is higher than the England average. Local health priorities include improving the health of older people, increasing vaccination coverage, and reducing cardiovascular disease by reducing the prevalence of obesity



ONS data 2015/2016 indicates an economic activity rate of 79%, slightly lower than the regional rate of 80.1% but higher than the GB rate of 77.9% Notably the number of self-employed persons was at 12.5% which was significantly above East of England (10.7%) and GB (10.3%) averages. Long-term unemployed rates were less than both regional and national averages



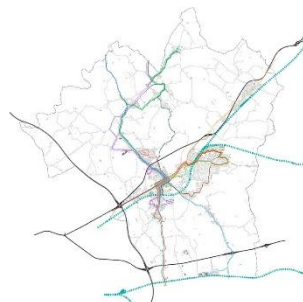
The current housing stock is largely made up of detached and semi-detached houses with less small unit accommodation



The higher average salaries in London and the south-east have resulted in higher house prices, making affordability a pressing issue in Brentwood



ONS Business Register and Employment Survey 2015 indicates that the top three employee jobs by industry in the Brentwood Borough are M: Professional, Scientific and Technical (12.5%); N: Administrative and Support Services (12.5%), and G: Wholesale and Retail Trade (11.1%). The Inter Departmental Business Register (ONS) UK Business Counts (2016) indicates a strong bias towards micro enterprises (90.6%) in the Brentwood Borough which is higher than the East of England figure of 89.7%



Public transport, bus services in particular, are centred on Brentwood Town Centre, making accessibility an issue for villages with infrequent services and lack of evening running



The arrival of Elizabeth Line at Brentwood and Shenfield will improve the existing service and provide new direct links through Central London

Figure 2.4: Our Story (Part 2 of 2)

# 03



## Spatial Strategy - Vision and Strategic Objectives

### Vision

Bearing testimony to its market town origins, Brentwood Borough will continue to thrive as a place of commerce and enterprise, strengthened by our proposals to protect existing employment sites, and enhance and develop new sites of economic opportunity, with good connectivity to wider markets.

Brentwood will continue to be a desirable, liveable place to live and visit and encourage healthy active lifestyles. It will provide the 'best of both worlds' where the benefits of urban living can be enjoyed, the bustling high street can continue to thrive and provide opportunities for entertainment and culture, where the surrounding countryside and numerous Country Parks will continue to provide havens to wildlife, as well as beautiful and historic locations to be explored through active recreational pursuits.

We are a 'Borough of Villages' and we will continue to maintain our village character, ensuring development respects and enhances these environmental qualities that give Brentwood its distinctive character. We will encourage this through landscape-led development, where new development responds to a 'design and build with nature' approach, firmly embedding high quality green infrastructure through the public realm to create a seamless transition to our surrounding countryside.

- 3.1 The vision for the development of the borough reflects and capitalises on Brentwood’s qualities (i.e. village character, heritage, environment), needs (i.e. liveable places, thriving enterprises), and opportunities (i.e. new economic opportunities, connectivity, thriving high streets for entertainment and culture).
- 3.2 The vision is reinforced by strategic aims and four strategic objectives and related policies.

## Strategic Aims and Objectives

- 3.3 Driven by Brentwood’s Borough of Villages character, our three overarching aims are to:
- i. harness the connectivity opportunities offered by the borough’s accessible transit corridors;
  - ii. orientate proposals to consider and embed a ‘design and build with nature’ landscape-led approach; and
  - iii. ensure that proposals demonstrate how outcomes will deliver healthy communities on multiple levels.

## Promoting Sustainable Mobility through Transit-orientated Growth

- 3.4 A key aim is ensuring sustainable mobility is maximised given the borough’s rural setting. Sustainable mobility is key in achieving a healthier environment, particularly in reducing air pollution from vehicular travel, but also in providing the necessary connectivity network to aid the local economy. Brentwood has two key transit / connectivity corridors running through the borough and these are identified in this Plan as the broad locations for growth to maximise these sustainable mobility opportunities: the ‘Central Brentwood Growth Corridor’, with the A12, the Great Eastern Main Line to London Liverpool Street Station, and the Elizabeth Line; and the ‘Southern Brentwood Growth Corridor’, with the A127 and the London, Tilbury and Southend Railway to London Fenchurch Street Station. Focusing growth along these axes ensures that future development is sustainable, maximising the benefits of transport infrastructure. While some investment to improve the transport network is necessary, this growth strategy ensures economies of scale are reached, with the critical mass of development making it more viable for such investment to occur.

## Developing Naturally and Sustainably

- 3.5 Given Brentwood’s village feel and countryside setting, development must be mindful of the ecological sensitivity and disruption to ecosystem services. For this reason, development should take a ‘design and build with nature’ landscape-led approach to drive design quality and create places which respond to their existing environment, work with natural assets, and create Environmental Net Gain wherever possible. Opportunities to embed green infrastructure in the public realm should be maximised to deliver multiple benefits, including

ecosystem services to address the impacts of climate change as well as providing a liveable environment.. This will not only plan for resilient and smart infrastructure to future-proof investment against climate change but also create living environments conducive to human health.

## Healthy Communities

- 3.6 Growing from a market town to the diverse economy it is today, future development should capitalise on this evolution to ensure a diverse balance of employment opportunities for all alongside vibrant hubs of economic and social-cultural activity to provide attractive, connected, walkable, lively and stimulating destinations with the necessary facilities and services required to sustain healthy and active communities.

## Strategic Objectives

- 3.7 This section defines four strategic objectives which consolidate the Borough's key priorities and help make the link between the vision and the supporting policies which help to deliver these. In reality there are many cross-overs between each objective and the policies which help delivery these, and should therefore not be treated in isolation when developing proposals.
- 3.8 **SO1: Manage Growth Sustainably**, by directing development to the most sustainable locations along identified transit growth corridors, ensuring that the characteristics and patterns of our different settlements are protected and enhanced to provide a strong emphasis on 'sense of place' to be enjoyed by people living, working and visiting Brentwood.
- 3.9 **SO2: Deliver a Healthy and Resilient Built Environment**, one where a landscape-led design approach helps to protect and enhance areas of environmental and heritage value; creates spaces that encourage social interaction, sustainable connectivity and mobility and healthy active lifestyles; mitigates, reduces impact or adapts to conditions of a changing climate through smart infrastructure; and creates public realm and homes where both the internal and external spaces are conducive to human health.
- 3.10 **SO3: Deliver Sustainable Communities with Diverse Economic & Social-cultural Opportunities for All**, opportunities which flexibly respond to the changing economic climate and employment sector trends making citizens feel economically empowered to enjoy and benefit from the necessary community/social infrastructure that sustains inclusive, informed, vibrant, active and cohesive communities.
- 3.11 **SO4: Deliver Beautiful, Biodiverse, Clean and a Functional Natural Environment**, where resources are carefully managed to avoid adverse impact on, and to provide net gains for, the borough's natural environment and biodiversity; and where our natural heritage is protected, and ecosystem services are restored, enhanced and integrated back into the built environment through multi-functional green and blue infrastructure and opportunities are pursued for securing measurable net gains for biodiversity.



# Spatial Strategy

- 3.12 Two key growth corridors have been identified, to meet our overarching aim to deliver sustainable development in accessible and connected transit corridors. Along these corridors, a comprehensive sequential analysis and review of sites has been undertaken to select suitable site allocations.

## Central Brentwood Growth Corridor

- 3.13 The Central Brentwood Growth Corridor runs through the main urban area of Brentwood (incorporating the neighbourhoods and towns of Brentwood, Shenfield, Hutton, Warley, Pilgrims Hatch) as well as the urban area of Mountnessing and Ingatestone villages further along the A12 corridor. The main central urban area is well served by public transport, with rail stations at Brentwood and Shenfield. It provides a range of shopping, employment areas, secondary schools, health and leisure facilities in close proximity to residential areas. It therefore offers scope to accommodate some growth. Here, every opportunity to bring forward brownfield land for development has been maximised and brownfield regeneration will continue to be prioritised as and when it becomes available in future. However, brownfield land is limited and so the spatial strategy in this growth area has also focused on delivering urban extensions of varying extents, including at Shenfield, Warley, Pilgrims Hatch and Ingatestone. Exceptional circumstances have been demonstrated to release land from the Green Belt to allow these urban extensions.

## South Brentwood Growth Corridor

- 3.14 The South Brentwood Growth Corridor runs along the southern transit axes up to the borough boundary. This location has traditionally played an instrumental role in delivering the borough's economic growth, with the location of employment sites due to the good transport connections to wider markets. The spatial strategy continues to enhance employment land in this location, and delivers two strategic allocations, one brownfield allocation at West Horndon Village and a new settlement at Dunton Hills Garden Village, providing new residential-led mixed-use development. A strategic employment allocation at M25 junction 29 (Brentwood Enterprise Park) will provide for most of the new employment land needed, bringing forward a modern business park in the south-west of the borough with excellent access to the M25. This will also act as a focus for a wider M25/A127 employment cluster considering existing employment uses in the area. Brownfield development of existing industrial land in West Horndon will create a new village centre with supporting services and facilities close to the village rail station. Developing here provides an opportunity to address conflicts arising from heavy freight traffic passing through the village.
- 3.15 The new Garden Village will be in keeping with the Borough's character as a 'Borough of Villages' and is of sufficient scale to provide the necessary infrastructure to support a self-sustaining community in the south-east of the borough. The Garden Village will be in line with the Government's prospectus for garden communities, delivering the necessary quality and a significant contribution to meeting housing needs. It also provides an opportunity to

contribute to the wider infrastructure investment requirements to support long-term growth within this Southern Growth Corridor, along with some capacity for future growth beyond the plan period to meet the evolving housing and economic needs of Brentwood. Exceptional circumstances have been demonstrated to release Green Belt to allow a new settlement in this location.

## Development Outside Growth Corridors

- 3.16 Development in areas outside these growth corridors will be limited, to retain the local character, with allocations at Kelvedon Hatch and Blackmore villages.
- 3.17 The spatial strategy is set out in Strategic Policy MG01 Spatial Strategy.

## Key Diagram

- 3.18 The Key Diagram shows the main aspects of the spatial strategy, illustrating the broad locations and pattern of development and how these relate to the two main transit growth corridors and borough gateways.



**Settlement Pattern**

- Settlement Hierarchy**
- Settlement Category 1
  - Settlement Category 2
  - Settlement Category 3
  - Settlement Category 4
- Green Belt**
- 

**Locations for Growth**

- Strategic Allocations**
- Residential-Led, Mixed-use Development
- Employment-Led Allocations**
- 
- Residential-Led Allocations**
- 
- Strategic Transit Growth Corridors**
- 

**Mobility & Connectivity**

- Transport Infrastructure**
- Key Roads
  - Rail
  - Railway Station
  - Borough Gateways

Figure 3.1: Key Diagram

# 04



## Managing Growth

### Delivering the Spatial Strategy

- 4.1 This chapter sets out two Strategic Policies and a number of supporting cross-cutting development management policies. Strategic Policy MG01 Spatial Strategy is the overarching strategic policy for the Local Plan to achieve the borough's Spatial Strategy and vision. It sets out the quantum and distribution of growth as described in Chapter 3. Strategic Policy MG02 Green Belt is also a key policy that informs the appropriate distribution of growth, given the predominance of Green Belt in the Borough.

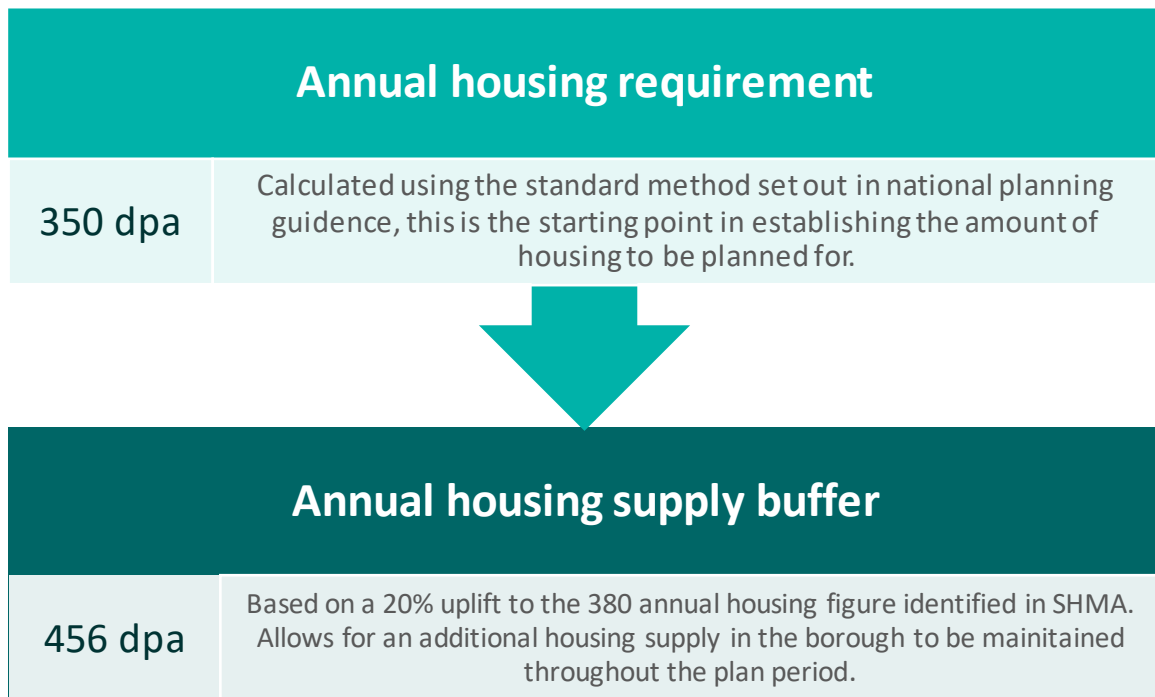


Figure 4.1: Annual housing requirement and supply buffer

## STRATEGIC POLICY MG01: SPATIAL STRATEGY

### Quantum of Development

1. The Council will work positively and proactively with development industry and wider stakeholders to enable the development of the allocated sites identified on the Policies Map in order to meet the borough’s housing and employment needs and targets. To facilitate a significant increase in the delivery of new homes as well as jobs to promote sustainable communities, provision is made for:
  - a. 7,752 new residential dwellings (net) to be built in the borough over the Plan period 2016-2033 at an annual average rate of 300 dwellings per year to 2023/24, followed by 400 dwellings per year to 2029/30 and then 984 dwellings per year to 2032/33;
  - b. 13 permanent pitches to accommodate Gypsy and Traveller accommodation needs, distributed across the borough as set out in Policy HP07;
  - c. about 46.64 ha of new employment land, 1,604 square metres (net) of comparison retail floorspace and 4,438 square metres (net) of

convenience floorspace, to enable the creation of at least 5,000 additional jobs.

### **Growth Distribution**

2. The majority of new development is directed to the borough's two strategic transit growth corridors, as illustrated in the Key Diagram, ensuring the benefits resulting from their proximity to existing sustainable transport infrastructure. This strategy has required the release of land from the green belt. The geographic distribution and pattern of growth is planned as follows:
  - a. Central Brentwood Growth Corridor comprising mainly brownfield infill and urban extensions. Three strategic residential-led, mixed-use sites in this location are allocated;
  - b. South Brentwood Growth Corridor comprising largely of employment provision, brownfield redevelopment and a new Garden Village settlement. Two strategic residential-led, mixed-use development sites in this location are allocated;
  - c. Limited growth is planned at suitable sites in two northern villages of Kelvedon Hatch and Blackmore;
  - d. The housing requirements for designated neighbourhood plan areas in the borough are outlined in the table of Figure 4.2.

## **Sequential Land Use**

- 4.2 The spatial strategy informs the allocation of sites for development. This considers each location in terms of a sequential land use test, in line with guidance and best practice, and should be a key consideration in determining applications. It prioritises growth based on brownfield land and land in urban areas first; and only then brownfield land in Green Belt areas where deemed appropriate according to policies in the Plan.
- 4.3 A range of economic evidence has informed the employment land and job growth need, including the Brentwood Economic Futures Report (2018) and Strategic Housing Market Assessment (2018).

## **Growth in Designated Neighbourhood Planning Areas**

- 4.4 Brentwood currently has three designated neighbourhood plan areas covering parish council areas as outlined on the Council's Neighbourhood Planning webpages. Housing requirements in the designated neighbourhood planning areas are set out in the table in Figure 4.2 below.

Parish/Designated Neighbourhood Plan Areas	Date of Designation	Housing Requirements	Site Allocations
West Horndon CP	Designated November 2014	2530	R01, R02
Ingatestone and Fryerning CP	Designated October 2017	57	R22
Doddinghurst CP	Designated December 2012	0	None

Figure 4.2: Housing Requirements in Neighbourhood Planning Parish Areas

# Green Belt and Rural Development

## Green Belt Local Context

- 4.5 London Metropolitan Green Belt was established by the Town and Country Planning Act 1974 to control the outward spread of London into surrounding counties such as Essex. This designation has provided an important protection to the borough's countryside. The Council strongly supports the continued preservation of the Metropolitan Green Belt. With Brentwood borough being the sixth highest Green Belt area in England, this significantly limits land available for development.
- 4.6 However, given Brentwood's proximity to London and good connectivity, there is huge demand and pressure for development. The Council has had to make some difficult, but informed decisions around the alternation of the Green Belt boundary, in line with national planning policy. Through the Green Belt review process and alongside the Sustainability Appraisal process, exceptional circumstances were established to release of a number of sites to meet housing, employment and Gypsy and Traveller needs, as described in Policy MG01 Managing Growth. The Policies Map illustrates the Green Belt boundary as established by this Local Plan, with defensible boundaries around the allocation sites.

### STRATEGIC POLICY MG02: GREEN BELT

- A. The Metropolitan Green Belt within Brentwood Borough (as defined in the Brentwood Policies Map) will be preserved from inappropriate development so that it continues to maintain its openness and serve its key functions. Planning

permission will not be granted for inappropriate development in the Green Belt other than in very special circumstances.

- B. All development proposals within the Green Belt will be considered and assessed in accordance with the provisions of national planning policy.
- C. The Council will seek to enhance the beneficial use of the Green Belt to provide or improve access to it; to provide or enhance opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity and; to improve damaged and derelict land. Development proposals in or adjacent to the Green Belt (including those the subject of allocations in this plan) will be expected to include measures to achieve these objectives so far as it is possible and appropriate.
- D. For site allocations which are being released from the Green Belt, development proposals should set out ways in which the impact of removing land from the Green Belt are to be offset through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land.

## Purpose of the Green Belt

- 4.7 The National Planning Policy Framework sets out the five main purposes of the Green Belt:
- i. to check the unrestricted sprawl of large built-up areas;
  - ii. to prevent neighbouring towns merging into one another;
  - iii. to assist in safeguarding the countryside from encroachment;
  - iv. to preserve the setting and special character of historic towns; and
  - v. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

## Encouraging the Beneficial Use of Green Belt

- 4.8 The NPPF (2021, paragraph 145) promotes the beneficial use of the Green Belt. It states that once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access, to provide opportunities for outdoor sport and recreation, to retain and enhance landscapes, visual amenity and biodiversity, or to improve damaged and derelict land. In Brentwood, there are many areas of the Green Belt which also perform other key environmental and recreational functions that must also be maintained in accordance with the relevant policies. For example, there are large areas of woodlands, golf courses, playing pitches, parks, 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. There is also an extensive network of public rights of way providing public access to open countryside. Enhancement of these features will be supported in line with Strategic Policy MG02 Green Belt, to maintain the beneficial use of the Green Belt.

- 4.9 Furthermore, the NPPF states that any development proposals within Community Forests in the Green Belt should be subject to the normal policies for controlling development in Green Belts. The Thames Chase Community Forest reaches across much of the south western area of the borough. The Thames Chase Community Forest offers a valuable opportunity for improving the environment by upgrading the landscape and providing for recreation and wildlife and this will be supported in line with national policy and guidance.

## Proposals Affecting the Green Belt

- 4.10 All proposals coming forward in non-allocated Green Belt locations will be assessed in accordance with Strategic Policy MG02 Green Belt and national policy on Green Belt. Development will be considered inappropriate and refused unless very special circumstances are demonstrated and/or where the exceptions apply, in line with paragraph 145 and 146 of the NPPF. One of the Council’s objectives is to support the rural economy and sustainability of villages. Where proposals align with these exceptions, proposals will be supported.

### POLICY MG03: SETTLEMENT HIERARCHY

Settlement Category	Settlement Name
<p><b>Settlement Category 1</b></p> <p>This incorporates the towns and neighbourhoods that collectively form the main urban area of Brentwood Borough. They provide a wide range of existing community infrastructure, services and opportunities for employment, retail, education, health and leisure facilities in designated Town, District and Local Centres for the immediate residential areas as well as to the wider population in the borough. They are typically highly accessible and well served by public transport provision, including rail services.</p>	<p>Main urban area of Brentwood comprising:</p> <p>Brentwood</p> <p>Shenfield</p> <p>Hutton</p> <p>Pilgrims Hatch</p> <p>Warley</p> <p>Brook Street</p>
<p><b>Settlement Hierarchy 2</b></p>	<p>West Horndon</p> <p>Ingatstone</p>

<p>This includes the larger villages in a rural setting, with high levels of accessibility and public transport provision, including rail services. They provide a range of services and facilities to the immediate residential areas and nearby settlements in designated District and Local Centres.</p>	<p>Dunton Hills (when delivered)</p>
<p><b>Settlement Hierarchy 3</b></p> <p>Villages in a sparse rural setting that provide day-to-day needs for local residents in small local centres. These relatively larger villages also tend to have a primary school. They generally have limited, often shared, community and health facilities, local jobs and a variable bus service.</p>	<p>Blackmore</p> <p>Doddinghurst</p> <p>Herongate</p> <p>Ingrave</p> <p>Kelvedon Hatch</p> <p>Mountnessing</p>
<p><b>Settlement Hierarchy 4</b></p> <p>Remote and small rural villages and hamlets, with poor public transport, limited or no shops, jobs and community facilities; some of these settlements rely on nearby settlements for services.</p>	<p>Wyatts Green</p> <p>Hook End</p> <p>Stondon Massey</p> <p>Fryerning</p> <p>Great Warley</p> <p>Little Warley</p> <p>South Weald</p>

4.11 Brentwood borough is characterised by a central urban area, and a number of scattered villages north and south of this main urban core. This has given rise to its principal character as a 'Borough of Villages' and the spatial strategy seeks to preserve this historic development pattern and the character of the villages. The main urban area includes the towns of Brentwood, Shenfield, Hutton, Warley, Pilgrims Hatch and Brook Street. Inset villages from the Green Belt include West Horndon, Ingatestone, Mountnessing, Ingrave, Herongate, Blackmore, Doddinghurst, Kelvedon Hatch, Wyatts Green, Hook End and Stondon Massey. Each village is considered a separate settlement each with its distinct settlement characteristics, the boundaries of which are wholly demarcated by the Green Belt. Other smaller more rural dispersed villages and hamlets remain washed over by the Green Belt and include Fryerning, Great Warley and others. New development should seek to enhance historic patterns and settlement characteristics of significance. For those settlements which are removed from the Green Belt, their boundary and category is shown

on the Policies Map. Their distribution is also illustrated on the Key Diagram to aid an understanding of how each relates to sustainable growth locations.

- 4.12 The Borough Profile<sup>4</sup> provides a general assessment of the different services and facilities across Brentwood's settlements. This broad settlement hierarchy assessment describes the role, function and prominence of villages within a broad hierarchy. The hierarchy is divided into four categories providing a broad indication of the settlement's ability to accommodate growth and reflects the indicative prominence of each village by its size (indicatively based on population and settlement area), and the range of services each village offers. The Settlement Hierarchy is tabulated and set out in Policy MG03. The vitality of rural communities to ensure villages grow and thrive, in line with paragraph 78 of the NPPF, was a key consideration in defining the spatial strategy and where it was deemed possible, proportionate growth at key northern villages has been identified, as indicated in the Key Diagram.
- 4.13 The settlement hierarchy should not be confused with the retail hierarchy detailed in Chapter 7.
- 4.14 Brentwood Urban Area, made up of semi-connected settlements such as Brentwood, Shenfield, Hutton, Warley, Brook Street, and Pilgrims Hatch, is the borough's largest settlement. Accessible and well served by public transport, with rail stations at Brentwood and Shenfield, Brentwood Urban Area provides a range of shopping, employment areas, secondary schools, health and leisure facilities in close proximity to residential areas.
- 4.15 Within this settlement category, Brentwood and Shenfield offer the most scope to develop in accordance with sustainable development principles. Urban extensions into Green Belt are proposed in specific locations with clear physical defensible boundaries and accessible to local services and transport links. Release of land for development in these locations will in time enable a five-year supply of housing to be achieved, boosting local housing needs swiftly in line with national policy and guidance.
- 4.16 Ingatestone is the borough's largest village; facilities here serve a significant catchment beyond the 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 a lack of suitable sites.
- 4.17 Future development as guided by the Plan will result in changes to the hierarchy, adding West Horndon and Dunton Hills Garden Village to this category. Brownfield residential development at West Horndon is proposed to be of a size to provide for a new village centre along with new retail and job opportunities, and to assist with improvements at West Horndon railway station. Development at Dunton Hills Garden Village will create a new self-sustaining village with provision of new schools alongside retail, job opportunities and health facilities. Policies for the delivery of Dunton Hills Garden Village will set the precedent for new accessible connections to be made with West Horndon railway station nearby, providing a new transport interchange, among other aspirations.

<sup>4</sup> <https://www.brentwood.gov.uk/-/evidence-base#borough-profile>

- 4.18 Larger villages in the borough are served by a local shopping parade and a primary school. They generally have limited, often shared, community and health facilities, local jobs and a variable bus service.
- 4.19 Brownfield redevelopment opportunities will be encouraged to meet local needs and policies in this Plan will help to bring forward nearby redevelopment of brownfield sites in the Green Belt where appropriate. Minimal amendments are proposed to the Green Belt boundaries surrounding larger villages in order to retain the character of the borough in line with the spatial strategy.
- 4.20 Remote smaller villages and hamlets, some within the Green Belt. These settlements have limited local services and facilities and poor public transport links, reliant on other settlements nearby in many cases. Development in these locations will be encouraged only in brownfield locations, steered by the policies in the Plan

## Health Impacts

- 4.21 Local planning policy has a crucial role to play in ensuring that the opportunities exist for people to be able to make healthier life choices and addressing health inequalities (as per the role of health and well-being in plan-making 2017, plan-making guidance 2018 and the NPPF). The policies within the Brentwood Local Development Plan use both local and national evidence, strategy and policy with the aim to create and support strong, vibrant, sustainable and healthy communities. These will be delivered by promoting and facilitating healthy living, and creating environments which offer opportunities for healthy choices across generations. The health and well-being of communities must begin with the planning process, and it is agreed that if a community has access to well-designed places, access to appropriate health and community services and facilities set out above, health and well-being should be positively influenced.

### **POLICY MG04: HEALTH IMPACT ASSESSMENTS (HIAs)**

- A. To ensure new development is designed to promote good health, a Health Impact Assessment, will be required for residential proposals of 50 or more units (or less than 50 units at the discretion of the planning authority where the number of units could propose a significant impact on the community and infrastructure) and non-residential developments of 1,000m<sup>2</sup>, or more, and hot food takeaways that are not within a designated town, district or local centre and are within 400 metres of a school entrance. The Health Impact Assessment will be prepared in accordance with the advice and best practice as published by Public Health England and locally through the EPOA HIA Guidance Note, using the most up to date guidance. The purpose of the

Health Impact Assessment is to identify opportunities of positive health impacts and potential negative impacts and how they might be mitigated.

- B. Where significant impacts are identified, planning permission will be refused unless reasonable mitigation or planning controls can be secured.

- 4.22 The NPPF acknowledges that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Local planning authorities (LPAs) are expected to use their planning powers to ensure that health and well-being inequalities are reduced and mitigated where appropriate, to ensure positive social, economic, and environmental benefits are achieved. Brentwood Borough Council is committed to ensuring all new developments promote healthier and inclusive environments. This includes regeneration proposals. The design of the built environments and use of the natural environments play a key role in ensuring that health inequalities are not exacerbated and can support people to live healthier lives. The following issues impact on the physical, social, and mental health and well-being of communities and should be addressed in accordance with policies within this Plan:
- i. the location, density and mix of land use;
  - ii. street layout and connectivity;
  - iii. access to public services, employment, local fresh food, education, leisure and recreation activities, and other community services;
  - iv. safety and security;
  - v. open and green space;
  - vi. affordable and energy efficient housing;
  - vii. air quality and noise;
  - viii. extreme weather events and climate change;
  - ix. community interaction; and
  - x. transport.
- 4.23 Health and well-being inequalities have been recognised as having a significant impact on communities. The government has clearly signalled its commitment to promoting Health Impact Assessment since 2003 with the publication on Tackling Health Inequalities by the London Department of Health, followed by Choosing Health White Paper (2004), the Department of Health Guidance on Planning for NHS staff, and the inclusion of Health and Well-being requirements as set out in the NPPF.
- 4.24 In response to the government's priorities placed on health and well-being, the Essex Planning Officers Association (EPOA) published a guidance note on Health Impact

Assessments (2008) which set out targets for all local authorities to ensure that their Local Development Frameworks (or equivalent development plan documents) contain a policy requiring HIA for relevant planning applications. The EPOA Guidance Note was updated in 2019; once published, Public Health England (PHE) also published further guidance on Health Impact Assessments in spatial planning (2020)<sup>5</sup> which provides information on the process for undertaking an HIA and additional resources which may be helpful to applicants required to prepare an HIA as part of their planning application. Developers should refer to the most up to date guidance to ensure that health and well-being impacts have been fully considered as part of the proposal.

- 4.25 The updated Essex Design Guide (EDG) includes the principles of health and wellbeing and a common theme embedded throughout the document. The EDG encourages all developments to employ the principles of Building Regulations Part M4 Category 2 (Accessible and Adaptable Dwelling) so as to promote independent living. The provision of access to open spaces, natural environments and informal and formal recreation opportunities contributes significantly to prevention of ill health. Transport corridors should be well-established to encourage cycling and walking as safer, more active alternatives to the car for local journeys.
- 4.26 PHE's guidance Using the Planning System to Promote Healthy Weight Environments (February 2020) suggests that limiting the availability of takeaways within walking distance of schools can contribute to tackling the rising levels of obesity and other health impacts such as cardiovascular disease. 400 metres has been considered a reasonable walking distance and is outlined within the Urban Design Compendium 2 and CIHT Guidelines for providing journeys on foot.
- 4.27 PHE's Obesity Profile illustrates that where there are concentrations of hot food takeaways within Brentwood Borough, there is an increase in the number of children who are overweight and obese. The Borough's current obesity rates are approximately 14% which is below the National average of 20%. However, in areas where there is a concentration of hot food takeaways, the average overweight and obesity rates increase to 15-24%, which is higher than the National average.
- 4.28 Each application will be considered on its own merits and the 400m zone must be considered in the context of the local topography and context of the individual application. There are mitigating factors that can be considered, for example the potential for natural or man-made barriers that limit accessibility from schools, even within the 400m direct line exclusion zone.
- 4.29 The joint Essex health and wellbeing strategy 2018-2022 is supported by partners including district councils and health. The priorities within this are:
- i. improving mental health and wellbeing;
  - ii. addressing obesity, improving diet and increasing physical activity;

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<sup>5</sup> Public Health England. Health Impact Assessment in spatial planning. A guide for local authority public health and planning teams (2020).  
[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/929230/HIA\\_in\\_Planning\\_Guide\\_Sept2020.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/929230/HIA_in_Planning_Guide_Sept2020.pdf)

- iii. influencing conditions and behaviours linked to health inequalities; and
- iv. enabling and supporting people with long-term conditions and disabilities.

4.30 Developers will be expected to contact the Council at pre-application stage to complete the Healthy Communities Checklist (as part of the validation checklist), to enable joint discussions to take place on the likely health and well-being impacts and environmental impacts of proposals. This is an opportunity to strengthen the process of spatial planning through partnership working, community engagement, evidence sharing and coordination.

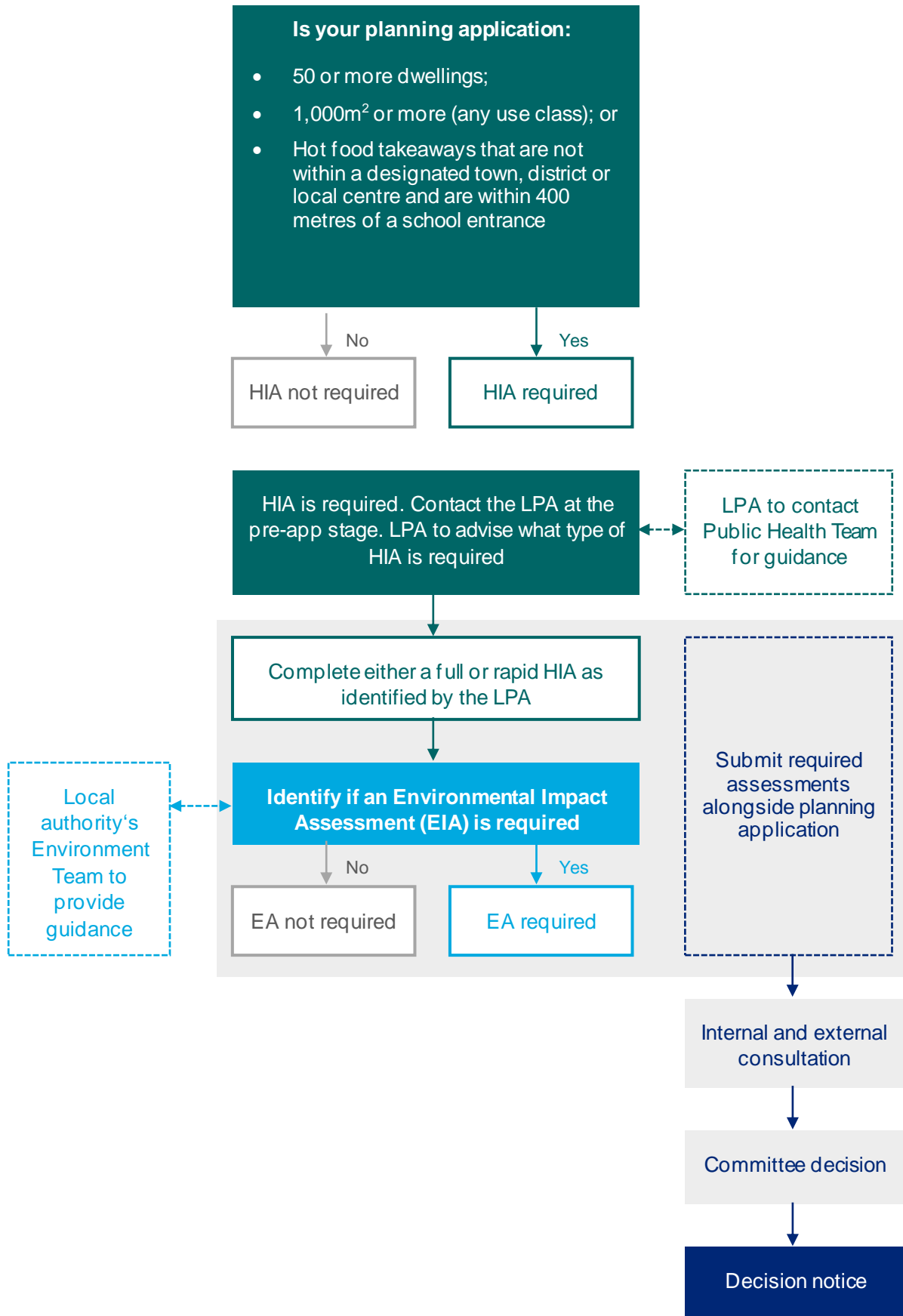


Figure 4.3: How to assess if a planning application requires to undertake an HIA and the steps involved



**POLICY MG05: DEVELOPER CONTRIBUTIONS**

1. All new development should be supported by, and have good access to, all necessary infrastructure. Permission will only be granted if it can be demonstrated that there is sufficient appropriate infrastructure capacity to support the development or that such capacity will be delivered in a timely and, where appropriate, phased manner by the proposal.
2. Where a development proposal requires additional infrastructure capacity, to be deemed acceptable, mitigation measures must be agreed with the local planning authority and the appropriate infrastructure provider. Such measures may include (not exclusively):
  - a. financial contributions towards new or expanded facilities and the maintenance thereof;
  - b. on-site provision of new facilities;
  - c. off-site capacity improvement works; and/or
  - d. the provision of land.
3. Developers and land owners must work positively with the Council, neighbouring authorities and other infrastructure providers throughout the planning process to ensure that the cumulative impact of development is considered and then mitigated, at the appropriate time, in line with their published policies and guidance.
4. Applicants proposing new development will be expected to make direct provision or contribute towards the delivery of relevant infrastructure as required by the development either alone or cumulatively with other developments, as set out in the Infrastructure Delivery Plan and other policies in this Plan, where such contributions are compliant with national policy and the legal tests. Where necessary, developers will be required to:
  - a. enter into Section 106 (S106) agreements to make provisions to mitigate the impacts of the development where necessary or appropriate. Section 106 will remain the appropriate mechanism for securing land and works along with financial contributions where a sum for the necessary infrastructure is not secured via CIL; and/or
  - b. make a proportionate contribution on a retrospective basis towards such infrastructure as may have been forward-funded from other sources where the provision of that infrastructure is necessary to facilitate and/or mitigate the impacts of their development (including the cumulative impacts of planned development),

5. For the purposes of this policy the widest reasonable definition of infrastructure and infrastructure providers will be applied. Exemplar types of infrastructure are provided in the glossary appended to this Plan.
6. Exceptions to this policy will only be considered if :
  - a. it is proven that the benefits of the development proceeding without full mitigation outweigh the collective harm;
  - b. a fully transparent open book Viability Assessment has proven that the full mitigation cannot be afforded, allowing only the minimum level of developer profit and land owner receipt necessary for the development to proceed. The viability assessment may be subject to an independent scrutiny by appointed experts, at the applicant's cost and will be required to be updated upon completion of the development through a planning obligation;
  - c. a full and thorough investigation has been undertaken to find innovative solutions to issues and all possible steps have been taken to minimise the residual level of harm; and
  - d. enter into planning obligations to provide for appropriate additional mitigation and/or contributions (as the case may be) in the event that viability improves prior to completion of the development.

4.31 The spatial vision and strategic objectives emphasise the importance of managing growth and shaping change sustainably. Planning for appropriate and adequate infrastructure is at the heart of sustainable development. Provision of appropriate and timely strategic infrastructure will be central to the continuing prosperity, attractiveness and sustainability of Brentwood. Plan-led growth provides the opportunity to address infrastructure needs, maximise the efficient use of existing infrastructure capacities and explore opportunities for new sustainable infrastructure.

4.32 In addition, the Council has prepared an Infrastructure Delivery Plan (IDP) to inform the Local Plan, this sits alongside the Local Plan and identifies the main items of infrastructure needed to mitigate the cumulative impacts of and support planned development; the site allocation policies also identify key pieces of site-specific infrastructure needed to support the development. New development will be expected to deliver or contribute to the necessary infrastructure requirements of the development as identified by the Council's IDP and site specific requirements, where such contributions are compliant with national policy and the legal tests. The Council will seek contributions from developers to fund the necessary infrastructure requirements through the use of planning condition and/or planning obligation and/or financial contributions through Community Infrastructure Levy (CIL) charges in accordance with the Community Infrastructure Regulations 2019.

- 4.33 The Council will work collaboratively with appropriate infrastructure providers, our partners and developers to facilitate the timely delivery of the infrastructure necessary to support the level of growth required.
- 4.34 The IDP Part B (Schedule) identifies the types of infrastructure required to support the anticipated growth in the borough and includes a summary of the currently identified infrastructure projects and their phasing, costing, delivery mechanism, priority ranking and relevant site allocations.
- 4.35 The IDP will be updated in consultation with both the internal and external stakeholders such as other service areas and infrastructure providers.
- 4.36 In negotiating planning obligations, the Council will also take into account strategic infrastructure (category 1 items in the IDP). The Council will use planning conditions or legal agreements to facilitate the provision of strategic infrastructure. Where necessary this will involve suitable phasing of development and forward funding of its supporting infrastructure. In addition to developer funding, where necessary, the Council will collaborate with its partners to lobby central Government and funding partners for additional funding sources for strategic infrastructure projects.
- 4.37 Early delivery of certain strategic and necessary infrastructure (category 1 and category 2 items in the IDP) in advance of all contributions having been collected may be required to support the level of growth planned. It will therefore be necessary to obtain funding from alternative sources and to collect developers' contributions retrospectively for these projects. In those instances, the Council and its partners including relevant landowners/developers will consider forward-funding wholly or partly to deliver critical infrastructure items. Therefore, in order to appropriately recover such forward-funding, when planning applications for development which will be enabled by and/or benefit from such infrastructure do come forward, the Council may seek retrospective planning obligation contributions from all relevant development, at the appropriate contribution rate, even if those applications are not made until after the relevant infrastructure has been completed and/or fully or partially funded. Where an item of infrastructure has been forward funded or provided by a relevant landowner/developer, the retrospectively collected planning contributions may be used to reimburse to such landowner/developer. As the final costs of the relevant item of infrastructure may not be known at the time, planning obligations requiring a contribution towards that infrastructure may also, where appropriate, contain a mechanism for review once the relevant item(s) of infrastructure has been fully paid for and constructed so as to secure payment of the appropriate level of contributions to cover the costs of the infrastructure. The CIL Regulations prohibit borrowing against future CIL receipts, so this method of forward-funding only applies to planning obligations.
- 4.38 Applicants should refer to Essex County Council's Developers' Guide to Infrastructure Contributions which sets out ECC's standards for the receipt of relevant infrastructure funding.
- 4.39 The Council will take into account financial viability to ensure that the cumulative impact of planning policy, standards and infrastructure requirements do not render the sites and development identified in the Local Plan unviable and therefore undeliverable .
- 4.40 This policy must be read in conjunction with Policy NE01 .

- 4.41 The Council intends to progress the introduction of the Community Infrastructure Levy (CIL) as soon as possible after the Local Plan Examination. CIL is a charge, used to fund borough wide and local infrastructure projects for the benefit of local communities. The CIL Charging Schedule is subject to independent Examination. CIL is payable upon the granting of planning consent. This enables the Council to raise funds from developers and provide some certainty 'up front' about how much money developers will be expected to contribute.

## Monitoring and Delivery

### Local Plan Review Requirements

- 4.42 The NPPF (2021) states that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence, and that this evidence is adequate and proportionate, taking into account relevant market signals. The NPPF (2021, paragraph 33) also states that reviews should be completed no later than five years from the adoption date of the plan, especially to take into account changing circumstances affecting the area, or any relevant changes in national policy.
- 4.43 The Council recognises that continuous 'horizon scanning' is necessary to maintain a long-term view of the relevance of the policies, in light of the fast-paced technological advances of the built environment sectors and market efficiency in delivering planned development. This includes joint working on initiatives such as the South Essex Joint Strategic Plan. This is in addition to the day-to-day monitoring of the strategic objectives and policy implementation to reflect on how effective the Plan is in delivering and maintaining a sufficient supply of housing to meet needs.
- 4.44 Therefore, we will monitor the implementation of policies and proposals of the Local Plan using key indicators and targets set out in the Monitoring Framework (Appendix 3). The Council are committed to undertaking an early update of the Local Plan to ensure it looks ahead over a minimum 15-year period from adoption. Such a review may also be required to address the implications of the national standardised approach to calculating local housing need, when adopted.

#### **POLICY MG06: LOCAL PLAN REVIEW AND UPDATE**

The Council will bring forward a partial update of the Plan with the objective of meeting the full Objectively Assessed Housing Needs. The review will commence immediately upon the adoption of this Plan with submission of the review for examination within 28 months. Specific matters to be addressed by the update

shall include the following (amongst all other matters that need to be assessed and taken into account for the purposes of plan preparation):

1. An update of Objectively Assessed Housing Needs in accordance with the NPPF 2021 and related guidance;
2. An updated full green belt review and an updated spatial strategy (informed by the green belt review) in turn to inform the sustainable allocation of further sites to meet the full Objectively Assessed Housing Needs as assessed in part A above;
3. The allocation of further sites to meet as a minimum the full Objectively Assessed Housing Needs in accordance with the updated spatial strategy for the full period of the plan review;
4. A review of transport and highway issues to cater for local plan growth throughout the period of the review (in consultation with National Highways and Essex County Council) taking into account:
  - a. the optimisation of existing, and the introduction of further, sustainable transport measures where appropriate along with the need to provide improvements to and around:
    - i. A12 junction 12;
    - ii. M25 Junction 28;
    - iii. M25 junction 29;
  - b. any additional transport and highways infrastructure that will be needed to meet in full the updated Objectively Assessed Housing Needs and facilitate the further allocations taking into account implemented and committed highway schemes.

## Managing Development

- 4.45 This Plan will be the main vehicle through which planning applications are determined. In some circumstances, policies will be supplemented with supporting evidence and/or additional development management documents in the form of Supplementary Planning Documents or other types of guidance. Where considered necessary, we will also use special legislative tools such as Article 4 directions.
- 4.46 The Council will continue to develop the use of masterplans to guide the design and layout of new development in collaboration with infrastructure providers and other relevant organisations.

- 4.47 The broader process for determining planning applications encompasses pre-application discussions and Planning Performance Agreements.
- 4.48 In some circumstances, particularly in the case of major developments, strategic allocations or with complicated sites, we will also consider the use of independent review panels.

## Pre-Application Engagement

- 4.49 We encourage the pre-application engagement process with applicants. This can help achieve effective decisions, and good quality and acceptable development. While the outcome of an application cannot be guaranteed, a planning application is more likely to succeed if it is well prepared, accords with the Local Plan, and addresses the relevant challenges raised at the pre-application stage.
- 4.50 When preparing planning applications, applicants and developers should have regard to the requirements set out in the latest validation checklist.
- 4.51 Where considered necessary, and as a last resort, legal powers through the Planning and Compulsory Purchase Act 2004 (as amended) may be used to enable development, in line with the growth strategy.

## 05



# Resilient Built Environment

- 5.1 It is increasingly recognised that the design and layout of our built environment can impact our well-being and the opportunities to live a healthy lifestyle.
- 5.2 The role of planning policies and decisions in enabling and supporting healthy lifestyles is recognised in the NPPF (2021, paragraph 92).
- 5.3 The NPPF (2021, section 14) emphasises the need to take a proactive approach to mitigating and adapting to climate change. Our built environment is often put under strain during extreme weather conditions. The policies in this section seek to avoid increased vulnerability to extreme weather conditions, to ensure infrastructure is built to be resilient under conditions of a changing climate, and to ensure development is planned in ways that reduce carbon emissions, providing a positive strategy for resource efficiency. The Council seeks to improve our built environment so that it can support the future resilience of communities and infrastructure, as well as create strong, vibrant and healthy communities.
- 5.4 Infrastructure plays a critical role in enabling communities and businesses to survive and flourish in the face of climate and other threats. The concept of resilience in a planning context can be understood as the ability to reduce exposure to, prepare for, cope with, recover better from, adapt and transform as needed, to the direct and indirect consequences of climate change, where these consequences can be both short-term shocks and longer-term stresses<sup>6</sup>.

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<sup>6</sup> Joseph Rowntree Foundation (2015) Community Resilience to Climate Change: An Evidence Review. Available at: <https://www.jrf.org.uk/report/community-resilience-climate-change>

- 5.5 Resilience-building strategies can be considered to be ‘reactive’ or ‘proactive’<sup>7</sup>. A reactive approach focuses on mitigating consequences, maintaining stability and the status quo, whereas a proactive approach focuses on change and adaptation and looks more towards addressing long term stresses. Both approaches are incorporated in this Plan.
- 5.6 A holistic approach to sustainable development that reduces the environmental impact of development and promotes healthy communities should be embedded within all development proposals from the outset.
- 5.7 The policies in this section aim to increase the efficiency and resilience of our infrastructure, making our borough smarter and better prepared for climate impacts and other threats.

## Responding to Climate Change

- 5.8 Climate change and its consequences including flooding, heatwave and drought are significant environmental challenges and mitigating them is key to sustainability. Globally, the average concentration of CO<sub>2</sub> now exceeds 400 parts per million, the highest in recorded history<sup>8</sup>. Sixteen of the seventeen warmest years on record have occurred since 2001<sup>9</sup>. The Environment Agency predicts an average sea level rise around the UK of at least a metre by 2115 from a 1990 baseline<sup>10</sup>.
- 5.9 The Climate Change Act (2008) legislates for an 80% reduction in greenhouse gas emissions against 1990 levels by 2050. In June 2019, parliament passed the Climate Change Act 2008 (2050 Target Amendment) Order 2019 committing the UK to reduce net emissions of greenhouse gases to zero by 2050. This requires everyone to be engaged, from national and local government to businesses, households and communities.
- 5.10 Building the resilience of wildlife, habitats and ecosystems to climate change, to put our natural environment in the strongest position to meet the challenges and changes ahead is one of the objectives of the National Adaptation Programme 2018<sup>11</sup> based on key recommendations from the Climate Change Risk Assessment 2017<sup>12</sup>. This is addressed further by a number of policies, such as Policy BE18 Green and Blue Infrastructure, Policy NE01 Protecting and Enhancing the Natural Environment, NE02 Recreational Disturbance

<sup>7</sup> Dovers, S.R. and Handmer, J.W. (1992) Uncertainty, sustainability and change, in *Global Environmental Change*, 2(4): 262–276; developed further in the context of flooding by Twigger-Ross et al., (2014) Resilience Community Pathfinder Evaluation: Rapid Evidence Assessment, Project Report, London: DEFRA

<sup>8</sup> NASA, Carbon Dioxide Hits New High. Available at: [http://climate.nasa.gov/climate\\_resources/7/](http://climate.nasa.gov/climate_resources/7/)

<sup>9</sup> NASA, NOAA Data Show 2016 Warmest Year on Record Globally. Available at: <https://www.nasa.gov/press-release/nasa-noaa-data-show-2016-warmest-year-on-record-globally>

<sup>10</sup> Environment Agency (2017) Flood Risk Assessments: Climate Change Allowances. Available at: <http://bit.ly/2w5Zo4o> United Kingdom Climate Projections 2018 (UKCP18) has started to consider revised risk associated with sea level change.

<sup>11</sup> DEFRA (2018) The National Adaptation Programme and the Third Strategy for Climate Adaptation Reporting. Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/727252/national-adaptation-programme-2018.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/727252/national-adaptation-programme-2018.pdf)

<sup>12</sup> HM Government (2017) UK Climate Change Risk Assessment 2017. Available at:

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/584281/uk-climate-change-risk-assess-2017.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/584281/uk-climate-change-risk-assess-2017.pdf)



Avoidance and Mitigation Strategy (RAMS), Policy NE03 Trees, Woodlands, Hedgerows, NE05 Air Quality, and NE06 Flood Risk.

- 5.11 The policies in this chapter require decision takers and developers to give an appropriate consideration to addressing the climate change, including:
- a. climate change mitigation measures which focus on reducing the impacts of human activities on the climate system, by means such as:
    - i. designing new communities and buildings to be energy and resource efficient;
    - ii. incorporating renewable technologies;
    - iii. reducing existing and potential source of pollution;
    - iv. reducing transport related carbon emissions through the promotion of sustainable modes of transport; and
  - b. climate change adaptation measures which focus on ensuring that new developments and the wider community are adaptable and resilient to the changing climate, by means such as:
    - i. buildings, infrastructure and construction techniques that are designed to adapt to a changing climate and to avoid contributing to its impacts, including urban heat island effect;
    - ii. safe and secure environment which is resilient against the impacts of climate change long term stresses and extreme weather events;
    - iii. enhancing biodiversity and ecological resilience where possible;
  - c. efficient resource management measures that take into account issues such as,
    - i. allocation and density of development;
    - ii. resource consumption (including water, energy, construction materials) during construction and operation as well as the environmental, social and economic impacts of the construction process itself and how buildings are designed and used.

# Sustainable Construction and Resource Efficiency

## Renewable Energy and Low Carbon Development

- 5.12 The NPPF requires the planning system to support the transition to a low carbon future in a changing climate, encourage the use of renewable and low carbon energy and associated infrastructure in line with the Climate Change Act 2008.
- 5.13 The Brentwood Renewable Energy Study (2014)<sup>13</sup> states that around half of all energy used in the borough is from road transport, with a third from domestic use and about a fifth from the commercial and industrial sector.
- 5.14 Statistical information from the Department for Business, Energy and Industrial Strategy (BEIS)<sup>14</sup>, indicates that Brentwood Borough has relatively high levels of domestic gas and electricity consumption. Over the period 2010 - 2015, Brentwood had the highest level of domestic customer mean gas consumption in the County and was also significantly higher than the England and East of England averages for the same period. Electricity usage for Brentwood ranks about 4<sup>th</sup> in the County and also significantly higher than the England and East of England averages for the period 2010 - 2015. One of the reasons for the higher domestic energy use in Brentwood maybe that homes in the borough are 13% larger than homes in England on average.
- 5.15 Over the period of the Plan, energy use and carbon emissions may increase by 10% following a 'business as usual' trajectory.

### STRATEGIC POLICY BE01: CARBON REDUCTION AND RENEWABLE ENERGY

#### 1. Carbon Reduction and Construction Standards

Development should meet the minimum standards of sustainable construction and carbon reduction as set out below:

- a. All major development will be required to achieve at least a 10% reduction in carbon dioxide emissions above the requirements of Part L Building Regulations; and

<sup>13</sup> University of Exeter (2014) Brentwood Renewable Energy Study

<sup>14</sup> BEIS Sub-national consumption statistics

- b. New Non-residential development will be required to achieve a certified 'Excellent' rating under the BREEAM New Construction (Non-Domestic Buildings) 2018 scheme, or other equivalent standards.

The version of BREEAM that a building must be assessed under should be the latest BREEAM scheme and not be based on scheme versions that have been registered under at the pre-planning stages of a project. Other construction standards, such as LEEDs or Passivhaus, will be supported provided that they are broadly at least in line with the standards set out above.

## 2. Renewable Energy

Wherever possible, application of major development will be required to provide a minimum of 10% of the predicted energy needs of the development from renewable energy. Where on-site provision of renewable technologies is not appropriate, or where it is clearly demonstrated that the above target cannot be fully achieved on-site, any shortfall should be provided through:

- a. 'allowable solutions contributions' via Section 106 or CIL. 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; or
  - b. off-site provision, provided that an alternative proposal is identified, and the measures can be secured.
3. Application of major development, including proposals involving the redevelopment of existing floor space, should be accompanied by a Sustainability Statement outlining their approach to the following issues:
- a. adaptation to climate change;
  - b. carbon reduction;
  - c. water management;
  - d. site waste management;
  - e. use of materials;
4. Where it is not possible to meet these standards, applicants must demonstrate compelling reasons and provide evidence, as to why achieving the sustainability standards would not be technically feasible or economically viable.

- 5.16 The Climate Change Act 2008 (2050 Target Amendment) Order 2019 commits the UK Government by law to reducing greenhouse gas emissions to zero by 2050.
- 5.17 Improvements in resource efficiency to meet the government's carbon target were made through Building Regulations which set standards for design and construction that applies to most new buildings, regardless of type.
- 5.18 However, local authorities can still require energy efficiency standards above Building Regulation, as allowed by the Planning and Energy Act 2008 and confirmed by the government in its summary response to the NPPF 2018 consultation.
- 5.19 As such, this policy requires an on-site reduction of at least 10 per cent beyond the baseline of part L of the current Building Regulations on major development. This takes into account the Local Plan Viability Assessment (2018)'s recommendation for the Council to only seek standards that are over and above those set out in Building Regulation in the case of major development where there is a requirement for 10% renewable energy.
- 5.20 According to the Brentwood Renewable Energy Study (2014), an international analysis of certified buildings has shown that the additional cost of achieving BREEAM 'Very Good' is expected to be minor and therefore should not be burdensome for developers. The version of BREEAM that a building must be assessed under should be the latest BREEAM scheme and not be based on scheme versions that have been registered under at the pre-planning stages of a project.
- 5.21 There are many approaches that can be taken to meeting the construction standards required by this policy. The Council will be supportive of innovative approaches to meeting and exceeding the standards set out in the policy. Where other construction standards are proposed for new developments, for example Leadership in Energy and Environmental Design (LEED) or construction methods such as Passivhaus Standard, these will be supported, provided that it can be demonstrated that they are broadly in line with the standards set out above, particularly in relation to carbon reduction and water efficiency.
- 5.22 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, developers should consider sustainable construction issues in pre-application discussions with the Local Planning Authority. Proposals should be captured within a Sustainability Statement, which can form part of the Design and Access Statement.
- 5.23 Sustainable design and construction are concerned with the implementation of sustainable development in individual sites and buildings. It takes account of the resources used in construction, and of the environmental, social and economic impacts of the construction process itself and how buildings are designed and used.
- 5.24 The choice of sustainability measures and how they are implemented may vary substantially from development to development. However, the general principles of sustainable design and construction should be applied to all scales and types of development. The Sustainability Statement should demonstrate how proposals avoid increased vulnerability to the impacts arising from climate change through sustainable and resilient design. The Sustainability Statement should be proportionate to the proposed scale of development and

clearly set out, providing sufficient detail on how sustainable design solutions have been integrated for both the construction and operation phases of the development. More guidance on areas to be covered in the Sustainability Statement is set out in Figure 5.1.

### **Adaptation to climate change**

Adaptation measures can be implemented at a variety of scales, from individual buildings up to community and conurbation scale. Measures that will have benefits beyond site boundaries, and that will have a cumulative impact in areas where development is to be phased, should also be pursued. Applicants should refer to best practice guidance.

### **Carbon reduction**

Proposals should demonstrate how the carbon reduction target will be met, in particular how the proposals:

- a. minimises the energy demand of new buildings by means such as fabric first approach and design;
- b. utilises energy efficient supply through low carbon technologies;
- c. supplies energy from new, renewable energy sources; and
- d. where on-site provision of renewable technologies is not appropriate, confirmation of offsite arrangement should be submitted.

Proposals for major development should contain a calculation of the energy demand and carbon dioxide emissions covered by Building Regulations and, separately, the energy demand and carbon dioxide emissions from any other part of the development, including plant or equipment, that are not covered by the Building Regulations (i.e. the unregulated emissions).

Proposals should also explain how the site has been future-proofed to achieve zero-carbon on-site emissions by 2050.

### **Water management**

Development must optimise the opportunities for efficient water use, reuse and recycling, including integrated water management and water conservation.

### **Site waste management**

Developments should be designed in a way that reduces the amount of construction waste and maximises the reuse and recycling of materials at all stages of a development's lifecycle.

All new development should be designed to make it easier for future occupants to maximise levels of recycling and reduce waste being sent to landfill. In order to do so, storage capacity for waste, both internal and external, should be an integral element of the

design of new developments. The Council will be supportive of innovative approaches to waste management.

### Use of materials

Although this is not a policy requirement, the Council will encourage all developers to maximise resource efficiency and identify, source, and use environmentally and socially responsible materials. There are four principal considerations that should influence the sourcing of materials:

- a. **Responsible sourcing** – sourcing materials from known legal and certified sources through the use of environmental management systems and chain of custody schemes including the sourcing of timber accredited by the Forestry Stewardship Council (FSC), or the Programme for the Endorsement of Forest Certification (PEFC);
- b. **Secondary materials** – reclaiming and reusing material arising from the demolition of existing buildings and preparation of sites for development, as well as materials from other post-consumer waste streams;
- c. **Embodied impact of materials** – the aim should be to maximise the specification of major building elements to achieve an area-weighted rating of A or B as defined in the Building Research Establishment (BRE) Green Guide to Specification. Consideration should also be given to locally sourced materials; and
- d. **Healthy materials** – where possible developers should specify materials that represent a lower risk to the health of both construction workers and occupants. For example, selecting materials with zero or low volatile organic compound (VOC) levels to provide a healthy environment for residents.

### Other

As well as the consideration of the above issues, the sustainability statement in support of the application should also address how the proposals meet all other policies relating to sustainability throughout the plan, including:

- a. biodiversity and ecology;
- b. land, water, noise and air pollution;
- c. transport, mobility and access;
- d. health and well-being, including provision of open space;
- e. culture, heritage and the quality of built form, including efficient use of land.

Figure 5.1: Areas to be covered in the sustainability statement and recommended approach

### Allowable Solution

- 5.25 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 can explore opportunities for using carbon offset funds and community energy funds as a way of delivering the concept of allowable solutions in their areas.

### Renewable Energy Generation

- 5.26 Incorporating renewable energy generation and energy efficiency measures into new development will be essential in order to achieve carbon reduction targets.
- 5.27 All developments should maximise opportunities for on-site electricity and heat production as well as use innovative building materials and smart technologies to reduce carbon emissions, reduce energy costs to occupants and improve the borough's energy resilience.

## POLICY BE02: WATER EFFICIENCY AND MANAGEMENT

### Water Efficiency

1. Development should incorporate water conservation measures in the proposals and meet the minimum standards for water efficiency as set out below:
  - a. New residential development will be required to achieve limits of 110 litres per person per day.
  - b. New non-residential development is expected to meet BREEAM 'Excellent' rating in category Wat 01.
  - c. Major developments and high or intense water use developments (such as hotels) is expected to provide more substantial water management measures such as rain/ and grey water harvesting.

### Waste Water and Sewage

2. Development proposals should:
  - a. seek to improve the water environment and demonstrate that adequate wastewater infrastructure capacity is provided;
  - b. ensure that misconnections between foul and surface water networks are eliminated and not easily created through future building alterations;

- c. incorporate measures such as smart metering, water saving and recycling, including retrofitting and rain/grey water harvesting, to help to achieve lower water consumption rates and to maximise futureproofing;
3. Applications will need to demonstrate that the sewerage network has adequate capacity both on and off-site to serve the development and to assess the need to contribute to any additional connections for the development to prevent flooding or pollution of land and water courses. Where sewerage capacity is identified as insufficient, development will only be permitted if it is demonstrated that improvements will be completed prior to occupation of the development.

### **Water Quality**

4. All development proposals should have regard to the Water Cycle Study and:
  - a. seek to improve water quality;
  - b. not cause deterioration in the quality of a water course or groundwater;
  - c. not lead to adverse impacts on the natural functioning of the watercourse, including quantity, flow, river continuity, groundwater connectivity, or biodiversity impacts;
  - d. where development is likely to have an impact, proposals must set out how impacts will be mitigated.

5.28 Brentwood Water Cycle Study 2018 identifies the borough as lying within an area of Serious Water Stress. A semi-arid climate and succession of dry winters can lead 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 reduction to 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. As the Code for Sustainable Homes has been withdrawn, water conservation measures will be required to ensure a 110 litres per person per day limit, at the level formerly considered at Level 3-4 in line with the Water Cycle Study 2018.

5.29 Major developments are encouraged to incorporate more substantial water management measures, such as grey water harvesting. This is supported by the Interim Sustainability Appraisal (2016, paragraph 21.1.4 and 2018, paragraph 10.8.3).



## **POLICY BE03: ESTABLISHING LOW CARBON AND RENEWABLE ENERGY INFRASTRUCTURE NETWORK**

### **Renewable energy infrastructure**

1. Innovative approaches to the installation and/or construction of energy generation facilities or low carbon homes which demonstrate sustainable use of resources and high energy efficiency levels will be supported.

### **Decentralised energy infrastructure**

2. New development proposals of over 500 dwelling units, including brownfield and urban extensions, or where the clustering of new sites totals more than 500 units, should include energy masterplans to incorporate decentralised energy infrastructure in line with the following hierarchy:
  - i. where there is an existing decentralised heat network with sufficient capacity or the capacity to expand, new development will be expected to connect to it;
  - ii. where there is no existing decentralised heat network with sufficient capacity or the capacity to expand, new development will be expected to deliver an onsite heat network, unless it can be demonstrated to the Council's satisfaction that this would render the development unviable;
  - iii. where a developer is unable to deliver a decentralised heat network, it will need to be demonstrated to the satisfaction of the Council that the applicant has fully assessed all reasonably available options for its incorporation and delivery and has designed the development to allow future connection to a heat network unless it can be demonstrated that a lower carbon alternative has been put in place
3. New development will be expected to demonstrate that the heating and cooling systems have been selected according to the following heat hierarchy:
  - i. connection to existing CHP/CCHP distribution network;
  - ii. site-wide renewable CHP/CCHP;
  - iii. site-wide gas-fired CHP/CCHP;
  - iv. site-wide renewable community heating/cooling;
  - v. site-wide gas-fired community heating/cooling;
  - vi. individual building renewable heating.

- 5.30 According to the International Renewable Energy Agency (IRENA, 2018)<sup>15</sup>, renewable energy will be cheaper than fossil fuels by 2020 as a result of improvements in technology. Renewables are experiencing a virtuous cycle of technology improvement and cost reduction.

#### Stand-alone renewable energy

- 5.31 It is acknowledged that standalone technologies such as large-scale wind turbines and photovoltaic (PV) arrays could be significant sources of energy. The resource assessment in the Brentwood Renewable Energy Study (2014) demonstrated that the borough's renewable energy target will not be possible without deploying large commercial scale renewable technologies. However, stand-alone renewable energy schemes would occur within and could impact on the Green Belt and would also be constrained by proximity to suitable connection to the national electricity grid. Therefore, whilst the Council would encourage opportunities for stand-alone renewable energy schemes within Brentwood, this will need careful consideration and be assessed on a case-by-case basis. Selection of the most appropriate locations would depend on balancing technical factors (such as proximity to substations) with minimising the impact of those developments through careful siting and mitigation measures. The Council would also support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning, in line with the NPPF.

#### Decentralised energy

- 5.32 Decentralised energy broadly refers to energy that is generated off the main grid, including micro-renewables, heating and cooling. It can refer to energy from waste plants, combined heat and power, district heating and cooling, as well as geothermal, biomass or solar energy. Schemes can serve a single building or a whole community, even being built out across entire cities. Decentralised energy is a rapidly deployable and efficient way to meet demand, whilst improving energy security and sustainability at the same time. Other benefits of decentralised energy include:
- i. increased conversion efficiency (capture and use of heat generated, reduced transmission losses);
  - ii. increased use of renewable, carbon-neutral and low-carbon sources of fuel;
  - iii. more flexibility for generation to match local demand patterns for electricity and heat;
  - iv. greater energy security for businesses that control their own generation;
  - v. greater awareness of energy issues through community-based energy systems, driving a change in social attitudes and more efficient use of our energy resources.
- 5.33 District heating and cooling systems (DH) are an important enabling technology for the use of renewables and need to be a central component of the decentralised system. DH can combine different sources of heat and can play a positive role in the integration of variable renewable energy. In 'the Future of Heating'<sup>16</sup> the government highlighted the role for heat

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<sup>15</sup> IRENA (2018) Renewable Power Generation Costs in 2017, International Renewable Energy Agency

<sup>16</sup> DECC (2013) The Future of Heating: Meeting the challenge

networks for delivering low carbon heat. District heating can be retrofitted for existing heat customers or installed in developments as part of a site wide low or zero carbon energy solution.

- 5.34 The East of England resource assessment and the Brentwood Renewable Energy Study 2014 suggest that there are unlikely to be major anchor and high heat density areas in the borough suitable for retrofit-only DH networks. New development will therefore play an important role in heat network development in the borough. Strategic allocations could play a key role in establishing a decentralised energy network, offering great opportunities to create or expand the borough's decentralised energy infrastructure.
- 5.35 According to the Brentwood Renewable Energy Study (2014), DH is a viable low and zero carbon energy solution for new development; the viability of DH and CHP schemes are improved with increased scale, density and mix of uses. Smaller sites close to large existing loads, on the other hand, provide opportunities for collaboration which provides cost effective, energy efficient, low carbon heat and electricity. Therefore, applicants of strategic sites should engage at an early stage with the Council, stakeholders and relevant energy companies to establish the future energy requirements and infrastructure arising from large-scale development proposals and clusters of significant new development.
- 5.36 The financial opportunity from DH schemes exists as there are economies of scale where the costs of providing a central heat source that also generates power, together with the associated distribution infrastructure, outweighs alternative means of complying with Part L. Where development occurs piecemeal, it is likely that individual developers for each site would choose traditional means of meeting Part L Building Regulations, which may result in a loss of opportunity.
- 5.37 Energy masterplanning at the large scale offers a unique opportunity to consider and plan for a robust infrastructure that will support the aspirations of a sustainable community – not only in terms of demand reduction, energy efficiency and renewable energy supply, but also in relation to water and waste management, transport and biodiversity. All these issues must be considered from the earliest stage and will have a major influence on the energy masterplan concept. Particular attention should be given to opportunities for utilizing existing decentralised and renewable or low-carbon energy supply systems and to fostering the development of new opportunities to supply proposed and existing development. Such opportunities could include co-locating potential heat customers and heat suppliers. Using the masterplanning process to map out zero-carbon and renewable energy opportunities in the area will help in identifying the potential for renewables at all scales, including community-scale schemes (TCPA, 2016, Practical Guides for Creating Successful New Communities, Guide 4: Planning for Energy and Climate Change).
- 5.38 An Energy Masterplan should identify:
- i. major heat loads (including anchor heat loads, with particular reference to sites such as schools, hospitals and social housing);
  - ii. heat loads from existing buildings that can be connected to future phases of a heat network major heat supply plant;
  - iii. opportunities to utilise energy from waste;

- iv. secondary heat sources;
- v. opportunities for low temperature heat networks;
- vi. land for energy centres and/or energy storage;
- vii. heating and cooling network routes;
- viii. opportunities for futureproofing utility infrastructure networks to minimise the impact from road works;
- ix. infrastructure and land requirements for electricity and gas supplies;
- x. implementation options for delivering feasible projects, considering issues of procurement, funding and risk.

### Building scale technologies

5.39 Brentwood Borough has relatively high levels of domestic gas and electricity consumption, therefore building-scale technologies have the potentials to meet the borough's domestic energy demands. Building scale technologies often comprise permitted development and can be included in new development or retro-fitted to existing units. Building scale technologies with the greatest potential include rooftop solar technologies and biomass boilers in the commercial and industrial sector.

## **POLICY BE04: MANAGING HEAT RISK**

1. All development proposals should minimise internal heat gain and the risks of overheating through design, layout, building orientation and use of appropriate materials.
2. Major development proposals should demonstrate how they will reduce the potential for overheating and reliance on air conditioning systems by:
  - a. minimising internal heat generation through energy efficient design;
  - b. reducing the amount of heat entering a building through orientation, shading, albedo, fenestration, insulation and the provision of green roofs and walls;
  - c. managing the heat within the building through exposed internal thermal mass and high ceilings;
  - d. maximising passive ventilation; and
  - e. where necessary, providing mechanical ventilation and active cooling systems.

- 5.40 For some, climate change and severe weather events could cause them discomfort; for others, especially children, the elderly, and those who have certain health conditions, the effects can be potentially lethal. According to the first UK Climate Change Risk Assessment (CCRA) in 2012, there are around 2,000 heat-related deaths in the UK; it projects that this number could more than double by the 2050s. Much of this increased risk is thought to be caused by exposure to high indoor temperatures. Overheating risks to health also emerged as one of the top six key risks where more action is required in the most recent UK Climate Change Risk Assessment 2017<sup>17</sup>.
- 5.41 The Climate Change Act (2008) and the NPPF (2021, paragraph 153) also require planning to take a proactive approach to mitigating and adapting to the risk of overheating from rising temperatures.
- 5.42 Many aspects of building design can lead to increases in overheating risk, including high proportions of glazing and an increase in the air tightness of buildings. There are a number of low-energy-intensive measures that can mitigate this risk; these include but not limit to solar shading, building orientation, solar-controlled glazing, living walls and green roof. For major developments, a landscape scheme integrating multi-functional green and blue infrastructure should be developed along the built form as this can be part of a sustainable and energy efficient development.
- 5.43 Developers should refer to most up to date guidance and best practice examples. The Chartered Institution of Building Services Engineers (CIBSE) produces a series of guidance on assessing and mitigating overheating risk in new developments, in particular:
- i. TM 59: Design Methodology for the Assessment of Overheating Risk in Homes - is relevant for domestic developments; and
  - ii. TM52: The Limits of Thermal Comfort: Avoiding Overheating in European Buildings - is relevant for non-domestic developments.

These can also be applied to refurbishment projects.

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<sup>17</sup> UK Climate Change Risk Assessment, HM (2017)

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/584281/uk-climate-change-risk-assess-2017.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/584281/uk-climate-change-risk-assess-2017.pdf)

# Sustainable Drainage

## POLICY BE05: SUSTAINABLE DRAINAGE

1. All developments should incorporate appropriate Sustainable Drainage Systems (SuDS) for the disposal of surface water, in order to avoid any increase in surface water flood risk or adverse impact on water quality.
2. Development within areas identified as a Critical Drainage Area (CDA) on the policies map, should optimise the use of Sustainable Drainage Systems by providing an individually designed mitigation scheme to address the site-specific issues and risk, as informed by a site specific Flood Risk Assessment. This could be provided as part of the Drainage Strategy and must address any issues highlighted in the Surface Water Management Plan, where relevant.
3. Greenfield developments, major development and all development within a Critical Drainage Area must achieve a greenfield runoff rate. Where it is demonstrated that this is not possible on brownfield developments then a runoff reduction of 50% minimum should be achieved. The technical approach should be justified in the Drainage Strategy.
4. Applicants are required to submit a surface water Drainage Strategy and a Flood Risk Assessment for all major development as well as for all development within a Critical Drainage Area. The Drainage Strategy must include a SuDs Management Plan setting out the long-term management and maintenance arrangements.
5. SuDs will be required to meet the following design criteria:
  - a. the design must follow an index-based approach when managing water quality. Implementation in line with the updated CIRIA SuDS Manual<sup>18</sup> is required. Source control techniques such as green roofs, permeable paving and swales should be used so that rainfall runoff in events up to 5mm does not leave the site;
  - b. SuDS should be sensitively designed and integrated into the Green and Blue infrastructure to create high quality public open space and landscaped public realm, in line with Strategic Policy NE02: Green and Blue Infrastructure;
  - c. maximise opportunities to enhance biodiversity net-gain;

<sup>18</sup> CIRIA (2017) The SuDS Manual (C753). Available at:

[https://www.ciria.org/CIRIA/Bookshop/Free\\_Publications/Books/Free\\_CIRIA\\_Publications.aspx?hkey=ca8794b8-b1b3-4742-880d-6c7a27719afb](https://www.ciria.org/CIRIA/Bookshop/Free_Publications/Books/Free_CIRIA_Publications.aspx?hkey=ca8794b8-b1b3-4742-880d-6c7a27719afb)

- d. improve the quality of water discharges and be used in conjunction with water use efficiency measures;
  - e. function effectively over the lifetime of the development;
  - f. 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;
  - g. have regard to Essex County Council SuDS Design Guide 2020, or as amended.
6. 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, in line with policy requirements in BE02 Water Efficiency and Management.
  7. Development proposals should be designed to include permeable surfaces wherever possible. Proposals for impermeable paving, including on small surfaces such as front gardens and driveways, will be strongly resisted unless it can be suitably demonstrated that this is not technically feasible or appropriate.

- 5.44 Sustainable Drainage Systems (SuDS) are the primary means by which increased surface run-off can be mitigated. They can manage run-off 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 run-off 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. Reference must be made to the criteria outlined in the Essex County Council SuDS Guide.
- 5.45 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 green roofs, rainwater attenuation measures, 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'.
- 5.46 SuDS must have regard to the criteria outlined in the Essex County Council SuDS Guide .
- 5.47 Essex County Council is the Lead Local Flood Authority. Applicants will need to prove compliance with the above drainage hierarchy and ensure sustainable drainage has been

adequately utilised, taking into account potential land contamination issues and protection of existing water quality, in line with local and national policy and guidance.

- 5.48 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.
- 5.49 When run-off does occur, treatment within SuDS components is essential for frequent rainfall events, for example up to 1:1 year return period event, where urban contaminants are being washed off urban surfaces, for all sites.
- 5.50 For rainfall events greater than the 1:1 event, it is likely that the dilution will be significant and will reduce the environmental risk. It is important that the SuDS design aims to minimise the risk of re-mobilisation and washout of any pollutants already captured by the system.
- 5.51 Developers are encouraged to refer to the Strategic Flood Risk Assessment 2018 (which maps infiltration areas) and guidance provided by the Construction Industry Research and Information Association (CIRIA) for design criteria, technical feasibility, to ensure the future sustainability of the borough's drainage system. Essex County Council has produced a SuDS Design Guide (2015) to help steer what is expected from development to complement national requirements and prioritise local needs.

## Communications Infrastructure

- 5.52 The 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.
- 5.53 High quality communications infrastructure including ultrafast broadband and mobile communication will be provided by working collaboratively with Essex County Council, communications operators and providers, and supporting initiatives, technologies and developments which increase and improve coverage and quality throughout the borough.

### **STRATEGIC POLICY BE06: COMMUNICATIONS INFRASTRUCTURE**

1. The Council will support proposals for high quality communications infrastructure and superfast broadband, including community-based networks, particularly where alternative technologies need to be used in rural areas of the borough.
2. Proposals from service providers for new or the expansion of existing communications infrastructure (including telecommunications masts,



equipment and associated development, and superfast broadband) will be supported subject to the following criteria:

- a. evidence is provided to demonstrate, to the Council's satisfaction, that the possibility of mast or site sharing has been fully explored and no suitable alternative sites are available in the locality including the erection of antennae on existing buildings or other suitable structures;
- b. evidence is provided to confirm that the proposals would cause no harm to highway safety;
- c. the proposal has no unacceptable impact on the character and appearance of the area, landscape or heritage impacts or unacceptable impacts on the natural environment;
- d. the proposal has been designed to minimise disruption should the need for maintenance, adaption or future upgrades arise;
- e. the proposal will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and
- f. the proposal conforms to the latest International Commission on Non-Ionising Radiation Protection (ICNIRP) guidelines, taking account of the cumulative impact of all operator equipment located on the mast/site where appropriate (i.e. prevent location to sensitive community uses, including schools).

- 5.54 The government has committed to improving broadband access. As part of this commitment the Superfast Essex Programme aims to extend the fibre broadband network as far as possible in Essex. The Council will work with broadband infrastructure providers and Essex County Council to ensure as wider coverage as possible. Upgrades to existing and new communications infrastructure, including ultrafast broadband and mobile communication will be strongly supported, including masts, buildings and other related structures, to harness the opportunities arising from new high-quality communications.
- 5.55 The objective of this policy is to ensure the right balance is struck between providing essential telecommunications infrastructure, conserving and preserving the environment and local amenity, particularly in the borough's sensitive areas. 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. Therefore, 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.

- 5.56 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 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)<sup>19</sup> which should take into account the cumulative impacts of all operators' equipment located on the mast/site.

## **POLICY BE07: CONNECTING NEW DEVELOPMENTS TO DIGITAL INFRASTRUCTURE**

1. To support Brentwood's economic growth and productivity now and in the future, all development proposals should:
  - a. Provide up to date communications infrastructure as an integral part of development proposals. As a minimum, all new developments must be served by the fastest available broadband connection, installed on an open access basis. This includes installation of appropriate cabling within dwellings and business units and full connection of the developed areas to the main telecommunications network;
  - b. ensure that sufficient ducting space for future digital connectivity infrastructure (such as small cell antenna and ducts for cables, that support fixed and mobile connectivity and therefore underpins smart technologies) is provided wherever possible;
  - c. support the effective use of the public realm, such as street furniture and other installations, to accommodate new state of the art well-designed and integrated mobile digital communication infrastructure;
2. When installing new and improving existing digital communication infrastructure in new development, proposals should:
  - a. identify and plan for the telecommunications network demand and infrastructure needs from first occupation;
  - b. take into account the Highway Authority's land requirements so as not to impede or add to the cost of the highway mitigation schemes where the location and route of new utility services in the vicinity of the highway network or proposed new highway network;

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<sup>19</sup> <https://www.icnirp.org/>

- c. ensure the scale, form and massing of the new development does not cause unavoidable interference with existing communications infrastructure in the vicinity. If so, opportunities to mitigate such impact through appropriate design modifications should be progressed including measures for resiting, re-provision or enhancement of any relevant communications infrastructure within the new development;
  - d. demonstrate that the siting and design of the installation would not have a detrimental impact upon the visual and residential amenity of neighbouring occupiers, the host building (where relevant), and the appearance and character of the area;
  - e. seek opportunities to share existing masts or sites with other providers; and
  - f. all digital communication infrastructure should have the capacity to respond to changes in technology requirements over the life of the development.
3. Where applicants can demonstrate, through consultation with broadband infrastructure providers, that superfast broadband connection is not practical, or economically viable:
- a. the developer will ensure that broadband service is made available via an alternative technology provider, such as fixed wireless or radio broadband; and
  - b. ducting to all premises that can be accessed by broadband providers in the future, to enable greater access in the future. Only where this is not practicable or viable, the Council will seek developer contribution towards off-site works to enable those properties access to superfast broadband, either via fibre optic cable or wireless technology in the future to provide like capacity.

5.57 Fast, reliable digital connectivity is essential in today's economy and especially for digital technology and creative sector. The provision for digital infrastructure is important for the functioning of development and should be treated with importance.

5.58 Digital connectivity supports smart technologies in terms of the collection, analysis and sharing of data on the performance of the built and natural environment, including for example, water and energy consumption, air quality, noise and congestion. Where it is appropriate and viable to do so, development should be fitted with smart infrastructure, such as sensors, to enable better collection and monitoring of such data. As digital connectivity and the capability of these sensors improves, and their cost falls, more and better data will become available to improve monitoring of planning agreements and impact assessments.

- 5.59 Digital connectivity also supports smart technologies such as Artificial Intelligence (AI), wireless motion sensors and Virtual Reality (VR) which are increasingly used to assist an ageing population and people living with dementia, by reducing isolation, promoting independent living and assisting and complementing care and support.
- 5.60 Provision of high capacity broadband will support businesses and attract investment to Brentwood. It allows residents and businesses to access essential online services, social and commercial networks. It also has the potential to increase opportunities for home-working and remote-working, reducing the demand on travel networks at peak periods. The importance is demonstrated by recent census returns which show that the biggest change in journey to work patterns in the last 20 years has been the increase in people working from home.
- 5.61 The Council aspires to have ultrafast broadband or fastest available broadband at all new employment areas and all new residential developments through fibre to the premises/home (FTTP/H). Fibre to the curb, copper connections to premises and additional ducting for future provision will be considered if developers can show that FTTP/H is not viable or feasible.
- 5.62 It is recognised that at present, in some rural areas of the borough, fast, reliable broadband is not available as it is uneconomic or unviable to serve small numbers of properties in isolated locations. These places generally have poor access to other facilities and as such would not be expected to provide significant levels of growth. Lack of fast, reliable broadband or lack of scale to deliver broadband may be considered as unsustainable in these locations.
- 5.63 Where new development is proposed in rural areas, investment in superfast reliable broadband will be required, subject to viability. This means that developers should explore all the options, and evidence of this engagement should be submitted with a planning statement.

## Transport and Connectivity

### Sustainable Transport

- 5.64 Sustainable transport is a key component of sustainable development, for its many benefits go beyond helping the environment. It encourages an active lifestyle, contributes to improving air and noise quality, helps improve public health, provides safer environments for children, increases social interaction in the neighbourhoods and can save travel time by reducing congestion.
- 5.65 Sustainable transport refers to:
- i. Transport strategies that increases accessibility/mobility while minimising traffic volume and overall parking levels, for example allocating development in highly accessible locations, or providing public transport and a cycling network (Policy BE08 Strategic

Transport Infrastructure, Policy BE09 Sustainable Means of Travel and Walkable Street, Policy BE10 Sustainable Passenger Transport, Policy BE13 Parking Standards)

- ii. Means of transport which reduces the impact on the environment such as sustainable public transport, low emission vehicles, vehicle charging points and car sharing, as well as non-motorised transport, such as walking and cycling (Policy BE14 Sustainable Passenger Transport, Policy BE15 Electric and Low Emission Vehicle,).
  - iii. Mitigating the transport impact of development (Policy BE16 Mitigating the Transport Impacts of Development)
- 5.66 Many aspects of transport and travel need to be considered, including reducing the need to travel, encouraging walking and cycling to reduce dependency on car travel and to improve public health, making public transport cleaner and more accessible to all users.
- 5.67 It is also important that we consider car ownership and be realistic about the fact that most households in the borough will own a car. While public transport links into London are good for Brentwood town and other areas along the transport corridors, villages are more remote with less good access. Therefore, it is acknowledged that some level of car travel and parking considerations will remain important for Brentwood as we consider the future.

## **POLICY BE08: STRATEGIC TRANSPORT INFRASTRUCTURE**

In order to support and address the cumulative impacts of planned and other incremental growth, allocated development within the Local Plan and any other development proposals shall (where appropriate) provide reasonable and proportionate contributions to required mitigation measures to strategic transport infrastructure, including:

- a. circulation arrangements, public realm and multimodal integration around Brentwood, Shenfield and Ingatestone stations;
- b. circulation arrangement and public realm around West Horndon station, and the creation of associated multimodal interchange through phases to support new residents and employees;
- c. improvements to the highway network as deemed necessary by transport evidence or as agreed by National Highways and Essex County Council as appropriate, other statutory bodies, stakeholders and passenger transport providers; and
- d. additional and/or improved pedestrian, cycling infrastructure and bus services connecting development to key destinations such as railway stations, education facilities, employment, retail and leisure.

- 5.68 Strategic transport infrastructure is that which is critical to the delivery of the Local Plan as such their timely provision must be in place in order to support development. Strategic transport infrastructure are assigned a priority category 1 in the Infrastructure Delivery Plan.
- 5.69 This policy seeks to align strategic transport infrastructure improvements with Brentwood's proposed allocations and economic growth and to contribute to health and well-being whilst preserving the environment. This would be achieved by maximising the value of Elizabeth Line, improving the capacity of the stations and road network, ensuring the main settlements and new development have convenient access to high quality and frequent public transport services which connect to the town centre, main employment centres, rail stations, ports and airports in the wider region.
- 5.70 Development proposed within this Plan will only be deliverable and supported if suitable transport measures and investment are led, coordinated and, where appropriate, delivered by Brentwood Borough Council and strategic partners. Development should seek to enhance transport, particularly public transport, and wider connectivity between new and existing employment areas. The Council's positive approach to planning may require it to use its compulsory purchase powers under section 226 of the Town and Country Planning Act 1990. That power gives the Council a positive tool to help bring forward necessary works to support planned growth in the borough, where strong planning justifications for the use of the power exist and statutory requirements are satisfied.

#### Maximising the value of railway connectivity and Elizabeth Line

- 5.71 Previously known as Crossrail, the new Elizabeth Line is a 118 km railway under development crossing through the heart of London, enabling access between Reading and Heathrow in the west, through central London to Shenfield and Abbey Wood in the east. The full route is expected to be fully operational by May 2023. The arrival of Elizabeth Line will provide an improved and more frequent service to Brentwood's residents and visitors thus benefiting businesses and facilitating growth. The Council will work with partners to improve the station environment at both Brentwood and Shenfield stations, specifically in terms of non-motorised users and enhanced public transport access, with improved forecourt and pedestrian crossing facilities.
- 5.72 It is expected that the introduction of this new railway will have both positive impacts, as a result of additional rail trips, and potentially negative impacts, with potential for increased travel by car to access the stations (Transport Assessment, PBA, 2021). There will be a need to monitor and review the situation once the services are operational. Any impacts identified should be addressed through the implementation and promotion of sustainable transport measures, for example the provision for non-car modes and the implementation of parking restrictions and pedestrian wayfinding system.
- 5.73 The proximity of new housing developments close to railway stations can provide the opportunity to improve cycling and walking infrastructure for shorter distance trips, to access rail services. Improving links to Brentwood and Shenfield stations will benefit both existing population as well as the new Local Plan developments within easy access of the stations. Proposed allocations and future development near Brentwood and Shenfield stations are required to demonstrate that the planning and design for movement connect well to the surrounding walking, cycling and public transport links to the station, and give priority to pedestrians and cyclists.

### Improvements to the train stations

- 5.74 In order to support a transit-oriented growth strategy and support projected travel demands from future development as well as provide the opportunity for non-motorist travel, it is important to achieve integration of transport modes. This should support regional trips by public transport and reduce pressure on the road network at the critical peak period. The Council will encourage improvements to the public realm surrounding existing train stations and look to improve access, interchange facilities, installation of wayfinding signs and introduce parking control where appropriate. Park and Ride/ Cycle/ Stride schemes to improve access to the stations will be considered subject to a future detailed feasibility study prepared by the Council.
- 5.75 The railway stations in the borough have potentials to assist in providing additional benefits to sustainable travel. New development should seek to provide new or improved links and access to the station. Where appropriate contributions will therefore be sought from nearby developments:
- a. Brentwood station: located on the Great Eastern Mainline, Brentwood station is served by TfL rail services operating between Shenfield and London Liverpool Street and Abellio Greater Anglia services operating between Southend Victoria and London. The emphasis on accessibility to both Shenfield and Brentwood stations will be on sustainable travel as a means of access, with improvements to pedestrian and cycle infrastructure and bus services, linking both new and existing developments near the stations, and on introducing new parking controls where needed to discourage parking around the stations, therefore reducing car travel.
  - b. Shenfield station: also located on the Great Eastern Mainline, Shenfield station is served by TfL and Greater Anglia rail services to Stratford and London Liverpool Street station and Greater Anglia services to Southend Victoria, Colchester Town, Ipswich, Braintree and Clacton-on-Sea, as well as some services to Norwich. From May 2023 it will be the terminus of the Elizabeth Line which will run from Reading and Heathrow Airport in the west through London. During 2014 JMP Associates undertook a station parking study for Shenfield prior to the development of the Elizabeth line. From the Rail User Survey carried out as part of the study, the study demonstrates that with the introduction of better bus services to the station, a reduction in the number of people who park at Shenfield who live in the vicinity as well as from any future Local Plan developments in the region could be witnessed, reducing overall traffic on the local network. As mentioned above, enhancement to Shenfield station would centre around improving pedestrian and cycle infrastructure and bus services and where necessary, parking controls. Where appropriate contributions will therefore be sought from nearby developments.
  - c. West Horndon station: West Horndon station is on the London, Tilbury and Southend Railway line and is served by C2C with two trains per hour to London Fenchurch Street and Shoeburyness. It is currently identified that parking capacity is fully utilised most weekdays for commuters into London from the A127/A13 corridors. The location of a number of the Local Plan development sites will mean that West Horndon Station will play an important role in future transport provision. The Transport Assessment (PBA, 2021) proposed that over the lifetime of this Plan, the improvements to the station, bus and cycle infrastructure and interchange facilities are phased to create a

new integrated transport hub. An increased capacity on the existing train service will be central to the new cycling, walking and bus movements of the new residents and employees. To ensure the new development will provide convenient access to the future interchange at West Horndon, the Transport Assessment (PBA, 2021) proposed that interim bus service(s) connecting the developments sites to the interchange should be built into the development agreements to be funded. This should allow time for enough customer demand for a commercial operator to take on the routes. This is particularly the case with Dunton Hills where new opportunities will exist.

- d. Ingatestone station: Ingatestone railway station is on the Great Eastern Main Line, currently served by Greater Anglia. New development should seek to provide new or improve links and access to Ingatestone station.

### Delivering improvements to the highway infrastructure capacity

- 5.76 As the backbone of our transport system, roads keep the population connected and the economy flowing. In light of planned development, it is important to grasp the opportunity to transform our roads and the experience of driving on them, whilst also addressing strategic imperatives such as economic growth and climate change.
- 5.77 It should be noted, however, that providing additional highway capacity will only have a short-term impact and may be quickly taken up by suppressed traffic. Therefore, investment in providing alternatives is important. Non-highway measures<sup>20</sup> such as sustainable transport measures and behavioural change that go beyond physical improvements could assist in alleviating pressures on the highway network. These measures are embedded in other policies in this Plan.
- 5.78 The Council is working with Associations of South Essex Local Authorities (ASELA) to prepare a statutory Joint Strategic Plan (JSP) which will identify ways to transform transport connectivity, among other required work to deliver growth. This work will inform public transport services needed to follow suit if the wider development needs of south east England are to be sustainably provided.
- 5.79 In Brentwood, the strategic highway infrastructure includes:
  - i. the A12 which connects the market town and major settlements in central Brentwood Borough to London and the wider region, providing access to services, jobs and recreation;
  - ii. the A127 which travels through the south of Brentwood Borough and connects it to London, Basildon, Rochford, Southend, Southend Airport and surrounding employment areas. The A127 corridor is a vitally important primary route for the south of Essex;
  - iii. the M25 in the west which connects Brentwood Borough to London and Stansted Airport;
  - iv. and associated key junctions.
- 5.80 The Transport Assessment (PBA, 2021) assessed how the highway network within the borough copes at a strategic level as a result of the new Local Plan Development and

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<sup>20</sup> More details on non-highway measures can be found in the Transport Assessment (PBA, 2021).



committed developments within adjacent local authorities that would likely have an impact on Brentwood Borough highways. This work identified a number of junctions that may require mitigation as well as a number of non-highway<sup>21</sup> related mitigation measures. The results of the modelling and junction assessments highlight the need to continue to monitor throughout the Local Plan period to identify any additional impact from other schemes on the highway network in Brentwood, such as the Lower Thames Crossing project, the A127 and any highway effect from the opening of the Elizabeth Line. Since the level of growth planned along the A127 and A12 are reliant on new and improved strategic infrastructure of regional and national importance (including the Lower Thames Crossing), the Council will continue to work with the highway authority (Essex County Council), statutory bodies (including National Highways), the Essex Heart and Haven Strategic Transport Boards<sup>22</sup> other partners (including the ASELA and the A127 Task Force), and developers to secure the mitigation measures to the highways and related junctions to deliver growth. The impact of individual access junctions for individual sites would be expected to be undertaken by promoters of individual sites.

- 5.81 It is recognised that existing mitigation undertaken by third parties is being considered and will assist in improving capacity of the highway network in the borough. These include:
- i. A127/A128: several studies, led by Essex County Council, have been progressing on the A127 corridor between Southend-on-Sea in the East to the M25 in the west, the final section of this road is within Brentwood Borough. Within the A127 Corridor for Growth study<sup>23</sup> there are individual pieces of work currently at various stages of planning and development, many of which are focussed on interchange capacity and/or safety improvements. Continued joint working with ECC and other neighbouring authorities will be important, so any outcomes from this study can feed through to the South Brentwood Growth Corridor Masterplan;
  - ii. M25 Junction 28: National Highways are currently undertaking work to develop improvements at M25 Junction 28<sup>24</sup>. Further engagement will be required with National Highways on this scheme;
  - iii. M25 Junction 29: mitigation measures at this junction are being considered with the aim to improve the junction's operation with the introduction of the Brentwood Enterprise Park. Proposals for the Lower Thames Crossing route that impact M25 Junction 29 will need further consideration as part of these overall aims.
  - iv. The A127 Task Force has representation from all South Essex authorities including BBC. This Task Force will oversee much of the public affairs interaction between the Councils and Government to ensure that the route is seen as strategic and as a

<sup>21</sup>: Non-highway measures within this Plan include sustainable transport measures and behavioural change that go beyond physical improvements to assist in reducing the impact of developments on the overall road network. More details on non-highway measures can be found in the Transport Assessment (PBA, 2021), and under Policy BE16 Mitigating the Transport Impacts of Development.

<sup>22</sup>: The Heart and Haven Strategic Transport Boards was established by ECC with the primary roles to determine infrastructure priorities, encourage partnership working on transport and growth issues, and fulfil the duty to co-operate on transport planning and delivery in the context of Local and National Plans.

<sup>23</sup> <https://www.essexhighways.org/uploads/docs/nevendon-a127-corridor-for-growth-paper2.pdf>

<sup>24</sup> <https://highwaysengland.co.uk/projects/m25-junction-28-improvements/>

potential candidate for re-trunking in order to bring about the long-term improvement required for an area of South Essex with over 600,000 residents. The planning and design work for any improvement of this scale will of necessity require a short-term, medium and long term phasing. Whilst the A127 is the main focus ECC would be looking to work collaboratively with BBC and other councils in the area.

- 5.82 Brentwood high schools and some primary schools are very attractive not only to residents within the borough, but also for many children from the surrounding Essex and London authorities. The five high schools located in the central area of Brentwood Borough generate a significant volume of parents dropping off and picking up their children; therefore, the impact of an increasing population of children and school related traffic should be taken into consideration as a part of mitigation measures to the highway network. Development in proximity to schools and education facilities should be designed with priority given to safety and convenience of pupils' walking, cycling to school, as well as other measures that can address the impacts of school run traffic, in line with ECC's Developers Guide to Infrastructure Contributions.
- 5.83 For Central Brentwood Growth Corridor, the Council is considering a sustainable transport strategy to help address traffic and associated air quality issues, based on non-highway measures identified in the Transport Assessment (PBA, 2021), options including but not limited to School Clear Zones and Low Emission Zone:
- i. The School Clear Zones concept seeks to remove school related trips from the town centre and to encourage greater use of non-car modes for such trips. In these zones, vehicles will be restricted from stopping, parking for drop off during AM/PM peak hour. The pupils will be encouraged to walk or cycle from drop off zones to relieve pressure on the highway network. The measure has the added benefit of encouraging more physical activity for children their parents, and all other users to walk or cycle from a reasonable distance. In addition, it would help improve air quality and address illegal car parking affecting residents living close to the schools. The Council intends to continue exploring the potential and deliverability of this concept;
  - ii. A Low Emission Zone is a defined area where access by polluting vehicles is restricted or deterred with the aim of improving the air quality. This may favour vehicles such as alternative fuel vehicles, electric vehicles, or zero-emission vehicles. Currently feasibility analysis is being considered for Low Emission Zone as part of a long-term assessment (Brentwood IDP).
  - iii. Other measures and behavioural change measures are detailed under Policy BE16 Mitigating the Transport Impacts of Development, and can also be found in the Transport Assessment (2021).
- 5.84 For South Brentwood Growth Corridor, there is a recognition that provision of sustainable transport in this area is poor. To mitigate the impact of future development on the highway network in the South, the Council will work proactively with developers, key stakeholders and service providers to implement new area-specific sustainable transport measures, which would seek to mitigate transport impacts of sites on the highway infrastructure, improve bus links across the area and improve capacity of West Horndon station. The measures would also seek to reduce the impacts of northward movements into central Brentwood. Where

northward movement happens, they should be undertaken by electric car club vehicles, electric bikes or bus.

- 5.85 It is considered that the preferred route of the Lower Thames Crossing, developed by National Highways, will have impacts on opportunities as well as cumulative impact on the local and strategic transport network. The Lower Thames Crossing is a proposed new road crossing of the River Thames which will connect the counties of Essex (north) and Kent (south). The planned route is expected to run from the M25 near North Ockendon, cross the A13 at Orsett before crossing under the Thames east of Tilbury and Gravesend. A new link road will then take traffic to the A2 near Shorne, close to where the route becomes the M2. At this stage, information on the impact of this scheme on the highway network in Brentwood is limited. The impact of the scheme on travel in the borough will need to be reviewed as the scheme progresses, in particular, if delivery of the scheme comes forward during the Plan period.
- 5.86 The Lower Thames Crossing Statutory Consultation commenced on October 10<sup>th</sup> 2018<sup>25</sup>, the forecast reporting released as part of the consultation evidence does not provide detailed analysis of flow changes on the A128 and A127; however, the non-technical summary identifies a reduction in traffic on these links, demonstrating that this is likely to have a beneficial effect in the operation at these junctions. Currently, National Highways anticipate that, subject to funding and planning consent, the scheme would open in 2027, within the Plan period. However, there is still uncertainty regarding the timescales for the delivery of this scheme (Transport Assessment 2021, PBA).

## **POLICY BE09: SUSTAINABLE MEANS OF TRAVEL AND WALKABLE STREETS**

1. Sustainable modes of transport should be prioritised in new developments to promote accessibility and integration with the wider community and existing networks. Priority should be given to cycle and pedestrian movements and access to public transport.
2. Development proposals should provide the following sustainable measures as appropriate:
  - a. the provision of pedestrian, cycle, public transport and where appropriate, bridleway connections within development sites and to the wider area, including key destinations;
  - b. the creation of safe, secure, well connected and attractive layouts which minimise the conflicts between traffic, cyclists and pedestrians, and allow good accessibility for passenger transport within sites and between sites and adjacent areas, and where appropriate improve

<sup>25</sup> <https://highwaysengland.citizenspace.com/lc/consultation/>

areas where passenger transport, pedestrian or cycle movement is difficult or dangerous;

- c. the provision of community transport measures promoting car pools, car sharing, voluntary community buses, cycle schemes;
- d. safeguarding existing and proposed routes for walking, cycling, and public transport, from development that would prejudice their continued use and/or development; and
- e. any development requiring a new road or road access, walking and cycling facilities and public transport, will be required to have regard to the adopted Essex County Council's Development Management Policies or successor documents, in order to assess the impact of development in terms of highway safety and capacity for both access to the proposed development and the wider highway network.

5.87 Securing public transport improvements and better provision for walking and cycling would 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.

5.88 This policy seeks to ensure that development proposals will be designed to promote sustainable travel choices by improving choices and making development easily accessible by different modes of transport, especially walking, cycling and public transport. An important policy tool to achieve this is the modal hierarchy. All development should follow the modal hierarchy by providing access for all of the following (most preferable first, least preferable last):

- a. walking and providing access for all, including people with mobility impairment;
- b. cycling;
- c. public transport;
- d. powered two wheelers;
- e. commercial vehicles and taxis;
- f. car sharing;
- g. electric and low emission vehicles;
- h. private cars.

- 5.89 Barriers to walking should be addressed in development proposals, to ensure that walking is promoted and that street conditions, especially safety/security and accessibility for disabled people, are enhanced. Walking networks and facilities in and around all new developments should be direct, safe, attractive, accessible and enjoyable.
- 5.90 Cycling is a space efficient mode compared to cars so making streets attractive for cycling can bring benefits to all road users while also improving the experience of living, working and getting around.
- 5.91 Cycling should 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. When providing for cycle parking, cycle parking areas should be secure and covered, and allow easy access for occupiers and their visitors, and provide facilities for all, including disabled cyclists. This could include identifying and reserving specific spaces which provide step-free cycle parking and opportunities for people using adapted cycles, as well as providing facilities for other non-standard cycles such as tricycles, cargo bicycles and bicycles with trailers. Space for folding bicycles should be provided as well as space for conventional bikes to cater for rail commuters. However, space for folding bicycles is not an acceptable alternative to conventional cycle parking as these are less popular in some areas, tend to be less affordable and present difficulties for some users. Surface level parking is preferable to stacked parking which may be difficult for some people to use. Visitor parking should be quickly and easily accessible to front entrances of buildings and not require cyclists to visit parts of a site restricted to occupiers only.
- 5.92 The Council strongly supports contributions to and provision for car clubs at new developments to help reduce the need for private car parking.
- 5.93 The Council will work with partners and stakeholders to facilitate and promote sustainable transport links from new development to key destinations and the wider network. This include new or improved infrastructure, services and promotion to support walking, cycling and public transport, and provision of charging points for electric vehicles. The Sustainable Modes of Travel Strategy (SMOTS) produced by Essex County Council provides a framework for the Council and its partners to co-ordinate the provision of services and infrastructure to achieve its objectives.
- 5.94 The design of streets, parking areas, and other transport elements should reflect current national guidance, including the National Design Guide and the National Model Design Code. The Essex County Council's Transportation Development Management Policies provide further detail on requirements relating to accessibility and access, including Transport Assessment and Statement thresholds for each land use category.

## **POLICY BE10: SUSTAINABLE PASSENGER TRANSPORT**

The Council will facilitate and support sustainable passenger transport services operating in Brentwood to help deliver the vision of the Local Plan. Development proposals should protect and enhance existing passenger transport and their capacity. Proposed new community facilities, schools, and specialist older persons housing, where reasonable and proportionate, are required to provide pick-up and drop-off facilities (with appropriate kerbs) for passenger transport close to the principal entrance suitable for minibuses, school buses, taxis, and/or ambulances.

- 5.95 Passenger transport, including bus, school bus, rail, taxis and private hire vehicles play a significant role in enabling access to facilities and services across the borough and to destinations in other authorities' areas. They also provide people with travel choices and can contribute to addressing congestion and offsetting the environmental impacts of travel.
- 5.96 Consideration should be given to sustainable passenger transport provision as set out within Essex County Council Development Management Policies.
- 5.97 The Council, in consultation with relevant partners, will seek the retention of existing bus and rail services and, where viable, encourage improved and new services. Support will be given to the refurbishment of rail station buildings and other improvements in facilities for public transport users including transport interchange improvements.
- 5.98 Brentwood and the surrounding area are served by multiple bus operators; the most frequent are First Bus, Stagecoach and Ensign Bus. There is potential in future, with the pattern of development, to provide improved bus services linking key residential areas, both existing and those proposed through the local plan, employment and railway stations. The Transport Assessment (PBA, 2021) highlights that there is an opportunity to provide services that will link Dunton Hills Garden Village (and Basildon), West Horndon Station, Brentwood Enterprise Park, Childerditch Business Park and Brentwood (including the station), which if providing a high-quality express service between these key origins and destinations would provide a realistic alternative to the private car. Moving forward, in addition to traditional bus services, demand responsive services could be considered as a part of sustainable transport measures.
- 5.99 The Council would support the commencement of passenger transport in large scale developments at the earliest opportunity, which should be considered to be the responsibility of the developer. The Council will seek to secure additional passenger transport facilities and service funding to enable the existing routes to be enhanced in terms of frequency, quality, connectivity and coverage where appropriate.

## POLICY BE11: ELECTRIC AND LOW EMISSION VEHICLES

All development proposals should wherever possible maximise the opportunity of occupiers and visitors to use electric and low emission vehicles, and maximise the provision of electric vehicle charging / plug-in points and/or the space and infrastructure required to provide them in the future.

- 5.100 According to the Brentwood Renewable Energy Study<sup>26</sup>, transport emissions in Brentwood are higher than the national average, due to increased car ownership and access to vehicles. Electric or other low emission vehicles will help reduce pollution, climate change impacts, oil use from the transport sector while improving energy independence, air and noise quality, thus well-being of Brentwood residents.
- 5.101 The development of a robust infrastructure network is widely considered a key requirement for a large-scale transition to electromobility. Research<sup>27</sup> has found that the availability of public charging is generally linked with electric vehicle uptake as providing charging stations can help meet charging demand and increase electric vehicle consumer confidence. National Highways has plans to install charging infrastructure every 20 miles along the major road network as part of its Road Investment Strategy<sup>28</sup>.
- 5.102 The Council may seek infrastructure for electric and low emission vehicle where it is appropriate and viable. This could be in the form of public charging infrastructure or make-ready infrastructure for charging stations. The design and operation of such infrastructure should follow best practice so that their operation would not undermine the quality of public realm nor refract from the shift towards active travel.
- 5.103 In addition, the provision of private charging infrastructure at home and at workplace will be encouraged:
- i. Home charging stations could help to make electric vehicles more accessible. In multi-unit dwellings, where residents frequently do not have dedicated parking spots, installation of charging infrastructure in shared parking facilities or public curbside charging stations could be sought. The UK Government's Office for Low Emission Vehicles currently offers incentive programs towards the up-front cost of each electric vehicle charge point purchased and installed to defray the added costs of charging infrastructure at home<sup>29</sup>.

<sup>26</sup> University of Exeter (2014) Brentwood Renewable Energy Study.

<sup>27</sup> Hall D., Lutsy N (2017) Emerging Best Practices for Electric Vehicle Charging Infrastructure, the International Council on Clean Transportation. Available at: [https://www.theicct.org/sites/default/files/publications/EV-charging-best-practices\\_ICCT-white-paper\\_04102017\\_vF.pdf](https://www.theicct.org/sites/default/files/publications/EV-charging-best-practices_ICCT-white-paper_04102017_vF.pdf)

<sup>28</sup> Jones A. (2015) Off Road Trials for 'Electric Highways' Technology, Highways England

<sup>29</sup> Office for Low Emission Vehicles (OLEV) (2016). Electric Vehicle Homecharge Scheme Guidance for Customers: Version 2.1. UK Department for Transportation. Available at: <https://www.gov.uk/government/publications/electric-vehicle-homecharge-scheme-guidance-for-customers-version-22>

- ii. Workplace charging can serve as the primary charging opportunity for drivers without a dedicated home charge point, allowing increased flexibility for drivers who commute with their electric vehicle. Since cars charging at a workplace tend to be plugged in for many hours during the middle of the day, it is an ideal setting for smart charging programs and could further the integration between electric vehicles and daytime renewable energy, especially solar. Pilots projects in the UK<sup>30</sup> and elsewhere<sup>31</sup> have shown that people are much more likely to switch to electric vehicles if there is access to charging infrastructure at their workplace. The UK Government's Office for Low Emission Vehicles offers financial support<sup>32</sup> towards the cost of installing EV charging to encourage organisations to install electric vehicle charging facilities at their workplace.

## **POLICY BE12: MITIGATING THE TRANSPORT IMPACTS OF DEVELOPMENT**

1. Developments must not have an unacceptable impact on the transport network in terms of highway safety, capacity and congestion.
2. New development proposals will be required to be supported by:
  - a. Travel Plans, Transport Assessments and/or Statements in accordance with the thresholds and detailed requirements for each land use category as set out in the Essex County Council's Development Management Policies or its successors; and engage in an appropriate and proportionate assessment process with National Highways where development has a likelihood to have a material impact on the Strategic Road Network which is not otherwise catered for by programmed works or improvements;
  - b. where necessary, reasonable and proportionate financial contributions and/or take reasonable measures to:
    - i. mitigate the cumulative transport impact of the development to an acceptable degree, including relevant highways measures identified in the IDP Part B; and
    - ii. accommodate the use of sustainable modes of transport including borough-wide sustainable transport measures identified in the IDP Part B, investment in infrastructure, services, Low Emission Zone,

<sup>30</sup> <https://www.businessgreen.com/bg/news/3007028/could-workplace-charge-points-trigger-electric-vehicle-demand>

<sup>31</sup> Oleksak, S. (2014) Survey Says: Workplace Charging Is Growing in Popularity and Impact, U.S. Department of Energy. Available at: <https://www.energy.gov/eere/artides/survey-says-workplace-charging-growing-popularity-and-impact>

<sup>32</sup> Office for Low Emission Vehicles (OLEV) (2016) Workplace Charging Scheme Guidance for Applicants, Installers and Manufacturers, UK Department for Transportation. Available at: <https://www.gov.uk/government/publications/workplace-charging-scheme-guidance-for-applicants-installers-and-manufacturers>



or measures to promote behavioural change (including enforcement).

- 5.104 Development resulting in an unacceptable impact on highway safety, or significant and harmful residual cumulative impacts on the road network will be prevented or refused on highways grounds, unless any impact will be effectively mitigated to an acceptable degree, in line with the NPPF.
- 5.105 Traffic congestion and road capacity remain key issues on the borough's transport network and the need to mitigate their impacts and to promote modal shift remains imperative, especially as growth in and around Brentwood increases.
- 5.106 Joint working has been undertaken with National Highways, Essex County Council (highways authority), developers and all relevant partners to identify necessary mitigations at key junctions, to address the cumulative impact of growth within the borough over the Plan period. In addition to strategic transport infrastructure, a number of highways junction improvements will need to be made to facilitate new growth, these are assigned a priority category 2 in the Infrastructure Delivery Plan.
- 5.107 As noted earlier in this chapter, providing physical improvements to the highway will only have a short-term impact therefore it is important to invest in long term alternatives. The Council will work with developers, highways authority and service providers to consider potential sustainable transport measures that could assist in reducing the impact of developments on the overall road network. The Transport Assessment (PBA, 2021) identifies a sustainable transport measures package that could be implemented in Brentwood Borough. These are listed in the IDP with priority category 3 which may be revised from time to time.
- 5.108 Applicants are expected to consult with the Highways Authority on transport matters and adhere to Essex County Council's development management policy requirements (or equivalent) in respect of Travel Plans, Residential Travel information Packs and other highways considerations. Please refer to the Essex County Council Highways Authority Development Management Policies.

## Managing Parking

- 5.109 The Council will continue to promote lower levels of private car parking to help achieve modal shift, particularly for non-residential developments where more sustainable transport alternatives such as walking, cycling and public transport exist. This will be particularly important in the Town Centre, where the transport strategy is to increase access without an increase in overall parking levels.

- 5.110 Car parking standards are an important means of managing traffic levels in and around a development, especially when combined with measures to increase access to transport alternatives to the private car.

### **POLICY BE13: PARKING STANDARDS**

1. Development proposals must take account of the Essex Parking Standards – Design and Good Practice (2009), or as subsequently amended. The decision-maker will have regard to these standards when determining planning applications.
2. Proposals which make provision below these standards should be supported by evidence detailing the local circumstances that justify deviation from the standard.

- 5.111 Developers should account for the following when proposing the level of car parking for a site:
- a. the location of the development, in terms of whether the site has convenient walkability and cyclability to the Town Centre, District Shopping Centres, major employment centres, and whether or not it has high public transport accessibility;
  - b. the type of development (fringe site, infill site, etc.) - infill sites are much more likely to be located in areas with existing travel patterns, behaviours and existing controls, and may be less flexible;
  - c. the type of residence (houses, flats, etc.) - houses tend to have higher car ownership than flats, even if they have the same number of habitable rooms;
  - d. local car ownership levels;
  - e. for developments requiring a Transport Assessment, it should be demonstrated that the level of parking proposed is consistent with the recommendations of this Transport Assessment;
  - f. the need to ensure an adequate provision of spaces for charging plug-in and other ultra-low emission vehicles. Electric vehicle charging points or the infrastructure to ensure their future provision should be provided within a development where reasonable and proportionate; and
  - g. adequate provision should be made for efficient deliveries and servicing.

- 5.112 Brentwood Borough Council adopted the Essex Parking Standards– Design and Good Practice (2009) as a Supplementary Planning Document (SPD) in 2011 and will expect these standards to apply until such time as they are revoked or superseded by other standards. This document sets out a range of standards to be applied depending on the proposed use of new development, such as minimum parking for residential development to address issues of on-street parking and maximum standards for parking in non-residential developments in order to encourage more sustainable transport methods. This document is subject to revision by Essex County Council in light of changes made to the NPPF (July 2021).
- 5.113 Parking associated with offices has the potential to generate car travel in the morning and evening peaks when streets are the most congested. This makes bus travel less reliable and active travel less attractive and road network more congested in some parts of the borough. Office parking also has the potential to induce car dependence even where alternatives to the car exist. Census 2011 origin and destination statistics indicate that workers commuting to Brentwood from the surrounding local authorities mainly commute by car. Reduced office parking provision where alternative choices are convenient and available can facilitate higher-density development and support the creation of mixed and vibrant places that are designed for people rather than vehicles. Applicants should ensure that the use of non-car modes are provided for where appropriate.
- 5.114 It is important that local retail and leisure sector businesses are provided with suitable facilities to continue to thrive. Current parking provision in Brentwood Town Centre, District Shopping Centres and Local Centres often have negative visual impacts yet does not always meet parking space demands of shoppers and visitors. The Council seeks to improve the quality of parking so that it is convenient, safe and secure, alongside measures to promote accessibility for pedestrians and cyclists.
- 5.115 The shared parking provision in the Town Centre and District Shopping Centres is encouraged to allow visitors, shoppers and commuters to share parking facilities at different times of the day and week and to relieve the current high parking demands in these areas.
- 5.116 Free commuter parking could contribute to congestion and pollution, it also undermines public transport, including park-and-ride and rural bus services. Reducing free commuter parking will therefore reduce congestion and pollution and create demand for public transport. The net effect will be to start a virtuous circle of more convenient and reliable bus services attracting more passengers, creating demand for an expansion in services.
- 5.117 The quantum of any parking provision, as well as its design and implementation, should have regard to the need to promote active modes and public transport use. The operation of car and cycle parking and the associated public realm should be designed and managed in a way that it would not have negative transport, visual and safety impacts on the surrounding areas, and that under-utilised parking space is converted to other uses such as additional cycle parking, amenity space or green and blue infrastructure. Parking provision should be flexible for different users and adaptable to future re-purposing in the context of changing requirements, including technological change. Applicants should refer to best practice and guidance on the design, layout, landscaping and lighting of parking as set out in the Essex Design Guide, Brentwood Town Centre Design Guide and British Parking Association.

- 5.118 While the aim will be to offer a choice of transport, reducing dependency on the car will reduce congestion and pollution and improve resilience in the face of future fuel shortages or price rises. The government's Active Travel Strategy (Department of Health and Department 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 well-being.
- 5.119 The dominance of vehicles on streets is a significant barrier to walking and cycling and reduces the appeal of streets as public places. When properly implemented in appropriate locations, car-limited development could have significant benefits including:
- a. accommodating more dwellings on a given site, without overdeveloping;
  - b. leaving more space for landscaping and green space;
  - c. safer streets for children's play, and more social interaction;
  - d. reduced car dependency, while supporting walking, cycling, public transport and local car clubs;
  - e. less traffic congestion and pollution associated with the new development.

Larger car-limited developments will be encouraged to incorporate a car club, which can be an attractive alternative to private car ownership and boost the attractiveness of car-limited housing.

## Design and Place-making

### Good Design

- 5.120 The Council attaches great importance to high quality and inclusive design for all development, irrespective of size - including individual buildings, public and private spaces and wider area development schemes.
- 5.121 Good design is a key aspect of sustainable development and is intrinsic to good planning. The form, layout and character of buildings and public spaces contribute greatly to creating quality of life, improving health and well-being, making effective use of land, and facilitating activities and services.
- 5.122 The term 'high quality design' is frequently used yet is frequently misunderstood as architectural styles. Although visual appearance and the architecture of individual buildings are very important factors, high quality and inclusive design go beyond aesthetic considerations and address the connections between people and places and the coherent integration of new development into the natural, built and historic environment.

- 5.123 The Essex Design Guide 2018 is a useful starting point for a development and provides guidance regarding amenity standards, layouts and case studies. The Essex Design Guide contains five cross cutting themes (ageing population, digital & smart technologies, health & wellbeing, active design, garden communities). For developments within or in the vicinity of Brentwood Town centre, applicants should take into account the Brentwood Town Centre Design Plan and Design Guide SPD . The Design Plan sets out how future development opportunities can collectively enhance Brentwood Town Centre, whilst the Design Guide SPD provide specific design guidance for development proposals in the area. Proposals should also take into account the most up to date design guidance, including Manual for Streets, Building for a Healthy Life, and Secured by Design.

#### **STRATEGIC POLICY BE14: CREATING SUCCESSFUL PLACES**

1. Proposals will be required to meet high design standards and deliver safe, inclusive, attractive and accessible places. Proposals should:
  - a. provide a comprehensive design approach that delivers a high quality, safe, attractive, inclusive, durable and healthy places in which to live and work;
  - b. make efficient use of land and infrastructure;
  - c. deliver sustainable buildings, places and spaces that can adapt to changing social technological, economic, environmental and climate conditions;
  - d. create permeable, accessible and multifunctional streets and places that promotes active lifestyles;
  - e. respond positively and sympathetically to their context and build upon existing strengths and characteristics, and where appropriate, retain or enhance existing features which make a positive contribution to the character, appearance or significance of the local area (including natural and heritage assets);
  - f. integrate and enhance the natural environment by the inclusion of features which will endure for the life of the development, such as planting to enhance biodiversity, the provision of green roofs, green walls and nature based sustainable drainage;
  - g. where applicable, ensure that new streets are tree-lined and opportunities are taken to incorporate trees elsewhere in developments;

- h. employ the use of high-quality street furniture, boundary treatments, lighting, signage, high quality materials and finishes to help create a durable development with local distinctiveness;
  - i. avoid unacceptable overlooking or loss of privacy;
  - j. safeguard the living conditions of future occupants of the development and adjacent residents;
  - k. sensitively integrate parking places and functional needs for storage, refuse and recycling collection points;
  - l. mitigate the impact of air, noise, vibration and light pollution from internal and external sources, especially in intrinsically dark landscapes and residential areas.
2. Proposals for major development should be supported by an area specific masterplan. Where appropriate, the Council will consider the use of a complementary design guide/code, to help guide the necessary design coherence across the entire development site. Design proposals will be expected to:
- a. demonstrate early, proactive, inclusive and effective engagement with the community and other relevant partners;
  - b. have regard to Supplementary Planning Documents and Guidance published by the Council, Essex County Council and other relevant bodies;
  - c. address feedback from the Council through its Pre-application Advice Service and where appropriate, feedback from an independent Design Review Panel.
3. Development proposals should be supported by a statement setting out the sustainable long-term governance and stewardship arrangements for the maintenance of supporting infrastructure including community assets, and open spaces; the statement should be proportionate to the scale of the scheme and quantum of infrastructure being delivered.

5.124 Achieving well-designed places is fundamental to creating distinctive and sustainable communities. It also ensures the development will function well over the lifetime of the development, ensuring that the design of the buildings and places have taken a proactive approach to mitigating and adapting to climate change. All proposals must clearly demonstrate that a comprehensive design approach has been used to inform the development and that all issues within this policy are positively addressed through the Design and Access /Planning Statements that accompany applications. Additionally,

sustainable development must also factor in how supporting infrastructure will be maintained throughout the life-time of the development. The design should therefore, factor in the lifespan of materials being used, and provide details for how these assets will be maintained over time, such as stewardship arrangements, where necessary.

- 5.125 The Council will require design to be addressed through early engagement in the pre-application process on major and strategic developments and in connection with all heritage sites. Where appropriate, the Council will require the use of masterplans and design codes to clearly set out the design rationale of the development site. Applicants should work collaboratively with those affected by their proposals to evolve designs that take account of the views of the community and ensure proposals have responded positively to local knowledge and context of the site. The NPPF is clear that applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. Therefore, early discussion with the Council and the local community about the design of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. Applicants that can demonstrate early, proactive, inclusive and effective engagement with the community will be looked on more favourably than those that cannot. Design codes will usually be prepared between outline and reserved matters stage on larger sites, especially those whose development will be spread over long periods. Where a site involves more than one developer, a collaborative masterplanning approach is expected to ensure the coherent application of design principles across the whole development site. The level of prescription will vary according to the nature of the site and the development proposed. The Council may, at its discretion, appoint an independent Quality Design Review Panel to review the detailed design proposals, to help provide additional rigour to the design-thinking process, thereby ensuring the longer-term sustainable success of the development.

### Local Character and Context

- 5.126 An important part of making successful places is to ensure that new buildings are attractive, appropriate in their setting and fit for purpose. Their massing, scale and layout should enhance, activate and appropriately frame the public realm, complement the existing streetscape and surrounding area.
- 5.127 Where development is in the vicinity of any of Brentwood's distinctive natural, cultural or historic assets, delivering high quality design that complements the asset will be essential. These natural and historic features are of high value and need to be protected and enhanced by the quality of development. Proposals that show a thorough understanding of the context of the site and demonstrate how the design proposal is sympathetic to its context, reinforcing local distinctiveness and sense of place are more likely to be successful.
- 5.128 The Design and Access Statements should clearly show an analysis of the site context, indicating the opportunities and constraints, and justify the principles that have informed the design rationale.
- 5.129 Existing landscape features on site such as trees, ponds and built-forms of value could also be integrated in the layout to establish a sense of place and/or a sense of legibility. The incorporation of existing landscape features is particularly important to people with dementia, as familiar landmarks can serve as visual cues to aid in wayfinding.

- 5.130 Proposals should either enhance local distinctiveness or seek to introduce distinctiveness to poor quality areas. When undertaking context appraisals, applicants should consider and set out in the Design and Access Statement the following:
- i. the built context: providing a demonstrable appreciation of built form in the vicinity covering analyses of building style, form, height and as well as the pattern of streets and spaces, morphology, skylines and landmarks;
  - ii. the environmental context: open spaces, bio-diversity structure, landscape character, areas liable to flood;
  - iii. the functional context: examining the existing activities and functions in the vicinity of the site including the existing pattern of uses, economic development initiatives, health, education & community facilities and public art;
  - iv. the spatial context: identifying the development site's position within the urban hierarchy;
  - v. the operational context: showing how infrastructure and facilities are used and their capacity to accommodate further demands;
  - vi. the community context: seeking to determine the reasonable and realisable needs and demands for space within an area and to associate these demands with the known existence of vacant or under-used space and the potential for creating new space; and
  - vii. the historic context: seeking to encourage new development that respects, incorporates and is informed by the character of and traditional historic form of the settlement in which the development will take place.

### Design Considerations

- 5.131 Permeable and legible layout is at the heart of good design and making successful places. Applicants are encouraged to optimise the layout, including spaces between and around buildings, to form a legible, safe and coherent pattern of streets and blocks. The overarching layout of a site should be informed by its context rather than technical demands of traffic.
- 5.132 Attention should be paid to the design of the parts of a building that people most frequently see or interact with, i.e. the ground plane and its legibility, use, detailing, materials and entrances.
- 5.133 New developments should be designed and managed so that online deliveries and goods deliveries can be received without causing unacceptable disturbance to residents and traffic.
- 5.134 Bin storage for dry recyclables and waste should be considered in the early design stages to help improve recycling rates, reduce smell and vehicle movements, and improve street scene and community safety.
- 5.135 Stimuli targeted at each of the senses (sight, scent, touch, sound and taste) should be incorporated into the landscape structure from the outset, to ensure that the development caters for people of all physical and mental abilities. This relates to both the natural, soft elements of the landscape – such as planting – and hard elements like sculptures, water features and furniture. Planning for users of all abilities and ages from the beginning can reduce the need for costly future adaptations.



- 5.136 The lighting of the public realm needs careful consideration to ensure it is appropriate to address safety and security issues and make night-time activity areas and access routes welcoming and safe, while also minimising light pollution.
- 5.137 Trees that line new streets are considered part of the GBI of the developments and as such proposals should provide appropriate long-term maintenance of newly-planted trees throughout the life of the development, in line with Strategic Policy NE02 Green and Blue Infrastructure.

### **POLICY BE15: PLANNING FOR INCLUSIVE COMMUNITIES**

To plan for and build inclusive environment that supports our residents and communities, the Council will require new development proposals to:

- a. provide access to good quality community spaces, services and amenities and infrastructure that accommodate, encourage and strengthen communities and social interaction for all users;
- b. create places that foster a sense of belonging and community, where individuals and families can develop and thrive;
- c. ensure that streets and public spaces are planned for everyone to move around and spend time in comfort and safety, are convenient and welcoming with no barriers to the disabled or impaired, providing independent access without additional undue effort, separation or special treatment;
- d. ensure buildings and places are designed in a way that everyone regardless of their ability, age, income, ethnicity, gender, faith, sexual orientation can use confidently, independently, with dignity and without engendering a sense of separation or segregation; and
- e. ensure that new buildings and spaces are designed to reinforce inclusivity of neighbourhoods and are resilient and adaptable to changing community requirements.

- 5.138 A key aspect of design that should be integral in all development proposals is its role in creating a safe and accessible environment. Inclusive and safe design principles should therefore be integral to the design and layout of the scheme, ensuring that people of all ages and abilities are able to benefit from high quality, accessible, safe and secure environments. This can be achieved by good natural surveillance, accessible and legible walkways, appropriate lighting, and active frontages. The Council strongly encourage the use of 'Secured by Design' principles to help reduce crime and improve perceptions of safety.

- 5.139 Enabling everyone to have safe access to places regardless of their age, ability, ethnicity, gender, faith, economic circumstance will create more inclusive communities, and improve the quality of life for people with a range of health conditions and older people. The Essex Design Guide 2018 provides guidance on residential development which is flexible and adaptable throughout its lifetime.

## Heritage

- 5.140 Brentwood Borough is rich in heritage assets - built, landscape and cultural. Brentwood's organic growth is recognisable by the historic settlement patterns for its villages and hamlets, these are largely sited on routes to and from London and East Anglia and often interspersed by high quality green infrastructure.
- 5.141 Brentwood's landscapes and villages are well documented by the Historic Environment Records<sup>33</sup>, its places, green areas and distinctive characteristics are often joined by historic thoroughfares which have grown over centuries into main routes following the urban expansion in the town at the end of the 19th century.
- 5.142 The Council positively encourages the enhancement and understanding of the significance of heritage assets and apporions great weight to the protection of the heritage assets in any decision-making process for future development.

## Heritage Assets

- 5.143 In Brentwood Borough, there are more than 500 entries on the statutory list of buildings of architectural or historic interest<sup>34</sup>, 12 scheduled monuments and 2 Grade II\* registered parks and gardens. In addition, the borough contains 13 designated Conservation Areas.
- 5.144 Understanding the significance of heritage assets whether of national designation or local significance is fundamental to their care, protection and long-term conservation. The term 'heritage assets' refers to those buildings, places or areas of national importance, registered on the Statutory list, but also includes those buildings, places or areas that are of local significance, these are referred to as non-designated heritage assets.
- 5.145 Designation affords a building, site or area of special interest and value which is protected under law or policy.
- 5.146 Non-designated heritage assets can include buildings, places, lanes or areas of cultural and/or local significance, or non-designated archaeological sites and deposits which whilst not nationally designated make a positive contribution to the Historic Environment and its understanding. In decision making, proposals which affect locally listed heritage assets

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<sup>33</sup> <http://www.heritagegateway.org.uk/gateway/>

<sup>34</sup> <https://historicengland.org.uk/listing/the-list/>

and/or their setting, must take into account the strong requirement for their retention and the enhancement of their significance locally.

- 5.147 Locally listed buildings within the borough are to be recorded on a live database. Whilst the Local Listing Programme is at embryonic stage, this list and its future enrichment is essential in conserving local distinctiveness and community engagement in the historic environment. The Council supports the ethos of local listing and the opportunities it brings to engage a diverse range of stakeholders into the management and education of the local historic environment.
- 5.148 The Council will apply a level of protection to and keep under review its heritage assets in order to preserve, and where appropriate enhance their special architectural or historic interest. A high standard of design for all new development affecting Heritage Assets and their setting is required.

## **POLICY BE16: CONSERVATION AND ENHANCEMENT OF HISTORIC ENVIRONMENT**

### **A. All Designated Assets**

1. Great weight will be given to the preservation of a designated heritage asset and its setting. Development proposals affecting a designated asset, including a listed building, conservation area, registered parks and gardens, or scheduled monument, will be required to:
  - a. sustain and wherever possible enhance the significance of the assets and its settings (including views into and out of conservation areas and their settings);
  - b. be supported by a Heritage Statement providing sufficient information on the significance of the heritage asset (according to its importance), the potential impacts of the proposal on the character and significance of the asset and its setting, and how the proposal has been designed to take these factors into account. The Statement should make an assessment of the impact of the development on the asset and its setting and the level of harm that is likely to result, if any, from the proposed development;
  - c. provide clear justification for any works that would lead to any harm to the asset.
2. Proposals that make sensitive and appropriate use of heritage assets, particularly where these bring redundant or under used buildings or buildings on the At Risk Register, into appropriate use consistent with their conservation status will be supported.

3. Proposals designed to enhance an asset and/or its setting and which reinforce its significance and contribution to the character of an area will be supported.
4. Development proposals that would be likely to cause either less than substantial or substantial harm to, or loss or partial loss of, a designated asset or its setting will be assessed in accordance with the statutory framework and national planning policy.
5. Where a proposed development involves the loss or partial loss of a designated asset, applicants will be required to record and advance understanding of the asset in a manner proportionate to its importance and the impact which will be caused.

#### **B. Conservation Areas**

In addition to satisfying the relevant criteria in A above:

1. Permission for proposals which involve the demolition or partial demolition of a building in a conservation area will only be granted subject to a condition and/or a planning obligation (as appropriate) that no demolition will take place until an enforceable contract has been let for the carrying out of the new development.
2. Development will be permitted in a conservation area where the siting, design and scale of the proposed development would preserve or enhance its character or appearance and important views into and out of the area are preserved or enhanced.

#### **C. Non-Designated Heritage Assets**

Development proposals that affect non-designated heritage assets and their settings, including protected lanes, should seek to preserve and wherever possible enhance the asset and its setting. When considering proposals which are likely to cause harm to such an asset consideration will be given to:

- a. the significance of the asset and its setting; and
- b. the extent to which the scale of any harm or loss harm has been minimised.

#### **D. Specific Requirements**

Specific requirements in relation to particular heritage assets identified in housing allocation policies should be read alongside the overarching requirements of this policy.

### Historic Records

- 5.149 All development proposals should be based on a full understanding of the significance of heritage assets, both within the proposed development site and within the surrounding area. This should be established by reference to relevant and available sources of historic environment information. Heritage assets are depicted on the Policies Map, however applicants are advised to consult the Essex Historic Environmental Record held by Essex County Council as well as any records held by Historic England and other sources to ensure the most up to date records are reviewed before submitting an application. It is also advised that early engagement is sought with the Council's Historic Buildings Advisor through pre-application consultation.
- 5.150 The Council recognise that on occasion heritage assets are not always documented or fully understood and could be identified through the development process; for example revealed by local groups through the consultation process or during preliminary site investigations undertaken by an applicant. In these circumstances the Council expect a positive approach to ensure the significance of these non-designated heritage assets are appropriately conserved and enhanced.

### Heritage Statement

- 5.151 All development proposals that are likely to have an impact on a heritage asset or its setting must be accompanied by a Heritage Statement that clearly describes the significance of both the asset and the setting as well as proportionately assesses how the proposal impacts upon it, in relation to its form, fabric, setting, architectural or historic relevance. The level of detail needed should be proportionate to the scale and nature of the proposal and the importance of the asset itself. A schedule of works should be included.
- 5.152 The Council advise that applicants seek advice from specialist historic environment consultants where necessary, to carry out appropriate assessments.
- 5.153 In respect of the loss of any asset the Council will require applicants to record the significance of any asset to be lost in a manner proportionate to its importance and the impact. The applicant should deposit such evidence to the Essex Historic Environment Record.
- 5.154 Listed buildings are defined under Section 1 of the Planning (Listed Buildings and Conservation Areas) Act 1990, as 'buildings of special architectural or historic interest'. The Secretary of State is required to compile or approve listed buildings for the guidance of local planning authorities. There are 512 listed buildings<sup>35</sup> within the borough, consisting of:
- 12 buildings of Grade I (buildings of exceptional interest)
  - 27 buildings of Grade II\* (particularly important buildings of more than special interest)
  - 473 buildings of Grade II (buildings of special interest, which warrant every effort being made to preserve them).

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<sup>35</sup> The current list for Brentwood was approved on 9 December 1994, following a comprehensive resurvey of buildings in the Borough, originally consisted of 512 listed buildings.

- 5.155 This policy addresses the statutory considerations of the Planning (Listed Buildings and Conservation Areas) Act 1990 which provides specific protection for buildings and areas of special architectural or historic interest as well as relevant polities within the NPPF.
- 5.156 Where there is evidence of deliberate neglect of, or damage to a heritage asset, the deteriorated state of the heritage asset will not be taken into account in any decision.
- 5.157 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.
- 5.158 Proposals affecting listed buildings should refer directly to the statutory list of Buildings of Special Architectural or Historic Interest<sup>36</sup>. 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.
- 5.159 National policy and guidance promotes the use/reuse 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 should not have an adverse impact on its context. Proposals for the change of use of a listed building in the Green Belt will also be assessed against development in the Green Belt policies within this Plan.
- 5.160 Proposals will be required to take a practical approach towards the alteration of listed buildings to comply with the Equality Act 2010 and subsequent amendments, provided that proposed alterations and changes to access are sympathetic and ensure the building's special interest remains unharmed. Applicants should refer to the Historic England Easy Access to Historic Buildings (2015) as a basis for practical guidance.
- 5.161 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. The Council will apply similar levels of preservation to its locally designated heritage assets and their settings in line with national policy and guidance to ensure a high standard of design for all new development affecting the character or setting of its built, natural and historic environment. 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.
- 5.162 Conservation Areas 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'. With a rich and varied cultural heritage, Brentwood has 13 designated Conservation Areas within the borough. Conservation Areas are shown on the Brentwood Policies Map.
- 5.163 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.

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<sup>36</sup> [www.historicengland.org.uk](http://www.historicengland.org.uk)

Development proposals in a Conservation Area should make reference to the relevant Conservation Area appraisal.

- 5.164 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, will not normally 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 by English Heritage (2011).
- 5.165 In order to ensure a high standard of design and materials, outline applications will not be accepted.

### Local List

- 5.166 Locally listed buildings will be a material consideration in determining planning applications: the retention of important features and fabric and the impact of proposals upon the local significance and understanding of a locally listed building will be a material consideration.
- 5.167 There are a number of country lanes and byways which are of historic and landscape value, and which make an important contribution to the rural character of the borough. The Council will seek to preserve these lanes and byways as far as possible, including their trees, hedgerows, banks, ditches and verges, which contribute to their character, and by resisting development proposals which have a detrimental effect upon them.

### Protected Lanes

- 5.168 The greater part of the road network in the Essex countryside derives from at least as far back as the medieval period. Much of it undoubtedly existed in Saxon times. These lanes are part of what was once an immense mileage of minor roads and track-ways connecting villages, hamlets and scattered farms and cottages. Many were used for agricultural purposes, linking settlements to arable fields, grazing on pasture, heaths and greens; and other resources such as woodland and coastal marsh.
- 5.169 Before metalled road, with wide verges and linear roadside green with ditches and interspersed with ponds for transporting, feeding and watering livestock on route to market. These lanes are an important part of the Essex landscape, providing insight into the development of a landscape and the relationship of features within it over time. They have considerable ecological value as habitats for plants and animals, serving as corridors for movement and dispersal for some species and acting as vital connections between other habitats; and promoting well-being.
- 5.170 The Protected Lanes in Brentwood are listed below:

National Street Gazetteer Name (NSG)	Location	Lane ID
Days Lane	Doddingtonhurst	BRWLANE1
Wenlocks Lane	Blackmore	BRWLANE2
Lincolns Lane	Coxtie Green	BRWLANE3
Hay Green Lane	Wyatt's Green	BRWLANE4
Mill Lane	Navestock Health	BRWLANE5
Sabines Road	Sabines Green	BRWLANE6
Dark Lane	Great Warley	BRWLANE8
Little Hyde Lane	Fryerning	BRWLANE10
Mill Green Road	Mill Green Common	BRWLANE11
Ivy Barns Lane	Mill Green Common	BRWLANE12
Ingatestone Road	Mill Green Common	BRWLANE13
Chivers Road	Stondon Massey	BRWLANE14

Figure 5.2: Protected Lanes in Brentwood

- 5.171 Recent assessment of the Protected Lanes<sup>37</sup> and update<sup>38</sup> in Brentwood has confirmed that these features remain and in the majority of instances, the designation for protection is recommended for retention. Two lanes, Back Lane and Sandpit Lane were identified by Essex County Council as no longer meeting the required criteria and have been removed whilst Chivers Road has been added as a Protected Lane<sup>39</sup>.
- 5.172 Material increases in motorised traffic using a Protected Lane due to development proposals must be assessed and action/infrastructure to influence user behaviour and encourage more sustainable modes of transport, will be required. Any proposals that would have a materially adverse impact on the physical appearance of Protected Lanes or generate traffic of a type or amount inappropriate for the traditional landscape and nature conservation character of a Protected Lane, will not be permitted.
- 5.173 The Council would consider exploring options and partnerships for influencing user behaviour and applying intelligent and positive measures of highway management that will serve to encourage local journeys to be made on bicycle or foot, and for recreation, and reduce the impact of vehicles on the historic fabric of lanes, whilst maintaining their local character.

### Mitigating Impacts

- 5.174 The heritage environment should be considered as an integral component of Brentwood's public realm and contribute positively to maintaining sustainable communities and must therefore, meaningfully inform the design of development. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), requires clear and convincing justification. Applicants are expected to demonstrate how the heritage assessment (as documented in the Heritage Statement) has appropriately informed and guided the design of the proposal to ensure they do not impact the architectural details and qualities of the asset. Proposals should be of the

<sup>37</sup> Brentwood Borough Protected Lane Assessment (2016) Essex County Council

<sup>38</sup> Brentwood Borough Protected Lane Assessment Update (Letter) (2018) Essex County Council

<sup>39</sup> Protected Lane Assessment, Chivers Road, Additional Lane (2020), Essex County Council



highest architectural and urban design quality, having regard to and respecting local character and other policies in this plan. Development proposals that appropriately preserve or help to better reveal and enhance heritage assets and their setting will be supported.

### Heritage-led Regeneration

- 5.175 A Heritage at Risk programme has been implemented by Historic England. It protects and manages the historic environment so the number of 'at risk' historic places and sites across England is reduced. The Heritage At Risk Register identifies those sites that are most at risk of being lost as a result of neglect, decay or inappropriate development. Proposals which seek to bring such assets back into appropriate use and help revitalise neighbourhoods in accordance with national policy will be supported.

### Archaeological Heritage

- 5.176 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.
- 5.177 Brentwood has a large number of sites of archaeological importance that are worthy of preservation for the future. 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, 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.
- 5.178 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.
- 5.179 As a finite and non-renewable resource, archaeology can become highly fragile and vulnerable to damage or destruction. The Council will need to be satisfied by the applicant that the significance of the archaeological remains adopt a presumption against proposals which would harm the setting of archaeological remains of national or local importance, whether scheduled or not, are conserved.
- 5.180 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.

# 06



## Housing Provision

### Housing

#### Housing Mix

- 6.1 It is important that new housing development addresses local needs and contributes to the creation of mixed and balanced communities. A core planning principle in the NPPF is that every effort should be made objectively to identify and then meet the housing needs of an area. This means providing sufficient good-quality housing of the right types, mix, sizes, and tenure in the right places, which will be attractive to and meet the identified needs of different groups in society, including families with children, first-time buyers, older people, people with disabilities, and people wishing to build their own homes. Well-designed housing should also be accessible and adaptable to meet people's changing needs and helping to sustain independent living.
- 6.2 The amount and distribution of housing to be delivered in the borough over the Plan period is established through Strategic Policy MG01 Spatial Strategy. Policy HP01 Housing Mix seeks to ensure that residential development proposals deliver housing in a way that contributes to the rebalancing of the housing stock to ensure it better reflects the identified needs and demands for housing of the existing and future communities of the borough.

**STRATEGIC POLICY HP01: HOUSING MIX**

1. All new residential development should deliver an inclusive, accessible environment throughout.
2. On residential development proposals of 10 or more (net) additional dwellings the Council will require:
  - a. an appropriate mix of dwelling types, sizes and tenures to meet the identified housing needs in the borough as set out in the Council's most up to date housing need evidence to provide choice, and contribute towards the creation of sustainable, balanced and inclusive communities; and
  - b. each dwelling to be constructed to meet requirement M4(2) accessible and adaptable dwellings, unless it is built in line with M4(3) wheelchair adaptable dwellings of the Building Regulations 2015, or subsequent government standard.
3. On developments of 60 or more (net) dwellings the Council will require all of the above, and:
  - a. a minimum of 5% of new affordable dwellings should be built to meet requirement M4(3) wheelchair accessible dwellings of the Building Regulations 2015, or subsequent government standard.
4. On development sites of 100 or more dwellings the Council will require all of the above, and:
  - a. a minimum of 5% self-build homes which can include custom housebuilding provided there is a need as justified within the Council's most up to date evidence; and
  - b. provision for other forms of Specialist Accommodation taking account of local housing need in accordance with the criteria set out in Policy HP04 Specialist Accommodation.
5. Where a development site has been divided into parts, or is being delivered in phases, the area to be used for determining whether this policy applies will be the whole original site.
6. The inclusion of self-build and custom build homes and Specialist Residential Accommodation on smaller sites will also be encouraged.

- 6.3 The NPPF requires local planning authorities to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community, including, but not limited to, those who require affordable housing, families with

children, older people, people with disabilities, travellers, people who rent their homes and people wishing to commission or build their own homes. Across the borough, there is a need to rebalance the housing market to provide a range of housing that will meet the changing needs of communities.

- 6.4 The Council's Strategic Housing Market Assessment (SHMA) Part 2 (2016) provides a detailed assessment of the housing required to meet existing and future needs across the borough. Proposals should respond to other up-to-date and relevant local evidence where available, such as the Council's Housing Strategy.
- 6.5 The Council's latest SHMA indicates that the greatest need for Market housing is two-bedroom units, closely followed by a need for family housing consisting of three or more bedrooms. Figure 6.1 below will be used to inform negotiations between the Council and developers to determine the appropriate mix of housing. The final mix of housing/types will be subject to negotiation with the applicant.

<b>Size of new Market housing required up to 2033</b>	
<b>Dwelling Size</b>	<b>Indicative Mix</b>
One bedroom	3.8%
Two bedrooms	35.8%
Three bedrooms	30.2%
Four or more bedrooms	30.2%
Total	100%

**Figure 6.1: Indicative Size Guide for Market Housing**

- 6.6 Census data<sup>40</sup> indicates an above average proportion of the borough's households contain older persons, at 24.1% compared to 22.3% regionally and 20.5% nationally. The proportion of the borough's population living beyond 65 years of age is set to rise during the Plan period, from 14,564 residents in 2013 to 21,093 residents in 2033, a rise of 44.8%, meaning a significant proportion of projected households are likely to have a household representative aged 65 or over.
- 6.7 The government position is that older persons should remain at home rather than enter residential facilities (use class C2) where appropriate. This combination of factors shows the need for homes that are adapted and further adaptable for a less mobile population. It is

<sup>40</sup> As referenced within the Strategic Housing Market Assessment (SHMA) Part 2 (2016)

expected that all dwellings on major residential schemes achieve requirement M4(2) accessible and adaptable dwellings, or M4(3) wheelchair adaptable dwellings of the Building Regulations 2015.

- 6.8 Government research<sup>41</sup> shows that, based on English Partnerships figures from 2011-2012, nearly 30% of households have at least one person with a long-term illness and over 3% have one or more wheelchair user.
- 6.9 While nationally 3.3% of households have a wheelchair user, for households living in affordable housing this rises to 7.1%. The rates are also higher for older households; and given that the number of older person households in the borough is set to increase over the period to 2033, the Council seeks to ensure 5% of affordable housing development on proposals of 60 or more dwellings achieves requirement M4(3) wheelchair accessible dwellings.
- 6.10 The development of self-build properties by individuals or community groups (including Community Land Trusts) can also contribute to meeting the need for additional housing within the district and provide a more diverse housing stock. Self-build plots are plots of land which are made available for individuals to design and build their own home whereas custom build plots are provided by site developers to the specification of individuals which may or may not follow a basic design pattern.
- 6.11 To assist in the delivery of a choice of accommodation, the provision of self and custom housebuilding plots is required to be made available on residential schemes of 100 dwellings or more. A figure of 5% of the total dwelling numbers shall be made available for sale as self or custom housebuilding plots whilst there is an identified need on the Council's Self-build and Custom Housebuilding Register. The Council will have regard to the information in its Self & Custom Housebuilding Register when negotiating the mix of plots to come forward as self or custom build and will secure this through S106 or other legal agreements. Self-build/custom build homes will not be considered as an alternative to, or replacement for, the affordable housing requirements set out in Policy HP05 Affordable Housing
- 6.12 Where a site has five or more self or custom build dwellings the Council may require these dwellings to be developed in accordance with an agreed design code. Where plots have been available at market value and marketed appropriately for at least three years and have not sold, the plot(s) may remain on the open market as self or custom build or be offered to the Council or a Housing Association before being built out by the developer.
- 6.13 The Council will also seek the provision of Specialist Accommodation on residential schemes of 100 dwellings or more, to ensure there will be sufficient housing to accommodate identified local need as set out in Policy HP04 Specialist Accommodation. The Council will have regard to the information in its AMR 'Specialist Accommodation Report' when negotiating the mix and type of units to come forward as Specialist Accommodation and will seek to secure this through S106 or other legal agreements.
- 6.14 Where an applicant considers that it is not feasible or viable to meet the requirements as set out in Policy HP01, the Council will expect this to be demonstrated with robust evidence and

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<sup>41</sup> Guide to available disability data DCLG

[https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/416475/150323\\_Guide\\_to\\_disability\\_data\\_\\_\\_final\\_web\\_version.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/416475/150323_Guide_to_disability_data___final_web_version.pdf)

may negotiate a proportionate housing mix which is achievable, account will be taken of the nature, constraints, character and context of the site.

- 6.15 Conditions may be used to ensure particular housing types provided, remain available in perpetuity and by tenure.
- 6.16 The Essex Design Guide 2018 seeks to provide residential development which is flexible and adaptable throughout its lifetime. The Design Guide includes guidance on cross cutting themes, one of which is specifically in relation to the ageing population.

## Protecting the Existing Housing Stock

### **POLICY HP02: PROTECTING THE EXISTING HOUSING STOCK**

1. To ensure that housing supply is protected, the net loss of existing dwellings will be resisted. The Council will only support development proposals that would result in the net loss in the number of dwellings where one or more of the following criteria are met:
  - a. the continued use of the building as a dwelling is undesirable due to proven environmental constraints; and
  - b. the loss of the dwellings would be outweighed by the provision of an essential community service or another form of residential accommodation.
2. In justifying any change of use between residential use classes, proposals must demonstrate how they are responding to established housing need as demonstrated in the Council's most up-to-date housing need evidence.

- 6.17 As demonstrated in this Plan, there are substantial needs for additional housing in the borough. The Council's work to determine land supply has demonstrated that to meet this need the release of some of the Green Belt is necessary and justified. Taking these factors together, the Council considers that it is important to resist the net loss of existing dwellings.

## Residential Density

### POLICY HP03: RESIDENTIAL DENSITY

Proposals for new residential developments not allocated in the Plan:

- a. should take a design led approach to density which ensures schemes are sympathetic to local character and make efficient use of land;
- b. be expected to achieve a net density of at least 35 dwellings per hectare net or higher, unless the character of the surrounding area suggests that such densities would be inappropriate, or where other site constraints make such densities unachievable; and
- c. be expected to achieve a higher density, generally above 65 dwellings per hectare net in the Town Centre and District Shopping Centres listed below Strategic Policy PC04 Retail Hierarchy of Designated Centres, or other locations with good public transport accessibility, subject to Strategic Policy BE14 Creating Successful Places.

- 6.18 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 appropriate 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.
- 6.19 Proposals for housing developments should promote an effective use of land in line with the NPPF. Policy HP03 Residential Density sets out the Council's expectations on the net density of sites in the borough, supporting development proposals that make efficient use of land and discouraging low density development to ensure optimal use of each site.
- 6.20 The Council considers it reasonable to expect proposals to achieve densities of at least 35 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 well served by retail, commercial and community facilities and services, and/or locations with good public transport accessibility.
- 6.21 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.

## Specialist Accommodation

### **POLICY HP04: SPECIALIST ACCOMMODATION**

1. The Council will grant permission for proposals which contribute to the delivery of Specialist Accommodation, provided that the development:
  - a. meets demonstratable need;
  - b. is readily accessible to public transport, shops, local services, community facilities and social networks and, where appropriate, employment and day centres; and
  - c. would not result in the over concentration of any one type of accommodation.
2. Subject to viability, where accommodation falls within use class C3 an appropriate proportion of affordable housing in accordance with Policy HP05 Affordable Housing will be required with a mix of tenures to meet identified needs.
3. A condition may be imposed restricting occupation to persons requiring specialist accommodation where deemed necessary.
4. Where a need for Gypsy and Traveller pitches are identified by the Council, Policy HP10: Proposals for Gypsies, Travellers and Travelling Showpeople Windfall Sites would apply.

6.22 The NPPF requires local planning authorities to plan for a mix of housing based on current and future demographic trends, market trends and the needs of different groups in the community.

6.23 There are certain groups of people within the community that need specialist residential accommodation that caters for their specific needs. This form of accommodation includes, but is not limited to, housing for older people such as Independent Living schemes for the frail elderly, homes for those with disabilities and support needs, residential institutions and culturally appropriate accommodation for those Gypsies and Travellers or Travelling Showpeople who no longer exercise a nomadic lifestyle and where the Planning Policy for



Traveller Sites does not apply. Policy HP04 Specialist Accommodation is intended to support the delivery of this national policy requirement.

- 6.24 The Council's SHMA Part 2 provides a detailed assessment of the housing required to meet existing and future needs across the borough. The SHMA indicates that if occupation patterns of specialist residential accommodation for older people remain at current levels, there will be a requirement for 494 additional specialist units to 2033. Essex County Council (ECC)'s Independent Living Programme is encouraging the provision of specialist residential accommodation in Essex as a means to provide housing for people over the age of 55 whose current home no longer meets their needs. Brentwood has an ageing population which has clear implications for the future delivery of housing over the Local Plan period. ECC is the provider of adult social care in Brentwood. Their approach to Independent Living (Extra Care) encourages the provision of specialist accommodation in Essex as a means by which older people can continue to live healthy and active lives within existing communities. This approach to meeting the specialist accommodation needs of older people is intended to reduce the demand for residential/nursing home care across the County. Independent Living schemes are part of a wider accommodation pathway to enable older people to remain as independent as possible with the right housing and support to meet their needs. The Council will work with ECC to secure provision of suitable sites.
- 6.25 In terms of housing, new potential builds for Supported Living could be beneficial to supply demand for this type of accommodation, and any specialist accommodation provision for people with disabilities could meet the need of the local population or individuals who would move to this area. The demand for adults with disabilities is considered under the Independent Living programme.
- 6.26 The SHMA Part 2 will be used alongside other relevant local evidence, such as the Brentwood Gypsy and Traveller Accommodation Assessment and Housing Strategy, to inform a 'Specialist Accommodation Report', produced and updated regularly as part of the Councils ongoing Authority Monitoring commitments.
- 6.27 The Council will refer to the latest 'Specialist Accommodation Report' during negotiations with developers in establishing local need and securing the provision, and where relevant location, of the most appropriate Specialist Accommodation. The final type, tenure and quantum of specialist accommodation provision will be determined through negotiations on individual planning applications and will be secured through S106 or other legal agreements.
- 6.28 In the monitoring of this policy there will be a need to ensure the Council is satisfied with the provision of specialist accommodation being delivered, if a shortfall in provision is identified the policy will be reviewed as necessary.

## Affordable Housing

- 6.29 Affordable housing is defined as housing for sale or rent, for those whose needs are not met by the market (including housing that provides a subsidised route to home ownership and/or is for essential local workers); the definition includes, but is not limited to, social rented/affordable rented and intermediate housing as well as starter homes. To be 'affordable', the cost of housing must be low enough for eligible households to afford based on local incomes and house prices.

- 6.30 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. 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 family or social network of choice – all factors that contribute to the sustainability of neighbourhoods.
- 6.31 The provision of affordable housing to meet identified need is an important objective of the Local Plan. To assess this need, the Council, commissioned consultants to produce a Strategic Housing Market Assessment (SHMA) Part 2, which was published in June 2016, and uses the national planning practice guidance to calculate the level of affordable housing need. This assessment identified that the annual level of need for affordable housing in the borough is 107 households per year.

#### **POLICY HP05: AFFORDABLE HOUSING**

1. The Council will require the provision of 35% of the total number of residential units to be provided and maintained as affordable housing within all new residential development sites on proposals of 10 or more (net) units.
2. In considering the suitability of affordable housing, the Council will require that:
  - a. the tenure split be made up of 86% Affordable/Social Rent and 14% as other forms of affordable housing (this includes starter homes, intermediate homes and shared ownership and all other forms of affordable housing as described by national guidance or legislation) or regard to the most up to date housing evidence;
  - b. the affordable housing be designed in such a way as to be seamlessly integrated to that of market housing elements of a scheme (in terms of appearance, build quality and materials) and distributed throughout the development so as to avoid the over concentration in one area; and
  - c. the type, mix, size and cost of affordable homes will meet the identified housing need as reported by the Council's most up-to-date housing evidence.
3. In seeking affordable housing provision, the Council will have regard to scheme viability; only where robust viability evidence demonstrates that the full amount of affordable housing cannot be delivered, the Council will negotiate a level of on-site affordable housing that can be delivered taking into account the mix of unit size, type and tenure and any grant subsidy received.
4. The Council will only accept off-site provision, or an appropriate financial contribution in lieu of on-site provision where it can be robustly demonstrated that on-site provision is not possible and that, in the individual case and to the

satisfaction of the Council, the objective of creating mixed and balanced communities can be effectively and equally met through either off-site provision or an appropriate financial contribution in lieu or a combination of the two.

5. Where a site has been sub-divided or is not being developed to its full potential so as to fall under the affordable housing threshold, the Council will seek a level of affordable housing to reflect the provision that would have been achieved on the site as a whole had it come forward as a single scheme for the allocated or identified site.
6. Planning obligations will be used to ensure that the affordable housing will remain at an affordable price for future eligible households, or for the subsidy to be recycled to alternative affordable housing provision.
7. The requirement to provide affordable housing will apply to all residential development falling under use class C3 with the exception of Gypsy & Traveller Pitches or Travelling Showman Plots.

- 6.32 Chapter 5 of the NPPF sets out that in delivering a sufficient supply of homes, local planning authorities should (amongst other things, where they have identified that affordable housing is needed) set policies for meeting this need, specifying the type of affordable housing required, and expect it to be met on-site unless off-site provision or a financial contribution of broadly equivalent value can be robustly justified and the agreed approach contributes to the objective of creating mixed and balanced communities.
- 6.33 There is a significant need for affordable housing in the borough as evidenced in the Council's SHMA which supports an affordable housing target of 35% on major developments.
- 6.34 The local plan viability assessment demonstrates that the thresholds of affordable housing contributions identified in the Local Plan are achievable and the cumulative impact of policies in the local Plan will not put development at risk. The use of further viability assessments at the decision-making stage should not be necessary. It is up to the applicant to demonstrate whether particular circumstances relevant to the characteristics of the site and the proposed development justify the need for a viability assessment at the application stage.
- 6.35 Where an applicant formally requests the Council to consider a reduced level of affordable housing, it will need to demonstrate that it is not possible to meet the full quota of affordable housing without prejudicing the delivery of housing on the site. It will also need to demonstrate to the satisfaction of the Council that, in the individual case, the objective of creating mixed and balanced communities can be effectively and equally met through either off-site provision or an appropriate financial contribution in lieu or a combination of the two. To this end, and in demonstrating the above, a full viability assessment would need to be

submitted with a planning application which is based upon, and refers to, the Brentwood Local Plan Viability Assessment. Such an assessment should include evidence of what has changed since the adoption of the Plan which has impacted on viability and should reflect the government’s recommended approach to defining key inputs as set out in National Planning Guidance.

6.36 The Council’s SHMA indicates that within the affordable housing sector there is a need for 86% affordable/social rent. Figure 6.2 below will be used to inform negotiations between the Council and developers to determine the appropriate tenure and mix of affordable housing.

<b>Size &amp; Tenure of all affordable housing required up to 2033</b>						
<b>Tenure</b>	<b>% Split</b>	<b>Indicative Size</b>				
		<b>One bedroom</b>	<b>Two bedrooms</b>	<b>Three bedrooms</b>	<b>Four/+ bedrooms</b>	<b>Total Size</b>
Affordable rent / Social rent	86%	31%	24%	19%	26%	100%
Other forms of affordable housing	14%	28%	36%	24%	12%	100%
<b>Total Tenure</b>	<b>100%</b>					

**Figure 6.2: Indicative Size Guide for Affordable Housing**

6.37 Whilst the Council’s starting point in any affordable housing negotiations is that a scheme is viable at the percentages and tenure splits set out within Policy HP05, the policy recognises that there may be sites on which the provision of affordable housing to the percentages or tenure splits set out, would render a development unviable or would prejudice the realisation of other planning objectives that need to be given priority.

6.38 In these circumstances, the applicant will be required to provide a level of on-site affordable provision which can be viably delivered. In doing so, the percentage of on-site provision not met may be made up from financial contributions in lieu of the on-site requirement subject to viability. The Council will normally take into account exceptional site costs and the existing use value of the site but would not consider the price paid for the site to be a relevant factor as this should have taken account of policy requirements. The Council will take an ‘open book’ approach to negotiation and may require viability assessments to be scrutinised by independent consultants at cost to the developer.

- 6.39 Only where it can be demonstrated that providing any affordable housing on-site is not viable or feasible will the Council consider accepting financial contributions in lieu of on-site provision.
- 6.40 The Council encourages applicants to work with registered providers and to engage with them and the Council's housing department at an early stage in the planning process, further guidance on early engagement and preferred partner registered providers is provided in the Housing Strategy.

## Standards for New Housing

### POLICY HP06: STANDARDS FOR NEW HOUSING

#### Internal Residential Space

1. All new build housing will achieve appropriate internal space through compliance with the nationally-described space standard as summarised in Figure 6.3 or as may be superseded.

#### External Residential Space

2. New residential units will be expected to have direct access to an area of private and/or communal amenity space. The form of amenity space will be dependent on the form of housing and could be provided in a variety of ways, such as a private garden, roof garden, communal garden, courtyard balcony, or ground-level patio with defensible space from public access. In providing appropriate amenity space, development proposals should be designed to provide amenity space of a shape, size and location to allow effective and practical use of and level access to the space by residents.

#### Internal Space Standards

- 6.41 The government's Housing Standards Review 2015 published internal space standards which local authorities could apply to new build residential development using planning policy. The council requires the use of these standards for new build development as set out in Policy HP06 and supports these standards for all new residential development.
- 6.42 The provision of sufficient space within new homes is an important element in improving the quality of life and well-being of Brentwood residents and new dwellings should provide sufficient space for basic daily activities and needs. The need for minimum internal space standards in the Borough is reported in the Council's AMR.

6.43 In order to ensure that homes meet the needs of local residents, regardless of their income level, it is important that internal space standards are improved alongside the overall housing mix. New homes created through residential conversions and homes created by changes of use from non-residential land uses should seek to meet or exceed the standards as far as it is practicable to do so.

6.44 To meet the needs of occupiers, all new residential development should be built in accordance with the nationally described space standard. The standard requires that:

- a. A dwelling provides at least the Gross Internal Area (GIA) and built-in storage area set out in Figure 6.3
- b. A dwelling with two or more bedspaces has at least one double (or twin) bedroom
- c. In order to provide one bedspace, a single bedroom has a floor area of at least 7.5 sqm and is at least 2.15 m wide
- d. In order to provide two bedspaces, a double (or twin bedroom) has a floor area of at least 11.5 sqm
- e. One double (or twin bedroom) is at least 2.75 m wide and every other double (or twin) bedroom is at least 2.55 m wide
- f. Any area with a headroom of less than 1.5m is not counted within the GIA unless used solely for storage (if the area under the stairs is to be used for storage, assume a general floor area of 1 sqm within the GIA)
- g. Any other area that is used solely for storage and has a headroom of 900-1500 mm (such as under eaves) is counted at 50% of its floor area, and any area lower than 900 mm is not counted at all
- h. A built-in wardrobe counts towards the GIA and bedroom floor area requirements, but should not reduce the effective width of the room below the minimum widths set out above. The built-in area in excess of 0.72 sqm in a double bedroom and 0.36 sqm in a single bedroom counts towards the built-in storage requirement
- i. The minimum floor to ceiling height is 2.3 m for at least 75% of the GIA.

Minimum gross internal floor areas of storage (square metres)					
Number of bedrooms	Number of bedspaces	1-storey dwellings	2-storey dwellings	3-storey dwellings	Built-in storage
Studio	1 person	39(37)	N/A	N/A	1.0
1 Bedroom	2 person	50	58		1.5

2 Bedroom	3 person	61	70		2.0
	4 person	70	79		
3 Bedroom	4 person	74	84	90	2.5
	5 person	86	93	99	
	6 person	95	102	108	
4 Bedroom	5 person	90	97	103	3.0
	6 person	99	106	112	
	7 person	108	115	121	
	8 person	117	124	130	
5 Bedroom	6 person	103	110	116	3.5
	7 person	112	119	125	
	8 person	121	128	134	
6 Bedroom	7 person	116	123	129	4.0
	8 person	125	132	138	

Figure 6.3: Nationally Described Space Standard

### External Residential Space

- 6.45 External amenity space can make an important contribution in improving the quality of life and well-being of Brentwood residents as well as supporting and enhancing local biodiversity. Gardens, in particular, are an important environmental resource and are a component of Brentwood's greenery character. They form part of an area's development pattern, providing a setting for buildings, which in turn informs the prevailing privacy and amenity enjoyed by residents. They provide a semi-natural habitat for local wildlife and corridors for the movement of wildlife through the urban environment. Collectively, they help to mitigate fluvial and surface water flooding in the more built-up parts of the borough.
- 6.46 The NPPF sets out the need to secure high-quality design and a good standard of amenity for all existing and future occupants of land and buildings.

- 6.47 External amenity space should be sufficient to accommodate:
- a table and chairs suitable for the size of dwelling;
  - where relevant, provision of a garden shed for general storage (including bicycles if garage provision or cycle storage to the frontage of the dwelling is not possible);
  - space for refuse and recycling bins;
  - an area to dry washing;
  - circulation space; and
  - an area for children to play in.
- 6.48 External residential space would not include car parking or turning areas. Suitable arrangements for access to refuse and recycling bins should be made to prevent bins/bags being transported through dwellings.
- 6.49 One-bedroom dwellings would not be expected to provide space for children to play, due to the lower likelihood of children occupying these units. Dwellings with more than one bedroom would need to take space for children to play into account.
- 6.50 Where it is appropriate and viable to do so, developments with flats will need to provide high-quality shared amenity areas on site to meet the needs of residents, including play space for children, in addition to private amenity space and cycle storage.
- 6.51 Applicants are also encouraged to consider external residential space size specifications as set out by the most up to date Essex Design Guide:
- a. New development on sites larger than 0.1 hectares or at densities above 50 dwellings per hectare should provide at least 25 sqm of private external space for each home;
  - b. Exceptionally, apartments adjacent to and overlooking a park or other large public space of high amenity value could be provided with a smaller amount of communal space. In this instance, apartments should also have balconies with a floor area of at least 5 sqm;
  - c. At least 60% of the private communal space should receive direct sunlight for a minimum of four hours a day in June;
  - d. A gross floor area of 5 sqm per balcony should be provided for houses or apartments with more than one bedroom if private external space size specifications cannot be met.
- 6.52 Applicants should refer to best practice and guidance on achieving quality design for all new residential development, as set out in the Essex Design Guide.



# Gypsies, Travellers and Travelling Showpeople

- 6.53 The Council has a duty to identify land to meet the local needs of Gypsies, Travellers and Travelling Showpeople; national planning policy seeks to ensure fair and equal treatment for travellers.
- 6.54 In doing so, government guidance sets out the approach Local Authorities should take when making provision for Gypsy and Travellers. It requires Local Authorities to make their own assessment of need, develop fair and effective strategies to meet need through the identification of land for sites, to plan for sites over a reasonable timescale, to increase the number of traveller sites in appropriate locations in order to address under provision and maintain an appropriate level of supply.
- 6.55 In August 2015, a new definition of Gypsy and Traveller was introduced into the Planning Policy for Traveller Sites (PPTS):
- 'Persons of nomadic habit of life whatever their race or origin, including such persons who on grounds only of their own or their family's or dependants' educational or health needs or old age have ceased to travel temporarily, but excluding members of an organised group of travelling showpeople or circus people traveling together as such.'* (PPTS) (DCLG, 2015)
- 6.56 Responding to the new guidance and the need to update evidence on the level of need, the Council alongside other Essex Local Authorities undertook a Gypsy and Traveller Accommodation Assessment (GTAA) in 2016.
- 6.57 This identified those Gypsies, Travellers and Travelling Showpeople which should be planned for in accordance with the PPTS, as they retain a nomadic lifestyle, and those which should otherwise have their specific cultural needs of living accommodation met in accordance with the Equalities Act 2010, the Children's and Families Act 2014 and the Human Rights Act 1998, but no longer exercise a nomadic lifestyle and where the PPTS does not apply.
- 6.58 In respect of those Gypsies and Travellers or Travelling Showpeople, who do not meet the PPTS definition, who may be able to demonstrate a need for culturally appropriate accommodation under Equalities legislation, the Council will continue to assess and plan to meet their needs through Policy HP04 Specialist Accommodation, as part of its wider responsibilities to plan to meet the accommodation needs of its settled community.
- 6.59 The Brentwood GTAA covers the period 2016 to 2033 and identifies a requirement of 11 additional Gypsy and Traveller pitches to be developed by 2033 for those who meet the PPTS definition of 'travelling'.
- 6.60 Despite achieving a good response rate for the completion of interviews, it is acknowledged in the GTAA that it was not possible to determine the travelling status of all Gypsy and Traveller households in the borough, and a proportion of these may meet the definition

provided in the PPTS. The Council's GTAA consultants Opinion Research Services therefore advise in the GTAA that an allowance of 10% is a realistic assumption of those that are recorded as 'unknown' who may in fact comply with the revised definition; this increases total need to 12 pitches.

- 6.61 Since completion of the GTAA a Gypsy and Traveller pitch at Cottage Garden, Pilgrims Hatch, has been granted planning consent for the change of use to a detached dwelling (14/01069/FUL), to replace this lost traveller site a requirement for an additional pitch is added to the total requirements of Gypsy and Traveller pitches identified in the GTAA, further increasing the total need to 13 pitches.
- 6.62 No current need has been identified in the borough for accommodation for travelling showpeople, however, any need that arises over the life of the Plan will be addressed using the criteria based Policy HP10 Proposals For Gypsies, Travellers and Travelling Showpeople on Windfall sites.
- 6.63 The Gypsy and Traveller Accommodation Assessment finds no evidence of need for a transit site specifically within Brentwood Borough. Further work is currently being undertaken by Essex County Council to consider the need for transit provision across Essex as a whole. Should such a need be identified within Brentwood in the future this will be considered through the review of the Local Plan, taking into account the Essex Planning Officers' Association Protocol for Unmet Gypsy, Traveller and Travelling Showpeople Needs 2018 which has been developed collaboratively across Essex under the Duty to Cooperate.

## Provision for Gypsies and Travellers

### POLICY HP07: PROVISION FOR GYPSIES AND TRAVELLERS

1. In order to meet identified need, a total of 13 permanent pitches for Gypsies and Travellers as defined by national planning policy for the period 2016-2033 will be provided.
2. The following sites are removed from the Green Belt and are allocated for permanent Gypsy and Traveller accommodation, as shown on the Brentwood Policies Map. Proposals for these sites must comply with the specified requirements:
  - a. **Site Ref GT16**
    - i. Site Address: Oaktree Farm (Greenacres), Chelmsford Road
    - ii. Allocated for 7 pitches

- iii. Proposals for development at this site require a landscape framework to be submitted to provide suitable boundary treatment to include a mixture of native trees and shrubs around the site to safeguard the character and appearance of the area.

**b. Site Ref GT17**

- i. Site Address: Hunters Green, Albyns Lane, Navestock
- ii. Allocated for 1 pitch

**c. Site Ref R01 (I) Dunton Hills Garden Village Strategic Allocation**

- i. Site Address: Dunton Hills Garden Village, West Horndon, Brentwood
- ii. Allocated for 5 pitches
- iii. Proposals for development at this site should comply with the site-specific requirements set out in policy R01(I).

- 6.64 The PPTS requires local planning authorities to identify and update annually, a supply of specific deliverable sites sufficient to provide five years' worth of sites against their own locally set targets. The Council's GTAA identifies the need for Traveller pitches in the borough over the period of the Local Plan.
- 6.65 In identifying the provision of sites to meet Gypsy and Traveller needs, a sequential approach to site identification has been adopted, based upon best practice, as set out in Figure 6.4.
- 6.66 The sequential approach sets out a clear strategy to minimise the use of greenfield Green Belt land for development, existing sites are promoted before new sites are identified. The approach also shows that there is insufficient suitable land located outside the Green Belt to meet the identified need of Gypsy and Traveller pitches.
- 6.67 A total of 13 permanent pitches for Gypsies and Travellers as defined by national planning policy for the period 2016-2033 will be provided through the incorporation of a minimum of 5 serviced Gypsy and Traveller pitches as part of the Dunton Hills Garden Village allocation, to be delivered in the first five years of development. A further 8 existing pitches are to be regularised in accordance with Policy HP07.
- 6.68 The Council has carried out an assessment of potential Gypsy, Traveller and Travelling Showperson sites for allocation through its Housing and Economic Land Availability Assessment (HELAA) and found some to be suitable in HELAA terms. However, it is recognised all were in the Green Belt. To be consistent with national planning policy, these sites have been removed from the green belt for the use as gypsy and traveller pitches only.

<b>Sequential Approach</b>	<b>Commentary</b>
Step 1 - use of vacant pitches	No vacant pitches available to meet needs
Step 2 - potential additional provision from existing expired temporary sites	GTAA does not count tolerated pitches as components of need therefore the identification of pitches on all expired temporary sites within the borough cannot be counted towards meeting need
Step 3 - un-authorised sites that may potentially be suitable for regularisation	8 pitches identified on two suitable sites through HELAA and site assessment process
Step 4 - potential intensification of existing sites	The HELAA and site assessment process identify potential however delivery of such sites cannot be guaranteed
Step 5 - potential extension of existing Traveller sites or sites which could be regularised	Discounted as extension on all existing sites would result in development in Green Belt
Step 7 - new Traveller sites in non-Green Belt areas	No suitable sites identified through HELAA and site assessment process
Step 8 – new Traveller sites in Green Belt areas with a focus on strategic larger allocations	5 pitches identified through HELAA and site assessment process as part of Dunton Hills Garden Village Strategic Allocation

**Figure 6.4: Provision of Gypsy and Traveller Sites – A Sequential Approach**

- 6.69 The approach not only secures the planning status of the sites for the current occupants, contributing to the specified need, but also provides certainty in relation to the delivery of sites to meet the needs of the borough (13 pitches as identified in policy HP07).
- 6.70 The sites identified through Policy HP07 will still be subject to the usual planning legislation and applications will need to be submitted to formally authorise their permanent Traveller use. Applicants will be expected to comply in full with the requirements of the policy; it will also be necessary to restrict the occupancy to ensure that the site as a whole is retained for traveller occupation.

## Safeguarding Permitted Sites

### POLICY HP08: SAFEGUARDING PERMITTED SITES

1. The existing Gypsy and Traveller sites listed below are removed from the Green Belt and will be safeguarded from alternative development, unless it can be demonstrated that the site is no longer required to meet any identified Traveller need across the borough, or acceptable replacement accommodation can be provided.
2. Any other site that is subsequently granted a permanent planning permission for Gypsy and Traveller use shall be safeguarded in accordance with this policy.

<b>Gypsy and Traveller Sites</b>		
Site Ref	Location	No of Pitches
GT1	Clementines Farm, Murthering Lane, Navestock	1
GT2	Deep Dell Park (Willow Farm), Ingatestone	6
GT3	Lilliputs, Blackmore	2
GT4	Meadow View, Blackmore	2/3
GT5	Pond End, Kelvedon Hatch	1/2
GT6	Ponderosa, Kelvedon Hatch	1
GT7	Poplar Farm, Ingatestone	2/3
GT8	Roman Triangle, Mountnessing	5
GT9	Rye Etch, Navestock	3
GT10	The Willows', Kelvedon Hatch	3
GT11	Tree Tops, Navestock	3
GT12	Warren Lane, Doddinghurst	1
GT13	Wenlock Meadow	1
GT14	Hope Farm, Navestock	3

GT15	Orchard View, Navestock	4
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3. Of the sites listed above, applications for the removal of temporary personal planning permissions for Gypsy and Traveller sites to permanent planning permissions for Gypsy and Traveller sites will be supported by the local planning authority provided the occupant meet the definition of a Gypsy, Traveller or Travelling Showperson as defined in national planning policy.

- 6.71 Across the borough, there are many existing sites which have planning permission for traveller use. Most of these were granted permission several years ago with conditions limiting occupation to those falling within the traveller definition applicable at the time and often specific to named occupants.
- 6.72 Policy HP08 ensures that existing sites which have planning permission or lawful use for gypsy or traveller use, will be safeguarded to guarantee that the permitted use as a traveller site is not lost through the grant of any subsequent planning permission, or relaxation of planning conditions, to allow for other types of development.

## Sub-division of Pitches or Plots

### **POLICY HP09: SUB-DIVISION OF PITCHES OR PLOTS**

1. The local planning authority will allow the sub-division of allocated or authorised Gypsy, Traveller and Travelling Showpeople sites on a case by case basis provided that all the following criteria are met:
  - a. the living environment of residents on the proposed site and neighbouring land is protected;
  - b. sites are of a suitable size to enable the creation of additional pitches or plots;
  - c. there is no significant loss of soft and hard landscaping and amenity provision within the existing site, particularly where conditioned by a previous consent;

- d. there is no significant adverse impact on the intrinsic character and beauty of the countryside; and
  - e. there is no adverse impact in terms of highways access and vehicle movement.
2. The sub-division of plots/pitches on additional sites that might come forward within the green belt will be considered against green belt policy.

- 6.73 It is recognised that during the Plan period, there may be a demonstrable need for additional pitches on those sites safeguarded or allocated through the Local Plan, to meet the changing needs of the households on the sites. This policy applies to existing pitches and plots listed in Policy HP08 as well as those identified for allocation in Policy HP07.
- 6.74 With 89% of the borough within the Green Belt, serving to limit development opportunities, the sub-division of existing sites to provide more pitches could be a suitable way to increase provision within existing lawful sites without the need to consider the allocation of additional sites upon plan review.
- 6.75 All safeguarded sites are being removed from the Green Belt, as required by the National Planning Policy Framework and Planning Policy for Traveller Sites.

## Proposals for Gypsies, Travellers and Travelling Showpeople on Windfall Sites

### **POLICY HP10: PROPOSALS FOR GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE ON WINDFALL SITES**

1. Planning permission for Gypsy and Traveller caravan sites and sites for Travelling Showpeople (as defined in the governments Planning Policy for Travellers) on unallocated land outside the Green Belt, will only be granted in accordance with all the following criteria:
  - a. 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;

- b. safe and convenient vehicular access to the local highway network can be provided;
  - c. essential services (water, electricity and foul drainage) are available on site or can be made available on site;
  - d. there is no significant adverse impact on the intrinsic character and beauty of the countryside;
  - e. the site would not lead to the loss of, or adverse impact on, important historic and natural environment assets;
  - f. there is no significant risk of land contamination or unacceptable risk of flooding;
  - g. the site provides a suitable living environment for the proposed residents and there is no significant adverse impact on the amenity of nearby residents;
  - h. the site is of sufficient size to accommodate the proposed number of caravans, vehicles and ancillary areas; and
  - i. plots for Travelling Showpeople should also be of sufficient size to enable the storage, repair and maintenance of equipment.
2. Sites within the Green Belt will need to demonstrate very special circumstances which clearly outweigh the harm to the Green Belt and any other harm in addition to the criteria A above.

- 6.76 It is recognised that during the Plan period, there may be a demonstrable need for additional pitches to those safeguarded or allocated through the Local Plan. This policy applies to non-allocated or safeguarded sites which may come forward during the Plan period in built-up areas and the countryside.
- 6.77 National planning policy establishes a general presumption against inappropriate development in the Green Belt. The definition of inappropriate development includes Gypsy and Traveller sites and Travelling Showpeople sites. Subject to the best interests of the child, personal circumstances and unmet need are unlikely to clearly outweigh harm to the Green Belt and any other harm so as to establish very special circumstances.
- 6.78 When permission is granted, appropriate conditions or planning obligations will be imposed to ensure occupation of the site is restricted to those persons falling within the appropriate definition of Gypsies and Travellers and may also include conditions relating to landscaping and boundary treatments.



## 07



# Prosperous Communities

## Delivering Economic Growth

- 7.1 Brentwood is an attractive business location with a high-quality environment, within close proximity to London, a well-qualified workforce and good transport links. It has a diverse economic base and total employment in the borough has risen to 43,200 in 2016. The borough is well known for its entrepreneurial culture with above average rates of business start-ups and is home to a number of major national firms whose regional headquarters are located within the borough.
- 7.2 Figure 2.2 depicts how well Brentwood is placed in terms of transport links to surrounding centres in Essex, London and Kent, legacy opportunities from the Queen Elizabeth II Olympic Park, and airports at Stansted and Southend. The Elizabeth Line 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, as well as Lakeside, Bluewater, and Stratford City Shopping Centres.
- 7.3 The Council's Economic Strategy sets out a series of economic aims and strategic priorities which are reflected in the vision and strategic objectives of the Local Plan:

### Economic Aims:

- A1. Promote a mixed economic base and a discerning and sustainable approach to economic growth;
- 2. Encourage high value, diverse, employment uses that will provide a significant number of skilled and high-quality jobs;

- A3. Encourage better utilisation, upgrading and redevelopment of existing land and buildings; and
- A4. Enable the growth of existing business, the creation of new enterprises and encourage inward investment.

#### Strategic Priorities:

- P1. Support business development and growth;
- P2. Facilitate and deliver skills and employability support;
- P3. Facilitate and encourage business workspace, infrastructure and inward investment;
- P4. Facilitate and support stronger and more vibrant town & village centres;
- P5. Develop and support the borough's rural economy; and
- P6. Promote Brentwood Borough as a place to visit and invest, encouraging the visitor economy.

- 7.4 To maximise opportunities for economic growth and development, the Council is working closely with the South East Local Enterprise Partnership (SELEP), the Essex Business Board (EBB) and the Brentwood Business Partnership (BBP). The Council's Economic Strategy, and Economic Futures Report<sup>42</sup> provides the local evidence to support the relevant Local Plan policies.
- 7.5 To meet future needs and maintain a competitive successful local economy, we will plan for new jobs and new homes. We will work with existing businesses through partnerships and attract new businesses by ensuring the borough remains an attractive place to work. The importance of striking the right balance between meeting development needs and retaining our Borough of Villages character is critical when considering the future of the local economy.

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<sup>42</sup> Lichfields (2018) Brentwood Economic Futures Report, available at: <https://document.brentwood.gov.uk/pdf/29042018122226000000.pdf>



Figure 7.1: Brentwood and South East Local Enterprise Partnership (SELEP)

- 7.6 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 businesses 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. improving access to a range of employment opportunities for borough's residents;
  - b. providing sufficient employment and industrial space in sustainable locations to support economic development and regeneration;
  - c. intensification of vacant and underutilised employment floorspace and sites and the regeneration of previously developed land in sustainable locations;
  - d. renewal and improvement to the quality of business premise and office space of different sizes;
  - e. enhancing and protecting the important role of small and medium sized commercial enterprises;
  - f. directing major new retail, office and leisure investment to the borough's Designated Centres according to their significance on the retail hierarchy, stimulating improvement and regeneration;

- g. supporting the borough's rural economy and growing agricultural enterprises;
- h. maintaining current tourist attractions and encouraging new opportunities to increase the number of visitors to the borough; and
- i. maximising the value of existing and future public transport, walking and cycling network, to support economic activity.

### New Jobs

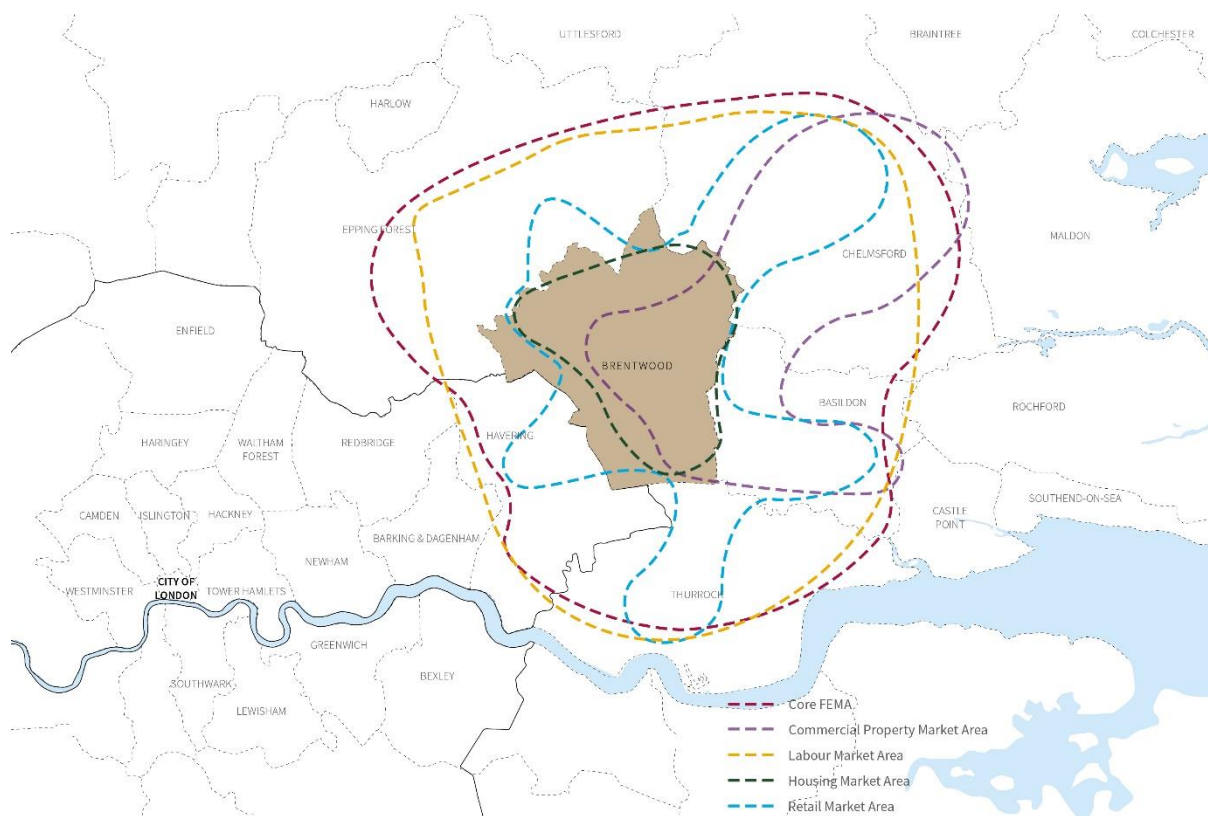
- 7.7 Policies are required to plan for future jobs growth on our employment land and ensure new employment land is provided where needed. For the purposes of planning policy, the simplest way to measure and plan for new job creation is through planning use classes. B-Class uses generally comprise employment land types, such as B1 business (offices, research and development, light industry appropriate in a residential area), B2 general industrial, and B8 storage or distribution.
- 7.8 The borough has recorded strong levels of job growth, the number of B-class jobs has increased by 40% over the last 17 years. This employment growth has been driven by consumption sectors including residential care and social work, business services, education, healthcare and construction. Job losses have been recorded within public administration and defence, utilities, accommodation and food services and retail.
- 7.9 According to *Enterprising Essex: Meeting the Challenge* (Essex County Council, 2018)<sup>43</sup>, potential occupiers looking for office space in the North East quadrant of the M25 would most likely locate to Chelmsford or Brentwood, which are seen as more established office locations. Reflecting the borough's desirable location, high quality and distinctive locational offer, the Council's preference is for efficient land use and provision for high value business.

### Functional Economic Market Area

- 7.10 Economic evidence includes an assessment of the Functional Economic Market Area (FEMA) for the borough, which considers a number of evaluation factors including travel to work areas, commuting flows, the commercial property market area; retail market areas, local economic partnership areas and strategic transport routes to define the key economic linkages and spatial relationships. Producing a FEMA is not an exact science and often represents just a snapshot in time but is useful in indicating the borough's broad core economic geography and connections. Figure 7.2 sets out the Brentwood FEMA.

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<sup>43</sup> <http://www.essexgrowth.co.uk/media/1036/sec-final-report-march-2018.pdf>



**Figure 7.2: Brentwood Functional Economic Market Area (FEMA)**

- 7.11 In considering employment site allocations and growth, the Council has also taken into account commercial agent feedback on employment sites to ascertain the level of market interest, views on strategic locations and commentary on employment land take-up and overall deliverability.

### Employment land provision

- 7.12 The calculation of new B-use employment land required to inform Draft Plan allocations is summarised below:
- i. The proposed amount of land the Council needs to provide to achieve sufficient growth in jobs range from 8.1 ha to 20.3 ha (Economic Futures Report, 2018)<sup>44</sup>.
  - ii. Redeveloping existing employment land in central or residential locations for new homes (i.e. Wates Way Industrial Estate, Brentwood; Council Depot, Warley; Ford offices, Eagle Way and West Horndon Industrial Estates, West Horndon) means the loss of almost 21.01 ha of employment land that will need to be re-provided.
  - iii. Before arriving at a final employment land requirement, consideration has also been given to the forecast loss of existing employment allocations through structural change, planning permissions and changes to permitted development rights allowing office to residential conversions. This loss of employment space equates to about 9.3 ha.

<sup>44</sup> Lichfield (2018) Economic Futures Report. Available online at: <https://document.brentwood.gov.uk/pdf/29012018122226000000.pdf>

iv. These elements combined result in a total additional employment land requirement range from 38.41 to 50.61 ha.

7.13 Overall a total of circa 46.64 ha of new employment land is proposed to be allocated, in addition to existing commitments. At a high-level, the amount of employment land allocations is broadly sufficient to ensure that the Council meets its overall forecast employment land needs up to 2033. It is also recognised that the future restructuring of employment sites and businesses may change floorspace requirements.

<b>Employment Land (ha)</b>				
<b>Uses</b>	<b>Scenario A: Experian</b>	<b>Scenario B: EEFM</b>	<b>Scenario C: OAN (380)</b>	<b>Scenario D: Past rates</b>
Offices	9.4	7.7	5.6	0.4
Manufacturing (coming within classes E and B2)	4.4	0.1	3.1	3.5
Warehousing (B8)	6.5	0.7	4.4	4.2
<b>Total</b>	<b>20.3</b>	<b>8.5</b>	<b>13.1</b>	<b>8.1</b>

Figure 7.3: Gross Employment Land Requirement Scenarios

<b>New Requirements</b>	<b>(ha)</b>
Forecast requirement for employment land for the specified employment uses above	+ 8.1 ha to 20.3 ha
Forecast loss of employment land by re-allocations for other uses	+ 21.01 ha
Forecast loss of existing employment allocations through structural change, changes in allocation threshold and permitted development	+ 9.3 ha
<b>Combined Requirement</b>	<b>→ 38.41 ha to 50.61 ha</b>

Figure 7.4: Employment Land Need

**STRATEGIC POLICY PC01: SAFEGUARDING EMPLOYMENT LAND**

1. In order to maintain sufficient employment land supply to meet identified needs, within those areas designated for general employment development, as shown on the Brentwood Policies Map, the Council will only approve redevelopment proposals from offices, light industrial, research and development (within Class E), B2, B8 or sui generis employment uses to non-employment uses where one or more of the following criteria apply:
  - a. the proposal is for ancillary non-residential uses that provide employment, and there is no reasonable prospect for the site to be used for the above purposes; or
  - b. the proposal is for any other use and the application is supported by reliable evidence of reasonable efforts made to secure re-use for all of the above uses including ancillary non-residential uses that provides employment and which evidence demonstrates there is no realistic prospect of the site or buildings being used or re-used for these purposes in their own right or, through refurbishment, adaptation, subdivision or redevelopment.
2. Development proposals (including the redevelopment of existing developed areas) on designated employment land within the Green Belt will be considered in line with national and local green belt policy.

- 7.14 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, identified on the Policies Map, the presumption is that employment uses and 'sui generis' uses of a similar employment nature will be retained, and that proposals entailing loss of employment premises and sites without replacement will be resisted.
- 7.15 To enable flexibility for business operation, it is recognised that complementary and ancillary uses to support employment uses can be appropriate where they provide employment, adding to the character, mix and vitality of the area. As offices, research and development and light industrial uses are now falling under use class E together with retail and other main town centre uses, this may result in unintended consequence where they can either individually, or collectively, harm other policy objectives of the Local Plan including the objective to protect the retail function of Brentwood Town Centre and other designated centres. A proliferation of retail uses therefore will be resisted, with the exception of small scale proposals (in terms of floorspace) and it being ancillary in nature by supplementing the predominant employment offering within the employment area. It may be necessary to impose planning conditions to restrict movement within use class E as necessary, a judgement will be made on a case by case basis. The scale of new employment allocations and acceptable uses are set out in the relevant site allocation policies.

Site Ref	Site Name	Indicative employment area (ha)
111	Upminster Trading Park	2.6
228	Peri Site, Warley Street, Great Warley	5.36
E02	Brook Street Employment Area	1.25
E03	BT Offices, London Road, Brentwood	3.5
E04	Hubert Road Industrial Estate	3.78
E05	Warley Hill Business Park (excl. Regus)	2.5
E06	OCE offices, Chatham Way, Brentwood	0.45
E07	Hutton Industrial Estate	10.48
E08	Land adjacent to Ingatestone by-pass (part bounded by Roman Road)	1.6
E09	Hallsford Bridge Industrial Estate	3.41
E10	Land at Codham Hall	9.62
E11	Brentwood Enterprise Park (M25 Junction 29 works)	25.85
E12	Childerditch Industrial Estate	20.54
E13	Land at East Horndon Hall	5.5
Part of R01	Dunton Hills Garden Village Strategic Allocation	5.5
Part of R02	West Horndon Industrial Estate	2.0
Part of R03	North of A1023	2.0
Part of R05	Ford Offices and Council Depot	2.0
<b>Total:</b>		<b>107.94</b>

Figure 7.5: Designated Employment Land and Indicative Site Areas



### Existing and Regularised Employment Sites

- 7.16 The presumption for existing and proposed employment sites for general employment and office development shall be for existing uses to 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 to support business growth and ensure continuing economic vitality.
- 7.17 Where an application is made under PC01 (criterion 1.b), the applicant should provide information regarding:
- a. length of time the property has been unused for employment purposes;
  - b. period during which it has been actively marketed for such purposes, which includes the possibility of redevelopment and provides evidence (not less than 24 months). Evidence should show where the property has been publicly marketed including publications and property journals as well as clear advertisement on site;
  - c. prices at which the land and buildings have been marketed during this period, which should reflect similar property in the locality;
  - d. a list of all expressions of interest during this period; and
  - e. 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. The applicant should provide an independently commissioned viability assessment to demonstrate that the use is unlikely to be economically viable in the foreseeable future. The assessment should be undertaken by a reputable and suitably experienced company to be determined by the Council in agreement with the applicant, to be funded by the applicant.

### New Employment Allocations

- 7.18 Informed by the spatial strategy, the selection of employment sites aims to retain the borough's character and encourage employment growth in suitable available locations. In employment terms, it is also beneficial to consider modern business needs, such as access to the transport network. The selection process can be summarised as followed:
- a. Brentwood and Shenfield will be the focus to attract economic growth in the Central Brentwood Growth Corridor given their excellent geographic position. From the available sites coming forward through the HELAA process, new employment land is proposed at Ingatestone where the southbound A12 junction with the village creates suitable land for new employment premises. This will help create a range of choice for employment land and encourage competition from existing premises to improve the quality of the local offer.
  - b. Partly due to difficulties in accommodating the quantum of employment land within other parts of the borough, the opportunity is taken to capitalise on the strategic connections of the South Brentwood Growth Corridor to key economic centres in the region (including Tilbury Port, Southend Airport and those in Greater London), by:
    - i. redeveloping brownfield land at Brentwood Enterprise Park (Site E11);

- ii. extending employment land around Childerditch Industrial Estate (par of Site E12);
  - iii. providing new employment land at land south of East Horndon Hall (Site E13);  
and
  - iv. delivering mixed-use employment opportunities within Dunton Hills Garden Village as part of a self-sustaining new community;
- c. Considering that other parts of the borough including larger villages are in a position to accommodate a limited amount of employment and retail development, the emphasis regarding employment land in these places will be on the provision of local services.

- 7.19 The proposed land at Brentwood Enterprise Park and land south of East Horndon Hall will accommodate mixed office, light industrial and research and development and B-uses. The excellent access onto the strategic highway network, makes them a very desirable place for certain businesses. In addition, the size of Brentwood Enterprise Park provides benefits by way of supplying for a large amount of employment need while bringing along new infrastructure and supporting services. Brentwood Enterprise Park will provide an opportunity for high-end modern premises at a key gateway to the borough and into Essex. Appropriate accompanying uses will be considered appropriate where these meet local needs, such as hotel and associated restaurant options. Retail will not be considered appropriate, in line with the retail strategy and sequential approach. Specific site policies for the Enterprise Park are within Policy E11, in Chapter 9.
- 7.20 The Lower Thames Crossing will open up opportunities for goods and services to flow more easily between Brentwood and the area of Kent and beyond across the Thames, strengthening links to a market area that is currently less accessible from the borough. This could extend the borough's FEMA to the south into Kent. However, it should be noted the crossing would be most beneficial to distributors who may use it to avoid congestion at the Dartford Crossing. For the borough to take advantage of the distribution movements, it is likely Brentwood Enterprise Park will need to be delivered to provide premises that are of the scale required by distributors (Economic Futures, Lichfield, 2018)<sup>45</sup>.
- 7.21 The potential relocation of industrial activities from London could create additional demand for offices, light industrial, research and development, and B2 and B8 premises in wider South East local authorities. Brentwood is well located to take advantage if firms do relocate outside of London. Delivery of the Brentwood Enterprise Park could provide a significant area of the floorspace that meets the needs of relocating businesses<sup>4</sup>.
- 7.22 The Economic Futures report (2018) indicates that in terms of manufacturing and warehousing / logistics uses the portfolio of sites put forward is likely to be attractive to the market and provide a sufficient range and high-quality offer.
- 7.23 The Essex Grow-on Space Feasibility Study (2016) has highlighted a gap in supply and demand in the borough in relation to the availability of smaller sized office and industrial units for emerging small businesses, curtailing the potential growth of these businesses. This identifies a concealed need for employment floorspace of 9ha arising from local businesses looking for room to grow into. The Council will encourage the provision of flexible

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<sup>45</sup> Lichfield (2018) Economic Futures Report Page 162

working space, incubation units and grow-on<sup>46</sup> space in the proposed employment allocations where appropriate.

- 7.24 There is a clear need to ensure that strategic investment sites are well connected through public transport an active travel infrastructure to support their overall sustainability. The Council will work with developers and service providers to ensure employment sites such as East Horndon and Dunton Hills will be well connected to existing and new housing sites, including Dunton Hills Garden Village. Work has been undertaken to assess the cumulative impacts of planned development on the A127 and suitable highway measures. More details can be found in Chapter 5.
- 7.25 There is a recognised need to effectively manage the period of transition for a number of current employment sites (such as West Horndon) moving from traditional employment uses to residential led-developments. This is to ensure a clear pipeline of available employment land is achievable to meet the needs of businesses relocating to new premises within the borough. The early delivery of strategic sites within the A127 corridor will be important to maintain an effective stock of employment land.
- 7.26 Other site-specific policies for employment allocations in this policy can be found in Chapter 9.

## **POLICY PC02: SUPPORTING THE RURAL ECONOMY**

Proposals to diversify the range of economic activities on a farm or in a rural area will be supported where proposals do not comprise retail uses unless they are of a limited nature, small-scale and intended to support the farming enterprise. This is subject to compliance with green belt policy where relevant.

- 7.27 One of the Council's objectives is to support economic growth in the rural area by encouraging the diversification and expansion of agricultural and other businesses and enterprise in the rural area.
- 7.28 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 office 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

<sup>46</sup> Grow-on space could be understood as space for small growing businesses with around ten employees plus; that is, businesses that have grown to the extent that they are too large to be accommodated in incubator space or enterprise centres, but are still too small to occupy large, often freestanding, offices or factory/workspace units. Essex County Council (2016) Grow On Space Feasibility Study

use of buildings and land while fitting in with farming practices, rural surroundings and maintaining openness of the Green Belt.

- 7.29 Proposals may be required to safeguard the employment function of the development from other uses through planning conditions/planning gain mechanisms.

## Retail and Commercial Leisure

- 7.30 Brentwood Borough is made up of the market town of Brentwood, village centres and several local shopping parades providing services to its nearby settlements. These areas are where people go to access their employment, leisure, shopping and even housing needs; many have become the heart of the local community's activities.
- 7.31 Focusing people's day to day activities within these centres have multiple benefits to both businesses as well as local communities: businesses benefit from linked trips where people visit more than one activity as part of a single journey whilst the community benefits from having a wide choice of activity within a concentrated area<sup>47</sup>.
- 7.32 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. The following policies provide the Council's proposed way forward, separating Brentwood Town Centre as the focus for economic growth while emphasising the importance of retaining and enhancing its District Shopping Centres and Local Centres.
- 7.33 The revised NPPF (2021) removed the requirement to identify primary and secondary shopping frontages and acknowledged the significant challenges facing town centres and in particular the retail sector. It recognised that diversification is key to the long-term vitality and viability of town centres to 'respond to rapid changes in the retail and leisure industries'. As such, the following policies also aim to clarify the range of uses permitted in Designated Centres, as part of a positive strategy for the future of each centre.

### STRATEGIC POLICY PC03: RETAIL AND COMMERCIAL LEISURE GROWTH

In order to meet identified retail floorspace needs as set out in Policy MG01, retail floorspace will be provided on the following sites as part of mixed-use development:

- a. Dunton Hills Garden Village (R01);

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<sup>47</sup> Association of Convenience Stores (2015) Planning for Diverse Local Centres. Available at: <https://www.acs.org.uk/sites/default/files/planning-guide.pdf>

- b. Land at West Horndon Industrial Estate (R02);
- c. William Hunter Way Car Park (R14);
- d. Wates Way Industrial Estate (R15).

- 7.34 The NPPF states that in meeting anticipated needs for retail, leisure, office and other main town centre uses, planning polices should look at least ten years ahead, so that the local economy is not constrained, and potential investment is not diverted elsewhere or lost.
- 7.35 The Council is required to positively promote competitive town centre environments and manage their growth. It is important to provide for Retail, Commercial and Leisure uses that are appropriate and realistic to the role of centres in the borough's settlement hierarchy, set out in Policy MG03, and the retail hierarchy, set out in Strategic Policy PC04 Retail Hierarchy of Designated Centres. These should be based on the current state of centres and opportunities to meet development needs in full. In this regard, meeting retail needs and planning for the future of town and district centres are intrinsically linked.
- 7.36 Retail needs are traditionally split into two categories; convenience goods and comparison goods. More recently, the proportion of restaurants and cafes has also increased in the High Streets.
- Comparison goods: often products from High Street shops clustered together, purchased relatively infrequently by consumers and so prices, features and quality levels are often compared before purchasing. Examples include clothing and appliance stores.
  - Convenience goods: often products of habit or impulse, easily found by consumers and inexpensive enough for most to purchase. A prime example is goods sold in foodstores.
- 7.37 Medium term capacity figures up to 2028 suggest surplus of available convenience goods expenditure could support an additional 4,061 sqm net (5,801 sqm gross), primarily concentrated in Brentwood Town Centre and in new centres proposed at West Horndon and Dunton Hills. In the long term, surplus expenditure at 2033 could support 4,438 sqm net of sales floorspace (6,339 sqm gross) in the borough as a whole.
- 7.38 For comparison goods, the surplus expenditure could support an additional 972 sqm net (1,296 sqm gross) by 2020 across the borough. The surplus expenditure at 2033 could support 1,604sqm net (2,139 sqm gross). The vast majority of this surplus is for Brentwood Town Centre and new centres proposed at West Horndon and Dunton Hills, with only a very limited amount identified for the rest of the borough.
- 7.39 There is also requirement for 2,286 sqm gross of food and drink (pubs, bars, restaurants and takeaway) floorspace and 1,196 sqm gross of other non-retail (including commercial leisure) service up to 2033 primarily concentrated in Brentwood Town Centre and in new centres proposed at West Horndon and Dunton Hills.

7.40 The identified retail floorspace needs would be met via windfall development in the Designated Centres as well as provision of retail floorspace as part of development proposals on the following sites. New retail floorspace will serve the local community and complement rather than compete directly with the existing local shops.

- a. Site R01: Dunton Hills Garden Village
- b. Site R02: West Horndon Industrial Estate
- c. Site R14: William Hunter Way Car Park
- d. Site R15: Wates Way Industrial Estate

## STRATEGIC POLICY PC04: RETAIL HIERARCHY OF DESIGNATED CENTRES

### The retail hierarchy and Designated Centres

1. The Council will promote the continued roles and functions of the Designated Centres to positively contribute towards their viability, vitality, character and structure. The following centres and their associated Primary Shopping Area, as shown on the Brentwood Policies Map, are designated for retail, leisure and other main town centres uses.

Designated Centres	Primary Shopping Area
<b>Town Centre</b> The principal market town of Brentwood Borough that provides a wide range of social, cultural and economic facilities and services for local residents as well as visitors. The Town Centre must have good access to major roads and public transport links and benefits from a high quality retail environment.	
Brentwood Town Centre	Brentwood High Street
<b>District Shopping Centres</b> Groups of shops often containing at least one supermarket or superstore, and a range of non-retail services, such as banks, building societies, and restaurants, as well as local public facilities such as a library.	
Shenfield Hutton Road	Hutton Road
Warley Hill	n/a
Ingatestone High Street	Ingatestone High Street
The main service centre of Dunton Hills Garden Village (DHGV) <sup>10</sup>	to be considered by the future Local Plan review <sup>10</sup>

## Local Centres

A range of small shops of a local nature, serving a small catchment. Typically, Local Centres might include, amongst others, shops, a small supermarket, a newsagent, a sub-post office and a pharmacy. Other facilities could include a hot food takeaway and a laundrette.

West Horndon Village Centre	n/a
Blackmore Village Centre	
245-267 Ongar Road	
Brook Street Post Office	
Church Lane	
Doddinghurst Post Office, Doddinghurst Road	
Herongate Post Office, Brentwood Road	
1-23 Eastham Crescent	
200-216 Rayleigh Road	
60-74 Woodland Avenue	
Hanging Hill Lane Post Office, Hanging Hill Lane	
Blackmore Road	
Kelvedon Common Post Office, Church Road	
Danes Way/Hatch Road	
2-8 Harewood Road	
245-267 Ongar Road	
Stondon Post Office, Ongar Road	
The Keys, Eagle Way	
The two neighbourhood hubs at Dunton Hills Garden village <sup>48</sup>	

2. The retail hierarchy of Designated Centres in Brentwood Borough is as follows:
  - a. Brentwood Town Centre should be the first choice for retail, leisure and main town centre uses.

<sup>48</sup> The boundary of DHGV District Shopping Centre and two Local Centres and any subsequent Primary Shopping Area will be considered as part of the future Local Plan review

- b. District Shopping Centres will be a focus of more localised retail, commercial, flexible work space, community facilities and services that reduce the need to travel and contribute towards more sustainable and neighbourhood-scale living.
- c. Local Centres include small shops of a local nature, serving a small catchment. They have an important role in providing day to day shops and services that are accessible to residents in villages and rural parts of Brentwood, especially in areas more remote from the larger centres.

### **The sequential approach and impact assessment**

- 3. Retail, leisure, office and other main town centre uses will continue to be directed to these centres in line with the sequential approach to retail development locations set out in the NPPF.
- 4. Development should contribute positively to the attractiveness, vitality, safety, environmental quality, historic character, employment opportunities and social inclusiveness of these centres.
- 5. Change of use of upper floors above commercial premises to working space and/or residential will be encouraged provided that reasonable facilities and amenities are provided for, that development does not result in the loss of ancillary storage space or other beneficial use to the extent that it would make a ground floor unit unviable, and that the development would not prevent off street servicing of any ground floor unit.
- 6. Any retail and leisure developments proposed outside these centres must be subject to a retail impact assessment, where the proposed gross floorspace is greater than 2,500 sqm. A retail impact assessment may be required below this threshold where a proposal could have a cumulative impact or an impact on the role or vitality of nearby centres within the catchment of the proposal.

7.41 The NPPF places emphasis on the sequential approach with regard to the location of new retail provision. It also promotes mixed-use development (particularly the incorporation of residential uses) and the retention of main town centre uses<sup>49</sup>. The sequential approach is reflected in the network of centres set out in this policy, defined to meet retail and service needs and support the local businesses and communities. The position of a centre in the

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<sup>49</sup> Main town centre uses are retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).



hierarchy reflects its size and range of services and facilities, as well as the size of its catchment. In particular:

- a. **Brentwood Town Centre** is the social, cultural and economic focus of the borough and attracts many visitors. It has good access to major roads and rail links and benefits from a refurbished, high quality shopping environment. The sequential approach suggests that it should be the first choice for retail, leisure, community, employment and main town centre uses.
- b. **District Shopping Centres** will be a focus of more localised retail, commercial and community facilities and services that reduce the need to travel. Shenfield, Ingatestone and Warley Hill fit this category due to their size and range of services.
  - i. Shenfield is home to a major railway station with fast train services into central London. It will be the terminus for Elizabeth Line and it is vital that the most is made of this opportunity to invest in improving Shenfield's retail offer.
  - ii. The increased number of passengers travelling through and using Elizabeth Line at Brentwood Station and hence Warley Hill could lead to a demand for additional or improved retail and service facilities over and above the identified floorspace requirements. There are limited short term opportunities for additional development in the vicinity of these stations and Warley Hill, but in the longer term, sites could become available to meet anticipated future needs.
  - iii. Ingatestone has the largest village centre in the borough, an attractive local service and convenience centre with a train station.
  - iv. There is potential for DHGV to have a District Shopping Centre and/or additional Local Centre(s). An appropriate amount of retail floorspace would also be required to meet local needs in the south of the borough, reduce generated trips by car to other centres as well as contribute to the local economy. The designation of a District Shopping Centre and/or additional Local Centre(s) and any subsequent Primary Shopping Area at DHGV will be informed by the South Brentwood Growth Corridor Masterplan and further retail evidence, and considered as part of future Local Plan review.

In the existing District Shopping Centres, development options for additional retail floorspace are currently limited. The future strategy for these centres should focus on the reoccupation of vacant units and small-scale intensification and extensions (Brentwood Retail and Commercial Leisure Study, 2014 and Brentwood Retail Study Update Addendum, 2020)<sup>50</sup>.

- c. **Local Centres** include shopping parades, individual shops and facilities such as small supermarket, newsagent, post office, takeaways and pharmacy providing 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

<sup>50</sup> Nathaniel Lichfield & Partners (2014) Retail and Commercial Leisure Study and (2020) Brentwood Retail Study Update Addendum. Available at: <https://document.brentwood.gov.uk/pdf/29012018122226000000.pdf> and <https://document.brentwood.gov.uk/pdf/07092020121851000000.pdf>

walking distance. Local Centres are therefore an important component of community life and must be afforded proper planning protection and support, with regard to any related development proposal that may affect their provision.

- 7.42 Aside from the Designated Centres identified above, small parades comprising of less than ten units, albeit not covered by this policy, are still an important feature within a neighbourhood and could be included within a Neighbourhood Plan.
- 7.43 The Council will look favourably upon the change of use to office space, flexible working space, incubation units or grow-on<sup>51</sup> space above existing commercial development, as and where appropriate. These types of development would not only provide a re-use of under-used or unused floor space that can lead to neglect and deterioration of a building, but also address the retail trend, demand of commercial workspace and facilitate business expansions.
- 7.44 Residential development often plays an important role in ensuring the vitality of centres; therefore, residential development on appropriate sites and/or above existing commercial premises are encouraged.
- 7.45 New development should be of a type and scale appropriate to the centre it is located within and/or close to.
- 7.46 While greater use of public transport, cycling and walking is central to sustainable development, it is recognised that in order to maintain the viability of shopping centres, there will continue to be a justification for appropriate levels of shoppers' short-stay and/or on street car parking. It is necessary to ensure that the economic viability of the Town Centre and its ability to continue to compete with other shopping centre is not undermined by the inability of shoppers being able to find a secure, safe, well laid out parking space in reasonably proximity to the shops. At the same time, car parking provision must not be made at the expense of the local character. Current parking provision in and around some existing Designated Centres currently have negative visual impacts yet not always meet parking spaces demands of shoppers and visitors. Therefore, proposed retail parking provision must be carefully managed so that it meets local demands without adding to congestion or undermining the streetscape and the attractiveness of alternatives to the car. Developers should refer to Policy BE13 Parking Standards for further information.

## **POLICY PC05: BRENTWOOD TOWN CENTRE**

1. The Council will require development to conserve the positive qualities of Brentwood Town Centre while enhancing and improving negative aspects of function and appearance where relevant. Development in the Town Centre

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<sup>51</sup> Grow-on space could be understood as space for small growing businesses with around ten employees plus; that is, businesses that have grown to the extent that they are too large to be accommodated in incubator space or enterprise centres, but are still too small to occupy large, often freestanding, offices or factory/workspace units. Essex County Council (2016) Grow On Space Feasibility Study, available online.

should contribute to the Council's aim of improving the capacity and quality of the public realm throughout Brentwood Town Centre, contribute to a vibrant High Street and the surrounding Conservation Area in line with the Town Centre Design Guide SPD.

2. Shopfronts and signage have significant impacts on its surroundings therefore proposals are required to incorporate high quality, attractive shopfronts that enhance the street scene, in line with the Council's adopted Town Centre Shopfront Guidance SPD.
3. **Chapel Ruins, Baytree Centre and South Street areas:** This area provides a link to strategic sites on the High Street therefore improving its permeability and integration into the wider public realm network will create a more welcoming and flexible space at the heart of the Town Centre, enable its historical settings to be celebrated. Proposals should:
  - a. contribute to the enhancement of public realm around Chapel Ruins and the Conservation Area, retain and enhance their significance and character;
  - b. complement the retail function and maintain or add to the vitality, viability and diversity of the Town Centre, by means such as mixed-use schemes that include retail, leisure and residential;
  - c. facilitate safe and pleasant pedestrian movement through improved alleyways, lighting, wayfinding and landscaping; and
  - d. assist in uplifting and transforming the Baytree Centre and integrate it with the other parts of the Town Centre.
4. **William Hunter Way, Chatham Way Car Park and Crown Street:** The Council will work with developers and partners to improve the public realm links in these areas, and through the redevelopment of the car parks, create a mixed-use scheme to provide new residential, retail, flexible working space and commercial floorspace. Proposals in these areas should:
  - a. contribute to the improvements to frontages and public realm through landscaping and redevelopment;
  - b. provide additional shopfronts and double fronted shops, if development involves the rear of premises on the north side of the High Street; and
  - c. facilitate safe and pleasant pedestrian movement through improved alleyways lighting, wayfinding and landscaping.
5. **Linkages to Brentwood station:** Improvements to the rail service to London will increase Brentwood Town Centre's regional public transport accessibility. The Council will seek to enhance public realm and way finding around

Brentwood station, foster a stronger sense of place and sense of arrival, improve the linkages from the Town Centre to the station, with Kings Road being the primary focus. Proposals should:

- a. contribute to the enhancement of public realm around Brentwood station, Kings Road and Kings Road junction through design, landscaping and redevelopment;
- b. facilitate safe and convenient traffic movement with priority given to passenger transport, pedestrians and cyclists, by means such as improved junctions, cycle paths, lighting and wayfinding; and
- c. add to the vitality and vibrancy of the Town Centre by providing an appropriate mix and balance of uses including residential, employment, commercial and amenity spaces.

- 7.47 The Retail and Commercial Leisure Study (2014)<sup>52</sup> outlines that Brentwood Town Centre has the largest quantum of convenience and comparison goods floorspace in the borough and offers a number of other services including restaurants, banks and evening venues. It has a high-quality shopping environment, distinctive offer, 'niche' independent shops, as well as a variety of evening entertainment. These must be supported and developed further.
- 7.48 In line with national guidance the Council aims to support the viability and vitality of the Town Centre by directing new retail, commercial and leisure provision here and encouraging new investment and improvements. Development should balance the requirements of those who live, work, shop, and enjoy leisure time via a diverse range of use and an efficient, convenient network of public transport, cycling and walking routes.
- 7.49 The Brentwood Town Centre Design Plan (2017)<sup>53</sup> establishes a vision and consider how to deliver new development that contributes to enhancing the town through improved links and key opportunity sites. William Hunter Way car park and the Chapel Ruins, Baytree Centre and South Street areas, among others, are key development opportunities identified in the Brentwood Town Centre Design Plan. This policy points towards the need for development proposals to achieve these aims.
- 7.50 The redevelopment of sites along William Hunter Way offers an excellent opportunity for the Town Centre to grow and meet local needs. It is a former service road north of Brentwood High Street that faces directly onto the rear of High Street premises. The car park and servicing spaces on the southern side of William Hunter Way are underutilised and untidy. Opportunities exist to redevelop the car park for a mix of uses including residential improve this frontage and public realm. It will be important to enhance the local environment through improved pedestrian links, encouraging double fronted units, and high-quality design. This

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<sup>52</sup> Nathaniel Lichfield & Partners (2014) Retail and Commercial Leisure Study.

<sup>53</sup> Levitt Bernstein (2017) Brentwood Town Centre Design Plan. Available at: <http://www.brentwood.gov.uk/designplan>

would attract more visitors and additional investment. To achieve this, it is vital that the development is carefully integrated with the High Street and not seen as a separate destination. The loss of public parking provision on William Hunter Way car park should be re-provided with an appropriate quantum for the same reasons identified above.

- 7.51 Travelling north, from the south of Brentwood Town, Brentwood railway station serves as a gateway into the Town Centre. However, currently links to the Town Centre are hindered by a number of physical barriers such as car dominated public realm, a lack of wayfinding support, and undefined pedestrian and cycle routes. There is a poor sense of arrival at Brentwood Station. In addition, the layout of junctions at other gateways into the Town Centre also favour car rather than pedestrian movement. Movement within the Town Centre is a key issue to address, the High Street is fairly weak in terms of providing a positive pedestrian experience to use, move through and congregate within the Town Centre. Therefore, it is important to enhance the public realm and encourage pedestrian movement, starting with improving the Town Centre's connectivity with Brentwood station and its immediate surroundings, and address the current 'drop off' experienced by pedestrians reaching either end of the High Street.
- 7.52 In addition, parking space design and provision near Brentwood railway station should take into account the potential impacts of the Elizabeth Line. The Elizabeth Line once completed will provide very frequent services from Brentwood (and Shenfield) Stations to and through London. Whilst it is expected that this will have impacts on the local highway network both positive (as a result of additional rail trips) and potentially negative (with potential for increased travel by car to access the stations), at this stage the impact of the scheme is unknown and there will be a need to monitor and review the situation once the services are operational<sup>54</sup>. Any impacts identified should be addressed through the implementation and promotion of sustainable transport measures, for example promote use of non-car modes and the implementation of parking restrictions in the area. Developers should also refer to Policy BE13 Parking Standards and Policy BE12 Mitigating the Transport Impacts of Development.
- 7.53 Congestion at peak times and air quality are key issues around the Town Centre, innovative measures that incorporate technology and property management to mitigate the impacts of traffic and congestion would be favourably considered. For example, flexible office hours that avoid peak times, design and spacing of drive ways, introducing electrical parking points to encourage use of such vehicles, planning and delivering IT infrastructure to allow future implementation of emerging smart systems, smart car hire, etc.
- 7.54 It is vital that an appropriate mix of uses contribute to a vibrant Town Centre. Where appropriate, higher density development can help meet the need for more housing and local jobs. Efficient use of previously developed land and buildings should be made, such as making good use of upper floors above shops. High quality retailers should be attracted to compete with retail centres outside the borough. Major drivers of footfall in suitable locations will help increase the number of 'linked trips' to benefit all local services.
- 7.55 Development should respond to the character of Brentwood Town Centre Conservation Area, amended in 2010 to include the southern frontage of William Hunter Way in

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<sup>54</sup> Stantec (2021) Transport Assessment

recognition of this underutilised land and to encourage high quality redevelopment that is sympathetic to the wider Conservation Area.

## **POLICY PC06: MIXED USE DEVELOPMENT IN DESIGNATED CENTRES**

Within the boundary of Designated Centres as set out in Policy PC04 Retail Hierarchy of Designated Centres and defined on the Brentwood Policies Map:

1. Mixed use development will be supported if it:
  - a. is in proportion to the scale and function of the centre;
  - b. contains an appropriate mix of ground floor uses; and
  - c. makes efficient use of the site and is considered to be of sufficient density.
2. Proposals resulting in the loss of main town centre uses at ground floor level to non-centre uses, as defined in Figure 7.6, which results in an unacceptable mix of uses will not be permitted. Proposals resulting in the loss of main town centre uses at ground floor must demonstrate that:
  - a. the use is no longer viable, by evidence of active marketing to the public for at least 12 months, showing that the premises are not reasonably capable of being used or redeveloped for a main town centre use; and
  - b. development would not result in 3 or more adjacent non-centre use units.
3. Non-retail development that are classed as main town centre uses, as defined in Figure 7.6, should:
  - a. complement the retail and service function and maintain or add to the vitality, viability and diversity of the centre;
  - b. provide an active frontage, such as a window display, which is in keeping with the character of the shopping area; and
  - c. not give rise to a detrimental effect, individually or cumulatively, on the character or amenity of the area through smell, litter, noise or traffic problems.
4. Changes of use from class E to another main town centre use as set out in Figure 7.6 will only be permitted where the development would satisfy the above criteria and retain an appropriate mix and balance of uses which will provide for the needs of local residents.
5. Proposals for separate units of retail, offices, leisure, cultural, community facilities and residential on upper floors are supported provided that the use

would have a safe and convenient access, a separate refuse and recycling store, and would not inhibit the functioning of the ground floor use. Main town centre uses and employment uses should be given priority over residential uses unless it can be demonstrated that this would lead to an imbalance of uses.

- 7.56 The NPPF recognises that diversification is key to long-term vitality and viability of town centre, to ‘respond to rapid changes in the retail and leisure industries. Locating a variety of land uses close together reduces the need to travel, brings jobs and essential services closer to where people live and enhances community safety. For example, uses such as building societies, banks, estate agents, restaurants, takeaways etc., attract people into the centres 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.
- 7.57 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 and Local Centre. In these areas, the mix of uses will be assessed at a local level. 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.
- 7.58 Too great a concentration of non-centre uses can undermine the role of Designated Centres as the main locations for retail, leisure and business uses. It is therefore important to consider their location and siting and ensure incorporation of window displays to overcome potential problems associated with the creation of ‘dead frontages’.
- 7.59 Policy PC06 is written in the context of the need to retain a mix of appropriate uses for the benefit of a centre.
- 7.60 Proposals resulting in the loss of centre uses at ground floor level to non-centre uses would only be considered when there is substantial evidence of non-viability showing that the premises are not reasonably capable of being used or redeveloped for a centre use despite active marketing to encourage potential occupiers. An economic assessment of the sale or lease price the property is offered at may form such evidence.

## POLICY PC07: PRIMARY SHOPPING AREAS

Retail use should remain the predominant use in Primary Shopping Areas as set out in Policy PC04 Retail Hierarchy of Designated Centres, and defined on the Brentwood Policies Map. Proposed retail development should:

- a. contribute to the area's attractiveness, accessibility and vibrancy by adding to or providing a range of shops to meet local needs, including opportunities for small, independent shops;
- b. not result in subdivision of an existing large retail unit;
- c. be fully integrated with the existing shopping area; and
- d. facilitate safe, convenient and pleasant pedestrian movement through improved lighting and landscaping.

- 7.61 Primary Shopping Area is defined in the NPPF as an area where retail development is concentrated.
- 7.62 In addition to providing opportunities for small, independent 'niche' shops, the Council seeks to retain existing large retail units in Primary Shopping Areas. 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 the Town Centre viability. This policy aims to strike a balance between these potentially competing market forces, ensure a broad range of dynamics and shopping opportunities.
- 7.63 Retail developments are significant trip attractors and should be located in places that are well-connected by public transport, many retail trips are potentially walkable or able to be reached by cycling, improving the attractiveness of these modes through improved public realm will support the vitality of the Primary Shopping Areas. Proposals that contribute to such aim will be considered positively.
- 7.64 Historically, non-retail uses were resisted in Primary Shopping Area; however, changes in retail trends and technology need to be taken into account as part of future development assessment.



**POLICY PC08: NON-CENTRE USES**

Proposals for non-centre uses in the Designated Centres will only be permitted if:

- a. complement the retail and service function and makes a positive contribution to the vitality, viability and diversity of the Designated Centre it is located within;
- b. would not create an over-concentration of non-centre uses which are harmful to the function of the centre;
- c. provide an active frontage in keeping with the character of the Designated Centre;
- d. would not give rise, either alone or cumulatively, to a detrimental effect on the character or amenity of the area through smell, litter, noise or traffic problems. Demonstrates any potential related problems 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; and
- e. for proposals creating more than two residential flats above ground floor level, the development would not result in the loss of ancillary storage space or other beneficial use to the extent that it would make a ground floor unit unviable, and the development would not prevent off street servicing of any ground floor unit.

7.65 To avoid an overconcentration of non-centre uses this policy aims to strike a balance between competing uses, ensure a broad range of businesses, provide for a reasonable dispersal of uses throughout the centres and integrate non-retail uses into the general shopping environment.

7.66 Proposals in and around Brentwood Town Centre area should be in line with the adopted Shopfront Guidance SPD, the Town Centre Design Plan and the Town Centre Design Guide.

Main town centre uses (uses suitable at ground floor level in the Designated Centres and Primary Shopping Areas)	Non-centre uses (uses not suitable at ground floor level in the Designated Centres and Primary Shopping Areas)
<ul style="list-style-type: none"> <li>• Shops</li> <li>• Financial and professional services</li> <li>• Cafés and restaurants</li> </ul>	<ul style="list-style-type: none"> <li>• General industry (class B2)</li> <li>• Storage and distribution (class B8)</li> </ul>

<ul style="list-style-type: none"> <li>• Business uses, including offices and research and development</li> <li>• Hotels</li> <li>• Learning and non-residential institutions such as schools, museums, public libraries, public hall, and places of worship</li> <li>• Creche, day nurseries or day centre</li> <li>• Provision of medical or health services</li> <li>• Assembly and leisure</li> <li>• Other uses typically found in centres, including hotfood takeaways, pub or drinking establishment, cinemas, concert halls, bingo halls, dance halls, theatres, nightclubs, amusement arcades, laundrettes, tattooists, beauty parlours</li> </ul>	<ul style="list-style-type: none"> <li>• Residential institutions (class C2 and class C2a)</li> <li>• Residential (class C3)</li> <li>• Houses in multiple occupation (class C4)</li> <li>• Other uses which do not provide services direct to the public</li> </ul>
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Figure 7.6: Uses suitable and not suitable at ground floor level in Designated Centres and Primary Shopping Area

### POLICY PC09: NIGHT TIME ECONOMY

Development proposals for cultural, entertainment and leisure uses in Designated Centres should where appropriate, contribute to the diversity of the evening and night-time economy. Proposals are required to:

- a. not give rise, either alone or cumulatively, to a detrimental effect on the character or amenity of the surrounding residential area through smell, litter, noise or traffic problems. Proposals are required to demonstrate any potential related problems can be overcome satisfactorily to protect amenities of surrounding residents; and
- b. provide evidence of responsible management and stewardship arrangements to ensure there is no disturbance to surrounding properties and residents or harm to surrounding area amenity.

7.67 'Main town centre uses' as defined in the NPPF include those that are part of the evening and night time economy (ENTE). ENTE is recognised to allow town centres to diversify and is an opportunity for economic and social development. This policy therefore seeks to strike the right balance between supporting the evening economy and protecting the living conditions of residents and nearby uses in terms of anti-social behaviour, noise pollution, health and wellbeing and other issues.

# Community Infrastructure

## STRATEGIC POLICY PC10: PROTECTING AND ENHANCING COMMUNITY FACILITIES

The Council recognises the importance of community facilities, including those registered as Assets of Community Value (ACV), as part of social infrastructure and seeks to ensure that:

- a. existing community assets will be protected from inappropriate changes of use or redevelopment;
- b. new facilities should be easily accessible by public transport, cycling and walking;
- c. development proposals that provide high quality, inclusive community assets that addresses a local or strategic need and supports service delivery strategies will be supported;
- d. development proposals should make best use of land, including, where possible, the co-location of different forms of community facilities and the rationalisation or sharing of facilities;
- e. development proposals that would result in the unnecessary loss of community facilities will not be permitted unless it can be demonstrated that:
  - i. they will be replaced by alternative and well located facilities that will continue to serve the similar needs of the neighbourhood and wider community; or
  - ii. the loss is a consequence of the genuine need to rationalise existing facilities in an area in order to provide for existing and future community needs.
- f. the development or change of use of redundant community facilities should be considered only after it is established that there is no reasonable prospect of them being put to alternative community uses.

- 7.68 Community facilities and services can include any provision that provides social, recreational and cultural facilities to meet the day-to-day needs of the community. It can include facilities such as village halls, community centres, libraries, and buildings for sports, leisure, healthcare, and arts venues, amongst others. Applicants should take into account the

Council's Built Facilities Strategy and Leisure Strategy when considering indoor sports and leisure facilities. While recreational facilities can include those outdoors in parks and open spaces, Policy PC10 applies to facilities and services related to buildings only; it excludes any outdoor sport or recreation facilities, which is covered by Policy NE05 Open Space and Recreation Facilities.

- 7.69 Community facilities are a part of social infrastructure and play an important role in providing good quality of life, stimulating and supporting social cohesion and interaction, as well as developing strong and inclusive communities. They provide opportunities to bring different groups of people together, contributing to social integration and the desirability of a place.
- 7.70 Good quality leisure and sport facilities support and encourage people to lead healthy lifestyles, raising the quality of life for local residents. Leisure, cultural and entertainment facilities help attract people to the borough as a place to work, visit and live. It is therefore important that new and replacement facilities support new and existing communities, respectively. These should also facilitate the growth of the borough by providing sufficient capacity to accommodate community need and demand.
- 7.71 The Council will work collaboratively with service providers, developers and relevant stakeholders, including the local community, to fully understand existing and future social infrastructure needs and plan appropriately for these, including through the Community Infrastructure Levy.
- 7.72 The loss of social infrastructure can have a detrimental effect on a community. The Council seeks to protect its existing community facilities. Where a development proposal leads to the loss of a facility, a replacement that continues to meet the needs of the neighbourhood it serves will be required.
- 7.73 Proposals for new and replacement facilities will be supported where there is a local need. This need will be demonstrated through a local need assessment. This is particularly important where existing deficits in community or leisure provision have already been identified in line with the Council's Leisure Strategy and Built Facilities Strategy.
- 7.74 When new developments generate the need for new community facilities, the need should be met by on and off-site provision, in line with Policy MG05 Developer Contributions.

#### Assets of Community Value

- 7.75 Assets of Community Value (ACV) as designated under the Localism Act 2011 will be a material consideration in any proposal for redevelopment. The Localism Act 2011 introduced the Community Right to Bid which provides a new right for residents to nominate certain local public or privately-owned buildings or land as being an Asset of Community Value. The Council is obliged to consider all nominations received and include the building or land on the ACV list, if the current use or a recent past use of the asset has furthered the social well-being or social interests of the community and can continue to do so. Once an asset is included in the ACV list it will remain on that list for five years, after that re-application will be necessary. During this time, the owner cannot dispose of the asset without giving the community interest group the opportunity to bid for it.. The community are then given six months to put together a bid to buy the asset. The Brentwood most up to date ACV list and

how to nominate an asset are available to view in the Council's information database, DataShare<sup>55</sup>.

- 7.76 This policy should be read in conjunction with Policy MG05 Developer Contributions and Policy BE15 Planning for Inclusive Communities.

## **POLICY PC11: EDUCATION FACILITIES**

1. The change of use or re-development of existing or proposed educational establishments and/or their grounds for alternative purposes will not be permitted unless:
  - a. it can be clearly demonstrated that the use of the site is genuinely redundant for educational purposes and no other alternative educational or community use can be found for the site in question; or
  - b. satisfactory alternative and improved facilities will be provided; or
  - c. in the case of playing fields or open space associated with educational establishments, any proposals that involve their loss or change in use will be subject to Policy NE05.
2. Where there is a demonstrable need for new educational facilities, planning permission will be granted for appropriate and well-designed proposals which broadly meet the criteria for new education facilities set out in the ECC's Developers' Guide to Infrastructure Contributions.
3. Developments that generate a need for additional education facilities should make appropriate provision for their timely delivery as part of the development or through financial contributions if appropriate and in accordance with ECC's Developers' Guide to Infrastructure Contributions.
4. New educational establishments should plan and design their playing fields and sports facilities to be used for community use when not required for their own use, provided always that any such use must not detract from the safety of pupils or their learning environment.

- 7.77 Further information regarding requirements for educational facilities over the Plan period is detailed in the Council's Infrastructure Delivery Plan. This policy should be read in conjunction with Policy MG05 Developer Contributions and Policy NE05 Open Space and

<sup>55</sup> <http://opendata.brentwood.gov.uk/>

Recreational Facilities, as well as infrastructure requirements set out under site-specific policies in Chapter 9. Applicants should engage with the Local Education Authority at the earliest opportunity and work cooperatively to ensure educational requirements are identified early on and are delivered at the appropriate time in line with the phasing of development.

- 7.78 Education in this section relates to early years and childcare, primary, secondary and further education provision for all children and young people, including those with special educational needs and/or disabilities, and where residential elements may form part of the provision. Higher education and other types of education such as language schools are not included in this policy.
- 7.79 New and established schools and their related educational facilities, including playing field and sports facilities, make a major contribution to community use and provide essential support to increased housing growth. Education providers and institutional users will be encouraged to improve facilities and make efficient use of their assets and landholdings. Where feasible, providers will be encouraged to share their assets with the wider community to improve health and social well-being, subject to site specific context and wider impacts.
- 7.80 Easy access to good quality educational provision is important for supporting economic growth, developing strong sustainable communities, promoting economic prosperity and sustaining quality of life. It is therefore appropriate for new residential development to contribute towards the cost of education provision, either towards the expansion of existing facilities, or, in some cases, towards the funding of a new school, through planning obligations and the Community Infrastructure Levy (CIL) as appropriate.
- 7.81 Essex County Council (ECC) as the Local Education Authority has the responsibility for early years and childcare and school place planning. Through this process, ECC identifies the need for school places and identifies surpluses or deficits through a 10 Year Plan for School Places currently covering the period 2019-2028. Whether the change of use or redevelopment of independent schools would be considered surplus to educational requirements will be considered on a case by case basis.
- 7.82 The Council will continue to work with ECC to determine what additional education facilities and local education services will be needed as a result of planned future development. The Council will seek contributions from developers to fund required infrastructure, in line with Policy SP04 Developer Contribution.
- 7.83 Regard should be given as to how teachers, parents and pupils will access the nearest primary and secondary school and encourage sustainable travel to and from the school. Development should seek to ensure that children and young people can walk or cycle to school safely on designated safe routes through new developments in line with Policy BE09 Sustainable Means of Travel and Walkable Streets, and Policy BE10 Sustainable Passenger Transport. Such routes should be planned from the outset of development and not retrofitted into a scheme's design.

#### Early years and childcare

- 7.84 The Council, as advised by ECC, will seek new early years and childcare facilities preferably co-located with new primary schools, where appropriate, and which will be funded through developer contributions. Sufficient early years and childcare provision also needs to be considered alongside other essential services and infrastructure. It may prove necessary to

locate new early years and childcare facilities close to major new employment locations, where demand is identified.

### Primary and secondary schools

- 7.85 The NPPF stresses the importance on ensuring sufficient and choice of school places to meet existing and future needs. Where growth is to be located, it will be essential to ensure the delivery of education facilities is undertaken in a timely and phased manner. Additional school places can be provided either by the expansion of existing schools/ academies or the opening of new “free schools” or academies. However, existing primary schools, especially in the Brentwood urban area are generally close to capacity, with limited space on site to expand, but there is generally a high level of capacity at secondary schools.
- 7.86 Whilst faith schools and academies may have sufficient site area to expand this would need the agreement of the Anglican Diocese of Chelmsford/Roman Catholic Diocese of Brentwood or the academy trusts responsible for these schools/ academies. This is particularly relevant as a significant proportion of schools/ academies located within the borough are faith schools.
- 7.87 When considering the housing applications, the interests of schools will be taken on board. This is likely to involve reserving suitable sites for new schools on strategic allocation. Developers should refer to the required site areas set out in the ECC’s Developers’ Guide Education Supplement.

# 08



## Natural Environment

- 8.1 The policies in this chapter seek to ensure future development avoids and/or positively mitigates the impact on the natural environment and achieves sustainable, well-designed places that promote community well-being. The policies help deliver Strategic Objective 4.

SO4: Deliver Beautiful, Biodiverse, Clean and a Functional Natural Environment, where resources are carefully managed to avoid adverse impact on and to provide net gains for, the borough's natural environment and biodiversity; and where our natural heritage is protected, ecosystem services are restored, enhanced and integrated back into the built environment through multi-functional green and blue infrastructure and opportunities are pursued for securing measurable net gains for biodiversity.

- 8.2 The borough of Brentwood currently enjoys a varied built and natural landscape. At its core is the main urban area with the settlements of Brentwood, Shenfield, Pilgrims Hatch and Hutton, along with the dispersed, yet neighbouring northern villages and the more distant villages in the south; it is set within the varied landscape of intrinsic character and beauty within the Essex countryside. This enables Brentwood residents to enjoy the best of both worlds – the urban and the rural benefits - leading to the descriptive reference as the Borough of Villages.
- 8.3 While Brentwood currently enjoys this rich and varied natural landscape, the pressure to grow and accommodate change must not be complacent to this privileged position. The policies in this section, therefore, aim to ensure this natural heritage is protected and enhanced for future generations to enjoy. The policies aim to:



- a. maintain the character of Borough of Villages, while improving public access in between through ecological networks and green infrastructure;
  - b. harness the characteristics and intrinsic value of the landscape to inspire landscape-led developments throughout Brentwood;
  - c. Conserve and enhance sites of significant international, national and local geological, ecological and landscape value;
  - d. minimising the impacts and providing opportunities for net gains for biodiversity through habitat improvements and establishing ecological networks and green infrastructure provision;
  - e. maintaining the character and ecology of the Essex Wildlife Trust living landscapes; and
  - f. preventing unacceptable levels of soil, air, water, noise and land pollution, ensuring development contributes to improvements in local environmental conditions.
- 8.4 The Council is committed to the conservation and enhancement of the natural environment in line with the NPPF (2021, Section 15). 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 including the positive conservation management of Local Wildlife Sites (LWS) within the borough.
- 8.5 Future growth is planned in sustainable locations to ensure that the quality of our environment is valued and sustained. Consideration for integration, conservation and enhancement of the natural and built environment to promote the health and well-being of inhabitants is paramount. This will be achieved through the considered management of development in line with the government's 25 Year Environment Strategy<sup>56</sup> and NPPF with a commitment to improving green infrastructure connectivity for wildlife and people in line with Green and Blue Infrastructure and Open Space policies.

## Summary of Natural Assets

- 8.6 The borough has a number of landscape, biodiversity and geodiversity areas of interest which contribute to local distinctiveness. These should be retained and protected and their enhancement and restoration will be encouraged. The majority of the landscape is dominated by Wooded Farmland comprising of undulating areas of deciduous and mixed woodland interspersed with arable fields, mature hedgerows, smaller pastures and paddocks, and narrow lanes. Brentwood has 15 areas of ancient woodland along with veteran trees and lowland fen. The Thames Chase Community Forest Area covers the south and south-west of Brentwood. The Thames Chase Plan (2014)<sup>57</sup> describes the landscape as

<sup>56</sup> HM Government (2018) A Green Future: Our 25 Year Plan to Improve the Environment. Available at: <https://www.gov.uk/government/publications/25-year-environment-plan>

<sup>57</sup> The Thames Chase Trust (2014) The Thames Chase Plan. Available at: [http://www.thameschase.org.uk/uploads/TC\\_Plan\\_Summary.pdf](http://www.thameschase.org.uk/uploads/TC_Plan_Summary.pdf)

'Land of the Fanns', comprising of marshy land - a low lying district with fens, forests and farming made up of large field patterns with hedgerows, often called the Horndon Fens. Fanns is a Saxon term for low marshy land or a low-lying district. This area provides an inspirational image of a forest landscape that is being developed to Community Forest principles. Taking into account the age, uniqueness, species diversity and rarity of these habitats, their re-creation, once destroyed, will be difficult to achieve. Therefore, proposals which impact these irreplaceable habitats will be refused unless there are wholly exceptional reasons and a suitable compensation strategy is set out.

- 8.7 The Roding River Valley in the north-west comprises of linear patches of woodland along the valley with mature hedgerows.
- 8.8 Amongst this backdrop are a number of interspersed Country Parks, namely St Faith's, Weald, Hutton, Warley, Thorndon and Merrymeads.
- 8.9 The country parks of Warley, Weald and Thorndon are also on Historic England's Register of Parks and Gardens of Special Historic Interest in England.
- 8.10 The borough contains three Sites of Special Scientific Interest (SSSI): Curtis Mill Green, Thorndon Park and The Coppice in Kelvedon Hatch. Hutton Country Park is also a statutory Local Nature Reserve. The 2012 Local Wildlife Site Review identified 147 Local Wildlife Sites (LWS), identified for their value as semi-natural habitats and for their role in environmental education and public engagement with wildlife. In the Mill Green area, lies the Forest of Writtle, which is a designated Ancient Landscape. All these sites are important landscapes recognised for their special cultural, horticultural, historic and landscape qualities.
- 8.11 Other natural features of conservation interest include commons, small copses, trees, tree belts, woodlands, ponds and watercourses and hedgerows. Recreational impacts already pose a challenge to conserving these sites. Ancient hedged landscape of narrow lanes links historic farmsteads and hamlets in the Brentwood countryside.
- 8.12 A number of sites within or partly within Brentwood are also classed as the Living Landscapes<sup>58</sup>: Havering and Brentwood Ridge (19), Thorndon Woods (23), Ramsden Heath and Woods (34), Writtle Forest (36), Upper Roding: Abbess to M25 (18), Lower Roding: M25 to Chigwell (17) and Tylers Common (22).

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<sup>58</sup> <https://www.essexwt.org.uk/living-landscapes>

# Protecting and Enhancing Natural Heritage

## **STRATEGIC POLICY NE01: PROTECTING AND ENHANCING THE NATURAL ENVIRONMENT**

1. The Council will require development proposals to use natural resources prudently and protect and enhance the quality of the natural environment. All proposals should, wherever possible, incorporate measures to secure a net gain in biodiversity, protect and enhance the network of habitats, species and sites (both statutory and non-statutory) and avoid negative impacts on biodiversity and geodiversity. Compensatory measures will only be considered if it is not possible fully to mitigate any impacts.
2. When determining planning applications, the council will apply the principles relevant to habitats and biodiversity as set out in National Planning Policy.

### **International Designated Sites**

3. Where a proposed development is likely to have an adverse impact on European Designated Site (whether individually or in combination with other plans or proposals) permission will not be granted unless there is due compliance with the requirements of the Habitats Regulations.
4. New residential development within the Essex RAMS and Epping Forest SAC Zones of Influence will be required to provide appropriate on-site measures for the avoidance of, and/or reduction in, recreational disturbance on European Designated Sites through the incorporation of recreational opportunities, including the provision of green space and footpaths in the proposals. Proposals will be required to follow the mitigation hierarchy by seeking to avoid creating recreational impacts first and foremost, with mitigation measures considered separately to avoidance.

### **Nationally Designated Sites**

5. Development proposals within or outside a SSSI, likely to have an adverse effect on a SSSI (either individually or in combination with other developments), will not be permitted unless, exceptionally, the benefits of the proposed development clearly outweigh both the adverse impacts on the features of the site that make it of national importance and any impacts on the wider network of SSSIs.

### Sites of Local Importance

6. Development proposals that are likely adversely to affect locally designated sites, including their functional status within any identified ecological network, will only be permitted where the applicant can demonstrate that:
  - a. the ecological coherence of the site and any local ecological network is maintained; and
  - b. it can be demonstrated that the benefits of the development clearly outweigh the loss.

- 8.13 All stages of development must be considered when assessing the impact and cumulative impact on wildlife sites both within and in proximity to the borough of Brentwood.
- 8.14 The Council acknowledges the sensitive biodiversity sites just beyond the borough boundary, including Basildon Meadows SSSI, Norseley Wood SSSI and Epping Forest SSSI and Special Area of Conservation. Proposals likely to have an adverse effect on these neighbouring sites will be assessed per in accordance with Strategic Policy NE01 Protecting and Enhancing the Natural Environment.
- 8.15 Where there is a confirmed presence, or reasonable likelihood, of a legally protected species or priority species on an application site, the applicant will be required to demonstrate that adverse impacts upon the species have been avoided, and where they cannot be avoided adequately mitigated. Mitigation must conform to the requirements of relevant legislation and Natural England Standing Advice. Where impacts cannot be adequately mitigated, the proposal will not be permitted.
- 8.16 The Council will take a precautionary approach where insufficient information is provided about avoidance, management, mitigation and compensation measures and refuse such planning applications. The Council will secure management, mitigation and compensation measures through planning conditions/obligations where necessary.
- 8.17 Where Priority Habitats are likely to be adversely impacted by the proposal, the developer must demonstrate that every effort has been made to avoid adverse impacts. Mitigation and compensation measures will only be acceptable where it has been demonstrated impacts cannot be reasonably avoided in the first place. Impacts that cannot be avoided are to be mitigated onsite. Where residual impacts remain, offsite compensation will be required so that there is no net loss in quantity and quality of Priority habitat in the borough of Brentwood.
- 8.18 The Council supports the Essex Wildlife Trust Living Landscape's vision to 'restore, recreate and connect wildlife habitats'. Within each Living Landscape, opportunities for the preservation, restoration and recreation of priority habitats, ecological networks and populations of priority species will be supported in order to conserve and enhance strategic wildlife corridors and habitats in Essex. Development proposals that would deliver these

opportunities will in principle be supported, subject to other policies within this Plan. Development resulting in a significant adverse impact on the ecological function of these Living Landscapes will be refused.

- 8.19 In addition to the statutory protections and obligations for designated sites, proposals must also demonstrate how they are responding to:
- a. the Essex Wildlife Trust Living Landscapes vision; and
  - b. the Thames Chase Plan.

## Essex Coast RAMS

- 8.20 Development in the borough has the potential to increase the recreational pressures and disturbance on existing European level sensitive habitats such as the Essex Estuaries Special Area of Conservation (SAC), the Crouch and Roach Estuaries Special Protection Areas (SPA), and the Epping Forest Special Area of Conservation.
- 8.21 Recreational disturbance has been further considered in an Appropriate Assessment which has identified the need to prepare a Recreational disturbance Avoidance and Mitigation Strategy (RAMS) for these locations to deliver the mitigation necessary to avoid significant adverse effects from 'in-combination' impacts of residential development that is anticipated within the zone of influence.
- 8.22 Following consultation with Natural England, a Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) has been prepared and adopted to include all coastal European sites. The strategy identifies where recreational disturbance is happening and the main recreational uses causing the disturbance. Development that is likely to have a significant effect on European sites will be required to contribute towards the implementation of the mitigation. It is considered that development in this zone of influence will be required to pay for the implementation of mitigation measures to protect the interest features of European designated sites along the Essex Coast which include the Essex Estuaries Special Area of Conservation; the Crouch and Roach Estuaries Special Protection Area, and the Colne and Blackwater Estuaries Special Protection Areas, and Ramsar sites. The appropriate mitigation mechanisms are identified in the RAMS. The Zones of Influence affecting Brentwood are shown on the Policies Map.
- 8.23 Any residential development within the Zone of Influence of the Essex Coast RAMS is likely to affect the integrity of these European sites. The developer will be required to either contribute towards mitigation measures identified in the RAMS or, identify and implement bespoke mitigation measures at the Essex Coastal Habitats sites to ensure compliance with the Habitat Regulations.

## Epping Forest RAMS

- 8.24 A similar assessment process is being carried out for the Epping Forest Special Area of Conservation involving the local planning authorities that have been identified as having the potential for impact by their geographical proximity to Epping Forest. The detailed evidence

base has now been prepared and has identified the new residential development Zones of Influence (ZOI) of these internationally important protected biodiversity sites.

- 8.25 Prior to the adoption of a Supplementary Planning Document, or similar, in respect of the Epping Forest SAC, development in the Zones of Influence will be required to make an appropriate assessment of the in combination impact of the development and identify suitable mitigation proposals, in line with Natural England advice. Areas within Brentwood Borough fall just inside this ZOI; the Council will however, carefully consider the impacts, if any, of development that falls adjacent to this ZOI.

## Green and Blue Infrastructure

- 8.26 Green and Blue Infrastructure (GBI) is a network of multi-functional natural or semi-natural networks of green (soil covered or vegetated) and blue (water covered) spaces and corridors, in either an urban or rural setting, that connects, maintains and enhances ecosystem services. GBI should thread through and surround the built environment and connect the urban area to its wider rural hinterland. It is capable of delivering a wide range of environmental and quality of life benefits for local communities by providing recreational or cultural experiences. It can also help support a number of strategic objectives across policy areas, such as promoting public health and wellbeing, mitigating and adapting to climate change (heat risk, flood risk, sustainable drainage), improving water and air quality, as well as conserving habitats and contributing to biodiversity net-gain. Figure 8.1 defines the different types of GBI. They include those found in Brentwood, but also additional types that could be delivered as part of new development.
- 8.27 In Brentwood, GBI includes open space, woodlands, wildlife habitat, parks, commons, villages and town greens, nature reserves, recreational sports facilities, cemeteries, allotments, gardens, waterways and bodies of water, registered parks and gardens. Figure 8.1 sets out the GBI typology which is based upon the Green Infrastructure Strategy<sup>59</sup>, Sport, Leisure and Open Space Assessment<sup>60</sup>, Natural England's Green Infrastructure Guidance<sup>61</sup>.
- 8.28 A well connected GBI network will play a crucial role in maintaining the Borough's distinctive 'Borough of Villages' character. The Council will take a strategic approach to maintaining and enhancing networks of GBI, ensuring a variety of managed, multi-functional open spaces, coherent ecological green corridors, water courses and water bodies to promote a resilient and sustainable built environment, in line with the Council's Green Infrastructure Strategy (2015). The Council will work with statutory bodies, and wider stakeholders, including developers to conserve, enhance and maintain the natural environment.
- 8.29 Open spaces take many forms and all are an integral component of the GBI network, forming key destinations. The designated Urban Open Spaces, as depicted on the Policies

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<sup>59</sup> Groundwork (2015) Brentwood Green Infrastructure Strategy

<sup>60</sup> PLC (2016) Sport, Leisure and Open Space Assessment Final Report

<sup>61</sup> Natural England (2009) Green Infrastructure Guidance

Map, represent green spaces in urban settlements that provide an important multi-functional local resource to residents and therefore, are to be protected. They are made up of different types of open spaces, including parks, sports grounds and playing fields (including playing fields forming part of an education establishment), woodlands, and amenity green space. However, Brentwood has direct access, via the Public Rights of Way network, to extensive publicly accessible parks, including Country Parks such as Hutton, South Weald and Thorndon within the surrounding countryside also identified on the Policies Map. There will be a presumption against the development of open spaces which provide a significant amenity resource.

GBI Typologies	GBI sub-types
Urban Open Spaces	Designated green spaces in existing settlement (urban) areas, of various typologies that are to be protected.  NB. These were previously partly identified by the 'Protected Open Space' designation in the replacement Local Plan 2005.
Parks and Gardens	Country Parks, Borough parks and Recreation Grounds, Registered Parks and Gardens.
Ecological assets and natural and semi-natural greenspaces (urban / rural)	Special Sites of Scientific Interest (SSSI), Local Nature Reserves (LNR), Local Wildlife Sites (LoWS), Woodlands, Geological Assets, Thames Chase Forest.
Green Corridors	Hedgerows, amenity grasslands/greenspace or green verges along major road corridors and major rail corridors, rights of way, and Protected Lanes.
Blue corridors	Main rivers (e.g. Rivers Roding, Ingrebourne, Wid and Mardyke), large ordinary/ non-main river watercourses, major tributaries, wetland.
Sports and Recreation Grounds	Play pitches that are green/permeable in nature such as: tennis courts, bowling greens, sports pitches, golf courses, school and other institutional playing fields, and other outdoor sports areas. Green formal/ informal recreation areas.
Allotments	Statutory and Non-statutory allotments; community gardens.
Cemeteries and churchyards	Public and privately-owned facilities.

Landscapes and accessible urban fringe countryside	Ancient Landscapes, fringe countryside.
Garden Land	Private back gardens, private amenity green space on estates or private communal gardens that are entirely to the rear or within the curtilage of a dwelling or dwellings, as originally designed
Other GI	Green walls, green roofs, estate greenspace, etc

Figure 8.1: Brentwood Green and Blue Infrastructure Typology

## STRATEGIC POLICY NE02: GREEN AND BLUE INFRASTRUCTURE

1. Brentwood's network of green and blue infrastructure (GBI) will be protected, enhanced and managed to provide a multi-functional, high quality open space resource, capable of delivering opportunities for recreation, health and wellbeing, ecological connectivity, biodiversity net-gain as well as wider ecosystem services for climate change adaptation.
2. New development is expected, where possible and appropriate, to maximise opportunities to enhance or restore existing GBI provision and/or create new provision on site that connects to the wider GBI network. Its design and management should also respect and enhance the character and distinctiveness of the local area.
3. Developments on sites containing or are adjacent to a water course or water body (Blue Infrastructure) are required to ensure there is no adverse impact on the functioning or water quality of the Blue Infrastructure. Proposals that maximise opportunities to enhance or restore Blue Infrastructure and incorporate these features into the public realm of the development will be supported. An adequate undeveloped buffer zone should be applied as necessary to mitigate flood risk, in line with Policy NE09 and/or support sustainable drainage, in line with Policy BE05.
4. Proposals should provide appropriate specification and maintenance plans for the proposed green and blue infrastructure throughout the life of the development.

8.30 This policy is in line with the NPPF, as well as the government's latest environment plan: A Green Future: Our 25 Year Plan to Improve the Environment which sets out a vision for



England's environment post-Brexit. The 25 Year Environment Plan stresses the importance of good-quality green and blue infrastructure (GBI) and commits to creating a 'national framework of green infrastructure standards, ensuring that new developments include accessible green spaces and that any area with little or no green space can be improved for the benefit of the community'. This policy seeks to achieve well managed, high quality multi-functional Green and Blue Infrastructure to ensure opportunities are maximised for recreation, health and wellbeing, net gain for biodiversity as well as help achieve additional benefits for air quality and climate adaptation. High quality green and blue infrastructure should be built into the design proposals and/or masterplans of new development, wherever possible.

- 8.31 It is vital that the right infrastructure is in place to support future growth in the borough, and this includes GBI. There is a need to better link formal and informal open spaces in the borough to improve their wider use and value, as highlighted by the Brentwood Green Infrastructure Strategy (2015). Existing GBI should be protected and enhanced and where opportunities arise, e.g. in conjunction with new development, additional provision made.
- 8.32 There is a growing and compelling body of evidence substantiating the potential for GBI to contribute to the economic, social and environmental well-being of individuals and society; for example, access to the countryside, sport and recreation facilities can promote active and healthy lifestyles through the enhancement of walking and cycling. Strategic scale and more local GBI can make a vital contribution to quality of place and health outcomes if properly integrated into the design and delivery of new development.
- 8.33 It is widely acknowledged that GBI 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, flood alleviation and supporting habitats. Through the provision of GBI 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.
- 8.34 Landscape, parks and open space often have heritage interest, and can play a key role in enhancing and conserving the historic environment. It can be used to improve the setting of heritage assets and to improve access to it. Likewise, heritage assets can help contribute to the quality of green spaces by helping to create a sense of place and a tangible link with local history. Opportunities can be taken to link GBI networks into already existing landscapes or green spaces in towns or existing historic spaces such as church yards, town paths, verges etc. as well as larger designed landscapes to improve the setting of and access to historic buildings or historic townscape. Maintenance of GBI networks and spaces should also be considered so that they continue to serve as high quality places which remain beneficial in the long term.
- 8.35 Brentwood rivers and their valleys form an attractive and important ecological, leisure and recreation resource. The rivers are valued by residents and used as corridors of movement by people and wildlife. They also contain floodplains that provide flood storage capacity. The River Wid is located within the Anglian River Basin District and the Roding, Beam and Ingrebourne catchment and Mar Dyke lie within the Thames River Basin District. They contribute to the objectives of the Water Framework Directive, the Thames and Anglian River Basin Management Plan.

- 8.36 According to the Brentwood Water Cycle Study (2018), watercourses in the study area are either of Poor or Moderate Status; therefore, new development proposals need to ensure construction does not result in deterioration and where necessary, provide protection, enhancement and buffering of watercourses. This includes the provision of ecological buffer strips and corridors, native tree planting and the new wetland areas to help manage flood risk and reduce diffuse pollution whilst connecting people to nature. This could also include de-culverting, removal of redundant structures, alien species removal where appropriate.
- 8.37 According to the TCPA's guidance Planning for Green and Prosperous Places , as time goes by, GBI usually becomes increasingly valuable, but only if it is well maintained. This guidance also emphasises on the importance of maintaining GBI. Therefore, when planning GBI, the following should be considered from the earliest stage:
- a. revenue funding: to pay for the care of the GBI in perpetuity;
  - b. capital funding: to pay for creating the GBI; and
  - c. the design of the GBI: which will affect the cost of maintaining it as well as the cost of creating it.
- 8.38 Proposals that provide appropriate GBI which is well integrated with the existing and new development and with the surrounding area will be supported. In progressing an allocation, strategic consideration should be given to additional mitigation measures, for example planning for the provision of 'off-site' compensatory habitats to address likely residual impacts upon Priority Habitats and Species, and long-term financial support to land managers of nearby green and blue infrastructure that may be subject to significant additional recreational pressure.
- 8.39 The strategic allocation of Dunton Hills Garden Village is located between three living landscape areas; other strategic allocations in the south of the borough, such as the Enterprise Park and West Horndon Industrial Estate redevelopment are also likely to have cumulative impacts on the landscape. However, they also present significant opportunities to establish a strategic framework that deliver a positive contribution to the local ecological network. The quantity, quality, accessibility and distribution of GBI across the area will be considered in site policies in Chapter 9 and development masterplan frameworks.
- 8.40 Development should seek to deliver green and blue infrastructure network in the borough. The strategic planning, implementation and management of GBI requires a co-ordinated approach from a multi-disciplinary, cross-organisational team of partners, for example, National Highways, Essex County Council, Natural England, Thames Chase Forest, Essex Wildlife Trust, the Council's public health team, as well as voluntary groups.
- 8.41 This policy should be read in conjunction with Policy BE05 Sustainable Drainage, Policy NE01 Protecting and Enhancing the Natural Environment, Policy NE03 Trees, Woodlands and Hedgerows, and Policy NE09 Flood Risk.

**POLICY NE03: TREES, WOODLANDS, HEDGEROWS**

1. Development proposals that would result in the deterioration or loss of irreplaceable ancient woodland and ancient and veteran trees will not be permitted other than in wholly exceptional circumstances and only if the proposals include a suitable compensation strategy. Applicants will need to demonstrate the efficacy of the strategy by reference to the value of the habitats that will be lost or harmed and provide an appropriate implementation and maintenance programme to underpin the strategy the performance of which will be subject of a condition and/or planning obligation, as appropriate.
2. In all other cases, proposals should, so far as possible and practicable, seek to retain existing trees, woodlands and hedgerows where they make a positive contribution to the local landscape and/or biodiversity or which have significant amenity value. Wherever possible and appropriate, landscaping schemes should take account of and incorporate these existing features in the scheme and where any loss is unavoidable, incorporate measures to compensate for their loss.

- 8.42 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).
- 8.43 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.
- 8.44 Trees, woodlands, hedges and hedgerows provide important habitats for a range of species, provide shelter, help reduce noise and atmospheric pollution and also store carbon dioxide, helping to mitigate against climate change. They add to the character and quality of the local environment, can have historic value (e.g. ancient woodlands) and can offer recreation opportunities supporting health and well-being.
- 8.45 Trees, woodlands, hedges and hedgerows, wherever appropriate, should be incorporated within a landscape scheme. This can assist in integrating the scheme into the wider local environment by providing some mature, established landscape elements. When this cannot

be achieved, or it is known that trees are being lost to disease, mitigation or replacement compensatory measures will be required to ensure no loss to the overall value to the environment. These should be secured by condition or through a S106 Agreement.

- 8.46 Some specific trees or groups of trees are of particular amenity value, such that their removal would have a significant impact upon the local environment and its enjoyment by the public. Where they are potentially under threat, the Council will seek to retain and protect them, either through planning conditions or through Tree Preservation Orders (TPO).
- 8.47 A hedge or hedgerows is generally found within a settlement and often has an amenity or ornamental role; a hedgerow is more commonly found in a rural setting, although some old hedgerows remain within settlements and often provide field boundaries and may comprise a range of native species. They make an important contribution to the character of an area and may be historically and occasionally archaeological important. They also contribute significantly to biodiversity. Therefore, like trees, hedgerows should be conserved for their amenity, biodiversity and historic value. Development that is likely to impact hedgerows must be subjected to an assessment against the criteria of the Hedgerow Regulations 1997.
- 8.48 If a hedgerow is deemed to be important under the Hedgerow Regulations, development proposals must demonstrate that adverse impacts upon the Important Hedgerow will be avoided, and impacts that cannot be avoided are mitigated on-site.
- 8.49 In considering development proposals, the Council will normally expect the retention and beneficial management of any existing hedgerow; where a hedgerow is to be removed, the Council will, where appropriate, require its replacement with native species, either within or neighbouring sites, as part of its mitigation strategy, or demonstrate how it will contribute to biodiversity net-gain through other appropriate habitat creation.
- 8.50 In granting planning permission for new development, where significant hedgerows are to be retained, the Council will ensure that these hedgerows are given appropriate protection during the building works, through the use of planning conditions.

#### **POLICY NE04: THAMES CHASE COMMUNITY FOREST**

Development proposals which fall within the Thames Chase Community Forest Area should not prejudice the implementation, aims and objectives of the Thames Chase Plan.

- 8.51 The Thames Chase Community Forest covers 40 square miles of landscape in East London and South West Essex. It is one of 10 national community forests across England established in 1990 to actively regenerate the landscape, protecting, improving and expanding the woodland character of the Community Forest for the benefit of local people

and wildlife Management is led by the Thames Chase Trust<sup>62</sup> in accordance with the Thames Chase Plan<sup>63</sup>.

- 8.52 The Council supports the aims of the Thames Chase Plan, being:
- a. to conserve, improve and expand the woodland character of the Community Forest;
  - b. to sustain the natural integrity of the Community Forest's air, land and water including wildlife;
  - c. to integrate climate change adaption and mitigation responses into the developing Community Forest;
  - d. to use the Community Forest to improve local health and well-being, volunteering, learning and employment; and
  - e. to enable effective partnership working from national to local level to maximise the impact of available resources.
- 8.53 The Thames Chase Plan provides a green infrastructure framework, to support and guide applications in enhancing the local environment, through landscaping, conservation works and upgrading of footpaths or bridleways. Such benefits are welcome, provided uses are consistent with Green Belt policy.
- 8.54 In 2016, following an award from the Heritage Lottery Fund, a wider partnership of organisations was set up with a stronger emphasis on area-based project delivery that translates forest wide ambition into tangible, quantifiable initiatives on the ground. This Land of the Fanns Partnership includes a number of national and local organisations, including Brentwood Borough Council, who are working towards the Landscape Conservation Action Plan (LCAP)<sup>64</sup>. Development proposals falling within the Thames Chase Community Forest area are strongly encouraged to consider the Thames Chase Community Forest aims and objectives outlined in these plans when devising their landscape schemes and green infrastructure proposals.

## Open Space Needs and Adopted Standards

### **POLICY NE05: OPEN SPACE AND RECREATIONAL FACILITIES**

1. All open spaces, including the designated Urban Open Spaces, as identified will be protected and where necessary enhanced to ensure access to a

<sup>62</sup> The Thames Chase Trust <https://www.thameschase.org.uk/about-thames-chase/the-thames-chase-trust>.

<sup>63</sup> Thames Chase Plan 2014 [https://www.thameschase.org.uk/uploads/TCP\\_Full.pdf](https://www.thameschase.org.uk/uploads/TCP_Full.pdf)

<sup>64</sup> Land of the Fanns Landscape Conservation Action Plan (LCAP) 2016 - <https://www.landofthefanns.org/our-partnership/about-the-scheme/>

network of high quality provision and opportunities for sport, play and recreation within the borough. The loss of open spaces and any ancillary facilities, such as sports, play and recreation provision, will not be permitted unless it can be demonstrated that:

- a. an assessment has been undertaken which clearly shows the provision and the function it performs is surplus to requirements; or
  - b. the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable, accessible location within the local catchment area; or
  - c. the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss.
2. New development is required to maximise opportunities to incorporate new publicly accessible, high quality and multi-functional open space and/or, where appropriate, enhance existing provision that will serve the new and existing community, through improved connections, biodiversity net-gain and high quality sport, play and recreational amenities.
  3. The amount and type of provision required will be determined according to the Council's identified needs, as set out in its Open Space and Play Pitch Strategy and adopted open space standards; with regard to children's play space, the Council will seek proposals which meet the Fields in Trust minimum standards (see Figure 8.3).
  4. Where it can be clearly demonstrated that proposals are not able to incorporate new provision or enhance existing provision to serve the new community, then a commuted sum may be requested in line with Policy MG05 Developer Contributions where such contributions will provide alternative or enhanced and conveniently accessible off-site open space provision.
  5. Proposals for the inclusion or enhancement of supporting and ancillary uses and facilities on open space, such as sport, play and other supporting recreational provision, should meet the following criteria:
    - a. the proposed facilities help improve the quality of the open space and promote inclusive access to a wide range of users and recreational interests;
    - b. are demonstrably ancillary to the use of open space and its primary function, e.g. play/sports fields;
    - c. help to contribute to both the character and amenity of the area and are appropriate and proportionate to the function and nature of the open space;

- d. do not have a detrimental impact on the environmental function of the open space.
- 6. Maintenance plans should be submitted at planning application stage for all new facilities to ensure their long-term quality and management.

- 8.55 Brentwood’s existing sport, leisure, public and private open spaces are important valued assets serving communities and visitors.
- 8.56 Access to good quality open space is essential for health and well-being. The ability to access local open space across the borough varies with a lack of provision in some areas. Provision within new development is therefore particularly important in areas where a deficiency has been identified or where new development would give rise to a deficiency.
- 8.57 The Council’s Open Space, Play Pitch and Leisure Assessments provide an overview of the existing provision across the borough, as well as known deficiencies. All major development proposals should investigate and maximise opportunities to enhance open space, play, sport and recreation facilities where possible and appropriate, particularly in areas of deficiency in quantity and quality. New development can help to enhance provision even where it is not feasible to deliver new public open space on site. This could include improving access, through public realm enhancements, to existing nearby facilities or alternatively, contributions will be sought where appropriate.
- 8.58 All proposals, where appropriate, will be required to comply with the Council’s identified needs and open space standards as set out in Figure 8.2 or any subsequent update, to inform the design of the proposals and planning application process. These take account of the recommendations in open space and sports facilities evidence, i.e. Brentwood Play Pitch Strategy (2018), Brentwood Open Space Strategy (2008-2018), the Leisure Strategy and Play Strategy (2018). With regards to children’s play space, the Council will seek proposals which meet the Fields in Trust minimum standards as set out in Figure 8.3.

Outdoor Sport	3.15 ha per 1,000 population
Children’s Playing Space	Between 0.13 – 0.17 ha per 1,000 population
Allotments and Community Gardens	0.18 per ha per 1,000 population

Figure 8.2: Open Space Standards

<b>Local Area for Play (LAP)</b>	Characteristics: The LAP is a small area of open space specifically designated and primarily laid out for very young children to play close to where they live. Aimed at children up to the age of 6.
	<p>Walking distance: 100 m</p> <p>Minimum activity zone: 100 sqm</p> <p>Minimum buffer zone: 5 m</p>
<b>Local Equipped Area for Play (LEAP)</b>	Characteristics: The LEAP is an area of open space specifically designated and laid out with features including equipment for children who are beginning to go out and play independently close to where they live.
	<p>Walking distance: 400 m</p> <p>Minimum activity zone: 400 sqm</p> <p>Minimum buffer zone: 20 m</p>
<b>Neighbourhood Equipped Area for Play (NEAP)</b>	Characteristics: The NEAP is an area of open space specifically designated, laid out and equipped mainly for older children but also with play opportunities for younger children.
	<p>Walking distance: 1,000 m</p> <p>Minimum activity zone: 1,000 sqm</p> <p>comprising an area for play equipment and structures and a hard surfaced area of at least 465 sqm – the minimum needed to play five-a-side football)</p> <p>Minimum buffer zone: 30 m</p>

Figure 8.3: Fields in Trust Children’s Play Space Standards

## POLICY NE06: ALLOTMENTS AND COMMUNITY FOOD GROWING SPACE

1. The provision of allotment space should, where possible and appropriate, be an integral part of the green and blue infrastructure provision in residential development.
2. Provision of areas for personal and community gardening and food growing will be favourably considered.



3. The change of use or development of designated allotment sites will not be permitted unless it can be demonstrated that provision is no longer required or that an alternative provision can be provided.

- 8.59 Community food growing not only helps to improve social integration and community cohesion but can also contribute to improved mental and physical health and well-being. It supports healthy living by enabling residents make more sustainable food choices, protects local ecosystems and fosters community spirit and enterprise. It also helps reduce the carbon footprint of food production by minimising CO2 emissions from transporting food and is beneficial for air quality by helping to reduce pollution.
- 8.60 The wider benefits of growing produce are identified in the Brentwood Open Space, Sport and Leisure Assessment (2016) which highlights that providing opportunities for people to grow their own food contributes to sustainability, health and social inclusion.
- 8.61 The Council therefore aims to safeguard its existing allotments, and encourage development proposals to include spaces for residents and communities to grow their own food.
- 8.62 There are currently 16 known allotment sites in Brentwood, as illustrated on the Policies map. Ten of these sites have statutory status and are therefore afforded additional legal protection provided by the Allotments Act 1925. Policy NE06 applies to all statutory and non-statutory allotments equally.
- 8.63 When allotments or community gardens are provided on site as part of a development, developers should also provide sufficient information to address the long-term maintenance, in line with the requirements of Strategic Policy NE02: Green and Blue Infrastructure.
- 8.64 Innovative solutions to small scale food growing space are encouraged, such as green roofs/walls, re-utilising existing under-used spaces and incorporating spaces for food growing in new schools.
- 8.65 This policy should be read in conjunction with Strategic Policy NE02: Green and Blue Infrastructure.

#### **POLICY NE07: PROTECTING LAND FOR GARDENS**

Proposals for development on sites that form part of an existing garden or group of gardens will only be permitted where:

- a. sufficient garden space and space around existing dwellings is retained, especially where these spaces and any trees are worthy of retention due

to their contribution to the character of the area and their importance for biodiversity;

- b. the form, height and layout of the proposed development is appropriate to the surrounding pattern of development and the character of the area;
- c. the amenity and privacy of neighbouring, existing and new residents are protected; and
- d. provision is made for adequate amenity space, vehicular access arrangements and parking spaces for the proposed and existing properties.

- 8.66 The definition of Previously Developed Land within the NPPF excludes private residential gardens. The development of garden land will be resisted unless proposals fulfil the requirements this policy and other relevant policies within this Plan.
- 8.67 Garden land (includes private back gardens and private amenity areas or private communal gardens) forms an important part of the network of green infrastructure and an integral part of the urban layout and assist in defining the character of the residential area. Garden land provides a semi-natural habitat for local wildlife and corridors for the movement of wildlife in the urban area. Collectively, they help to mitigate fluvial and surface water flooding in the built-up parts of Brentwood. Private gardens also form an important amenity resource for private dwellings as well as form part of an area's development pattern, providing a setting for buildings. They are an important environmental resource and are a vital component of Brentwood's character.
- 8.68 If designed appropriately, some forms of redevelopment and infill development, which make efficient use of land, will continue to be a valuable additional source of housing supply. Proposals will be considered on a case-by-case basis, taking into account the nature and scale of the proposed use, its context and the quality of the design and whether the remaining area of garden is sufficient to meet occupier needs. This will depend upon the size of the dwelling and the Council will take into account the relevant guidance in the Essex Design Guide in making its assessment as well as other relevant policies in this plan.
- 8.69 In this regard, applicants should also refer to Policy HP06 Standards for New Housing, Policy NE05 Open Space and Recreation Provision as well as the Brentwood Town Centre Design Guide SPD.

# Promoting a Clean and Safe Environment

## STRATEGIC POLICY NE08: AIR QUALITY

1. Development is required to meet national air quality standards and identify opportunities to improve air quality or mitigate local exceedances and impacts to acceptable legal and safe levels. Development proposals must demonstrate that they will not:
  - a. Compromise the achievement of compliance targets within Air Quality Management Areas (AQMAs);
  - b. Create new exceedance areas; and
  - c. Create unacceptable risk of high levels of exposure to poor air quality, particularly where development is near to, or promotes land uses to be used by those particularly vulnerable to poor air quality (such as children and older adults).
2. Development proposals should be designed to minimise exposure to existing poor air quality and make appropriate provisions to improve local air quality conditions through design solutions and measures to the outdoor and indoor environment. Particular attention should be given to the positioning, layout and design of proposals for new build developments and community infrastructure (indoor and outdoor) that are likely to be used by large volumes of people on a daily basis, especially by vulnerable groups. Community infrastructure should, where possible incorporate appropriate buffer zones to prevent or minimise exposure to air pollution sources.
3. An Air Quality Impact Assessment is required as part of any planning application for:
  - a. major developments;
  - b. employment led developments;
  - c. developments which will require substantial earthworks or demolition;
  - d. developments which include community infrastructure including leisure, education and health facilities or open space (including child play space);

- e. new build developments in areas along busy or congested road and rail lines where residents will be exposed to poor air quality;
  - f. developments which propose the use of Combined Heat and Power, biomass boilers or similar solutions that might impact air quality; and
  - g. new developments within AQMAs.
4. Development proposals should have regard to their individual and cumulative impacts on air quality. Proposals that do not meet the requirements of (A) and (B) above will be resisted unless appropriate measures are implemented to ensure adverse impacts can be mitigated to an acceptable level. Mitigation should be provided onsite unless it can be demonstrated that it is inappropriate and that off-site provision will deliver equivalent or wider benefits.

## Air Quality in Brentwood

- 8.70 Transport generated emissions are the main source of poor air quality in the borough. Air quality relates to both particulate and gaseous pollution, including fumes, odours, dust and unsafe levels of Carbon Dioxide, Nitrogen Dioxide and other pollutants in the atmosphere which can impact environmental amenity for people and wildlife. This policy aims to address existing poor air quality and ensure new development does not contribute to the worsening of air quality across the borough, but instead contributes to improving air quality through design and other mitigation measures.
- 8.71 The Council will ensure that all development plays its part in securing 'clean growth', in line with Government's Clean Air Strategy (2019)<sup>65</sup>. As a minimum, development must not create further deterioration of existing poor air quality or lead to new exceedances of legal air quality standards or compromise achievement of compliance in those areas currently in exceedance, as currently stipulated by the Air Quality Standards Regulations 2010<sup>66</sup>. Development proposals should also reduce the population's exposure to poor air quality, particularly for those groups who are most vulnerable to its impacts such as children and young people and older people.

## Air Quality Management Areas (AQMAs)

- 8.72 Exceedances of legal air quality standards are currently as provided by the Air Quality Standards Regulations (2010). Brentwood currently has three declared Air Quality Management Areas (AQMA) where exceedances have been previously recorded:
- a. AQMA No. 2: M25/Brook Street Roundabout;

<sup>65</sup> <https://www.gov.uk/government/publications/clean-air-strategy-2019>

<sup>66</sup> <https://www.legislation.gov.uk/uksi/2010/1901/contents/made>

- b. AQMA No. 4: A12/ Warescot Road/Hurstwood Avenue/Ongar Road;
  - c. AQMA No. 7: A128/A1023 Junction (Wilson's Corner).
- 8.73 AQMAs can be found on the Council's website. Ongoing monitoring will continue and the AQMA areas will be adjusted and reported to DEFRA accordingly. Monitoring data of air pollution in these AQMAs since 2015 has shown that the air quality standard for Nitrogen Dioxide has been met. However, as these three AQMAs remain potentially problematic, they remain in place for now. The designated AQMAs are illustrated on the policies map and declared on the DEFRA website<sup>3</sup>; these will be subject to periodic review and updating. Development should have regard to the Council's Air Quality Action Plan<sup>67</sup>.

## Air Quality Assessments

- 8.74 An appropriate and proportionate assessment of air quality must be included with any application that may adversely affect local air quality or be significantly affected by existing poor air quality levels. It is important that applicants consider the need for any assessment before any application is submitted.
- 8.75 Air Quality Assessments (AQA) must follow best practice guidance and should include the following as a minimum:
- a. must address the impacts arising during construction and operation/occupation of the development;
  - b. assessments should take into account the individual and wider cumulative impacts on the proposed development, consistent with national policy;
  - c. where an AQA indicates a potential negative impact on air quality, the AQA should identify implementable measures that will minimise or mitigate impacts from the development;
  - d. an AQA with full dispersion modelling is required for all proposed Biomass and CHP boilers and this must demonstrate that the impact on nearby receptors is minimal.
- 8.76 Development that involves significant demolition, construction or earthworks will be required to assess the risk of impacts according to the latest best practice guidance, such as the Institute of Air Quality Management's (IAQM) 'Air Quality Monitoring in the Vicinity of Demolition and Construction Sites' (2018)<sup>68</sup>. Applicants should also refer to further guidance, such as the Considerate Contractor Advice Note<sup>69</sup> on the Council webpages.

<sup>67</sup> Air Quality Action Plan (2008), or any update of this <http://aqma.defra.gov.uk/action-plans/BBC%20AQAP%202008.pdf>

<sup>68</sup> <https://iaqm.co.uk/guidance/>

<sup>69</sup> [https://document.brentwood.gov.uk/pdf/pdf\\_1185.pdf](https://document.brentwood.gov.uk/pdf/pdf_1185.pdf)

## Mitigating Poor Air Quality

- 8.77 Tackling poor air quality requires a multi-dimensional approach to help achieve the objective of improving air quality across Brentwood. Therefore, this policy should be read in conjunction with all other policies that together also address poor air quality impacts, including, but not limited to: BE09: Sustainable Means of Travel And Walkable Streets, BE10: Sustainable Passenger Transport, BE11: Electric And Low Emission Vehicles, BE12: Mitigating The Transport Impacts Of Development; NE02 Green and Blue Infrastructure.
- 8.78 While focus is often on outdoor air quality, it is important that design proposals demonstrate how ventilation in buildings can be designed to prevent or reduce the health impacts of poor indoor air quality, whilst maintaining adequate energy and thermal performance as required by Strategic Policy BE01: Carbon Reduction and Renewable Energy. This is especially important for developments adjacent to key transport infrastructure where emissions are higher. Applicants are advised to look at best practice guidance on how to achieve safe indoor air quality in new developments, such as NICE 2020 guidance 'Indoor Air Quality at Home'<sup>70</sup>.
- 8.79 Appropriate measures are often cross-cutting and involve different actions across the different aspects of the development's design proposals. Such measures should be proportionate to the scale of development and should include: sustainable transport considerations, such as reducing vehicular traffic levels, encouraging sustainable movement patterns; sustainable building design to reduce emissions throughout the lifetime of the building, or reducing emissions from associated plant equipment; improving or greening the public realm.
- 8.80 Developments comprising new or enhanced community infrastructure, such as schools, should consider how they can include appropriate safe 'Buffer Zones', such as low traffic zones or traffic exclusion zones, to eliminate or reduce exposure. Implementation of these would require joint working between the Council, Essex County Council as the Lead Local Education Authority and Highways Authority, and relevant schools.

### STRATEGIC POLICY NE09: FLOOD RISK

1. New development will be required to avoid areas of flood risk by applying the Sequential and, where necessary, the Exception Tests in accordance with national policy and guidance.
2. A site specific Flood Risk Assessment must assess all sources of flooding. It should demonstrate how flood risk will be managed over the development's lifetime, taking climate change into account. A site specific FRA is required, in

<sup>70</sup> <https://www.nice.org.uk/guidance/ng149/chapter/Recommendations#prioritising-indoor-air-quality-in-local-strategy-or-plans>

accordance with national policy guidance, for the following types of development:

- a. all new development greater than 1 ha in size in Flood Zone 1 ;
  - b. all development within a Critical Drainage Area;
  - c. all new development (including minor development and change of use) in flood zones 2 and 3;
  - d. new development or a change of use to a more vulnerable class which may be subject to other sources of flooding.
3. Where proposals satisfy the Sequential and Exception Tests design proposals should ensure that:
- a. the most vulnerable land uses are located in areas within the site that are at lowest risk of flooding;
  - b. development will be safe for its lifetime taking account of the vulnerability of its users,
  - c. flood risk will not increase elsewhere;
  - d. development would not constrain the natural function of the flood plain, either by impeding flow or reducing storage capacity;
  - e. development is constructed so as to remain operational even at times of flood through resistant and resilient design;
  - f. appropriate mitigation measures are incorporated to address any residual flood risk safely, including safe access and egress for all likely users of the development;
  - g. where necessary incorporate flood resistant and flood resilient design measures such that, in the event of a flood, the development could be quickly brought back into use without significant refurbishment;
  - h. incorporate sustainable drainage systems in line with Policy BE05 Sustainable Drainage, unless there is clear evidence that this would be inappropriate;
  - i. where possible, the development will reduce flood risk overall.
  - j. safe access and escape routes are included where appropriate, as part of an agreed Emergency Response Plan, where required.

4. Where the site is additionally located within a Critical Drainage Area (CDA), development should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage.

- 8.81 This policy should be read in conjunction with Policy BE05 Sustainable Drainage, Strategic Policy NE02 Green and Blue Infrastructure and Policy BE02 Water Efficiency and Management.

## Flood Risk Data and Assessment

- 8.82 In 2020, Essex County Council produced an updated Surface Water Management Plans for the borough identifying an area specific action plan for each CDA. This must be taken into account by development proposals falling within each CDA. Applicants should also follow the guidance and recommendations set out in Strategic Flood Risk Assessment (SFRA 2018)<sup>1</sup> which was undertaken to assess the risk of flooding in Brentwood to inform development of the Local Plan.
- 8.83 In line with the NPPF and associated Government guidance, a sequential approach will be applied when deciding on the location of new development to ensure that development is directed to those areas of the Borough, and locations within sites, that are at the lowest risk of flooding. The applicant must demonstrate the appropriateness of proposed uses within the different respective flood zones having regard to the Sequential and Exception Tests. Development proposals should be informed by site specific Flood Risk Assessments submitted by applicants. Assessments are required to take into account the long-term impact of climate change. The latest standing advice on climate change allowances published by the EA should be referred and form the basis of any assessment.
- 8.84 Flood zones 2 and 3, and Critical Drainage Areas (CDA) (as defined by the 2018 modelling updates) are illustrated on the Policies map, using the latest available data. Applicants should consult the Environment Agency (EA) and Essex County Council as the Lead Local Flood Authority (LLFA) to establish whether the data has since been updated. All proposals will be assessed against the latest available information.

## Extent of Flood Risk in Brentwood

- 8.85 Fluvial flood risk in Brentwood is not extensive and is largely limited to areas in very close proximity to local watercourses. Risk of flooding from surface water presents a more extensive zone of risk than the fluvial flood zones. This is because the fluvial flood zones in Brentwood are relatively narrow owing to the 'headwater' nature of most of the watercourses. Incidences of fluvial (river) flooding are recorded along the eastern boundary of the River Wid from Stondon Hall Brook, and the River Roding to the north of the borough. Areas at risk of surface water flooding are mainly rural and include low lying areas south of



the A127 west and east of West Horndon. The most likely mechanism for surface water runoff generation is when heavy rainfall exceeds the capacity of the local drainage network and of the ground to infiltrate water; therefore surface treatments in new development are equally important in avoiding localised flooding. Therefore, Policy BE05 Sustainable Drainage must also be taken into account alongside flood risk. The feasibility of infiltration on site will need to be determined through a site-specific drainage assessment that forms part of the Drainage Strategy. Brentwood's Surface Water Management Plan (SWMP 2015, updated 2020) and Strategic Flood Risk Assessment (SFRA 2018) provide additional information on other sources of flood risk and potential mitigation measures.

## Flood Management and Mitigation

- 8.86 Developers are encouraged to refer to the Environment Agency's Flood Risk Standing Advice for planning applicants. Early pre-application engagement with Brentwood Borough Council, Essex County Council as the Lead Local Flood Authority, the Environment Agency and the relevant water utility company (i.e. Thames Water or Anglian), is strongly advised.
- 8.87 It is important that development does not increase flood risk to people, properties and infrastructure. All proposals should proactively seek to minimise and mitigate risk wherever possible, especially in areas with identified risk from flooding. Applicants will be expected to consider risk from all sources of flooding using appropriate up to date information. All development proposals should also take into consideration the impacts of climate change over the lifetime of the development.
- 8.88 The SFRA recommends that 'Functional Floodplain' status is applied to all of Flood Zone 3 extent in the Borough (as described in Section 4.4), with the exception of the areas for which the EA hold detailed modelled data (Rivers Wid and Mardyke). All areas of Flood Zone 3 should have the Flood Zone 3b planning restrictions applied, as per Table D.2 in Appendix D of the SFRA. The EA would object to any new development in functional floodplain (Flood Zone 3b). Development should be located in areas suitable to the vulnerability level of the proposed uses, in accordance with the exceptions test. For any proposed water-compatible uses within a functional floodplain, the applicant must demonstrate that development is designed and constructed to:
- a. remain operational and safe for users in times of flood;
  - b. result in no net loss of floodplain storage;
  - c. not impede water flows and not increase flood risk elsewhere.
- 8.89 Compatible development will be assessed in accordance with national planning policy guidance for flood risk vulnerability and flood zone 'compatibility' tables.
- 8.90 Where the Sequential and Exception Tests are satisfied, the Council expects that proposals fully investigate opportunities to avoid, reduce, manage and mitigate flood risk through the site's layout and design. Residual risk must be fully assessed and addressed by incorporating flood resistant design (e.g. constructed to prevent water from entering the building and damaging its fabric) and resilient design measures (e.g. impact is minimised,

ensuring the building's structural integrity is maintained and that drying and cleaning can be facilitated).

- 8.91 All development proposals in areas at risk of flooding will need to submit a site specific Flood Risk Assessment (FRA), commensurate with the scale of the flood risk and recognising all likely sources of flooding - surface water, ground water and watercourse flood risk. Sites within a Critical Drainage Area are also required to submit a Drainage Strategy in line with Policy BE05 Sustainable Drainage.

## **POLICY NE10: CONTAMINATED LAND AND HAZARDOUS SUBSTANCES**

### **Contaminated Land**

1. Planning permission will only be granted for development on, or near to land which is suspected to be contaminated, where the Council is satisfied that:
  - a. any risks, including to human health and the environment, can be adequately addressed in order to make the development safe; and ;
  - b. there will be no adverse impact on the environment and quality of local groundwater or quality of surface water.
2. Proposed development on or near known or potentially contaminated land will be required to submit a Phase 1 Preliminary Risk Assessment to identify the level and type of risk and, where necessary:
  - a. undertake a Phase 2 Intrusive Site Investigation to provide a detailed assessment of contamination and risks to all receptors;
  - b. prepare a Remediation Statement providing details of a remediation scheme appropriate to the individual site; and
  - c. submit a Validation Report prior to the construction of the development.

### **Hazardous Substances and Installations**

3. Development proposals involving the use, movement or storage of hazardous substances will only be permitted within designated employment areas as identified on the Policies Map and only if proposals can demonstrate that appropriate safeguards are in place to ensure there is no unacceptable risk to human health, safety and the environment.
4. Development of a site in the vicinity of a hazardous installation, will only be permitted where it is demonstrated that development will not constitute an unacceptable risk to human health, safety and the environment. Depending on individual site circumstances proposals may be required to be accompanied by

a Preliminary Risk Assessment and Management Strategy that clearly identifies risks and sets out measures to appropriately manage and mitigate these.

## Contaminated Land

- 8.92 The Essex Contaminated Land Consortium's Land Affected by Contamination - Technical Guidance for Applicants and Developers (2014), provides detailed information on how to deal with land contamination. In accordance with this guidance, where sites are known to be contaminated, or where contamination is subsequently discovered, the 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 remediate the contamination. The guidance also provides guidance on how planning conditions may be used to secure suitable remediation when dealing with planning applications where contaminated land is identified.
- 8.93 Where insufficient information is submitted with a planning application for a contaminated, potentially contaminated or suspected contaminated site, the Council will take a precautionary approach when making a decision.

## Hazardous Substances and Installations

- 8.94 The Planning (Hazardous Substances) Act 1990 aims to prevent major accidents and limit the consequences of such accidents. In considering proposals for development which may involve hazardous substances, the Council will 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. The Council will consult with the Health and Safety Executive and other expert bodies, where necessary to seek technical advice on the potential risks of a proposal, and follow the required regulatory procedures as appropriate. Development proposals to expand existing sites handling or processing hazardous substances will not be granted where this would harm public safety.
- 8.95 Hazardous substances are defined by the Planning (Hazardous Substances) Regulations 1992. The 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.
- 8.96 Similarly, where development is proposed within the consultation zone of notifiable hazardous installations, the Council is required to consult the Health and Safety Executive and other expert bodies on the suitability of that development in relation to the risks posed by the existing establishment to the surrounding population. Where such development could affect a sensitive natural area, Natural England must be consulted. Other regulatory procedures may apply as appropriate.

## POLICY NE11: FLOODLIGHTING AND ILLUMINATION

1. 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 and has been appropriately designed to prevent light spillage ;
  - b. is energy efficient;
  - c. provides the minimum level of light necessary to achieve its purpose;
  - d. uses an appropriate light spectrum and specification that will not be harmful to nocturnal wildlife or human health;
  - e. does not impact unacceptably on the night sky or give rise to any unacceptable increase in sky glow; and
  - f. ensures the appearance and design of the installation when unlit is sympathetic to the character and design of the development of which it forms part and will when lit have no unacceptable adverse effect on visual amenity, highway safety, landscape or the historic character of the area.
2. Applicants will need to submit a full lighting strategy, proportionate to their application, specifying details of external lighting, its power and type, the overall level and distribution of illumination and times of operation. Appropriate conditions will be imposed to restrict lighting levels and hours of use or require measures to be taken to minimise adverse effects where reasonably necessary.

8.97 External lighting can contribute to a healthy, safe environment, enhance the appearance of buildings and extend hours of operation of some activities such as 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.

8.98 Whilst local residents acknowledge that street lighting for safety reasons is important (Brentwood Strategic Growth Options, 2015), they 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 take into account the effect of light and lighting columns on the character and amenity of the surrounding area.

- 8.99 Applicants should also consider the effect of lighting in terms of sky glow, glare and light trespass, effect on wildlife, and any potential disturbance arising from the associated use. 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.
- 8.100 Where appropriate, the Council will control the location, form, timing and level of all external lighting and illumination.
- 8.101 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 which include floodlighting or other forms of external illumination.
- 8.102 Lighting installations on listed buildings that materially affect their character, or illumination of some types of outdoor advertisements, will also require consent.

# 09



## Site Allocations

- 9.1 Site allocations listed in this chapter reflect the spatial strategy and strategic objectives. The allocations in this chapter contain specific, sometimes additional, requirements to those set out in Chapter 5-8. All site allocations are depicted on the Policies Map of the Local Plan.
- 9.2 Each policy follows a similar format, providing the basis for how development is expected to come forward and key considerations. While these site policies detail specific requirements for each allocation site, these requirements will apply along with all other relevant policy requirements in this Local Plan unless the site-specific requirements differ. The following sub-headings are included for each site:
- a. **Amount and type of development:** Sets out an approximate number of new homes considered appropriate for a site according to certain characteristics, such as surrounding density and character, and the amount of land considered to be developable (i.e. not including areas that will not be developed within a site, like gardens or roads). The number of new homes on a site is indicative, and in each case, the Council will consider the need to maximise development according to policies within the Plan. Where appropriate for some residential allocations the land requirements for education and early years and child care facilities are stated. In addition any land/floorspace requirements for employment and retail provision are included. For employment allocation policies, figures stated for hectares of employment land are more accurate and should be adhered to as a starting point.
  - b. **Development principles:** Sets out the wider principles of development on site that should be considered further through the decision-making process.
  - c. **Infrastructure requirements:** Sets out the specific requirements for each site that are expected to be delivered alongside development. These are not exhaustive, and any planning application should look to consider wider infrastructure needs informed by

evidence, such as the Council's Infrastructure Delivery Plan (IDP). In determining appropriate contributions for infrastructure reference should also be made to Policy MG05.

- 9.3 Where reference is made to the type and size of new homes, the local character should also be considered.
- 9.4 Affordable housing should be provided in line with Policy HP05, as well as considerations for specialist housing, Policy HP04.
- 9.5 The trajectory is not fixed, it gives an indication to how development is expected to come forward within a phased approach and taking account of the ability to build in infrastructure. However, proposals should show whether development can be delivered sooner. The Council is committed to delivering new homes swiftly, in line with the government's aims.
- 9.6 Where sites with more than one landownership are allocated, policies set out the need for joint working. However, this does not preclude multiple planning applications being submitted, these applications should evidence consideration of other sites and working together on proposals. This is reflected in individual site allocation policies.
- 9.7 This chapter is split according to strategic sites and non-strategic allocation sites for both residential-led and employment development. Residential-led allocation sites will deliver predominantly residential dwellings along with any necessary infrastructure. The Strategic Allocations also include other primary uses, such as employment and community infrastructure and are therefore referred to as Residential-Led, Mixed-use sites. In summary, the sites are:

#### **Strategic Residential-led and Mixed-Use Allocations:**

R01	Dunton Hills Garden Village Strategic Allocation
R02	Land at West Horndon Industrial Estate, West Horndon
R03	Land North of Shenfield, Shenfield
R04	Ford Headquarters and Council Depot, Warley

#### **Residential-led Allocations:**

R06	Land at Nags Head Lane, Brentwood
R07	Sow and Grow Nursery, Pilgrims Hatch
R08	Land at Mascalls Lane, Warley
R09	Land at Warley Hill, Warley
R10	Brentwood Railway Station Car Park, Brentwood
R11	Westbury Road Car Park, Brentwood

R12	Land at Hunter House, Brentwood
R13	Chatham Way Car Park, Brentwood
R14	William Hunter Way Car Park, Brentwood
R15	Wates Way Industrial Estate, Brentwood
R16	Land off Doddinghurst Road, Pilgrims Hatch and Brentwood
R19	Land at Priests Lane, Shenfield
R21	Land South of Ingatestone, Ingatestone
R22	Land Adjacent to the A12, Ingatestone
R23	Brizes Corner Field, Kelvedon Hatch
R24	Land off Stocks Lane, Kelvedon Hatch
R25	Land North of Woollard Way, Blackmore
R26	Land North of Orchard Piece, Blackmore

#### **Strategic Employment Allocations:**

E11	Brentwood Enterprise Park
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#### **Employment Allocations:**

E12	Childerditch Industrial Estate
E10	Codham Hall Farm
E13	Land at East Horndon Hall
E08	Land Adjacent to A12 and Slip Road, Ingatestone

## Dunton Hills Garden Village

### Background

9.8 The NPPF (2021, Section 5 Delivering a Sufficient Supply of Homes) sets out how the plan-making process should positively plan to identify appropriate land for homes. It goes further



to states that a significant step towards meeting the housing shortage is through larger scale development, such as new settlements or significant extensions to existing villages and towns.

- 9.9 The Council's strategy for growth has considered all potential brownfield sites and previously developed underutilised land within the main urban area, and this has formed the Central Brentwood Growth Corridor. However, with 89% of the borough falling within the Metropolitan Green Belt of London, it has meant that the Council has had to make some difficult decisions about the most sustainable areas where its housing needs could be delivered. This has meant the Council has undergone a review of potential locations to determine the considered balance between minimising the impact on the Green Belt and ensuring chosen locations are sustainable – that is the most accessible and least harmful to key environmental designations. The assessment concluded, as detailed in the Sustainability Appraisal, that the south Brentwood locations were deemed the most suitable locations; this has determined the South Brentwood Growth Corridor strategy.
- 9.10 Dunton Hills was selected as a strategic allocation (ref R01) to meet the majority of Brentwood's housing need, within the Plan period and beyond. Given its proximity to the A127, to West Horndon railway station, and to nearby employment areas, development at Dunton Hills provides a unique opportunity to deliver a sustainable new settlement. Its size means supporting infrastructure can also be delivered, thereby relieving the impact on existing facilities that are at capacity. Providing a significant amount of development will help reduce pressure to alter the Green Belt boundaries again in the next Plan period.
- 9.11 In January 2017, Dunton Hills was announced as one of 14 proposed garden villages across England receiving funding to take plans forward and to help timely delivery of the development. The site at Dunton Hills offers a unique opportunity to deliver a new settlement that meets both Garden Community principles as well as Brentwood's growth strategy.
- 9.12 The site is approximately 259.2 ha and is bounded by A128 (Tillbury Road / Brentwood Road) on the west; the A127 (Southend Arterial Road) on its northern edge; the London, Tilbury & Southend C2C Railway on its southern edge; and the borough boundary on its eastern edge. The B148 (West Mayne) is the eastern road beyond the borough boundary separating the site from the built-up area of Basildon.
- 9.13 Its location is ideally placed to align with the principles of Garden Communities. It is connected enough to make it a sustainable location; at the same time physically contained and surrounded by countryside to not only align to Brentwood's Borough of Villages character, but also continue to maintain characteristics of Green Belt openness.

## A Spatial Vision for Dunton Hills

- 9.14 Dunton Hills Garden Village (DHGV) will be holistically planned, self-sustaining and characterful. The development will align to the principles and qualities for Garden Communities as set out in two key publications: the TCPA Garden Villages Guidance by the TCPA (2017)<sup>71</sup> which incorporates the 'Garden City Principles', and the government's

<sup>71</sup> TCPA (2018) Understanding Garden Villages: An Introductory Guide

Prospectus on 'Garden Communities' (MHCLG, 2018)<sup>72</sup>. While the principles listed in these two publications differ slightly, their intention is the same. Garden Communities are '*holistically planned new settlements that enhance the natural environment and offer high-quality affordable housing and locally accessible work in beautiful, healthy and sociable communities*' (TCPA, 2017). MHCLG further states that there are clear expectations to ensure these new developments achieve and maintain the necessary quality so that they become '*vibrant, mixed-use, communities where people can live, work and play for generations to come – communities which view themselves as the conservation areas of the future*'.

- 9.15 The Garden Community principles should be seen as an indivisible and interlocking framework for delivery. These principles can be organised into those which define the expected qualities of the development; those which relate to the delivery process; and those necessary to ensure sustainable management of the garden village into the future. This division broadly aligns to the three overarching strategic objectives for Dunton Hills Garden Village.
- 9.16 Dunton Hills should form a place where people will want to live, where they feel healthy and happy and which provides opportunities to prosper and flourish. Dunton Hills must not be the type of dormitory 'non-place' that has so often become the norm for such developments in the recent past.
- 9.17 The policy framework is set out in two parts interrelated policies:
- i. **The Strategic Allocation** – describing the overarching site requirements and land use parameters;
  - ii. **Masterplanning, Delivery and Legacy** – prescribing the physical components needed to deliver the necessary quality for a healthy, liveable and sustainable village, setting out the expectations for how the delivery of the scheme should be achieved to embed an ethos of co-design and participation, timely and good governance in delivery, and an embedded legacy management of the village assets.
- 9.18 The Council requires development proposals to demonstrate how they will deliver the ambitions set out in the vision statement and the strategic objectives.

## DHGV Strategic Aims and Objectives

- 9.19 The vision for Dunton Hills is summarised as three overarching aims, each supported by a number of sub-objectives that together provide the link between the vision and the development strategy (illustrated in Figure 9.1). These form the fundamental development principles to help shape and inform the development of a masterplan, and in turn, guide decision-making:
- 9.20 **Strategic Aim DH01:** To create a distinctive and well-designed garden village at Dunton Hills that responds to its spatial context and incorporates all the necessary components to achieve a healthy, liveable and self-sustaining new community. Seven sub-objectives

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<sup>72</sup> MHCLG (2018). Garden Communities Prospectus

encapsulate the key spatial interrelated opportunities that should be embedded into the masterplanning, design, and delivery of the garden village.

- i. **DH01a: DISTINCTIVE CHARACTER & HARMONIC DESIGN.** Development that delivers homes and neighbourhoods that have their own unique character, with architectural design and materials that are durable and human-scale in nature; where elements are spatially organised to create safe, positive experiences and interactions.
- ii. **DH01b: LANDSCAPE-LED.** Development that takes a natural landscape-led approach to urban design, to deliver a healthy, walkable and climatically adapted public realm and multi-functional green and blue infrastructure, amongst the backdrop views of the Essex countryside.
- iii. **DH01c: EMBEDDING HERITAGE ASSETS.** Development that takes every opportunity to embed the natural and built heritage assets of the site.
- iv. **DH01d: SOCIAL PLACE.** Development that creates active, vibrant village centre(s) with the necessary community infrastructure, all connected and interspersed by nodes of social-cultural activity and recreational opportunities throughout the village that foster social well-being and healthy communities.
- v. **DH01e: SMART INFRASTRUCTURE.** Development that delivers smart, sustainable and resilient infrastructure to future-proof investment and help manage resources (i.e. water, energy, waste) efficiently and sustainably.
- vi. **DH01f: SUSTAINABLE TRAVEL.** Development that encourages integrated and sustainable travel solutions across all modes of transport, including: mitigation of any road infrastructure impacts; delivery of a well-networked, safe streetscape environment that encourages by default, active modes of travel (walking and cycling) for short distances and everyday conveniences; smart infrastructure for clean vehicular travel options, across both private and shared/passenger transport modes.
- vii. **DH01g: HOMES THAT PROVIDE DESIRABLE DESIGN, CHOICE AND ARE AFFORDABLE.** Development that delivers homes that people will be proud to live in, that are universal, adaptable and sustainable in design using quality, durable materials; and homes which are affordable and provide a range of choices in terms of size and tenure, to encourage a mixed and balanced community to establish and flourish.

9.21 **Strategic Aim DH02:** To create a place that promotes enterprise, innovation and learning as part of the delivery process, but also as an embedded culture for the future village.

- i. **DH02a: HEALTHY & PRODUCTIVE WORKPLACES.** Development that delivers a variety of workplaces, including incubator/affordable spaces designed to be places conducive to health and productivity and flexible enough to respond to economic drivers and emergence of new sectors of employment and changing work patterns.

- ii. **DH02b: ALL THROUGH LEARNING.** Development that delivers an exemplar all through school with a design that fosters a learning environment for all types of learners and through life, from nursery through to adult learning opportunities.
- iii. **DH02c: INNOVATION & ENTERPRISE.** Development that creates a construction process that quick-starts a programme of innovation, learning and enterprise, and ensures that innovation drives the use of smart infrastructure.

9.22 **Strategic Aim DH03:** To create a legacy of co-design, co-delivery, and eventual, vibrant and cohesive community spirit and stewardship.

- i. **DH03a: GOOD GOVERNANCE.** Development that embeds the right governance structures and covenants to maintain an ongoing, proactive stewardship of communal and public interfacing spaces.
- ii. **DH03b: PHASING PLAN.** Development that implements a rigorous development phasing plan to ensure the scheme delivers the appropriate infrastructure at the right time to enable an early sense of community and belonging to the garden village.

## Development Principles

9.23 Underscoring these strategic aims are four underlying development principles that should be embedded into the different stages of the scheme, from design, through to construction methods and eventual legacy management:

- i. **Design and Build with Nature.** Development must take into account the site's natural assets and make a positive use of the landscape's natural systems to ensure the long-term health, resilience and sustainability of the new settlement. Green Belt, landscape capacity and the environmental impacts will be avoided and/or mitigated to allow the development to blend naturally into its surroundings. This approach should not be limited to just green infrastructure considerations, but also reflected in the thinking around nature-based solutions (such as for sustainable drainage), choice of building materials and design details (aesthetics and building function). The development approach should consider the learning and knowledge of ecosystem services, natural capital and benefits of GBI.
- ii. **Smart and Sustainable.** Development must achieve resilient and high performing infrastructure to ensure resource efficiencies and sustainable use. Design and construction choices must be forward looking, demonstrating how the development will be durable, long-lasting, optimised, self-sufficient and smart to support economic growth, productivity and well-being for a thriving community to establish. Modern infrastructure should consider the latest knowledge and innovation of emerging technologies.
- iii. **Adaptable.** Development should be flexible to accommodate the likely progression over a 20-year build-out period. Design choices should be robust, resilient and adaptable, and take into account the latest knowledge and technology advancements in relation to

changing working patterns, personal preferences and life circumstances, economics and climate change.

- iv. **Healthy.** Development must strive towards creating an environment that is conducive to human health so that it encourages healthy behaviours and active living, as well as ensures it is delivering a liveable settlement that addresses the wider determinants of health. The principles of health are imperative and cross-cutting and should form the basis against which proposals are continuously evaluated and monitored.

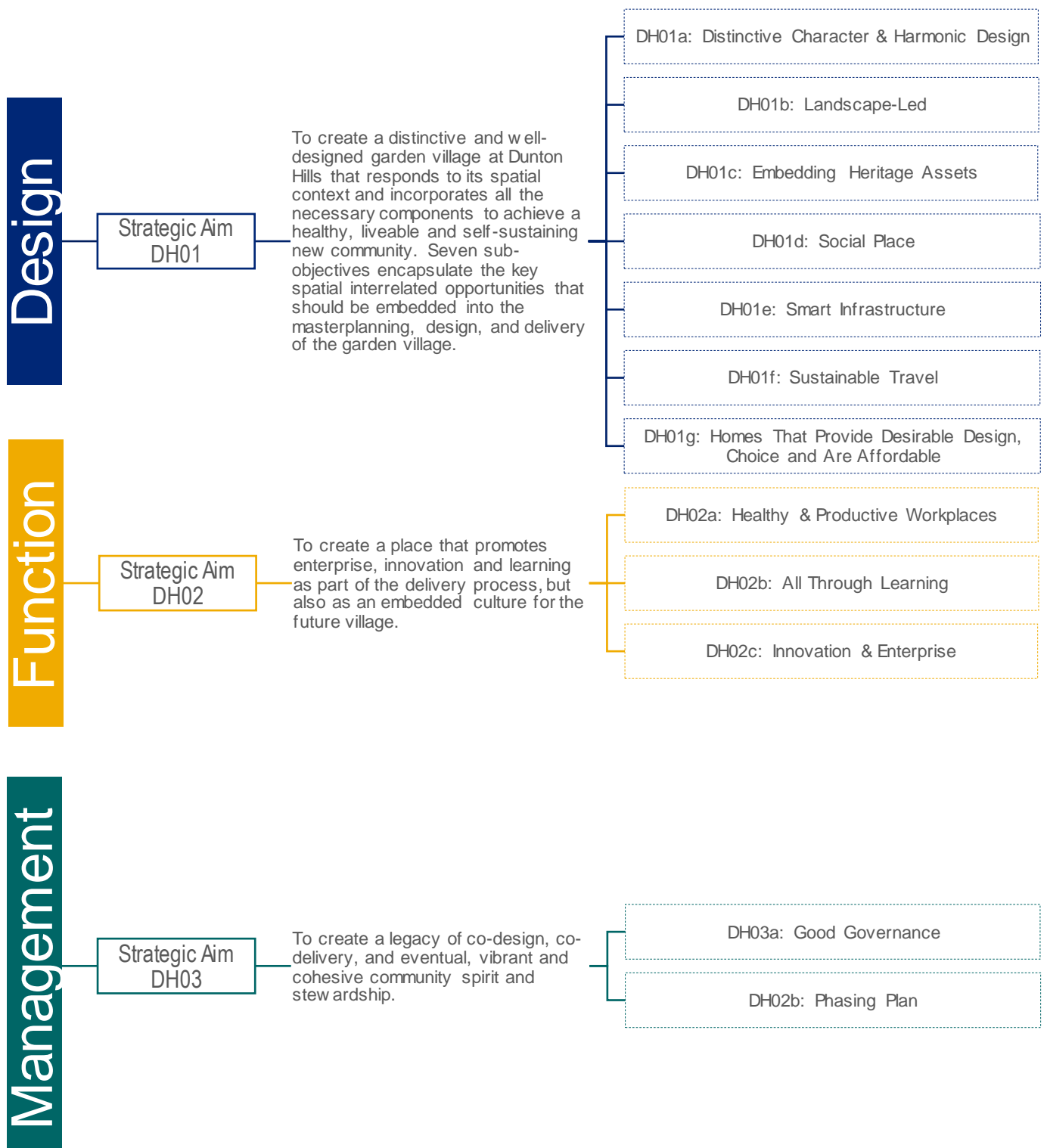


Figure 9.1: Strategic Aims and Objectives for Dunton Hills Garden Village

## DHGV Policies

### **POLICY R01 (I): DUNTON HILLS GARDEN VILLAGE STRATEGIC ALLOCATION**

1. In line with Policy MG01, land at Dunton Hills (east of the A128, south of the A127 and north of the C2C railway line, approximately 259.2 ha in size) is allocated for residential-led mixed-use development to deliver Dunton Hills Garden Village.
2. The development will deliver a mix of uses to comprise around 1,650 homes in the plan period (as part of an overall indicative capacity of around 4,000 homes, the remainder to be delivered beyond 2033) together with necessary community, retail and employment development and comprehensive infrastructure to support a self-sustaining, thriving and healthy garden village.
3. The development proposals shall accord with all other relevant policies in this Plan (including the master planning and delivery requirements of R01(ii)).

#### **Housing Mix**

4. Development proposals shall deliver an appropriate variety of housing types and tenures in accordance with the Borough's identified needs and the specific needs of Dunton Hills Garden Village. They shall include the provision of:
  - a. self-build and custom build plots in accordance with Policy HP01;
  - b. specialist accommodation including three care homes of around 80 beds each, or an appropriate mix of specialist accommodation to meet identified needs, in accordance with Policy HP04;
  - c. affordable housing in accordance with Policy HP05; and
  - d. a minimum of 5 serviced Gypsy and Traveller pitches, the location of the pitches and the timing of their provision to be identified in the masterplan.

#### **Employment Development**

5. Development proposals shall deliver around 5.5 hectares of employment development distributed across the village that may include office, light industrial and research and development uses coming within use class E and other employment development that is complementary to, and compatible with, the residential development.

#### **Main Town Centre Uses**

6. Development proposals shall deliver main town centre uses in the form of a district shopping centre and such additional local centres (in accordance with Policy PC04) as may be appropriate in order to optimise the self-sufficiency of the village. These centres shall also include the community and health facilities and related infrastructure necessary to support the village's residential and working community.

#### **Schools and Nurseries**

7. Development proposals shall make provision for:
  - a. a site for one secondary school (Class F1) (around 7.9 hectares) with capacity to co-locate one primary school and one early years and childcare nursery facility;
  - b. sites for an additional two primary schools with sufficient capacity to co-locate early years and childcare nursery facilities (around 2.1 hectares each);
  - c. a site for a further primary school with capacity to co-locate early years and childcare nursery facilities (around 2.1 hectares) in the eventuality primary education provision is not co-located with the secondary school; and
  - d. an additional stand-alone early years and childcare nurseries (around 0.13 hectares);

#### **Green and Blue Infrastructure**

8. Not less than 50% of the total allocated area shall comprise green and blue infrastructure which should, so far as possible, be of a multi-functional nature.

#### **Mobility Hub**

9. Development proposals shall make provision for a mobility hub that should relate well to the district centre.

## **POLICY R01 (II): SPATIAL DESIGN OF DUNTON HILLS GARDEN VILLAGE**

### **Master Planning, Design and Layout**

1. All development proposals in relation to the site shall be in accordance with an approved masterplan. The masterplan shall relate to the whole of the

allocated site and be produced in consultation with local communities and all relevant stakeholders and shall include a statement that sets out how community and stakeholder involvement has influenced the design and layout of the submitted scheme and its intended delivery. The masterplan shall be submitted to the Council for its approval as part of the initial application for planning permission.

2. The Masterplan shall:

- a. be locally led with the community and relevant stakeholders, in accordance with the Statement of Community Involvement;
- b. show the intended overall design and layout of the development and the proposed distribution and location of uses across the allocated site which shall accord with, be based upon and promote, garden community principles;
- c. demonstrate how heritage assets and their settings will be sympathetically and appropriately integrated into the development taking into account the requirements of para.3 (j) and (k) below;
- d. identify the proposed transport links, including access to the site and main internal highway links, and principal walking, cycling and bridle links (including links to the surrounding network);
- e. show all structural landscaping and the treatments to be provided (including boundary treatments and measures to ensure visual separation from Basildon);
- f. incorporate a green and blue infrastructure (GBI) plan which is informed by a comprehensive wildlife and habitat survey and heritage and landscape character assessments;
- g. show all intended links to the surrounding footpath and cycleway network and indicate potential footpath and cycleway links towards Basildon from the east of the allocated site;
- h. show how development will safeguard, maintain and, where possible, enhance key views in and across the allocated site;
- i. provide for convenient pedestrian and cycle links through the allocated site towards West Horndon Station;
- j. show how the development will incorporate the full range of sustainable transport measures, including dedicated bus services and the location and nature of a mobility hub;



- k. identify the locations and forms of the district and local centres, including the community and healthcare facilities to be provided within them; and
  - l. include a phasing and implementation plan which should secure the phasing of development across the whole of the allocated site to ensure that the development will be carried out in a manner that co-ordinates the implementation and timely delivery of such on and off-site infrastructure as shall be necessary to support each phase of the development and to ensure that:
    - i. its impacts are satisfactorily and appropriately mitigated;
    - ii. there are adequate supporting facilities (including access to adequate green and blue infrastructure, leisure and sporting facilities, shops, health, community and educational facilities) that will allow the early establishment of a self-sufficient and cohesive community; and
    - iii. occupiers have an appropriate range of sustainable travel options at their disposal, including access to bus services and the cycle and pedestrian link to West Horndon Station.
3. Development proposals should:
- a. ensure that detailed design and layout take into account the guidance contained in an adopted Garden Village Design Supplementary Planning Document;
  - b. ensure that the distinct spatial, landscape and heritage qualities of the site and its surroundings are maintained or enhanced;
  - c. ensure that the design of neighbourhoods is such that they are harmoniously integrated to form an overall Dunton Hills Garden Village identity and distinctiveness;
  - d. combine to provide an appropriate range of densities across the site to ensure a compact and highly networked, walkable and fine-grained environment with a highly connected street-based layout that encourages walking and cycling;
  - e. provide, or relate appropriately to, well-located multi-functional green infrastructure to promote safe, and attractive environments for leisure, informal and adventure play areas, recreational and sporting activity with appropriate levels of surveillance;
  - f. promote coherent signposted internal footpath and cycleway routes that provide, where appropriate, links to the surrounding network with sympathetic transitions between the rural and urban environment;

- g. provide or contribute to a highly connected and biodiverse ecological network that incorporates existing habitats of value and natural features and, wherever possible and appropriate, the enhancement of existing, or the creation of new, habitats; and
- h. provide an appropriate level of formal sports pitches and facilities to meet the evolving needs of the community;
- i. ensure the public right of way (PRoW) network is retained, maintained and enhanced;
- j. take into account the findings of the Council's Heritage Impact Assessment for Dunton Hills Garden Village and the applicant's own heritage impact assessment and demonstrate what measures have been taken to sustain the significance of any affected designated and non-designated heritage asset and its setting, whether on or off-site and, wherever possible and appropriate, include other measures to provide enhancements to their settings; and
- k. take into account the results of a programme of archaeological evaluation based upon a geophysical survey of the development area.

#### **Delivery and Legacy**

- 4. The development shall be delivered in accordance with the phasing and implementation plan.
- 5. A mobility hub shall be delivered prior to the first occupation of the development with provision for its enhancement and expansion during later phases to be secured through a planning obligation.
- 6. Where directly related to Dunton Hills Garden Village applicants will be required to make necessary, appropriate and reasonable financial contributions via planning obligations towards:
  - a. off-site highway infrastructure improvements as may be necessary and reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes) unless, in the case of the A127/128 junction, the applicant enters into a s.278 Agreement for its timely construction, if more appropriate;
  - b. necessary bus services to nearby school facilities prior to the delivery of on-site school facilities which services shall be secured before first residential occupation of the development;

- c. phased improvements to West Horndon Station in accordance with policy BE08 to increase its capacity and utility in line with anticipated demand generated by each phase of the development;
  - d. off-setting improvements to the Hartswood Golf Course.
7. Appropriate restrictions on the occupation of the development will be imposed subject to the carrying out and completion of necessary highway works to secure safe and convenient access to the site, including any necessary improvements to the A128 corridor.
  8. Proposals shall include a supporting statement which addresses the long-term governance and stewardship arrangements (including the management, maintenance and renewal) of the green and blue infrastructure, the public realm, community and other relevant public facilities. Planning obligations will be sought to secure the long term funding, maintenance and stewardship of the assets where necessary.
  9. Proposals shall include a supporting statement that includes initiatives to ensure that new jobs created are offered to local people, as far as may be reasonably possible.

- 9.24 The Council will adopt the Dunton Hills Garden Village Design Supplementary Planning Document to give guidance to subsequent applications. The sections that follow elaborate on the spatial vision and policy requirements which should be incorporated into the masterplan and any subsequent applications. This vision for Dunton Hills Garden Village was defined following two Design Review workshops with Design Council CABE in 2016, as well as a broad analysis of site constraints and opportunities.

## Distinctive Character & Harmonic Design

### DISTINCTIVENESS

- 9.25 Strategic Objective DH01 (distinctive character & harmonic design) aligns to Garden Community principles which highlight qualities such as 'clear local identity', 'well designed', 'beautiful and imaginatively designed homes with gardens', 'clear identity'. Dunton Hills Garden Village should achieve a distinctive recognisable character by respecting the traditions of village life while ensuring 21<sup>st</sup> century conveniences, technologies and design. To achieve this aim requires a thorough understanding of the spatial context (landscape, heritage, habitat, constraints). The site's masterplan should creatively respond to the site's context. Achieving distinctiveness should be inspired by the historic evolution of Dunton Hills: the landscape character, heritage assets and cultural heritage references, such as local names, features, and their significance, in line with Strategic Objective DH01c (embedding heritage assets).

- 9.26 Design must also be informed by local aspirations, by inviting active participation of local community and stakeholders, as part of a coordinated and informed approach to masterplanning.
- 9.27 Historic garden villages placed a huge emphasis on the use of high-quality, craftsmanship and often local materials. This has resulted in homes and communities that have remained desirable and unique to their geographic context. How a place looks and feels tends to be the focus of objections to new communities establishing and therefore, it is important to get this right. Dunton Hills should become a community which sees itself as a 'conservation area of the future', not a dormitory 'non-place' that has become the norm for such developments in the recent past.
- 9.28 The development should incorporate the principles of design harmony (balance, symmetry, scale, proportions, etc.). Approaches such as 'building with nature' and 'healthy-by-design' should also be the starting point and embedded in the process of design to achieve a healthy, liveable, resilient and a self-sustaining new settlement. TCPA guidance on Garden Communities provides extensive learning points to guide the future creation of garden communities.
- 9.29 The design of the garden village must also consider how the place will feel to walk through at night as well, given the probable openness of its surroundings; night-time lighting will need to be designed in a way that provides the necessary levels of illumination, but not be detrimental to nocturnal wildlife.

## DENSITY

- 9.30 The layout of the development should achieve a fine-grained, permeable and connected environment that makes the best, most efficient use of land. A new compact village vernacular should be defined that respects and maintains its feel as a village, but without the predominance of sprawling detached properties that do not make the best sustainable use of land and can often leave a place feeling exposed, incoherent, and car dominant. Development proposals should consider a density hierarchy that increases to medium density towards the local village centres and around public open spaces, to achieve a sense of enclosure and safety and natural surveillance overlooking exposed sites.

## Homes

- 9.31 Strategic Objective DH01g (homes that provide desirable design, choice and are affordable) seeks to achieve homes people will be proud to live in, that are universal, adaptable and sustainable in design using quality durable materials and that are affordable and provide a range of choice in terms of size and tenure. This responds to the Garden Community principles which state the need to provide 'mixed-tenure homes', 'housing types that are genuinely affordable', 'great homes offering a range of high-quality distinctive homes'.
- 9.32 Delivering great, affordable homes will be key to making the village distinctive and desirable. At least 1,650 homes are planned within the Plan period, with an indicative capacity of around 4,000 (with the remainder to be delivered after 2033, subject to further feasibility and assessment of impact). Homes, like the public realm, should be well designed and provide a

range of choice (dwelling sizes, tenure) to encourage a balanced community from all stages of life to form.

- 9.33 While houses should be designed to be distinctive, they must not be ‘over designed’, meaning that the traditional and much-loved elements of a house get distorted or become non-functional. At the same time development should avoid making Dunton Hills feel like dormitory non-place of sprawling, detached, cookie-cut houses that do not evoke any character or sense of pride, where traditional elements may have been included, but in a manner where the craftsmanship has neglected the detail to the extent that has rendered them undesirable, cheap-looking, slapdash and so often criticised of being ‘pastiche’ (but mean more likely a parody whereby the imitation falls short of the real thing).
- 9.34 The timely delivery of new homes will also be key to the early establishment and success of the new village. Proposals should demonstrate innovative ways to accelerate the delivery without compromising the quality, durability, longevity and overall sustainability of the built fabric.
- 9.35 A substantial fraction of the housing delivered on site should be genuinely affordable, and development proposals should think creatively about solutions to make this happen, learning from national and international case studies.
- 9.36 In accordance with the Golf Course Needs Assessment and the Golf Feasibility Assessment, the loss of entry level golf at Dunton Hills Garden Village should be mitigated by an appropriate financial contribution being secured through a planning obligation that would be used towards enhancements to the Borough Council’s Hartwood Golf Course.

## Landscape-Led

### URBAN LAYOUT / PUBLIC REALM

- 9.37 Strategic Objective DH01b (landscape-led) responds to the Garden Community principles that promote ‘generous, accessible green space’, ‘development that enhances the natural environment’, ‘comprehensive green infrastructure network’ and ‘deliver environmental gains and enhancements to natural capital. At Dunton Hills this will be achieved through a landscape-led development with generous amount of green infrastructure for multi-functional uses. The landscape setting of Dunton Hills provides a unique backdrop to ensure green infrastructure (as well as the harmonious horizon views afforded by the topography of the site) is the starting point for the design response.
- 9.38 A design and build with nature approach delivers multiple benefits taking advantage of the wider ecosystem services and natural capital afforded by green infrastructure to achieve sustainable development: a). climate resilient infrastructure to counteract the impact of climate change and help achieve resource efficiency; b). multi-functional green spaces that are highly connected, accessible and incorporate universal design measures that encourage healthy recreation such as walking, cycling and horse riding, as well as other outdoor leisure and learning pursuits; c). a healthy public realm that creates a harmonious living environment. The green infrastructure proposals should deliver varied recreational experiences to appeal to a varied range of users with different interests and age-related preferences.

- 9.39 The public realm should focus on the importance of the street scene through attractive buildings, public art, street furniture, the use of materials, strong landscaping providing wide pavements and grass/planted verges, tree-lined avenues and where appropriate, incorporation of rain gardens and food production opportunities.
- 9.40 A highly connected network of streets should be designed, using existing field boundaries as a reference point to form an accessible, connected and fine-grained urban layout with neighbourhoods that are legible and easy to navigate, with a wide range of interlinked uses and generous green spaces, ensuring street blocks are contiguous and permeable to encourage walking and social interaction.
- 9.41 The significance of the landscape features and key views such as London skyline and Langdon Hills and others identified must be retained and enhanced as part of the development. Grassy medians down the middle of streets should be used as a traffic calming tactic, especially on the larger roads which spur off the main A roads, to create lane separation for different transport modes.

#### BIODIVERSITY NET GAIN AND ECOLOGICAL CONNECTIVITY

- 9.42 The existing significant green infrastructure features such as the woodland, fenland and ponds should be retained and/or enhanced and connected to achieve a contiguous green corridor throughout the garden village, achieving biodiversity net-gain across the site.
- 9.43 As well as establishing an integrated ecological network within the site, the development should demonstrate its ecological connectivity to the wider 'living landscape' habitats and local wildlife destinations beyond the development boundary, for example Eastlands Spring, Thorndon Country Park to Langdon Hills Country Park. The site's existing habitats - such as the lakes and ponds - should inspire the basis for the design of parks and village greens as key destinations and nodes of social-cultural activity within the village, in line with DH01d (social place). Connecting these natural heritage assets gives structure to the site and naturally divides it into potentially varying character areas for development.
- 9.44 Proposals will need to retain and weave through priority habitats such as significant areas of existing woodland habitat; and where relevant, reinstate degraded fenland and demonstrate the measures taken to protect mature trees; and where appropriate, enhance hedgerows, ponds and other environmental features of note, which contribute to the character and biodiversity. The river course and ponds should be retained to minimise impact on the wildlife they support as well as contributing to sustainable drainage across the site.
- 9.45 The creative interweaving of productive landscapes within the GBI network will be favourably considered. The agricultural heritage of the site also provides a distinctive cultural context to inspire green infrastructure with a focus on food production and foraging as alternatives to grassed verges; while grass verges are well-loved in garden communities, alternatives or additional elements, such as sensory street verges through the use of, for example, culinary herbs or linear orchards could also add another dimension to the much-loved and expected tree-lined and green verge-lined residential avenues. Allotments and open space should be provided in accordance with Policy NE05 and NE06.

## Embedding Heritage Assets

### DESIGNATED & NON-DESIGNATED HERITAGE ASSETS

9.46 The site contains and is surrounded by the following listed buildings, designated heritage assets and non-designated heritage assets as set out in the Heritage Impact Assessment:

- Dunton Hills (Grade II listed building) on-site;
- Dunton Hall (Grade II listed building) off-site;
- Church of St Mary (Grade II listed building) off-site;
- Church of All Saints (Grade II\* listed building) off-site;
- Nightingale Hall (non-designated) on-site;
- Nightingales Lane (non-designated) on-site;
- Windmill – site of (non-designated) on-site;
- Cottages at entrance to golf course (non-designated) on-site.

Development proposals will be considered by reference to the requirements of Policy BE16 and the specific requirements of R01(ii).

9.47 Strategic Objective DH01c (embedding heritage assets) aims to ensure the surviving historic features, notably the listed buildings, the wider farmstead barns and buildings, moated sites, field boundaries, historic woodland and parish boundaries which preserve elements of a probable medieval or earlier landscape as well as later settlement patterns will be preserved and enhanced. Successful places tend to also have a strong heritage identity. Heritage can provide a powerful connection between people and place. For this reason, heritage should be harnessed in a manner that will drive Dunton Hill's distinctiveness, health and well-being and place attachment. Garden Communities Prospectus places an emphasis on ensuring these 'communities... view themselves as the conservation areas of the future'. The prospectus also emphasises that development 'should include consideration for how the natural and historic environment of the local area is reflected and respected' to build a 'strong local vision'.

9.48 The farmstead shows that the farmhouse was the heart of the settlement, and that the existing large threshing barns to north and south of the main house were each part of larger courtyards and groupings of farm buildings. It was clearly a substantial farmstead throughout the eighteenth and nineteenth centuries, and the impressive scale and construction of the original threshing barns indicates that this was a wealthy and substantial farmstead for at least 100 years earlier. The surviving buildings within the landscape represent the typical medieval settlement pattern for this area and most are designated Grade II listed buildings.

9.49 The natural heritage of the landscape (including views) should be interconnected with the heritage of the listed buildings as well as other non-designated heritage assets of interest. The layout, orientation and morphology of the residential streets must be designed to enhance and highlight the key views (e.g. street axes towards the views, instead of buildings

turning their backs onto them). As a minimum, the proposals should retain and incorporate this historic fabric.

- 9.50 Cultural references from the past, such as field patterns, field names and building names should inform the character and place-making aspects of the village. For example, heritage names such as Dunton Ridge, East Horndon Hall, as well as current hill names, given to the site by the golf players, should all inspire how the design of the village develops and how it could inform future street naming, neighbourhood naming, landmark naming.
- 9.51 While a preliminary desktop heritage assessment has highlighted these key heritage assets, proposals should be informed by a comprehensive Heritage Statement and Landscape Character Study, which should assess both the designated and non-designated heritage assets of the site.
- 9.52 Should any artefacts be found on site during construction, these should be recorded and safeguarded, with projects put in place to find a legacy home, including considerations as to how they can be incorporated as relics and public art in the village centre.

## Sustainable & Clean Travel

### ACTIVE TRAVEL

- 9.53 Strategic Objective DH01f (sustainable travel) seeks to ensure the development mitigates any road impacts resulting from the proposals and ensures development delivers sustainable travel options. The transport sector is innovating fast; and provision should, as far as appropriate, be planned to future proof transport needs. This objective responds to Garden Community principles which highlights the need for 'integrated, forward looking and accessible transport options' which facilitate access to jobs, education and services, where 'walking, cycling and public transport [is] designed to be the most attractive forms of local transport'. A Travel Plan should accompany an application to set out how sustainable travel will be achieved.
- 9.54 Starting from a blank canvas provides an opportunity to make streets like they do in many European cities, where cycling is the norm, rather than the exception. Principles of active design must guide the evolution of the village layout, street hierarchy and connectivity.
- 9.55 Planning for active travel must also consider the topography of the site, which will make this type of travel challenging for some. Innovative public transport schemes such as electric bikes should therefore be a considered option, providing appropriate locations for picking-up and dropping-off bikes.
- 9.56 Masterplan proposals will need to demonstrate how they are adhering to the creation of 'walkable neighbourhood's through the design of a highly networked street hierarchy, providing safe, segregated lanes for different modes of travel such as cycling and walking that are equitable to all users, minimising conflict of different modes and user abilities, thereby encouraging more to cycle and feel safe on the streets. These should integrate with 'quiet way' off-street options through green routes where possible.
- 9.57 The motor vehicle should be subordinate in importance on the street network within the village. Equally, while a car-limited development should be the main driver, the development



should also make owning or using clean vehicle options possible, taking advantage of the latest and emerging technologies.

- 9.58 The necessary electric vehicle charging infrastructure should also be designed and delivered appropriately, adhering to principles of universal design and clutter free public realm. Vehicle sharing clubs should be encouraged to establish. These less polluting vehicle options should be coupled by planning for clean air zones/car free, especially around the schools.
- 9.59 Design should consider how to influence safe and active travel mode behaviours through design, i.e. streets narrow and 'village' in feel, dense network of streets, paths and parks ensures that it is faster and more enjoyable to walk and bike than to drive, less land to streets.
- 9.60 Cul-de-sacs should be an exception; street width is important to allow cycling and not allow the car to dominate, making them pedestrian friendly with opportunities for home zones to establish.

## Social Place

### VILLAGE CENTRE

- 9.61 Strategic Objective DH01d (social place) seeks to ensure the development creates active, vibrant village centres with the necessary community infrastructure, all connected and interspersed by nodes of social-cultural activity and recreational opportunities throughout the green infrastructure to foster social wellbeing and healthy communities. This aligns to the Garden Community principles which state that development should deliver 'strong cultural, recreational and shopping facilities' and where the 'scale... supports the necessary infrastructure to allow the community to function self-sufficiently on a day-to-day basis'. Additionally, it states that Garden Communities should be 'healthy places', 'designed to provide the choices and changes for all to live a healthy life'.
- 9.62 The long-term success of any place is fundamentally rooted in the community that establishes; and this invariably depends on designing places that are social, that incorporate spaces where opportunities for recreation, social interaction and where individual and collective wellbeing pursuits can ensue. For Dunton Hills, the historic fabric of the farmstead already provides an ideal, cultural heritage backdrop for the primary village centre to establish itself with a village green and a mix of civic and commercial spaces to create a vibrant village core.
- 9.63 Knitting together the residential streets with the village centre(s) will be the green infrastructure, which will be interspersed with nodes of recreation/leisure activity and more local village hubs, making the whole village feel connected and walkable in line with DH01b (landscape-led).
- 9.64 The village centre should be on the District Shopping Centre level in the retail hierarchy, comparable with Ingatestone village centre, to create a central hub for new residents to come together and to provide day-to-day facilities including a supermarket, retail, healthcare, leisure and community amenities. The amount of retail is to be confirmed through the masterplan process.

## SOCIAL INFRASTRUCTURE

- 9.65 The timely delivery of education, health and community facilities early in the development will also be key to enabling the success of the village in its early years. Community spaces should be flexible to adapt to the needs and cultural preferences of the community which settles.
- 9.66 Opportunities to co-design these spaces with the surrounding communities and/or with early settlers should be harnessed.
- 9.67 A health facility will need to be part of the community infrastructure, and this should be carefully planned to ensure the integration encourages better, healthier behaviours. The facility should focus on wellbeing and prevention, and be an exemplar example of integrating diagnosis, treatment and proactive wellbeing onsite, set in a backdrop of nature, where prescribing healthy activity can be achieved by the integration of services. Integrating the health facility in proximity to recreation and community facilities will actively encourage 'sustainable healthcare', embedding a design that encourages healthy living, eating, and activities and opportunities for social prescribing.
- 9.68 Design principles for community and health facilities should incorporate:
- i. the principles set out by the Centre for Sustainable Health Care including: prevention, patient empowerment and self-care, lean systems, low carbon alternatives;
  - ii. principals of biophilic design which connect people with nature and use design elements which incorporate natural analogues (such as natural textures, patterns, colours and images) to create positive perceptual environments.

## Smart Infrastructure

- 9.69 Strategic Objective DH01e (smart infrastructure) seeks to ensure development delivers smart, sustainable and resilient infrastructure to future-proof investment. This objective aligns to the Garden Community principles which calls for 'future proofed' places, designed to be resilient to allow for changing demographics, future growth and the impacts of climate change; as well as development that 'uses zero-carbon and energy-positive technology to ensure climate resilience'. This is fundamental to a development site that will take over two decades to complete.
- 9.70 It is important that the infrastructure is creatively designed to take account of the anticipated opportunities presented by technological advances (such as driverless cars and renewable energy measures), therefore, ensuring some flexibility to adapt to future progression. Sustainable development can only be achieved through the use of cleaner, smarter, more energy efficient service infrastructure that save on running costs in the longer-term. Smart infrastructure should look at the best possible solutions to minimise resource waste and costs, and maximise efficiencies, value for money and digital convenience.
- 9.71 Digital infrastructure will be fundamental, especially to account for the changing working patterns and needs for home working.

- 9.72 Future proofing investment can be achieved by taking advantage of land value capture which is made possible by green field development at these early stages – a key Garden Communities principle. It is important to recognise the fundamental role that GBI can play in delivering climate resilient smart infrastructure to help achieve resource efficiencies in water management, energy consumption as well as mitigation of air pollution.
- 9.73 Opportunities to embed anticipated technological advances must be secured early in the design and build of the scheme. There are many examples of how smart infrastructure is being rolled out throughout the world; these should be taken into account in a scheme like this which will be 20 years into the future; opportunities such as driverless public transport, construction techniques that allow for accelerated delivery, building and construction materials that generate energy, smart grids that are more efficient at utilising energy, ambitious standards for environmental sustainability of housing, and undergrounding of refuse bins, etc. should all be considerations in the planning and design of the scheme, subject to further masterplanning work.

## Enterprise, Innovation and Learning

- 9.74 Strategic Objective DH02b (all through learning) will deliver exemplar education facilities that meet the needs of all types of learners through life, from nursery to adult learning opportunities.
- 9.75 Garden Community principles emphasise the need to integrate ‘a wide range of jobs within easy commuting distances of homes’. The success of enterprise depends on designing and building work places and learning spaces that are healthy-by-design, to inspire and promote creativity and productivity.
- 9.76 Strategic Objective DH02c (innovation & learning) aims to ensure the construction process quick-starts a programme of innovation, learning and enterprise; and Strategic Objective DH02a (healthy & productive work places) seeks to ensure the delivery of a variety of workplaces to ensure a self-sustaining garden village with good job opportunities.
- 9.77 Dunton Hills is being developed amongst a backdrop of wider economic growth opportunities, including the Enterprise Park and East Horndon employment site. The proximity of these workplaces will make Dunton Hills Village a desirable place to live, to be near work.
- 9.78 Equally however, the village centre(s) themselves should provide opportunities for localised employment, to ensure a thriving local economy ensues. The spaces should be designed to flexibly accommodate Class E and other employment development and community spaces that are complementary to, and compatible with, the residential development, thinking particularly about the entrepreneurial potential of the area.
- 9.79 The interior design should be informed by the latest research and guidance from key institutional bodies like British Council of Offices (BCO) and Chartered Institute of Building Services Engineering (CIBSE) on how design can create productive workplaces. The aspiration is to also create units that are suitable for small businesses as well as account for the current trend in flexible working modes; superfast broadband will be integral in all buildings to make this a success.

- 9.80 This aim also requires a programme of complementary actions to be embedded alongside the planning process, such as working with the research and innovation sectors and local education establishments, to ensure knowledge transfer and learning are firmly embedded from conception, through to construction and implementation of the scheme.
- 9.81 Delivery of, firstly, primary, and eventually, secondary education provision is key to the long-term success of the village. Its location and how it is designed is also fundamental to the overall performance of the school. The school should ideally be placed away from the main arterial roads that surround the site, and should be orientated towards the village centre, so that it becomes part of the social fabric of the place and creates opportunities for wider after-school recreation and learning pursuits by the wider community.
- 9.82 The school should be set within a garden itself, providing opportunities for outdoor learning and 'forest school' sessions in nature. It should also provide the on-site provision of playing fields for sports and physical education. The interior and functional design of the school should be informed by various case studies which have learned from successes and failures of making a good learning environment (e.g. schools for future programmes). Designing for sensory comfort and stimulation are fundamental components of interior design and particular attention should be placed on issues of solar gains, ventilation, air quality and movement through school. Implementation of accredited standards, such as the WELL standard will be expected.
- 9.83 The project team have already begun a programme working with local schools and universities. This is instilling a culture of co-design, which could eventually lead to a cultural of co-delivery within the community. Such initiatives can help foster a sense of community and achievement, and drive a sense of belonging to the place.
- 9.84 The construction programme should create a programme of apprenticeships to inspire future residents to be part of the process and should, where appropriate, incorporate elements of traditional skills and craftsmanship. Additional learning programmes could be implemented such as involving local schools and education establishments to help monitor and record any wildlife and changes as part of the school curriculum, establishing learning opportunities from the outset.

## Community Stewardship

- 9.85 Strategic Objective DH03a (governance) aims to ensure development embeds the right governance structures and covenants to maintain an ongoing and proactive stewardship of communal and public interfacing spaces. This responds to the fundamental Garden Communities principle of 'community ownership of land and long-term stewardship of assets'.
- 9.86 A suitable management body will need to be established at an appropriate time to manage the assets of the DHGV over the long-term. The most suitable approach should emerge through the design and delivery process. Consideration should be given to how the legacy assets will be handed over for on-going legacy operations and maintenance.
- 9.87 To achieve this aim requires the early thinking about the handover and legacy requirements of the development. The delivery process should firmly embed principles of co-creation and

participation. Embedding these requirements early will help the self-sufficiency of the site, providing the longer-term environment for a more effective resource management approach as well as a spirit of active citizenship, participation and stewardship of the village assets.

- 9.88 Development proposals should demonstrate how ongoing management is to be achieved in line with the key Garden Communities principle on legacy and stewardship arrangements. Active participation in the design and delivery will foster a sense of belonging and continued participation in the village life and stewardship of assets. The setup of such arrangements are to be funded by the development from the outset.
- 9.89 A delivery and legacy management strategy should be developed, in collaboration with development management, local authority departments (highways, planning, property), the Parish Council, utility service providers, land trusts, to find the best model to achieve the desired outcome, without a long-term disproportionate and unsustainable financial burden on any one stakeholder group.
- 9.90 Equally, thinking creatively about land registry solutions, such as creating covenants to achieve key stewardship elements for the maintenance of front of house green verges, or treatment of front gardens, for example, should be considered.
- 9.91 The Legacy Management Strategy should include the elements of logistics, project management, governance arrangements, code of construction, amongst others, to give assurance around the deliverability of the scheme, within a timely manner.

## Strategic Residential-Led and Mixed-Use Allocations

### West Horndon Industrial Estate

#### **POLICY R02: LAND AT WEST HORNDON INDUSTRIAL ESTATE**

Land at West Horndon Industrial Estate is allocated for residential-led mixed use development.

##### **1. Amount and Type of Development**

Development should provide:

- a. around 580 new homes;
- b. around 60 bed residential care home or an appropriate mix of specialist accommodation to meet identified needs, in accordance with policy HP04;
- c. 5% self-build and custom build across the entire allocation area;
- d. around 2ha of land for employment purposes which may include light industrial, offices, research and development (within class E) or other sui generis employment uses which are compatible with the residential development;
- e. retail, commercial and leisure floorspace sufficient to meet the needs of the new community.

## **2. Development Principles**

Proposals should:

- a. be accompanied by a comprehensive masterplan and phasing strategy to inform detailed proposals as they come forward;
- b. provide vehicular access via Station Road and Childerditch Lane;
- c. create a new village centre, connected by sustainable links to West Horndon station, and which comprises retail and supporting community facilities;
- d. provide new and enhanced links with West Horndon station and the wider area; and
- e. provide well-connected internal road layouts which allow for good accessibility;
- f. provide new multi-functional green infrastructure, including public open space in accordance with Policies NE02 and NE05;
- g. provide for appropriate landscaping and buffers along sensitive boundary adjoining the railway line; and
- h. any future development should sustain and where possible enhance the significance of the Scheduled former parish church and churchyard of St Nicholas, the Grade II\* listed Registered Park and Garden of Thorndon Hall, and the Thorndon Park Conservation Area and their settings.

## **3. Infrastructure Requirements**

- a. provision of improved bus service;

- b. provision of health facilities; and
- c. as the site is located within a Critical Drainage Area, development should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage.

#### 4. Infrastructure Contributions

Applicants will also be required to make necessary financial contributions via planning obligations towards:

- a. off-site highway infrastructure improvements as may be reasonably required by National Highways (M25, J28 and J29) and Essex County Council (A127/B186) in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);
- b. necessary bus services to secondary school facilities prior to the delivery of secondary school at Dunton Hills Garden Village, which services shall be secured before first residential occupation of the development;
- c. phased improvements to West Horndon Station in accordance with policy BE08 to increase its capacity and utility in line with anticipated demand generated by each phase of the development.

- 9.92 This site is situated on the western side of West Horndon adjoining the railway station in the centre of the village. The site will provide for around 580 homes, anticipated to be delivered between 2026/27 and 2032/33. This will deliver a high quality sustainable new development that maximises opportunities for travel by sustainable modes. It will provide a mix of size and type of homes including affordable, self-build and custom build, appropriately accessible and adaptable housing, as well as other types of specialist housing in accordance with the Council's policy requirements.
- 9.93 The development will take its main vehicular access from Station Road and will be expected to adequately mitigate its likely impacts on the performance of the local and strategic road network.
- 9.94 This development is in close proximity to the existing village and well located to existing facilities including the train station, shop, public house and village hall.
- 9.95 Opportunities for sustainable transport modes should be maximised to allow for alternative forms of transport to the private car (walking, cycling and public transport) are prioritised.
- 9.96 The development is expected to promote the highest standards of design to ensure inclusive and high-quality buildings and spaces.

- 9.97 Development of this site will need to sustain and, where opportunities arise, enhance the Scheduled former parish church and churchyard of St Nicholas, the Grade II\* listed Registered Park and Garden of Thorndon Hall, and Thorndon Park Conservation Area and their settings.
- 9.98 The development will be required to provide appropriate landscaping and buffers to preserve the amenity of adjoining residential properties. Buffers will also be required along sensitive boundaries adjoining the railway line.
- 9.99 As the site is located within a Critical Drainage Area early consultation with the Lead Local Flood Authority (Essex County Council) will be required to determine appropriate mitigation which should be incorporated into the overall design of the scheme.

## Land North of Shenfield, Shenfield

### **POLICY R03: LAND NORTH OF SHENFIELD**

Land north of Shenfield, known as Officer's Meadow and surrounding land is allocated for residential-led mixed-use development.

#### **1. Amount and Type of Development**

Development should provide:

- a. around 825 new homes;
- b. around 2.1 hectares of land for a co-located primary school and early years and childcare nursery;
- c. around 60 bed residential care home or an appropriate mix of specialist accommodation to meet identified needs, in accordance with policy HP04;
- d. 5% self-build and custom build across the entire allocation area; and
- e. around 2ha of land for employment purposes which may include light industrial, offices, research and development (within class E) or other sui generis employment uses which are compatible with the residential development.

#### **2. Development Principles**

Development should:



- a. be accompanied by a comprehensive masterplan and phasing strategy to inform detailed proposals as they come forward;
- b. be of a design quality and layout that reflects its key gateway location, particularly on land near to Junction 12, A12;
- c. provide vehicular access via Chelmsford Road (A1023) and Alexander Lane;
- d. allow if possible for the diversion of Alexander Lane to create a quiet lane for pedestrians and cyclists, with the provision for new and improved route through the development site linking to Chelmsford Road;
- e. enhance walking, cycling and public transport services with Shenfield station and local services and facilities in the wider area, including Brentwood Town Centre;
- f. provide well-connected internal road layouts which allow for good accessibility;
- g. provide new multi-functional green infrastructure including public open space in accordance with Policies NE02 and NE05;
- h. maintain and enhance Public Rights of Way within the site and to the wider area;
- i. protect and where appropriate enhance the Local Wildlife Site (Arnold's Wood).
- j. provide for appropriate landscaping and buffers along sensitive boundaries adjoining the A12 and railway line.
- k. maintain the same amount of existing playing field provision on site or, where this cannot be achieved, provide replacement playing fields (including supporting ancillary facilities) of equivalent or better provision in terms of quantity and quality in a suitable location prior to commencement of development on the playing field. Any replacement playing field provision should not prejudice Shenfield High School or the community from meeting their playing pitch needs; and
- l. be designed to ensure a coherent functional relationship with the existing development, which should be well integrated into the layout of the overall masterplan.

### 3. Infrastructure Requirements

Proposals should

- a. provide pedestrian and cycle crossing points across Chelmsford Road (A1023) where appropriate;
- b. provide an improved bus service;
- c. as the site is located within a Critical Drainage Area, development should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage.

#### 4. Infrastructure Contributions

Applicants will also be required to make necessary financial contributions via planning obligations towards:

- a. off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);
- b. 'quiet way' cycle routes connecting transfer hubs to schools in Brentwood Town Centre.

- 9.100 This policy does not apply to the existing properties that existed prior to the adoption of the Plan.
- 9.101 This site is situated to the north of Shenfield with the A12 adjoining the northern boundary and railway line to the east. The site will provide for around 825 homes, anticipated to be delivered between 2023/24 and 2030/31. This will deliver a high quality sustainable new development that maximises opportunities for travel by sustainable modes. It will provide a mix of size and type of homes including affordable, self-build and custom build, appropriately accessible and adaptable housing, as well as other types of specialist housing in accordance with the Council's policy requirements.
- 9.102 As the allocation comprises a number of parcels which could be brought forwards at different times it is important that consideration is given to how the site will develop holistically. As individual parcels are brought forwards any masterplan will need to appropriately consider and reflect what is being proposed elsewhere on the site. This is particularly important in ensuring that collective requirements for infrastructure provision are considered and delivered appropriately.
- 9.103 Given the scale of development, a wide range of new community services and facilities including a new co-located primary school and early years and childcare nursery, open space and play facilities are required. These services and facilities should be of an appropriate scale to serve the new communities and located where they will be easily accessible by walking, cycling and public transport.

- 9.104 The scale of development in this location will require a new primary school with co-located early years and childcare nursery located on 2.1ha of land. A comprehensive approach will be necessary to deliver this early on in the development.
- 9.105 The development will take its main vehicular access from Chelmsford Road (A1023) and will be expected to adequately mitigate its likely impacts on the performance of the local and strategic road network.
- 9.106 Opportunities for sustainable transport modes should be maximised to create neighbourhoods where alternative forms of transport to the private car (walking, cycling and public transport) are prioritised. New and enhanced pedestrian and cycle connections will be expected to be provided within the site and to the wider area. As parts of the site are separated by Chelmsford Road (A1023) pedestrian and cycle crossings need to be provided where appropriate to allow for safe connection between the two areas. Opportunities to improve and enhance pedestrian and cycle connectivity with Shenfield station, local services and shops should also be explored.
- 9.107 The development will be required to provide appropriate habitat mitigation and creation, and appropriate buffers to the Local Wildlife Site (Arnold's Wood). The site falls within the Shenfield CDA and is at potential risk of flooding from surface water as show on the EAs Risk of Flooding From Surface Water Maps. Any development within this area should be directed away from areas of existing flooding and where possible should try to have a positive impact on existing areas of flood risk downstream of the development. Early Engagement with the LLFA in this area is critical to ensure that existing and potential flood risk is properly managed.

## Ford Headquarters and Council Depot, Warley

### POLICY R04: FORD HEADQUARTERS AND COUNCIL DEPOT

The Ford Headquarters and Council Depot, Warley is allocated for residential-led mixed use development.

#### 1. Amount and Type of Development

Development should provide:

- a. 133 new homes;
- b. around 60 bed residential care home or an appropriate mix of specialist accommodation to meet identified needs, in accordance with policy HP04.
- c. 5% self-build and custom build housing across the entire allocation area; and

- d. around 2ha of land for employment purposes which may include light industrial, offices, research and development (within class E) or other sui generis employment uses which are compatible with the residential development.

## **2. Development Principles**

Proposals should:

- a. be accompanied by a comprehensive masterplan and phasing strategy to inform detailed proposals as they come forward;
- b. provide vehicular access via Eagle Way and The Drive;
- c. provide well-connected internal road layouts which allows for good accessibility;
- d. integrate existing community facilities within new development;
- e. provide for new multi-functional green infrastructure including public open space in accordance with Policies NE02 and NE05
- f. any future development should sustain and where possible enhance the significance of the Grade II listed Blenheim House and the Chapel of the Royal Anglian and Essex Regiments and their settings;
- g. protect and where appropriate enhance the Local Wildlife Sites (Barrack Wood/Donkey Lane Plantation); and
- h. provide an improved bus service.

## **3. Drainage**

As the site is located within a Critical Drainage Area, development should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage.

## **4. Infrastructure Contributions**

Applicants will also be required to make necessary financial contributions via planning obligations towards:

- a. off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);

- b. 'quiet way' cycle routes connecting transfer hubs to schools in Brentwood Town Centre.

- 9.108 This site is situated to the south of the Warley urban area. The site will provide for around 133 homes, anticipated to be delivered between 2022/23 and 2024/25. This will deliver a high quality sustainable new development that maximises opportunities for travel by sustainable modes. It will provide a mix of size and type of homes including affordable, self-build and custom build, appropriately accessible and adaptable housing, as well as other types of specialist housing in accordance with the Council's policy requirements.
- 9.109 The development will take its main vehicular access from Eagle Way and The Drive and will be expected to adequately mitigate its likely impacts on the performance of the local and strategic road network.
- 9.110 It is expected that existing community facilities adjoining the site (e.g. Brentwood Imperial Youth Band) will be integrated into the development.
- 9.111 Development of this site will need to sustain and, where opportunities arise, enhance the Grade II listed Blenheim House and the Chapel of the Royal Anglian and Essex Regiments and their settings. This development should be of high quality design. The historic context of the site including previous use by the Essex Regiment and current use by Ford Motor Company provides an opportunity to promote local history.
- 9.112 The development will be required to provide appropriate habitat mitigation and creation, and appropriate buffers to the Local Wildlife Site, Barrack Wood/Donkey Lane Plantation.
- 9.113 As the site is located within a Critical Drainage Area early consultation with the Lead Local Flood Authority (Essex County Council) will be required to determine appropriate mitigation which should be incorporated into the overall design of the scheme.

# Residential-Led Allocations

## Land off Nags Head Lane, Brentwood

### **POLICY R06: LAND OFF NAGS HEAD LANE**

Land off Nags Head Lane, Brentwood is allocated for around 125 new homes.

#### **1. Development Principles**

Proposals should:

- a. provide vehicular access via Nags Head Lane;
- b. provide good pedestrian and cycle connections to routes identified within the Brentwood Cycle Action Plan or other relevant evidence;
- c. provide public open space in accordance with policies NE02 and NE05; and
- d. provide sensitive landscaping along the north and eastern boundaries adjoining existing commercial development and residential dwellings; and
- e. any future development at R06 should sustain and where possible enhance the significance of The Grade II listed Nags Head public house and its setting.

#### **2. Drainage**

As the site is located within a Critical Drainage Area, developments should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage .

#### **3. Infrastructure Contributions**

Applicants will also be required to make necessary financial contributions via planning obligations towards:

- a. off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);

- b. 'quietway' cycle routes connecting transfer hubs to schools in Brentwood Town Centre.

- 9.114 This site is situated to the west of the Brentwood urban area bounded by the railway line and Nags Head Lane. Residential properties and retail units adjoin the site to the north and further residential properties adjoin the eastern boundary. The site will provide for around 125 homes, anticipated to be delivered between 2022/23 and 2025/26. It will provide a mix of size and type of homes including affordable in accordance with the Council's policy requirements.
- 9.115 The development will take its main vehicular access from Nags Head Lane and will be expected to adequately mitigate its likely impacts on the performance of the local and strategic road network.
- 9.116 Development of this site will need to sustain and, where opportunities arise, enhance the Grade II listed Nags Head public house and its setting. This development should be of high quality design.
- 9.117 As the site is located within a Critical Drainage Area early consultation with the Lead Local Flood Authority (Essex County Council) will be required to determine appropriate mitigation which should be incorporated into the overall design of the scheme.

## Sow and Grow Nursery, Pilgrims Hatch

### **POLICY R07: SOW AND GROW NURSERY**

Sow and Grow Nursery, Pilgrims Hatch is allocated for around 38 new homes.

#### **1. Development Principles**

Proposals should:

- a. provide vehicular access via Ongar Road;
- b. provide good pedestrian and cycle connections to routes identified within the Brentwood Cycle Action Plan or other relevant evidence;

- c. any future development should sustain and where possible enhance the significance of the Grade II listed Registered Park and Garden of South Weald Park and its setting; and
- d. provide sensitive landscaping along the southwestern boundary adjoining the allotments.

## 2. Drainage

As the site is located within a Critical Drainage Area development should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage .

## 3. Infrastructure Contributions

Applicants will also be required to make necessary financial contributions via planning obligations towards:

- a. off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);
- b. 'quietway' cycle routes connecting transfer hubs to schools in Brentwood Town Centre.

- 9.118 This site is situated to the south west of Pilgrims Hatch on off Ongar Road (A128). Residential properties are situated to the north and on the opposite side of Ongar Road (A128). Allotments and agricultural fields adjoin the site to the west. The site will provide for around 38 homes, anticipated to be delivered in 2022/23. It will provide a mix of size and type of homes including affordable in accordance with the Council's policy requirements.
- 9.119 The development will take its main vehicular access from Ongar Road (A128) and will be expected to adequately mitigate its likely impacts on the performance of the local and strategic road network.
- 9.120 Development of this site will need to sustain and, where opportunities arise, enhance the Grade II listed Registered Park and Garden of South Weald Park and its setting. This development should be of high quality design and will be required to provide appropriate landscaping and buffers to protect the amenity of the adjoining allotments and setting of the Historic Park and Garden at South Weald Park.
- 9.121 As the site is located within a Critical Drainage Area early consultation with the Lead Local Flood Authority (Essex County Council) will be required to determine appropriate mitigation which should be incorporated into the overall design of the scheme.



## Land at Mascalls Lane, Warley

### POLICY R08: LAND AT MASCALLS LANE

Land at Mascalls Lane, Warley is allocated for around 9 new homes.

#### 1. Development Principles

Proposals should:

- a. provide vehicular access via Mascalls Lane; and
- b. provide appropriate landscaping along sensitive north, east and western boundaries adjoining existing residential dwellings.

#### 2. Drainage

As the site is located within a Critical Drainage Area, development should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage.

- 9.122 This site is situated to the south of Warley on land off Mascalls Lane. Existing residential properties adjoin the site on the north, east and western boundaries. The site will provide for around 9 homes, anticipated to be delivered in 2022/23.
- 9.123 The development will take its main vehicular access from Mascalls Lane and will be expected to adequately mitigate its likely impacts on the performance of the local and strategic road network.
- 9.124 As the site is located within a Critical Drainage Area early consultation with the Lead Local Flood Authority (Essex County Council) will be required to determine appropriate mitigation which should be incorporated into the overall design of the scheme.

# Land off Warley Hill, Warley

## POLICY R09: LAND OFF WARLEY HILL

Land off Warley Hill, Warley is allocated for around 43 new homes.

### 1. Development Principles

Proposals should:

- a. provide vehicular access via Pastoral Way; and
- b. any future development should sustain and where possible enhance the significance of the Grade II listed Warley Hospital, Tower at Warley Hospital and Lodge to Warley Hospital and their settings; and;
- c. provide for sensitive landscaping throughout the site and consider the need for the retention of some existing trees on site where appropriate.

### 2. Drainage

As the site is located within a Critical Drainage Area, development should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage

### 3. Infrastructure Contributions

Applicants will also be required to make necessary financial contributions via planning obligations towards:

- a. off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);
- b. 'quietway' cycle routes connecting transfer hubs to schools in Brentwood Town Centre.

9.125 This site is situated near the centre of Warley on land west of Warley Hill (B186) to the south of Warley on land off Mascalls Lane. Residential properties lie to the north east and north west of the site with established woodland adjoining the western boundary. The site will provide for around 43 homes, anticipated to be delivered between 2022/23 and 2023/24. It will provide a mix of size and type of homes including affordable in accordance with the Council's policy requirements.

- 9.126 The development will take its main vehicular access from Pastoral Way. Development will be expected to adequately mitigate its likely impacts on the performance of the local and strategic road network.
- 9.127 The site forms part of the former Warley Hospital estate with nearby Grade II Listed Buildings situated to the north (Tower House and Lodge at Warley Hospital). Development of this site will need to sustain and, where opportunities arise, enhance the Grade II listed Warley Hospital, Tower at Warley Hospital and Lodge to Warley Hospital and their settings. This development should be of high quality design.
- 9.128 As the site is located within a Critical Drainage Area early consultation with the Lead Local Flood Authority (Essex County Council) will be required to determine appropriate mitigation which should be incorporated into the overall design of the scheme.

## Brentwood Railway Station car park, Brentwood

### POLICY R10: BRENTWOOD RAILWAY STATION CAR PARK

Brentwood Railway Station car park is allocated for around 200 new homes.

#### 1. Development Principles

Proposals should:

- a. provide vehicular access via St. James Road;
- b. provide good pedestrian and cycle connections to routes identified within the Brentwood Cycle Action Plan or other relevant evidence;
- c. provide public open space as required by Policy NE05; and
- d. ensure that the level of parking on site is sufficient to meet existing and future rail traveller needs.

#### 2. Drainage

As the site is located within a Critical Drainage Area, development should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage.

#### 3. Infrastructure Contributions

Applicants will also be required to make necessary financial contributions via planning obligations towards:

- a. off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);
- b. 'quietway' cycle routes connecting transfer hubs to schools in Brentwood Town Centre.

- 9.129 This site is situated in Brentwood on land west of Brentwood railway station. The site is bounded by the railway line to the south and there are residential dwellings situated to the north. The site will provide for around 200 homes, anticipated to be delivered between 2029/30 and 2032/33. It will provide a mix of size and type of homes including affordable in accordance with the Council's policy requirements.
- 9.130 The development will take its main vehicular access from St James Road and will be expected to adequately mitigate its likely impacts on the performance of the local and strategic road network.
- 9.131 With the site being centrally located opportunities to create improved connections and public realm enhancement, including the creation of public open space should be maximised.
- 9.132 Opportunities for sustainable transport modes should be maximised to allow for alternative forms of transport to the private car (walking, cycling and public transport) to be prioritised.
- 9.133 As the site is located within a Critical Drainage Area early consultation with the Lead Local Flood Authority (Essex County Council) will be required to determine appropriate mitigation which should be incorporated into the overall design of the scheme.

## Westbury Road Car Park, Brentwood

### **POLICY R11: WESTBURY ROAD CAR PARK**

Land off Westbury Road, Brentwood is allocated for around 45 new homes.

#### **1. Development Principles**

Proposals should:

- a. provide vehicular access via Westbury Road;

- b. be designed to a high standard to meet the objectives of the Town Centre Design Plan as part of a key opportunity area;
- c. provide good pedestrian and cycle connections to routes identified within the Brentwood Cycle Action Plan or other relevant evidence;
- d. any future development at R11 should sustain and where possible enhance the significance of the Brentwood Town Centre Conservation Area and the Grade II listed building at 120 High Street and their settings;
- e. be accompanied by a heritage assessment taking account of archaeological potential for the historic core of Brentwood; and
- f. the retention of public parking spaces to be reconfigured and integrated with the new development, provided that the number of spaces to be included is sufficient to meet overall town centre public parking needs in combination with other public parking provision within the town centre.

## 2. Drainage

As the site is located within a Critical Drainage Area, developments should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage .

## 3. Infrastructure Contributions

Applicants will also be required to make necessary financial contributions via planning obligations towards:

- a. off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);
- b. 'quietway' cycle routes connecting transfer hubs to schools in Brentwood Town Centre.

9.134 This site is located within Brentwood Town Centre on land south of the High Street (A1023) and west of Kings Road. Residential properties adjoin the southern boundary and business uses lie to the east. The site will provide for around 45 homes, anticipated to be delivered in 2023/24. It will provide a mix of size and type of homes including affordable in accordance with the Council's policy requirements.

9.135 The development will take its main vehicular access from Westbury Road and will be expected to adequately mitigate its likely impacts on the performance of the local and strategic road network.

- 9.136 The site is situated in an important central location in within Brentwood Town Centre. Development of this site will need to sustain and, where opportunities arise, enhance the Grade II listed building at 120 High Street, and the Brentwood Town Centre Conservation Area and their settings.
- 9.137 As the site is located within a Critical Drainage Area early consultation with the Lead Local Flood Authority (Essex County Council) will be required to determine appropriate mitigation which should be incorporated into the overall design of the scheme.

## Land at Hunter House, Brentwood

### POLICY R12: LAND AT HUNTER HOUSE

Land at Hunter House is allocated for around 48 new homes.

#### 1. Development Principles

Proposals should:

- a. provide vehicular access via Western Road;
- b. provide good pedestrian and cycle connections to routes identified within the Brentwood Cycle Action Plan or other relevant evidence;
- c. any future development at R12 should sustain and where possible enhance the significance of the Brentwood Town Centre Conservation Area and its setting; and
- d. be accompanied by a heritage assessment taking account of archaeological potential for the historic core of Brentwood.

#### 2. Drainage

As the site is located within a Critical Drainage Area, development should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage .

#### 3. Infrastructure Contributions

Applicants will also be required to make necessary financial contributions via planning obligations towards:

- a. off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance

with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);

- b. 'quietway' cycle routes connecting transfer hubs to schools in Brentwood Town Centre.

- 9.138 This site is located within Brentwood Town Centre on land adjacent to Western Road, south of William Hunter Way and the western end of the High Street (A1023). The site is adjoined by residential dwellings and commercial premises on all boundaries. The site will provide for around 48 homes, anticipated to be delivered between 2025/26 and 2026/27. It will provide a mix of size and type of homes including affordable in accordance with the Council's policy requirements.
- 9.139 The development will take its main vehicular access from Western Road and will be expected to adequately mitigate its likely impacts on the performance of the local and strategic road network.
- 9.140 Development of this site will need to sustain and, where opportunities arise, enhance the Brentwood Town Centre Conservation Area and its setting. This development should be of high quality design.
- 9.141 As the site is located within a Critical Drainage Area early consultation with the Lead Local Flood Authority (Essex County Council) will be required to determine appropriate mitigation which should be incorporated into the overall design of the scheme.

## Chatham Way car park, Brentwood

### POLICY R13: CHATHAM WAY CAR PARK

Chatham Way car park, Brentwood is allocated for around 31 new homes.

#### 1. Development Principles

Proposals should:

- a. provide vehicular access via Chatham Way;
- b. provide good pedestrian and cycle connections;

- c. retain as much public car parking as possible;
- d. any future development should sustain and where possible enhance the Brentwood Town Centre Conservation Area and its setting;
- e. be accompanied by a heritage assessment taking account of archaeological potential for the historic core of Brentwood; and
- f. the retention of public parking spaces to be reconfigured and integrated with the new development, provided that the number of spaces to be included is sufficient to meet overall town centre public parking needs in combination with other public parking provision within the town centre .

## **2. Drainage**

As the site is located within a Critical Drainage Area, development should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage .

## **3. Infrastructure Contributions**

Applicants will also be required to make necessary financial contributions via planning obligations towards:

- a. off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);
- b. 'quietway' cycle routes connecting transfer hubs to schools in Brentwood Town Centre.

9.142 This site is located within Brentwood Town Centre on land between Chatham Way and Crown Street at the western end of the High Street (A1023). The site is adjoined by residential dwellings and commercial premises on all boundaries. The site will provide for around 31 homes, anticipated to be delivered in 2026/27. It will provide a mix of size and type of homes including affordable in accordance with the Council's policy requirements.

9.143 The development will take its main vehicular access from Chatham Way. It will be expected to adequately mitigate its likely impacts on the performance of the local and strategic road network.

9.144 Development of this site will need to sustain and, where opportunities arise, enhance the Brentwood Town Centre Conservation Area and its setting. This development should be of high-quality design.



- 9.145 As the site is located within a Critical Drainage Area early consultation with the Lead Local Flood Authority (Essex County Council) will be required to determine appropriate mitigation which should be incorporated into the overall design of the scheme.

## William Hunter Way car park, Brentwood

### **POLICY R14: WILLIAM HUNTER WAY CAR PARK**

William Hunter Way car park, Brentwood is allocated for residential-led mixed use development.

#### **1. Amount and Type of Development**

Development should provide:

- a. around 300 new homes of mixed size and type, including affordable housing; and
- b. retail, commercial and leisure floorspace sufficient to meet the needs of the new community.

#### **2. Development Principles**

Proposals should:

- a. provide vehicular access via William Hunter Way;
- b. be designed to a high standard to meet the objectives of the Town Centre Design Plan as part of a key opportunity area;
- c. be the subject of a comprehensive masterplan to inform detailed proposals as they come forward, to include full consideration of the sensitive site edges;
- d. provide good pedestrian and cycle connections to routes identified in the Brentwood Cycle Action Plan or other relevant evidence;
- e. any future development should sustain and where possible enhance the Brentwood Town Centre Conservation Area and its setting ;
- f. be accompanied by a heritage assessment taking account of archaeological potential for the historic core of Brentwood; and
- g. the retention of public parking spaces to be reconfigured and integrated with the new development, provided that the number of spaces to be

included is sufficient to meet overall town centre public parking needs in combination with other public parking provision within the town centre .

### **3. Drainage**

As the site is located within a Critical Drainage Area, development should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage.

### **4. Infrastructure Contributions**

Applicants will also be required to make necessary financial contributions via planning obligations towards:

- a. off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);
- b. 'quietway' cycle routes connecting transfer hubs to schools in Brentwood Town Centre.

- 9.146 This site is located within Brentwood Town Centre on land to the north of the High Street (A1023) along William Hunter Way. The site is adjoined by residential dwellings on the north, east and western boundaries with commercial premises to the south. The site will provide for around 300 homes, anticipated to be delivered in 2026/27. It will provide a mix of size and type of homes including affordable in accordance with the Council's policy requirements. In addition, retail use is expected to be delivered on site due to its prominent town centre location.
- 9.147 The development will take its main vehicular access from William Hunter Way. It will be expected to adequately mitigate its likely impacts on the performance of the local and strategic road network.
- 9.148 Development of this site will need to sustain and, where opportunities arise, enhance the Brentwood Town Centre Conservation Area and its setting. This development should be of high quality design.
- 9.149 As the site is located within a Critical Drainage Area early consultation with the Lead Local Flood Authority (Essex County Council) will be required to determine appropriate mitigation which should be incorporated into the overall design of the scheme.

# Wates Way Industrial Estate, Brentwood

## POLICY R15: WATES WAY INDUSTRIAL ESTATE

Wates Way Industrial Estate, Brentwood is allocated for residential-led mixed use development.

### 1. Amount and Type of Development

Development should provide:

- a. around 46 new homes; and
- b. retail, commercial and leisure floorspace sufficient to meet the needs of the new community.

### 2. Development Principles

Proposals should:

- a. provide vehicular access via Ongar Road;
- b. provide public open space as required by policy NE05; and
- c. provide good pedestrian and cycle connections to routes identified in the Brentwood Cycle Action Plan or other relevant evidence.
- d. consideration of historic context for the area.

### 3. Drainage

As the site is located within a Critical Drainage Area, development should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage.

### 4. Infrastructure Contributions

Applicants will also be required to make necessary financial contributions via planning obligations towards:

- a. off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);
- b. 'quietway' cycle routes connecting transfer hubs to schools in Brentwood Town Centre.

- 9.150 This site is located within Brentwood Town Centre on land off Ongar Road (A128). The site is adjoined by residential dwellings on the north eastern boundary with further residential and commercial units on the south east and south western boundaries. The site will provide for around 46 homes, anticipated to be delivered between 2022/23 and 2023/24. It will provide a mix of size and type of homes including affordable in accordance with the Council's policy requirements. In addition, retail/commercial use is expected to be delivered on site.
- 9.151 The development will take its main vehicular access from Ongar Road (A128). It will be expected to adequately mitigate its likely impacts on the performance of the local and strategic road network.
- 9.152 With the site being centrally located opportunities to create improved connections and public realm enhancement, including the creation of public open space should be maximised.
- 9.153 As the site is located within a Critical Drainage Area early consultation with the Lead Local Flood Authority (Essex County Council) will be required to determine appropriate mitigation which should be incorporated into the overall design of the scheme.

## Land off Doddinghurst Road, Pilgrims Hatch and Brentwood

### **POLICY R16: LAND OFF DODDINGHURST ROAD**

Land off Doddinghurst Road, Pilgrims Hatch and Brentwood is allocated for around 200 new homes.

#### **1. Development Principles**

Proposals should:

- a. provide vehicular access via Doddinghurst Road;
- b. provide public open space as required by policy NE05;
- c. provide good pedestrian and cycle connections to routes identified in the Brentwood Cycle Action Plan or other relevant evidence;
- d. provide appropriate landscaping and buffers along sensitive boundary adjoining the A12; and
- e. provide improved bus service.

## 2. Drainage

As the site is located within a Critical Drainage Area, development should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage .

## 3. Infrastructure Contributions

Applicants will also be required to make necessary financial contributions via planning obligations towards:

- a. off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);
- b. 'quietway' cycle routes connecting transfer hubs to schools in Brentwood Town Centre.

- 9.154 This site comprises two parcels of land separated by the A12. The northern parcel is situated to the south of Pilgrims Hatch and the southern parcel is to the north of Brentwood. Both parcels adjoin existing residential dwellings on two boundaries. The site will provide for around 200 homes, anticipated to be delivered between 2022/23 and 2025/26. It will provide a mix of size and type of homes including affordable in accordance with the Council's policy requirements.
- 9.155 The development will take its main vehicular access from Doddinghurst Road. It will be expected to adequately mitigate its likely impacts on the performance of the local and strategic road network.
- 9.156 Opportunities to create improved connections should be maximised to create a development where alternative forms of transport to the private car (walking, cycling and public transport) are prioritised. New and enhanced pedestrian and cycle connections will be expected to be provided within the site and to the wider area.
- 9.157 As the site is located within a Critical Drainage Area early consultation with the Lead Local Flood Authority (Essex County Council) will be required to determine appropriate mitigation which should be incorporated into the overall design of the scheme.

# Land at Priests Lane, Shenfield

## POLICY R19: LAND AT PRIESTS LANE

Land at Priests Lane, Shenfield is allocated for around 75 new homes.

### 1. Development Principles

Proposals should:

- a. provide vehicular access points via Priests Lane;
- b. provide public open space as required by policy NE05 or a financial contribution towards other open space improvements within the borough;
- c. provide good pedestrian and cycle connections to routes identified in the Brentwood Cycle Action Plan or other relevant evidence; and
- d. provide land for Endeavour School expansion; and
- e. provide replacement playing field provision in the form of an appropriate financial contribution being made towards new or enhanced playing field projects within the Borough.

### 2. Drainage

As the site is located within a Critical Drainage Area, development should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage.

### 3. Infrastructure Contributions

Applicants will also be required to make necessary financial contributions via planning obligations towards:

- a. off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);
- b. 'quietway' cycle routes connecting transfer hubs to schools in Brentwood Town Centre.

9.158 This site is located to the south of Shenfield on land off Priests Lane. The site adjoins the railway line on the south eastern boundary and residential dwellings on the north, east and

southern boundaries. The site will provide for around 75 homes, anticipated to be delivered between 2022/23 and 2023/24. It will provide a mix of size and type of homes including affordable housing in accordance with the Council's policy requirements.

- 9.159 The development will take its main vehicular access from Priests Lane. It will be expected to adequately mitigate its likely impacts on the performance of the local and strategic road network.
- 9.160 Opportunities to create improved connections should be maximised to create a development where alternative forms of transport to the private car (walking, cycling and public transport) are prioritised. New and enhanced pedestrian and cycle connections will be expected to be provided within the site and to the wider area.
- 9.161 The Endeavour School (a Special Educational Needs school) which adjoins the site to the south is seeking to expand to accommodate a 6th Form. Essex County Council welcomes this proposal and intends to commission some of the places for local children with an Education Health and Care Plan. The 6th form provision will enable local children to continue their education within their community and reduce travel time to specialist establishments elsewhere. The school does not currently have the available land to expand. Land adjoining the school within the development site should be utilised to accommodate the expansion.
- 9.162 The development of the site will result in the loss of land last used as Brentwood Ursuline School's detached playing fields and was also used by local football clubs. The Councils' Playing Pitch Strategy identifies deficiencies in playing pitch provision and recommends that the loss of this site be mitigated through the development of replacement facilities elsewhere in the Borough. Development of this site will therefore be expected to mitigate the loss of the playing fields through an appropriate financial contribution being secured towards the delivery of off-site playing field
- 9.163 As the site is located within a Critical Drainage Area early consultation with the Lead Local Flood Authority (Essex County Council) will be required to determine appropriate mitigation which should be incorporated into the overall design of the scheme.

## Land South of Ingatestone

### **POLICY R21: LAND SOUTH OF INGATESTONE**

Land south of Ingatestone, comprising former garden centre and A12 works site is allocated for around 161 new homes.

#### **1. Development Principles**

Proposals should:

- a. provide vehicular access via Roman Road;
- b. provide public open space as required by policy NE05;
- c. provide good pedestrian and cycle connections to routes identified in the Brentwood Cycle Action Plan or other relevant evidence;
- d. provide appropriate landscaping and buffers along sensitive boundary adjoining the A12 and railway line; and
- e. be accompanied by a heritage assessment taking account of archaeological potential for the proximity to Roman Road.

## **2. Drainage**

As the site is located within a Critical Drainage Area, development should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage.

## **3. Infrastructure Contributions**

Applicants will also be required to make necessary financial contributions via planning obligations towards off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes).

- 9.164 This site is located to the south of Ingatestone and north of Mountnessing on land between the railway line and Roman Road. Residential properties adjoin the site on the northern boundary. The site will provide for around 161 homes, anticipated to be delivered between 2022/23 and 2024/25. It will provide a mix of size and type of homes including affordable in accordance with the Council's policy requirements.
- 9.165 The development will take its main vehicular access from Roman Road. It will be expected to adequately mitigate its likely impacts on the performance of the local and strategic road network.
- 9.166 Opportunities to create improved connections should be maximised to create a development where alternative forms of transport to the private car (walking, cycling and public transport) are prioritised. New and enhanced pedestrian and cycle connections will be expected to be provided within the site and to the wider area.



- 9.167 The site lies within close proximity to a Roman Road so there is potential for archaeological remains to be present. A heritage assessment should be undertaken in accordance with Policy BE16 Conservation and Enhancement of Historic Environment.
- 9.168 As the site is located within a Critical Drainage Area early consultation with the Lead Local Flood Authority (Essex County Council) will be required to determine appropriate mitigation which should be incorporated into the overall design of the scheme.

## Land adjacent to the A12, Ingatestone

### POLICY R22: LAND ADJACENT TO THE A12, INGATESTONE

Land adjacent to the A12, Ingatestone is allocated for around 57 new homes.

#### 1. Development Principles

Proposals should:

- a. provide vehicular access via Roman Road;
- b. provide public open space as required by policy NE05;
- c. provide appropriate landscaping and buffers along sensitive boundary adjoining the A12; and
- d. be accompanied by a heritage assessment taking account of archaeological potential for the proximity to Roman Road.

#### 2. Drainage

As the site is located within a Critical Drainage Area, development should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage..

#### 3. Infrastructure Contributions

Applicants will also be required to make necessary financial contributions via planning obligations towards off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes).

- 9.169 This site is located to the south of Ingatestone on land between Roman Road and the A12. Residential properties adjoin the south east and south western boundaries. The site will

provide for around 57 homes, anticipated to be delivered between 2022/23 and 2023/24. It will provide a mix of size and type of homes including affordable in accordance with the Council's policy requirements.

- 9.170 The development will take its main vehicular access from Roman Road. It will be expected to adequately mitigate its likely impacts on the performance of the local and strategic road network.
- 9.171 Opportunities to create improved connections should be maximised to create a development where alternative forms of transport to the private car (walking, cycling and public transport) are prioritised. New and enhanced pedestrian and cycle connections will be expected to be provided within the site and to the wider area.
- 9.172 The site lies within close proximity to a Roman Road so there is potential for archaeological remains to be present. A heritage assessment should be undertaken in accordance with Policy BE16 Conservation and Enhancement of Historic Environment.
- 9.173 As the site is located within a Critical Drainage Area early consultation with the Lead Local Flood Authority (Essex County Council) will be required to determine appropriate mitigation which should be incorporated into the overall design of the scheme.

## Brizes Corner Field, Kelvedon Hatch

### **POLICY R23: BRIZES CORNER FIELD**

Brizes Corner Field, Kelvedon Hatch is allocated for around 23 new homes.

#### **1. Development Principles**

Proposals should:

- a. provide vehicular access via Blackmore Road; and
- b. provide public open space as required by policy NE05.

#### **2. Infrastructure Contributions**

Applicants will also be required to make necessary financial contributions via planning obligations towards off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);

- 9.174 This site is located to the south west of Kelvedon Hatch on land off Blackmore Road. Residential properties adjoin the site on the north east and north western boundaries. The site will provide for around 23 homes, anticipated to be delivered between 2022/23 and 2023/24. It will provide a mix of size and type of homes including affordable in accordance with the Council's policy requirements.
- 9.175 The development will take its main vehicular access from Blackmore Road. It will be expected to adequately mitigate its likely impacts on the performance of the local and strategic road network.

## Land off Stocks Lane, Kelvedon Hatch

### POLICY R24: LAND OFF STOCKS LANE

Land off Stocks Lane, Kelvedon Hatch is allocated for around 40 new homes.

#### 1. Development Principles

Proposals should:

- a. provide vehicular access via Stocks Lane; and
- b. provide open space as required by policy NE05.

#### 2. Infrastructure Contributions

Applicants will also be required to make necessary financial contributions via planning obligations towards off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);

- 9.176 This site is located to the south east of Kelvedon Hatch on land off Stocks Lane. Residential properties adjoin the north east and north western boundaries. The site will provide for around 40 homes, anticipated to be delivered between 2022/23 and 2023/24. It will provide a mix of size and type of homes including affordable in accordance with the Council's policy requirements.
- 9.177 The development will take its main vehicular access from Blackmore Road. It will be expected to adequately mitigate its likely impacts on the performance of the local and strategic road network.

# Land north of Woollard Way, Blackmore

## **POLICY R25: LAND NORTH OF WOOLLARD WAY**

Land north of Woollard Way, Blackmore is allocated for around 40 new homes.

### **1. Development Principles**

Proposals should:

- a. provide vehicular access via Redrose Lane or Nine Ashes Road;
- b. provide good pedestrian and cycle connections to routes identified in the Brentwood Cycle Action Plan or other relevant evidence;
- c. provide public open space as required by policy NE05; and
- d. be accompanied by a heritage assessment taking account of archaeological potential for the historic settlement of Blackmore.

### **2. Infrastructure Contributions**

Applicants will also be required to make necessary financial contributions via planning obligations towards off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes).

- 9.178 The site is located to the north of Blackmore on land off Redrose Lane and Woollard Way. Residential properties adjoin the site on the southern boundary. The site will provide for around 40 homes anticipated to be delivered between 2022/23 and 2023/24. It will provide a mix of size and type of homes including affordable in accordance with the Council's policy requirements.
- 9.179 The development will consider an appropriate main vehicular access via Redrose Lane or Nine Ashes Road. It will be expected to adequately mitigate its likely impacts on the performance of the local and strategic road network.
- 9.180 The site lies within close proximity to the historic settlement of Blackmore so there is potential for archaeological remains to be present. A heritage assessment should be undertaken in accordance with Policy BE16 Conservation and Enhancement of Historic Environment.

## Land north of Orchard Piece, Blackmore

### POLICY R26: LAND NORTH OF ORCHARD PIECE

Land north of Orchard Piece, Blackmore is allocated for around 30 new homes.

#### 1. Development Principles

Proposals should:

- a. provide vehicular access via Redrose Lane, Orchard Piece or Fingrith Hall Lane;
- b. provide good pedestrian and cycle connections to routes identified in the Brentwood Cycle Action Plan or other relevant evidence;
- c. provide public open space as required in policy NE05; and
- d. be accompanied by a heritage assessment taking account of archaeological potential for the historic settlement of Blackmore.

#### 2. Infrastructure Contributions

Applicants will also be required to make necessary financial contributions via planning obligations towards off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes).

- 9.181 The site is located to the north of Blackmore on land off Redrose Lane and Orchard Piece. Residential properties adjoin the site on the southern boundary. The site will provide for around 30 homes anticipated to be delivered between 2022/23 and 2023/24. It will provide a mix of size and type of homes including affordable in accordance with the Council's policy requirements.
- 9.182 The development will consider an appropriate main vehicular access via Redrose Lane, Orchard Piece or Fingrith Hall Lane. It will be expected to adequately mitigate its likely impacts on the performance of the local and strategic road network.
- 9.183 The site lies within close proximity to the historic settlement of Blackmore so there is potential for archaeological remains to be present. A heritage assessment should be undertaken in accordance with Policy BE16 Conservation and Enhancement of Historic Environment.

# Strategic Employment Allocations

## Brentwood Enterprise Park

9.184 The site is located at a key strategic location at the junction of the M25 and A127. Most of the site comprises the former M25 works site and associated uses and comprises previously developed land.

### **POLICY E11: BRENTWOOD ENTERPRISE PARK**

Land south east of M25 Junction 29 is allocated for around 25.85 ha of land for employment development (principally for offices, light industrial and research and development, B2 and B8 and other sui generis employment uses). Other ancillary supporting development within classes C1, E and F1 or other sui generis ancillary supporting development may be permitted as a means of supporting these principal employment uses.

#### **1. Development Principles**

Proposals should:

- a. be accompanied by a high quality landscaping scheme (including a scheme of maintenance) for the site as a whole with the objective also to provide improved visual amenity between the site and adjoining Green Belt;
- b. be of a high quality in terms of its design and layout to reflect its status as a key gateway site;
- c. protect and where possible enhance the adjoining Local Wildlife Site (Hobbs Hole);
- d. preserve and where possible enhance the Public Right of Way through the site.

#### **2. Infrastructure Requirements**

Proposals should provide:

- a. access via M25 Junction 29 and/or Warley Street (B186) and associated slip roads;

- b. well-connected internal road layouts which allows good accessibility for bus services;
- c. new public transport or Demand Responsive Travel links with the surrounding area; and
- d. good walking and cycling connections within the site and to the surrounding area.

### 3. Infrastructure Contributions

Applicants will also be required to make necessary financial contributions via planning obligations towards:

- a. off-site highway infrastructure improvements as may be reasonably required by National Highways (M25, J28 and J29) and Essex County Council (A127 and B186) in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes) unless, in the case of the Junction 29 mitigation and A127/B186 works, the applicant enters into a s.278 Agreement for its timely construction, if more appropriate;
- b. phased improvements to West Horndon Station in accordance with policy BE08 to increase its capacity and utility in line with anticipated demand generated by each of phase the development.

- 9.185 The site is located on land to the south of the A127 and east of the M25. Warley Street runs along the eastern boundary. Existing residential properties are situated to the east. The site will provide for at least 25.85 ha of land for employment use (principally use classes B1, B2, B8 and any associated employment generating sui generis uses). This employment allocation will make a considerable contribution towards the overall employment needs for the Borough. It is envisaged that due to the location of the site next to one of the Borough's key gateway, development on site should create a positive impression through high quality design and layout.
- 9.186 The development will be required to provide appropriate habitat mitigation, creation, and appropriate buffers to the Local Wildlife Site (Hobbs Hole).
- 9.187 The development has a number of potential access points including via the M25 Junction 29 and Warley Street (B186). It will be expected to adequately mitigate its likely impacts on the performance of the local and strategic road network.
- 9.188 Opportunities for sustainable transport modes should be maximised to create a development where alternative forms of transport to the private car (walking, cycling and public transport) are prioritised.

# Employment Allocations

## Childerditch Industrial Estate

### **POLICY E12: CHILDERDITCH INDUSTRIAL ESTATE**

Land at Childerditch Industrial Estate is allocated for around 20.54 ha of land for employment development which may comprise offices, light industrial, research and development (within Class E), B2, B8 or sui generis employment uses. Other ancillary supporting development may be permitted as a means of supporting these principal employment uses.

#### **1. Development Principles**

Proposals for development (including the redevelopment of existing developed areas) should:

- a. include appropriate landscaping treatment to improve visual amenity on site, and safeguard and where possible and appropriate, enhance the visual amenity of the adjoining green belt;
- b. provide access to the site via the eastbound A127;
- c. make provision for improved walking and cycling links within the site and to the surrounding area;
- d. provide new public transport or Demand Responsive Travel links with the surrounding area; and
- e. any future development should sustain and where possible enhance the significance of the Grade II\* listed Registered Park and Garden of Thorndon Hall, and the Thorndon Park Conservation Area and their settings.

#### **2. Infrastructure Contributions**

Applicants will also be required to make necessary financial contributions via planning obligations towards:

- a. off-site highway infrastructure improvements as may be necessary and reasonably required by National Highways (M25, J28 and J29) and Essex County Council (A127 and B186) in accordance with policies MG05 and



BE08 (the planning obligation will determine the level and timing of payments for these purposes);

- b. phased improvements to West Horndon Station in accordance with policy BE08 to increase its capacity and utility in line with anticipated demand generated by each of phase the development.

- 9.189 The site is located on land to the north of the A127 on land off Childerditch Hall Drive. A number of residential dwellings lie to the west of the site. The site will provide for 20.54 ha of land for employment use (principally use classes B1, B2, B8 and any associated employment generating sui generis uses).
- 9.190 The development will take its main vehicular access from the eastbound carriageway of the A127. It will be expected to adequately mitigate its likely impacts on the performance of the local and strategic road network.
- 9.191 Opportunities for sustainable transport modes should be maximised to create a development where alternative forms of transport to the private car (walking, cycling and public transport) are prioritised.
- 9.192 Development of this site will need to sustain and, where opportunities arise, enhance the Grade II\* listed Registered Park and Garden of Thorndon Hall, and the Thorndon Park Conservation Area and their settings. This development should be of high quality design.
- 9.193 The proposed development area is at potential risk of flooding from surface water as shown on the Environment Agency Risk of Flooding from Surface Water Maps. Any development within this area should be directed away from areas of existing flooding and, where possible, should try to have a positive impact on existing areas of flood risk downstream of the development. It should however be ensured that any development within this area complies with flood risk mitigation measures outlined in the Essex SuDS guide.

## Codham Hall Farm

### **POLICY E10: CODHAM HALL FARM**

Land at Codham Hall Farm, north east of M25 Junction 29 is allocated for around 9.6 ha of land for employment development which may comprise offices, light industrial, research and development (within Class E), B2, B8 or sui generis

employment uses. Other ancillary supporting development may be permitted as a means of supporting these principal employment uses.

### **1. Development Principles**

Proposals for development (including the redevelopment of existing developed areas) should:

- a. provide access via M25 Junction 29 and Warley Street (B186);
- b. protect and where possible enhance the adjoining Local Wildlife Site (Codham Hall Wood);
- c. preserve and where possible enhance the Public Right of Way through the site;
- d. provide good walking and cycling connections within the site and to the surrounding area; and
- e. be accompanied by an appropriate landscaping treatment scheme for the site as a whole to improve visual amenity on site, and safeguard and where possible and appropriate, enhance the visual amenity of the adjoining green belt.

### **2. Infrastructure Contributions**

Applicants will also be required to make necessary financial contributions via planning obligations towards:

- a. necessary off-site highway infrastructure improvements as may be reasonably required by National Highways (M25, J28 and J29) and Essex County Council (A127 and B186) in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes) unless, in the case of the A127/B186 works, the applicant enters into a s.278 Agreement for its timely construction, if more appropriate;
- b. phased improvements to West Horndon Station in accordance with policy BE08 to increase its capacity and utility in line with anticipated demand generated by each of phase the development.

9.194 The site is located on land to the north of the A127 and east of the M25. The site will provide for 9.6ha of employment land (principally use classes B1, B2, B8 and any associated employment generating sui generis uses).

- 9.195 The development will take its main vehicular access via the existing arrangement directly onto Junction 29 of the M25. It will be expected to adequately mitigate its likely impacts on the performance of the local and strategic road network.
- 9.196 The development will be required to provide appropriate habitat mitigation, creation, and appropriate buffers to the Local Wildlife Site (Codham Hall Wood).
- 9.197 Opportunities for sustainable transport modes should be maximised to create a development where alternative forms of transport to the private car (walking, cycling and public transport) are prioritised.
- 9.198 The proposed development area is at potential risk of flooding from surface water as shown on the Environment Agency Risk of Flooding from Surface Water Maps. Any development within this area should be directed away from areas of existing flooding and, where possible, should try to have a positive impact on existing areas of flood risk downstream of the development. It should however be ensured that any development within this area complies with flood risk mitigation measures outlined in the Essex SuDS guide.

## East Horndon Hall

### **POLICY E13: EAST HORNDON HALL**

Land at East Horndon Hall is allocated for around 5.5 ha of land for employment development which may comprise offices, light industrial, research and development (within Class E), B2, B8 or sui generis employment uses. Other ancillary supporting development may be permitted as a means of supporting these principal employment uses.

#### **1. Development Principles**

Proposals should:

- a. provide access via Old Tilbury Road;
- b. provide good walking and cycling connections within the site and the surrounding area; and
- c. any future development should sustain and where possible enhance the significance of East Horndon Hall and All Saints Church and their settings.

#### **2. Infrastructure Contributions**

Applicants will also be required to make necessary financial contributions via planning obligations towards:

- a. necessary off-site highway infrastructure improvements as may be reasonably required by National Highways (M25, J28 and J29) and Essex County Council (A127 and B186) in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);
- b. phased improvements to West Horndon Station in accordance with policy BE08 to increase its capacity and utility in line with anticipated demand generated by each of phase the development.

- 9.199 The site is located on land to the east of West Horndon, south of the A127 and west of Tilbury Road (A128). Some residential properties are situated to the east and south of the site. The site will provide for 5.5ha of employment land (principally use classes B1, B2, B8 and any associated employment generating sui generis uses).
- 9.200 Opportunities to create sustainable links with the strategic housing allocation of Dunton Hills Garden Village and West Horndon station should be maximised.
- 9.201 The development will take its main vehicular access from the Old Tilbury Road. It will be expected to adequately mitigate its likely impacts on the performance of the local and strategic road network.
- 9.202 Opportunities for sustainable transport modes should be maximised to create a development where alternative forms of transport to the private car (walking, cycling and public transport) are prioritised.
- 9.203 Development of this site will need to sustain and, where opportunities arise, enhance the Grade II listed East Horndon Hall and All Saints Church and their settings. This development should be of high quality design.
- 9.204 The proposed development area is at potential risk of flooding from surface water as shown on the Environment Agency surface water flooding maps. Any development within this area should be directed away from areas of existing flooding and, where possible, should have a positive impact on existing areas of flood risk downstream of the development. It should be ensured that any development within this area complies with flood risk mitigation measures outlined in the Essex SuDS guide.

## Land adjacent to A12 and Slip Road, Ingatestone

### POLICY E08: LAND ADJACENT TO A12 AND SLIP ROAD, INGATESTONE

Land adjacent to A12 and slip road, Ingatestone is allocated for around 2.06 ha of land for employment development which may comprise offices, light industrial, and research and development (within Class E), B2, B8 or sui generis employment uses. Other ancillary supporting development may be permitted as a means of supporting these principal employment uses.

#### 1. Development Principles

Proposals should:

- a. provide access via Roman Road (B1002) with highway improvements;
- b. provide good walking and cycling connections within the site and the surrounding area.

#### 2. Drainage

As the site is located within a Critical Drainage Area, development should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage.

#### 3. Infrastructure Contributions

Applicants will also be required to make necessary financial contributions via planning obligations towards off-site highway infrastructure improvements as may be reasonably required by National Highways (M25, J28 and J29) and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes).

- 9.205 The site is located on land to the south west of Ingatestone between the A12 and southbound off slip from the A12. Some residential properties are situated to the east and south of the site. The site will provide for 2.06ha of employment land (principally use classes B1, B2, B8 and any associated employment generating sui generis uses).
- 9.206 The primary purpose of the allocation is to deliver jobs for the area and so consideration will be given to other uses that enable job opportunities, taking account of market needs.
- 9.207 The development should achieve safe and suitable access(es) for all highway users, including pedestrians and cyclists. This will need to be undertaken in consultation with Essex County Council as the Highway Authority, and National Highways who control the A12 and

its slip roads. It will be expected to adequately mitigate its likely impacts on the performance of the local and strategic road network.

- 9.208 Opportunities for sustainable transport modes should be maximised to create a development where alternative forms of transport to the private car (walking, cycling and public transport) are prioritised.
- 9.209 The site falls within the Mountnessing CDA. Any development within this area should where possible try to have a positive impact on existing areas of flood risk downstream of the development. Early engagement with the LLFA in this area is critical to ensure that existing and potential flood risk is properly managed.



# Appendix 1



## Local Development Plan Housing Trajectory

	New Homes	HELAA Ref.	Policy Ref	Plan Period																
				Year 1 2016/17	Year 2 2017/18	Year 3 2018/19	Year 4 2019/20	Year 5 2020/21	Year 6 2021/22	Year 7 2022/23	Year 8 2023/24	Year 9 2024/25	Year 10 2025/26	Year 11 2026/27	Year 12 2027/28	Year 13 2028/29	Year 14 2029/30	Year 15 2030/31	Year 16 2031/32	Year 17 2032/33
Completions (2016/17 - 2020/21)	977			150	213	246	200	168												
Extant permissions (as at 1st April 2021) and minus non-implementation discount (10% of permission supply)	1036								155	261	230	210	180							
Windfall	434													62	62	62	62	62	62	62
<b>Local Plan Allocations</b>																				
<b>Brownfield Land within Brentwood Urban Area / Settlement Boundary</b>																				
Ford Headquarters and Council Depot, Warley - northern and southern site	133	081 / 117A / 117B	R04							25	50	58								
Brentwood Railway Station Car Park	200	002	R10													100	100			
Westbury Road Car Park, Westbury Road, Brentwood	45	039	R11							45										
Land at Hunter House, Western Road, Brentwood	48	041	R12										24	24						



	New Homes	HELAA Ref.	Policy Ref	Plan Period																		
				Year 1 2016/17	Year 2 2017/18	Year 3 2018/19	Year 4 2019/20	Year 5 2020/21	Year 6 2021/22	Year 7 2022/23	Year 8 2023/24	Year 9 2024/25	Year 10 2025/26	Year 11 2026/27	Year 12 2027/28	Year 13 2028/29	Year 14 2029/30	Year 15 2030/31	Year 16 2031/32	Year 17 2032/33		
Chatham Way / Crown Street Car Park Brentwood	31	040	R13												31							
William Hunter Way	300	102	R14												300							
Wates Way Industrial Estate, Ongar Road, Brentwood	46	003	R15							23	23											
<b>Brownfield Land within Brentwood Urban Area / Settlement Boundary Total</b>	<b>803</b>									<b>48</b>	<b>118</b>	<b>58</b>	<b>24</b>	<b>355</b>				<b>100</b>	<b>100</b>			
<b>Greenfield Land within Brentwood Urban Area / Settlement Boundary</b>																						
Land at Priests Lane, Brentwood	75	044 / 178	R19							30	45											
<b>Greenfield Land within Brentwood Urban Area / Settlement Boundary Total</b>	<b>75</b>									<b>30</b>	<b>45</b>											
<b>Brownfield Land within settlement boundary – Other Locations</b>																						
West Horndon Industrial Estates	580	020 / 021 / 152	R02												80	75	95	100	100	65	65	
<b>Brownfield Land within settlement boundary – Other Locations</b>	<b>580</b>														<b>80</b>	<b>75</b>	<b>95</b>	<b>100</b>	<b>100</b>	<b>65</b>	<b>65</b>	
<b>Green Belt Land – Edge of Brentwood Urban Area</b>																						
Land north of Shenfield	825	034 / 158 / 235 / 087 / 263 / 276	R03								50	100	125	125	125	125	100	75				
Land East of Nags Head Lane, Brentwood	125	032	R06							25	25	50	25									
Sow and Grow Nursery, Ongar Road, Pilgrims Hatch	38	010	R07							38												

				Plan Period																	
	New Homes	HELAA Ref.	Policy Ref	Year 1 2016/17	Year 2 2017/18	Year 3 2018/19	Year 4 2019/20	Year 5 2020/21	Year 6 2021/22	Year 7 2022/23	Year 8 2023/24	Year 9 2024/25	Year 10 2025/26	Year 11 2026/27	Year 12 2027/28	Year 13 2028/29	Year 14 2029/30	Year 15 2030/31	Year 16 2031/32	Year 17 2032/33	
Land Adjacent to Carmel, Mascalls Lane, Warley	9	027	R08							9											
Land west of Warley Hill, Pastoral Way, Warley	43	083	R09							20	23										
Land off Doddinghurst Road, either side of A12	200	023A / 23B	R16							50	50	50	50								
<b>Green Belt Land – Edge of Brentwood Urban Area Total</b>	<b>1,240</b>									<b>142</b>	<b>148</b>	<b>200</b>	<b>200</b>	<b>125</b>	<b>125</b>	<b>125</b>	<b>100</b>	<b>75</b>			
<b>Green Belt Land – Edge of Ingatestone</b>																					
Land south of Ingatestone, Ingatestone	161	128 / 106	R21							50	60	51									
Land Adjacent to Ingatestone By-pass	57	079A	R22							17	40										
<b>Green Belt Land – Edge of Ingatestone Total</b>	<b>218</b>									<b>67</b>	<b>100</b>	<b>51</b>									
<b>Green Belt Land – Larger Villages</b>																					
Brizes Corner Field, Blackmore Road, Kelvedon Hatch	23	194	R23							12	11										
Land off Stocks Lane, Kelvedon Hatch	40	075B	R24							20	20										
Land north of Woollard Way, Blackmore	40	077	R25							20	20										
Land south of Redrose Lane, north of Orchard Piece, Blackmore	30	076	R26							10	20										
<b>Green Belt Land – Larger Villages Total</b>	<b>133</b>									<b>62</b>	<b>71</b>										
<b>Strategic Allocation – Dunton Hills Garden Village</b>																					

	New Homes	HELAA Ref.	Policy Ref	Plan Period																	
				Year 1 2016/17	Year 2 2017/18	Year 3 2018/19	Year 4 2019/20	Year 5 2020/21	Year 6 2021/22	Year 7 2022/23	Year 8 2023/24	Year 9 2024/25	Year 10 2025/26	Year 11 2026/27	Year 12 2027/28	Year 13 2028/29	Year 14 2029/30	Year 15 2030/31	Year 16 2031/32	Year 17 2032/33	
Dunton Hills Garden Village	1,650	200	R01												150	250	250	250	250	250	250
<b>Strategic Allocation – Dunton Hills Garden Village Total</b>	<b>1,650</b>														<b>150</b>	<b>250</b>	<b>250</b>	<b>250</b>	<b>250</b>	<b>250</b>	<b>250</b>
<b>Allocation Total</b>	<b>4,699</b>									<b>349</b>	<b>482</b>	<b>309</b>	<b>224</b>	<b>710</b>	<b>450</b>	<b>470</b>	<b>550</b>	<b>525</b>	<b>315</b>	<b>315</b>	
<b>Total Housing Provision</b>	<b>7,146</b>			<b>150</b>	<b>213</b>	<b>246</b>	<b>200</b>	<b>168</b>	<b>155</b>	<b>610</b>	<b>712</b>	<b>519</b>	<b>404</b>	<b>772</b>	<b>512</b>	<b>532</b>	<b>612</b>	<b>587</b>	<b>377</b>	<b>377</b>	
<b>Housing requirement by year</b>	<b>7,752</b>			<b>300</b>	<b>300</b>	<b>300</b>	<b>300</b>	<b>300</b>	<b>300</b>	<b>300</b>	<b>300</b>	<b>400</b>	<b>400</b>	<b>400</b>	<b>400</b>	<b>400</b>	<b>400</b>	<b>984</b>	<b>984</b>	<b>984</b>	
<b>Performance against requirement within individual year</b>				<b>-150</b>	<b>-87</b>	<b>-54</b>	<b>-100</b>	<b>-132</b>	<b>-145</b>	<b>310</b>	<b>412</b>	<b>119</b>	<b>4</b>	<b>372</b>	<b>112</b>	<b>132</b>	<b>212</b>	<b>-397</b>	<b>-607</b>	<b>-607</b>	
<b>Housing provision cumulative total</b>				<b>150</b>	<b>363</b>	<b>609</b>	<b>809</b>	<b>977</b>	<b>1,132</b>	<b>1,742</b>	<b>2,454</b>	<b>2,973</b>	<b>3,377</b>	<b>4,149</b>	<b>4,661</b>	<b>5,193</b>	<b>5,805</b>	<b>6,392</b>	<b>6,769</b>	<b>7,146</b>	
<b>Housing requirement cumulative total</b>				<b>300</b>	<b>600</b>	<b>900</b>	<b>1,200</b>	<b>1,500</b>	<b>1,800</b>	<b>2,100</b>	<b>2,400</b>	<b>2,800</b>	<b>3,200</b>	<b>3,600</b>	<b>4,000</b>	<b>4,400</b>	<b>4,800</b>	<b>5,784</b>	<b>6,768</b>	<b>7,752</b>	
<b>Cumulative total deficit/suplus</b>				<b>-150</b>	<b>-237</b>	<b>-291</b>	<b>-391</b>	<b>-523</b>	<b>-668</b>	<b>-358</b>	<b>54</b>	<b>173</b>	<b>177</b>	<b>549</b>	<b>661</b>	<b>793</b>	<b>1005</b>	<b>608</b>	<b>1</b>	<b>-606</b>	

**5 year supply calculations**

Five year supply calculation at adoption (2021/22) Includes 20% buffer from Housing Delivery Test and accounts for deficit (446) from start of plan period to year before adoption (2016/17 to 2020/21) which has been annualised over the remainder of the plan period (12 years) (2021/22 to 2032/33) (Liverpool approach)	Total supply 2021/22 to 2025/26	2,400
	Local Plan annual housing requirement (2021/22 to 2025/26)	1,700
	Deficit (2016/17 to 2020/21) ÷ 12 years x 5 years	-218
	Housing Delivery Test 20% buffer (Local Plan annual requirement + deficit)	384
	Total five year requirement (with undersupply + 20% buffer)	2,302
	Annual five year requirement (Total requirement ÷ 5 years (rounded))	460
	Five year supply (years) = Total supply ÷ Annual five year requirement	<b>5.21</b>

# Appendix 2



## Strategic and non-strategic policies and their relationship to the Strategic Objectives

Strategic Objective	Strategic Policies	Non-Strategic Policies
SO1: Managing Growth Sustainably	<p>Delivering Sustainable Patterns of Growth</p> <p>Strategic Policy MG01: Managing Growth</p> <p>Strategic Policy MG02: Green Belt</p>	<p>Cross-cutting Development Management</p> <p>Policy MG03: Settlement Hierarchy</p> <p>Policy MG04: Health Impact Assessments (HIAs)</p> <p>Policy MG05: Developer Contributions</p> <p>Policy MG06: Local Plan Review</p>
SO2: Deliver a Healthy and Resilient Built Environment:	<p>Sustainable Design of Buildings and Infrastructure</p> <p>Strategic Policy BE01 Carbon Reduction, and Renewable Energy</p> <p>Communications Infrastructure</p> <p>Strategic Policy BE06: Communications Infrastructure</p> <p>Transport Infrastructure</p> <p>Strategic Policy BE08: Strategic Transport Infrastructure</p> <p>Strategic Policy BE09: Sustainable Means of Travel and Walkable Streets</p> <p>Design &amp; Place-making (Buildings and Public Realm)</p> <p>Strategic Policy BE14: Creating Successful Places</p>	<p>Sustainable Design of Buildings and Infrastructure</p> <p>Policy BE02: Water Efficiency and Management</p> <p>Policy BE03: Establishing Low Carbon and Renewable Energy Infrastructure Network</p> <p>Policy BE04: Managing Heat Risk</p> <p>Policy BE05: Sustainable Drainage</p> <p>Communications Infrastructure</p> <p>Policy BE07: Connecting New Developments to Digital Infrastructure</p> <p>Transport Infrastructure</p> <p>Policy BE10: Sustainable Passenger Transport</p> <p>Policy BE11: Electric and Low Emission Vehicle</p> <p>Policy BE12: Mitigating the Transport Impacts of Development</p> <p>Policy BE13: Parking Standards</p> <p>Design &amp; Place-making (Buildings and Public Realm)</p>

Strategic Objective	Strategic Policies	Non-Strategic Policies
	<p><b>Heritage</b> Strategic Policy BE16: Conservation and Enhancement of Historic Environment</p> <p><b>Variety and Quality of Homes</b> Strategic Policy HP01: Housing Mix</p>	<p>Policy BE15: Planning for Inclusive Communities</p> <p><b>Heritage</b> Policy BE17: Archaeological Remains</p> <p><b>Variety and Quality of Homes</b> Policy HP02: Protecting the Existing Housing Stock Policy HP05: Affordable Housing Policy HP03: Residential Density Policy HP04: Specialist Accommodation Policy HP06: Standards for New Housing</p> <p><b>Gypsy and Traveller Provision</b> Policy HP07: Regularising Suitable Existing Traveller Sites Policy HP08: Safeguarding Permitted Sites POLICY HP09: Sub-Division of Pitches or Plots POLICY HP10: Proposals for Gypsies, Travellers and Travelling Showpeople on Windfall sites</p>
SO3: Deliver Sustainable Communities with Diverse Economic & Social-cultural Opportunities for All	<p><b>Economy and Jobs</b> Strategic Policy PC01: Safeguarding Employment Land</p> <p><b>Retail</b> Strategic Policy PC03: Retail and Commercial Leisure Growth Strategic Policy PC04: Retail Hierarchy of Designated Centres</p> <p><b>Community Infrastructure</b> Strategic Policy PC10: Protecting and Enhancing Community Facilities</p>	<p><b>Economy and Jobs</b> Policy PC02: Supporting the Rural Economy</p> <p><b>Retail</b> Policy PC05: Brentwood Town Centre Policy PC06: Mixed Use Development in Designated Centres Policy PC07: Primary Shopping Areas Policy PC08: Non-centre Uses Policy PC09: Night-Time Economy</p> <p><b>Community Infrastructure</b> Policy PC11: Education Facilities</p>
SO4: Deliver Beautiful, Biodiverse, Clean and a Functional Natural Environment	<p><b>Green Infrastructure and Biodiversity</b> Strategic Policy NE01: Protecting and Enhancing the Natural Environment Strategic Policy NE02: Green and Blue Infrastructure</p> <p><b>Clean and Safe Environment</b> Strategic Policy NE08: Air Quality Strategic Policy NE09: Flood Risk</p>	<p><b>Green Infrastructure and Biodiversity</b> Policy NE03: Trees, Woodlands, Hedgerows Policy NE04: Thames Chase Community Forest Policy NE05: Open Space and Recreation Provision Policy NE06: Allotments and Community Food Growing Space Policy NE07: Protecting Land-for Gardens</p> <p><b>Clean and Safe Environment</b> Policy NE10: Contaminated Land and Hazardous Substances Policy NE11: Floodlighting and Illumination</p>

# Appendix 3



## Monitoring Framework

This section Deals with how the Council will monitor the Local Plan's success in meeting the challenges and opportunities set out in the planning policies to ensure effective delivery of the Plan.

This will be done through the monitoring of the indicators set out in the tables below on an annual basis which will be published through the Authorities Monitoring Report (AMR). The AMR will be used to report the performance of the Local Plan as well as recommending any actions required to ensure the delivery of the Plan.

Table 1: Monitoring Framework. Broad parameters for monitoring policy implementation.

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
<b>Chapter 4: Managing Growth</b>						
MG01	Managing Growth	7,752 new homes over the Plan period as a running total	Planning permissions	Achieve 7,752 new residential dwellings (net) over the Plan period 2016-2033.  Target to also include the number of housing expected to be developed on an annual basis from the Housing Trajectory.	80% or less of the running total of the Housing Trajectory is achieved over a three-year period.	Review the housing trajectory and assess reasons why developments are not coming forward as expected.  If the five-year housing supply is not being achieved, then consider whether the policy requirements need to be reviewed as part of a full or focused review and, if necessary, consider undertaking a call for sites to include additional sites to help improve delivery of new homes.
		13 new gypsy and traveller pitches to be delivered over the plan period		13 new pitches to be delivered at the following sites (as identified in HP07):  Oaktree Farm (7 pitches) Hunters Green (1 pitch) DHGV (5 pitches)	Failure to meet 13 new pitches over the Local Plan period.	Refresh the HELAA and/or SHLAA to identify new gypsy and traveller pitches to meet the borough's needs.  Consider whether the policy requirements need to be reviewed as part of a full or focused review.
		46.64 ha of employment land over the Plan period		A minimum of 33.76 ha (or 2.81 ha per year) (net) of employment land provision over the remaining Plan period 2021-2033	80% or less over a five year period of the minimum employment land need (2.81 ha per year)	Assess the reasons why employment land provision is not being achieved.  Consider a refresh the HELAA to identify additional employment sites to meet job growth.

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
Page 288				(Based on the identified needs range of 33.76 - 45.96 ha)		Consider whether the policy requirements need to be reviewed as part of a full or focused review.
		1,604 sqm (net) of comparison retail floorspace  4,438 sqm (net) of convenience floorspace		1,604 sqm (or approximately 94sqm per year) (net) of comparison retail floorspace over the Plan period  4,438 sqm (or approximately 261 sqm per year) (net) of convenience floorspace over the Plan period	80% or less over a three year period of the average annual net comparison retail floorspace  80% of less over a three year period of the average annual net convenience floorspace	Assess the reasons why net comparison retail floorspace and/or net convenience floorspace is not being achieved.  Consider a refresh of the Retail Needs Assessment.  Consider whether the policy requirements need to be reviewed as part of a full or focused review.
MG05	Developers Contribution	Strategic Transport Infrastructure requirements as identified in the individual site allocation policies and the most up to date IDP Part B.	Planning permission	Appropriate level of funding collected based on the requirements set out in the most up to date IDP Part B for providing the required strategic transport infrastructure.	Failure to deliver a project that then results in a delay to the delivery of development sites allocated in the plan	Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.
<b>Chapter 5: Resilient Built Environment</b>						
BE08	Strategic Transport Infrastructure	Strategic Transport Infrastructure requirements as identified in the individual site allocation policies and the most up to date IDP Part B.	Planning permission	Appropriate level of funding collected based on the requirements set out in the most up to date IDP Part B for providing the required strategic transport infrastructure.	Failure to deliver a project that then results in a delay to the delivery of development sites allocated in the plan	Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.



Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
BE09	Sustainable Means of Travel and Walkable Streets	Develops provide an appropriate level of sustainable transport infrastructure as required by the policy	Planning permission	<p>Developments provide access to appropriate sustainable travel infrastructure including:</p> <ul style="list-style-type: none"> <li>Walking;</li> <li>Cycling; and</li> <li>Access to public transport</li> </ul> <p>No net loss of existing pedestrian and cycle paths</p> <p>Where appropriate access to car pools, car sharing, community buses and cycle schemes</p>	<p>Developments do not provide appropriate walking and cycle paths and access to public transport.</p> <p>A loss to the existing pedestrian and cycle paths as a result of development.</p>	Assess why pedestrian and/or cycle paths are not included within developments or why there is a net loss of pedestrian / cycle paths. Consider whether the policy should be reviewed.
BE11	Electric and Low-Emission Vehicles	Provide sufficient occupier and visitor access to electric vehicle charging points	Planning Permission	All development include electric charging points wherever possible	80% of all new developments do not provide access to electric vehicle charging points in line with the most up to date Government guidance and/or Council strategy, whichever is greater.	Assess why electric vehicle charging points are not being included in developments. Consider whether the policy should be reviewed to set minimum standards for electric vehicle charging points to ensure uptake.
BE13	Parking Standards	Provide the required amount of parking as determined by the most up to date Essex Parking Standards	Planning Permission	All developments adhere to the Essex Parking Standards as required by the most up to date parking standards Design and Good Practice document.	Not all developments provide the minimum level of parking spaces as required by the most up to date Essex Parking Standards guidance	Assess why not all developments meet the most up to date Essex Parking Standards Design and Good Practice requirements. Consider if a further review of the policy is required.

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		<p>No net loss of parking spaces for the Brentwood Town Centre development sites:</p> <p>R11: 97 R12: 48 R13: 122 R14: 371</p> <p>Total current parking spaces totaling: 638</p>	Planning Permission	No net loss of Town Centre car parking places.	R10, R11, R12, R13, and R14 total parking places are less than 80% of the original available parking spaces.	Assess why there was a net loss of parking within Brentwood Town Centre. Consider if a further review of the policy is required.
E16	Conservation and Enhancement of Historic Environment	National Heritage Risk Register	Planning permission	<p>Sites R01, R02, R06, R22, E12, and E13 to provide a Heritage Statements as required by the site specific policy requirements.</p> <p>Reduction in the number of heritage assets on the Historic England's 'At Risk' register. Reduction in the number of heritage assets considered to be 'at risk' on the local list of heritage assets once established.</p>	<p>Heritage Statements are not provided for all development sites required to do so as stated within the individual site policies.</p> <p>Identification of a heritage asset newly listed on the 'at risk' register. Periodic increase in the number of heritage assets on the 'at risk' register in the borough. Identification of a locally listed heritage asset that could be at risk through periodic review.</p>	Consider how the Council can contribute to measures to improve the condition of the 'at risk' heritage assets. Consider whether the policy is contributing to the neglect of the heritage assets, and if so, consider whether the policy should be reviewed.

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
<b>Chapter 6: Housing Provision</b>						
HP01	Housing Mix	Proposals of 10 or more to meet M4(2) or M4(3) Building Regulations	Planning permission	All developments of 10 or more dwellings meet the minimum requirement of M4(2) Building Regulation standards	5% of M4(3) Building Regulation standards for 80% of developments of 60 or more are not met.	Assess reasons why M4(3) Building Regulations are not being met. If this requirement is not being met due to viability reassess viability. Consider whether the policy requirements need to be reviewed as part of a full or focused review.
		Developments of 60 or more to meet 5% M4(3) Building Regulation		All developments of 100 or more provide 5% Self and Custom Build homes.		
HP04	Specialist Accommodation	Appropriate level of Specialist Accommodation is provided as indicated in the Council's 'Specialist Accommodation Report'	Planning Permission	Appropriate level and type of Specialist Accommodation is provided as indicated in the Council's most up to date Specialist Accommodation Report and other relevant evidence base.	80% of the required Specialist Accommodation is provided over the plan period.	Assess why the Specialist Accommodation requirements are not being met. If there are viability concerns, update the Viability Assessment and review the policy requirements.
HP05	Affordable Housing	All developments of 10 or more to provide 35% affordable housing	Planning Permission	All developments of 10 or more to provide 35% affordable housing as required by the policy	80% of all developments of 10 or more dwellings to provide 35% affordable housing	Assess why the affordable housing requirements are not being met. If concerns around viability, update the Viability Assessment and review the policy requirements.

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		Tenure split to be 86% Affordable / Social Rent and 14% of other forms of affordable housing.		Appropriate tenure split as required by the policy.	80% of all developments 10 or more to provide 86% affordable / social rent and 14% of other forms of affordable housing	Assess why the tenure split is not being achieved. If concerns around viability, update the viability assessment. If the needs of the borough have changed, then consider updating the housing evidence and updating the policy to reflect the new housing tenure split.
HP08	Safeguarding Permitted Sites	Gypsy and Traveller pitches listed in criteria B of the policy are granted permanent planning permission	Planning Permission	All Gypsy and Traveller sites and associated pitches are granted planning permission over the plan period.	80% or less of the Gypsy and Traveller sites identified in the policy are granted planning permission	Consider undertaking a Gypsy and Traveller Accommodation Needs Assessment to determine if the needs within the borough have changed. Consider reviewing the policy.
HP10	Proposals for Gypsies, Travellers, and Travelling Showpeople on Windfall Sites	New Gypsy and Traveller sites come forward during the plan period on windfall site.	Planning Permission	All gypsy and traveller windfall sites come forward in line with the policy requirements. Those that are granted permission on greenbelt sites have clearly demonstrated very special circumstances.	Gypsy and Traveller sites are granted permission on appeal.	Assess the justifications for gypsy and traveller sites being granted on appeal. Consider updating the Gypsy and Traveller Accommodation Needs Assessment and reviewing policies HP07: Provision for Gypsy and Traveller through to HP10: Proposals for Gypsies, Travellers, and Travelling Showpeople on Windfall Sites. Amend these policies where needed.
<b>Chapter 7: Prosperous Communities</b>						
PC03	Retail and Commercial Growth	Retail floorspace requirements met in line with policy MG01.	Planning Permission	Appropriate level of retail floorspace provided as indicated within policy MG01 and site policies R01, R02, R14, and R15	80% or less of the policy required retail floorspace is achieved in accordance with the site specific policies.	Assess the reasons why retail floorspace is not being achieved.

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
C10	Protecting and Enhancing Community Facilities	Retail floorspace to be provided as part of the following mix-use developments				Consider a refresh of the Retail Needs Assessment.
		Dunton Hills Gadren Village (R01) Land at West Horndon Industrial Estate (R02) William Hunter Way Car Park (R14) Wates Way Industrial Estate (R15)				Consider whether the policy requirements need to be reviewed as part of a full or focused review.
		Maintaining the existing level of Community Facilities.	Planning Permission	No net loss of existing community facilities, include those registered as Assets of Community Value (ACV).	The loss of a community facility to an alternative use.	Assess why the community facility was lost (i.e. there was no longer a need for the facility). Consider updating the Council's Built Facilities Strategy. Consider reviewing the policy.
<b>Chapter 8: Natural Environment</b>						
NE01	Protecting and Enhancing the Natural Environment	Biodiversity net gains	Planning permission	Achieve biodiversity net gains	New developments are unable to achieve biodiversity net gains.	Assess why biodiversity net gains are not able to be achieved on site(s). Consider a review of how the policy has been applied, and whether the policy should be reviewed.
		Sites within the RAMS Zone of Influence make appropriate contribution toward mitigation.		Sites within the RAMS Zone of Influence make appropriate contribution towards mitigation as required by the policy and	New developments not making appropriate contributions towards mitigations as required by the RAMS Strategy	Assess reasons why RAMS contributions were not made as required by the RAMS Strategy and the policy. Consider if

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
				the most up to date evidence.		changes to the policy wording are required.
		No impacts on SSSI's or Sites of Local Importance		No impacts from developments, either individually or in combination, on SSSI's or Sites of Local Importance	Unacceptable environmental impacts on SSSI's and/or Sites of Local Importance as a result of an individual development or a combination of developments.	Assess reasons why unacceptable environmental impacts on SSSI's and/or Sites of Local Importance have occurred. Consider reviewing the policy wording.
NE02	Green and Blue Infrastructure	Maximise opportunities for improving Green and Blue Infrastructure (GBI)	Planning Permission	Existing Green and Blue Infrastructure are protected and enhanced where possible	Adverse impact to green and blue infrastructure as a result of development.  Lack of appropriate specification and maintenance plans for the proposed green and blue Infrastructure through the life of the development.	Assess the reasons why appropriate protect and/or enhancement to Green and Blue Infrastructure was not achieved. Consider reviewing the policy wording.
		Development adjacent to water course or water body, do not have any adverse on the function or quality of the Blue Infrastructure.		No adverse impacts on water quality as a result of those developments located near water courses and/or water bodies.	Adverse impact on water courses and/or water bodies as a result of development.	Assess reasons why adverse impacts to water courses and water bodies. Consider reviewing the policy wording.
NE08	Air Quality	Developments do not create an unacceptable risk to Air Quality.  All development types listed within the policy, criteria C are required to submit an Air	Planning Permission	All developments required by the policy submit an Air Quality Assessment which clearly demonstrates no risk to air quality.	Planning permission is granted to developments where: <ul style="list-style-type: none"> <li>An Air Quality Assessment has</li> </ul>	Assess reason why planning permission was granted to a development which did not meet the requirements of the policy. Consider whether a review of the policy wording is required.

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		Quality Assessment as part of the planning application process.			not submitted; and/or <ul style="list-style-type: none"> <li>An unacceptable impact on air quality is identify</li> </ul>	
<b>Chapter 9: Site Allocations</b>						
R01	Dunton Hills Garden Village	Housing: <ul style="list-style-type: none"> <li>Delivery of 1,650 new homes, providing 35% affordable housing</li> <li>5% self and Custom build homes</li> <li>Delivery of three care homes of around 80 bed spaces each</li> <li>Minimum of 5 new Gypsy and Traveller pitches</li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>1,950 new dwellings</li> <li>577 affordable housing</li> <li>Approximately 82 self and custom build homes</li> <li>Three, 80-bed care homes</li> <li>Five gypsy and traveller pitches</li> </ul>	<ul style="list-style-type: none"> <li>Deliver the full identified housing of 1,650 new dwelling over the plan period</li> <li>Deliver the full 35% affordable housing requirement (approximately 577)</li> <li>Deliver 5% Self and Custom Build homes (approximately 82 dwellings)</li> <li>Three, 80 bed care homes</li> <li>5 Gypsy and Traveller pitches to be provided within the first five years of development coming forward</li> </ul>	Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.  Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs.

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		<p>Employment:</p> <p>5.5 ha of employment land of E use class</p>		A minimum of 5.5 ha employment land provision over the remaining Plan period 2021-2033	Less than 90% of employment land is provided as identified within the policy.	<p>Assess the reasons why employment land provision is not being achieved.</p> <p>Consider a refresh the HELAA to identify additional employment sites to meet job growth.</p>
		<p>Infrastructure:</p> <p>Delivery of at least one secondary school with sufficient capacity to co-locate early years and childcare nursery facilities</p>		At least one secondary school and co-located early years and childcare nursery facilities	Secondary school and early years and childcare nursery not provided	<p>Assess why the Secondary school, early years, and/or childcare facilities have not been provided.</p> <p>Consider whether a review of the viability assessment is needed.</p> <p>Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.</p>
		<p>Environment and Heritage:</p> <ul style="list-style-type: none"> <li>Minimum of 50% of the site is green and blue infrastructure</li> <li>National Heritage Risk Register</li> </ul>		<ul style="list-style-type: none"> <li>50% of the site is green and blue infrastructure</li> <li>Heritage Statement included with application</li> </ul>	<ul style="list-style-type: none"> <li>A minimum of 50% of the site is not green and blue infrastructure as required by the policy</li> <li>Heritage Statement not included in application</li> </ul>	<ul style="list-style-type: none"> <li>Assess why 50% of the site was not green and blue infrastructure as required by the policy.</li> <li>Consider how the Council can contribute to measures to improve the condition of the 'at risk' heritage assets. Consider whether policy BE16 Conservation and Enhancement of Historic</li> </ul>



Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
						Environment is contributing to the neglect of the heritage assets, and if so, consider whether the policy should be reviewed.
R02	Land at West Horndon Industrial Estate	<b>Housing:</b> <ul style="list-style-type: none"> <li>Deliver 580 new dwelling</li> <li>35% affordable housing</li> <li>5% Self and Custom Build homes</li> <li>60-bed residential care home or appropriate specialist accommodation</li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>Provide the full 580 new dwelling</li> <li>Provide 35% affordable housing (approximately 203 dwellings)</li> <li>Provide 5% Self and Custom Build homes (approximately 29 new dwellings)</li> <li>One 60-bed care home or other appropriate specialist accommodation to meet the needs of the borough</li> </ul>	<ul style="list-style-type: none"> <li>Less than 90% of the full identified housing requirement is met</li> <li>Less than 90% of the affordable housing requirement is met</li> <li>Less than 90% of the Self and Custom Build requirement is met</li> <li>60-bed care home or other appropriate specialist accommodation is not met.</li> </ul>	<p>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</p> <p>Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs.</p>
		<b>Employment:</b> Around 2 ha of employment land with an appropriate mix of retail, commercial, and leisure floorspace		A minimum of 2 ha employment land provision over the remaining Plan period 2021-2033	Less than 90% of employment needs are provided	<p>Assess the reasons why employment land provision is not being achieved.</p> <p>Consider a refresh the HELAA to identify additional employment sites to meet job growth.</p>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		Environment and Heritage: Preparation of a Heritage Statement		Heritage Statement including in application	No Heritage Statement included in application	Consider how the Council can contribute to measures to improve the condition of the 'at risk' heritage assets. Consider whether policy BE16 Conservation and Enhancement of Historic Environment is contributing to the neglect of the heritage assets, and if so, consider whether the policy should be reviewed.
R03	Land North of Shenfield	Housing: <ul style="list-style-type: none"> <li>Provide 825 new homes</li> <li>35% affordable housing</li> <li>5% self and custom builds</li> <li>60 bed residential care home</li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>825 new dwelling</li> <li>288 affordable dwellings</li> <li>41 self and custom build dwellings</li> <li>60 bed residential care home</li> </ul>	<ul style="list-style-type: none"> <li>Less than 825 new dwelling are provided</li> <li>90% of less of the affordable housing is provided</li> <li>Less than 90% self and custom build homes are provided</li> <li>Care home or appropriate mix of specialist accommodation to be meets not provided.</li> </ul>	<p>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</p> <p>Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs.</p>
		Employment: 2ha of employment land		2ha of employment land	Less than 90% of the required employment land is provided	<p>Assess the reasons why employment land provision is not being achieved.</p> <p>Consider a refresh the HELAA to identify additional employment sites to meet job growth.</p>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		<p>Infrastructure:</p> <ul style="list-style-type: none"> <li>• Provide vehicle access off Chelmsford Road and Alexander Lane</li> <li>• Provide multi-function green infrastructure, including maintaining the provision of the existing playing field on site.</li> <li>• 2.1 ha of land for primary school and early years and childcare nursey.</li> </ul>		<ul style="list-style-type: none"> <li>• Vehicle access off Chelmsford Road and Alexander Lane</li> <li>• Existing Green and Blue Infrastructure are protected and enhanced where possible. No loss of the existing playing field currently on site</li> <li>• Provide primary school, early years and childcare nursey</li> </ul>	<ul style="list-style-type: none"> <li>• A minimum of two vehicle access points into the site are provided agreed with ECC</li> <li>• Adverse impact to green and blue infrastructure as a result of development. Lack of appropriate specification and maintenance plans for the proposed green and blue Infrastructure through the life of the development.</li> <li>• Required educational facilities not provided.</li> </ul>	<ul style="list-style-type: none"> <li>• Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.</li> <li>• Assess the reasons why appropriate protect and/or enhancement to Green and Blue Infrastructure was not achieved. Consider reviewing the policy wording for policy BE16 Green and Blue Infrastructure.</li> <li>• Assess the reasons why the policy required educational facilities were not provided.</li> </ul>
R04	Ford Headquarters and Council Depot	<p>Housing:</p> <ul style="list-style-type: none"> <li>• Provide 133 new homes</li> <li>• 35% affordable housing</li> <li>• 5% Self and Custom Build</li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>• 133 new dwelling</li> <li>• 46 affordable dwellings</li> <li>• 6 self and custom build dwellings</li> <li>• 60-bed residential care home or other</li> </ul>	<ul style="list-style-type: none"> <li>• Less than 133 new dwelling are provided</li> <li>• 90% of less of the affordable housing is provided</li> <li>• Less than 90% self and custom build</li> </ul>	<p>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</p> <p>Consider whether a call for site should be undertaken and additional sites allocated to</p>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		<ul style="list-style-type: none"> <li>60-bed residential care home or appropriate mix of specialist accommodation</li> </ul>		appropriate specialist accommodation	<p>homes are provided</p> <ul style="list-style-type: none"> <li>Care home or other appropriate specialist accommodation is not provided.</li> </ul>	ensure the borough can meet its identified housing needs.
		<p>Employment:</p> <p>2ha of employment land</p>		2ha of employment land	Less than 90% of the employment land is provided	<p>Assess the reasons why employment land provision is not being achieved.</p> <p>Consider a refresh the HELAA to identify additional employment sites to meet job growth.</p>
		<p>Inf rastructure:</p> <ul style="list-style-type: none"> <li>Provide Vehicle access off Eagle Way and The Drive</li> <li>Provide multi-functional green infrastructure</li> <li>Provide appropriate financial contribution towards infrastructure improvements as set out in the Council's IDP</li> </ul>		<ul style="list-style-type: none"> <li>Vehicle access off Eagle Way and The Drive</li> <li>multi-f-unctional green infrastructure</li> <li>Appropriate financial contribution towards other infrastructure improvements</li> </ul>	<ul style="list-style-type: none"> <li>A minimum of two vehicle access points into the site are provided agreed with ECC</li> <li>Adverse impact to green and blue infrastructure as a result of development. Lack of appropriate specification and maintenance plans for the proposed green and blue Infrastructure through the life of the development.</li> </ul>	<ul style="list-style-type: none"> <li>Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.</li> <li>Assess the reasons why appropriate protect and/or enhancement to Green and Blue Infrastructure was not achieved. Consider reviewing the policy wording for policy NE02: Green and Blue Infrastructure</li> </ul>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		Heritage: Grade II listed Blenheim House and the Chapel of Royal Anglian and Essex Regiments		No negative impact on the Grade II listed Blenheim House and the Chapel of Royal Anglian and Essex Regiments	Negative impacts occur on the listed building within the area as a direct result of development.	Consider how the Council can contribute to measures to improve the condition of the 'at risk' heritage assets. Consider whether policy BE16 Conservation and Enhancement of Historic Environment is contributing to the neglect of the heritage assets, and if so, consider whether the policy should be reviewed.
R06	Land off Nags Head Lane	Housing: <ul style="list-style-type: none"> <li>125 new dwelling</li> <li>35% affordable housing</li> <li>5% Self and Custom Build</li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>125 new dwellings</li> <li>43 affordable dwellings</li> <li>6 Self and Custom Build dwellings</li> </ul>	<ul style="list-style-type: none"> <li>Less than 125 new dwelling are provided</li> <li>90% of less of the affordable housing is provided</li> <li>Less than 90% self and custom build homes are provided</li> </ul>	<p>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</p> <p>Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs.</p>
		Infrastructure: Provision for public open space		Provide multi-functional green infrastructure	Adverse impact to green and blue infrastructure as a result of development. Lack of appropriate specification and maintenance plans for the proposed green and blue Infrastructure through the life of the development.	Assess the reasons why appropriate protect and/or enhancement to Green and Blue Infrastructure was not achieved. Consider reviewing the policy wording for policy NE02 Green and Blue Infrastructure

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		Environment and Heritage:  National Risk Register		Heritage Statement submitted with application	No Heritage Statement is submitted with the application	Consider how the Council can contribute to measures to improve the condition of the 'at risk' heritage assets. Consider whether policy BE16 Conservation and Enhancement of Historic Environment is contributing to the neglect of the heritage assets, and if so, consider whether the policy should be reviewed.
R07	Sow and Grow Nursery	Housing: <ul style="list-style-type: none"> <li>38 new homes</li> <li>35% affordable housing</li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>38 new dwellings</li> <li>13 affordable dwellings</li> </ul>	<ul style="list-style-type: none"> <li>Less than 38 new dwellings</li> <li>90% or less affordable housing</li> </ul>	Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.  Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs.
		Infrastructure:  Appropriate developers contribution as set out in the Council's IDP towards highway infrastructure		Appropriate developers contribution as set out in the Council's IDP towards highway infrastructure	Insufficient developers contribution made as required by policy	Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.
		Environment and Heritage:  National Risk Register		No adverse impacts of Grade II listed Park and Garden of South Weald Park	Adverse impacts on the Grade II listed Park and Garden of South Weald as a result of the development.	Consider how the Council can contribute to measures to improve the condition of the 'at risk' heritage assets. Consider whether policy BE16: Conservation and Enhancement of Historic Environment is contributing to the neglect of the heritage assets,

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
						and if so, consider whether the policy should be reviewed.
R08	Land at Mascalls Lane	Housing: 9 new dwellings	Planning Permission	9 new dwellings	Less than 9 new dwelling	Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.
		Infrastructure: Appropriate financial contribution as determined by the Council's IDP		Appropriate financial contribution	No financial contribution	Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.
R09	Land of Warley Hill	Housing: <ul style="list-style-type: none"> <li>43 new dwellings</li> <li>35% affordable housing</li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>43 new dwellings</li> <li>15 affordable dwelling</li> </ul>	<ul style="list-style-type: none"> <li>Less than 43 new dwellings</li> <li>Less than 90% affordable housing</li> </ul>	Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.  Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs.
		Environment and Heritage: National Risk Register		No negative impacts of the Grade II listed Warley Hospital, Tower at Warley Hospital and Lodge to Warley Hospital	Adverse impacts on the Grade II listed buildings as a result of the development.	Consider how the Council can contribute to measures to improve the condition of the 'at risk' heritage assets. Consider whether policy BE16: Conservation and Enhancement of Historic Environment is contributing to the neglect of the heritage assets,

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
						and if so, consider whether the policy should be reviewed.
R10	Brentwood Railway Station	Housing: <ul style="list-style-type: none"> <li>• 200 new dwellings</li> <li>• 35% affordable housing</li> <li>• 5% Self and Custom Build dwellings</li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>• 200 new dwellings</li> <li>• 70 affordable dwelling</li> <li>• 10 self and custom build dwellings</li> </ul>	<ul style="list-style-type: none"> <li>• Less than 200 new dwellings</li> <li>• 90% or less affordable housing</li> <li>• 90% or less self and custom builds</li> </ul>	<p>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</p> <p>Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs.</p>
		Infrastructure: <ul style="list-style-type: none"> <li>• Adequate parking for future rail traveler needs</li> <li>• Developers contribution as required by the Council's IDP</li> </ul>		<ul style="list-style-type: none"> <li>• Adequate parking for future rail traveller needs</li> <li>• Appropriate developers contribution</li> </ul>	<ul style="list-style-type: none"> <li>• Insufficient parking provided</li> <li>• Insufficient developers contribution made as required by policy</li> </ul>	<p>Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.</p>
R11	Westbury Road Car Park	Housing: <ul style="list-style-type: none"> <li>• 45 new dwelling</li> <li>• 35% affordable housing</li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>• 45 new dwellings</li> <li>• 15 affordable dwellings</li> </ul>	<ul style="list-style-type: none"> <li>• Less than 45 dwellings</li> <li>• 90% or less affordable housing</li> </ul>	<p>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</p> <p>Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs.</p>



Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		Infrastructure: <ul style="list-style-type: none"> <li>Developers contribution to Highway improvements as required by the IDP</li> <li>No net loss of Town Centre parking – 638 parking spots</li> </ul>		<ul style="list-style-type: none"> <li>Sufficient developers contribution</li> <li>638 car parking places for the Town Centre allocate sites</li> </ul>	<ul style="list-style-type: none"> <li>Insufficient developers contribution</li> <li>Loss of Town Centre parking as a result of development</li> </ul>	Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.
		Environment and Heritage: National Risk Register		Heritage Statement	No Heritage Statement	Consider how the Council can contribute to measures to improve the condition of the ‘at risk’ heritage assets. Consider whether policy BE16 Conservation and Enhancement of Historic Environment is contributing to the neglect of the heritage assets, and if so, consider whether the policy should be reviewed.
R12	Land at Hunter House	Housing: <ul style="list-style-type: none"> <li>48 new dwelling</li> <li>35% affordable dwellings</li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>48 new dwellings</li> <li>16 affordable dwellings</li> </ul>	<ul style="list-style-type: none"> <li>Less than 48 dwellings</li> <li>90% or less affordable housing</li> </ul>	Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.  Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs
		Infrastructure: <ul style="list-style-type: none"> <li>Developers contribution to Highway</li> </ul>		<ul style="list-style-type: none"> <li>Sufficient developers contribution</li> <li>638 car parking places for the Town</li> </ul>	<ul style="list-style-type: none"> <li>Insufficient developers contribution</li> <li>Loss of Town Centre parking as a</li> </ul>	Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
Page 306		<p>improvements as required by the IDP</p> <ul style="list-style-type: none"> <li>No net loss of Town Centre parking – 638 parking spots</li> </ul>		Centre allocate sites	result of development	of meeting the infrastructure needs.
		<p>Environment and Heritage: National Risk Register</p>		Heritage Statement	No Heritage Statement	Consider how the Council can contribute to measures to improve the condition of the 'at risk' heritage assets. Consider whether policy BE16 Conservation and Enhancement of Historic Environment is contributing to the neglect of the heritage assets, and if so, consider whether the policy should be reviewed.
		<p>Housing:</p> <ul style="list-style-type: none"> <li>31 new dwellings</li> <li>35% affordable housing</li> </ul>		Planning Permission	<ul style="list-style-type: none"> <li>31 new dwellings</li> <li>10 affordable housing</li> </ul>	<ul style="list-style-type: none"> <li>Less than 31 dwellings</li> <li>90% or less affordable housing</li> </ul>
	Chatham Way Car Park	<p>Infrastructure:</p> <ul style="list-style-type: none"> <li>Developers contribution to Highway improvements as required by the IDP</li> <li>No net loss of Town Centre parking – 638 parking spots</li> </ul>		<ul style="list-style-type: none"> <li>Sufficient developers contribution</li> <li>638 car parking places for the Town Centre allocate sites</li> </ul>	<ul style="list-style-type: none"> <li>Insufficient developers contribution</li> <li>Loss of Town Centre parking as a result of development</li> </ul>	Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		Environment and Heritage: National Risk Register		Heritage Statement	No Heritage Statement	Consider how the Council can contribute to measures to improve the condition of the 'at risk' heritage assets. Consider whether policy BE16: Conservation and Enhancement of Historic Environment is contributing to the neglect of the heritage assets, and if so, consider whether the policy should be reviewed.
R14	William Hunter Way Car Park	Housing: <ul style="list-style-type: none"> <li>300 new dwellings</li> <li>35% affordable housing</li> <li>5% Self and Custom Build dwelling</li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>300 new dwellings</li> <li>105 affordable housing</li> <li>15 self and custom build</li> </ul>	<ul style="list-style-type: none"> <li>Less than 300 dwellings</li> <li>90% or less affordable housing</li> <li>90% or less self and custom build</li> </ul>	<p>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</p> <p>Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs</p>
		Infrastructure: <ul style="list-style-type: none"> <li>Developers contribution to Highway improvements as required by the IDP</li> <li>No net loss of Town Centre parking – 638 parking spots</li> </ul>		<ul style="list-style-type: none"> <li>Sufficient developers contribution</li> <li>638 car parking places for the Town Centre allocate sites</li> </ul>	<ul style="list-style-type: none"> <li>Insufficient developers contribution</li> <li>Loss of Town Centre parking as a result of development</li> </ul>	Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.
		Environment and Heritage: National Risk Register		Heritage Statement	No Heritage Statement	Consider how the Council can contribute to measures to improve the condition of the 'at risk' heritage assets. Consider whether policy BE16: Conservation and Enhancement of Historic

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
						Environment is contributing to the neglect of the heritage assets, and if so, consider whether the policy should be reviewed.
R15	Wates Way Industrial Estate	Housing: <ul style="list-style-type: none"> <li>46 new dwellings</li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>46 new dwellings</li> </ul>	<ul style="list-style-type: none"> <li>Less than 80 dwellings</li> </ul>	<p>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</p> <p>Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs</p>
		Infrastructure: Developers contribution to Highway improvements as required by the IDP		Sufficient developers contribution	Insufficient developers contribution	Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.
R16	Land off Doddinghurst Road	Housing: <ul style="list-style-type: none"> <li>200 new dwellings</li> <li>35% affordable</li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>200 new dwellings</li> <li>70 affordable</li> </ul>	<ul style="list-style-type: none"> <li>Less than 200 dwellings</li> <li>90% or less affordable housing</li> </ul>	<p>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</p> <p>Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs</p>
		Infrastructure: Developers contribution to Highway improvements as required by the IDP		Sufficient developers contribution	Insufficient developers contribution	Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
						of meeting the infrastructure needs.
R19	Land at Priests Lane	Housing: <ul style="list-style-type: none"> <li>75 new dwellings</li> <li>35% affordable</li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>75 new dwellings</li> <li>26 affordable</li> </ul>	<ul style="list-style-type: none"> <li>Less than 75 dwellings</li> <li>90% or less affordable</li> </ul>	Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.  Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs
Page 309		Infrastructure: <ul style="list-style-type: none"> <li>Replacement playing field</li> <li>Developers contribution to Highway improvements as required by the IDP</li> </ul>		<ul style="list-style-type: none"> <li>Replacement playing field</li> <li>Sufficient developers contribution</li> </ul>	Insufficient developers contribution	Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.
	R21	Land South of Ingatestone	Housing: <ul style="list-style-type: none"> <li>161 new dwellings</li> <li>35% affordable</li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>161 new dwellings</li> <li>56 affordable dwellings</li> </ul>	<ul style="list-style-type: none"> <li>Less than 161 dwellings</li> <li>90% or less affordable</li> </ul>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
Page 310 22		Infrastructure: Developers contribution to Highway improvements as required by the IDP		Sufficient developers contribution	Insufficient developers contribution	Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.
		Environment and Heritage: National Rik Register		Heritage Statement submitted with application	No Heritage Statement submitted with application	Consider how the Council can contribute to measures to improve the condition of the 'at risk' heritage assets. Consider whether policy BE16 Conservation and Enhancement of Historic Environment is contributing to the neglect of the heritage assets, and if so, consider whether the policy should be reviewed.
	Land adjacent to the A12, Ingatestone	Housing: <ul style="list-style-type: none"> <li>57 new dwellings</li> <li>35% affordable dwellings</li> </ul>		<ul style="list-style-type: none"> <li>57 new dwellings</li> <li>20 affordable</li> </ul>	<ul style="list-style-type: none"> <li>Less than 57 dwellings</li> <li>90% or less affordable</li> </ul>	<p>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</p> <p>Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs</p>
		Infrastructure: Developers contribution to Highway improvements as required by the IDP		Sufficient developers contribution	Insufficient developers contribution	Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		Environment and Heritage: National Rik Register		Heritage Statement submitted with application	No Heritage Statement submitted with application	Consider how the Council can contribute to measures to improve the condition of the 'at risk' heritage assets. Consider whether policy BE16 Conservation and Enhancement of Historic Environment is contributing to the neglect of the heritage assets, and if so, consider whether the policy should be reviewed.
R23	Brizes Corner Field	Housing: <ul style="list-style-type: none"> <li>23 new dwellings</li> <li>35% affordable</li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>23 new dwellings</li> <li>8 affordable</li> </ul>	<ul style="list-style-type: none"> <li>Less than 23 new dwellings</li> <li>90% or less affordable</li> </ul>	<p>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</p> <p>Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs</p>
		Infrastructure: Developers contribution to Highway improvements as required by the IDP		Sufficient developers contribution	Insufficient developers contribution	Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.
R24	Land off Stocks Lane	Housing: <ul style="list-style-type: none"> <li>40 new dwellings</li> <li>35% affordable</li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>40 new dwellings</li> <li>14 affordable</li> </ul>	<ul style="list-style-type: none"> <li>Less than 40 dwellings</li> <li>90% or less affordable</li> </ul>	<p>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</p> <p>Consider whether a call for site should be undertaken and additional sites allocated to</p>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		Infrastructure: Developers contribution to Highway improvements as required by the IDP		Sufficient developers contribution	Insufficient developers contribution	ensure the borough can meet its identified housing needs  Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.
R25	Land North of Wollard Way	Housing: <ul style="list-style-type: none"> <li>40 new dwellings</li> <li>35% affordable</li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>40 new dwellings</li> <li>14 affordable</li> </ul>	<ul style="list-style-type: none"> <li>Less than 40 dwellings</li> <li>90% or less affordable</li> </ul>	Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.  Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs
		Infrastructure: Developers contribution to Highway improvements as required by the IDP		Sufficient developers contribution	Insufficient developers contribution	Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.
R26	Land North of Orchard Piece	Housing: <ul style="list-style-type: none"> <li>30 new dwellings</li> <li>35% affordable</li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>30 new dwellings</li> <li>10 affordable</li> </ul>	<ul style="list-style-type: none"> <li>Less than 30 dwellings</li> <li>90% or less affordable</li> </ul>	Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.  Consider whether a call for site should be undertaken and additional sites allocated to



Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
						ensure the borough can meet its identified housing needs
		Infrastructure: Developers contribution to Highway improvements as required by the IDP		Sufficient developers contribution	Insufficient developers contribution	Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.
E11	Brentwood Enterprise Park	Employment: 25.85 ha of employment	Planning Permission	25.85 employment – B2, B8, and sui generis	90% or less employment	Assess the reasons why employment land provision is not being achieved.  Consider a refresh the HELAA to identify additional employment sites to meet job growth.
		Infrastructure: Developers contribution to Highway improvements and early years child care as required by the IDP		Sufficient developers contribution	Insufficient developers contribution	Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.
E12	Childerditch Industrial Estate	Employment: 20.64 ha of employment land	Planning Permission	24.64 employment – Class E, B2, B8, and sui generis	90% or less employment	Assess the reasons why employment land provision is not being achieved.  Consider a refresh the HELAA to identify additional employment sites to meet job growth.
		Infrastructure: Developers contribution to Highway improvements and		Sufficient developers contribution	Insufficient developers contribution	Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		early years child care as required by the IDP				of meeting the infrastructure needs.
		Environment and Heritage: National Risk Register		Heritage Statement submitted with application	No Heritage Statement is submitted with application	Consider how the Council can contribute to measures to improve the condition of the 'at risk' heritage assets. Consider whether policy BE16: Conservation and Enhancement of Historic Environment is contributing to the neglect of the heritage assets, and if so, consider whether the policy should be reviewed.
	Codham Hall Farm	Employment: 9.6 ha of employment	Planning Permission	9.6 ha employment – Class E, B2, B8 or sui generis uses	90% or less employment	Assess the reasons why employment land provision is not being achieved.  Consider a refresh the HELAA to identify additional employment sites to meet job growth.
		Infrastructure: Developers contribution to Highway improvements and early years child care as required by the IDP		Sufficient developers contribution	Insufficient developers contribution	Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.
E13	East Hordon Hall	Employment: 9.6 ha employment	Planning Permission	9.6 ha employment – Class E, B2, B8, or sui generis	90% or less employment	Assess the reasons why employment land provision is not being achieved.  Consider a refresh the HELAA to identify additional employment sites to meet job growth.

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
108		Infrastructure: Developers contribution to Highway improvements and early years child care as required by the IDP		Sufficient developers contribution	Insufficient developers contribution	Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.
		Environment and Heritage: National Risk Register		Heritage Statement submitted with application	No Heritage Statement submitted with application	Consider how the Council can contribute to measures to improve the condition of the 'at risk' heritage assets. Consider whether policy BE16: Conservation and Enhancement of Historic Environment is contributing to the neglect of the heritage assets, and if so, consider whether the policy should be reviewed.
	Land Adjacent to A12 and Slip Road, Ingatestone	Employment: 2.06 ha employment	Planning Permission	2.06 ha employment – Class E, B2, B8, or sui generis	90% or less employment	Assess the reasons why employment land provision is not being achieved.  Consider a refresh the HELAA to identify additional employment sites to meet job growth.
		Infrastructure: Developers contribution to Highway improvements and early years child care as required by the IDP		Sufficient developers contribution	Insufficient developers contribution	Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.

# Appendix 4



## Schedule of Plans and Policies which will be superseded by the new Plan

In accordance with Regulation 8 (5) of the Town and Country Planning (Local Planning) (England) Regulations 2012, the following Development Plan Documents and Policies will be superseded by the Local Plan:

**Table 1: Schedule of Superseded Documents**

Superseded Development Plan Document	Date Adopted
Brentwood Replacement Local Plan 2005	August 2005

**Table 2: Schedule of Superseded Policies**

Superseded Replacement Local Plan 2005 Policies
CP1 General Development Criteria
CP2 New Development and Sustainable Development Choices
CP3 Transport Assessments
CP4 The Provision of Infrastructure and Community Facilities
H3 Community Uses in Residential Development
H4 Mixed Use Development
H5 Changes of Use of Upper Floors
H6 Small Unit Accommodation
H7 Single Storey Dwellings
H8 Conversions
H9 Affordable Housing on Larger Sites
H10 Affordable Rural Housing

## Superseded Replacement Local Plan 2005 Policies

H11 Supported Accommodation
H12 Residential Homes
H14 Housing Density
H15 Hutton Mount
H16 Lifetime Homes
H17 Dormer Windows
E1 Areas Allocated for General Employment
E2 Areas Allocated for Office Purposes
E4 Sites for Additional Employment Land
E5 Land Adjacent to Council Depot, Warley
E6 Childerditch Industrial Park, Warley
E8 Employment Development Criteria
S1 New Major Retail Developments
S3 Petrol Filling Retail Developments
S4 Non-Retail Uses within Local Shopping Centres and Parades
T1 Travel Plans
T2 New Development and Highway Considerations
T3 Traffic Management
T5 Parking - General
T6 Public Car Parking Strategy
T7 Off Street Public Car Parking
T8 On-Street Parking
T9 Commuter Car Parking
T10 Access for Persons with Disabilities
T11 Bus Services
T12 Rail Services
T13 Taxis
T14 Cycling
T15 Pedestrian Facilities
GB1 New Development
GB2 Development Criteria
GB3 Settlements Excluded from the Green Belt
GB4 Established Areas of Development
GB5 Extensions to Dwellings
GB6 Replacement Dwellings
GB7 Garages, Swimming Pools/Enclosures and Outbuildings
GB8 Extensions to Gardens
GB9 Havering Grove
GB10 Subdivision of Dwellings
GB11 Temporary Siting of Mobile Homes
GB12 Permanent Dwellings for Agricultural Dwellings
GB13 Removal of Agricultural Occupancy Conditions
GB14 Agricultural Buildings
GB15 Re-Use and Adaptation of Rural Buildings for Small-Scale Employment, Tourism, Leisure, and Community Uses
GB16 Residential Conversions

## Superseded Replacement Local Plan 2005 Policies

GB17 Conversion or Change of Use of Listed Buildings
GB18 Existing Inappropriate Development Sites
GB19 Farm Shops and Retailing
GB22 Outdoor Facilities
GB23 Ancillary Buildings
GB25 Riding Schools and Livery Stables
GB26 Other Stables
GB27 Access to Countryside
LT1 Strategic Public Open Spaces
LT2 Development of Existing Urban Open Spaces
LT3 Areas Deficient in Open Space
LT4 Provision of Open Space in New Development
LT5 Displacement of Open Land Uses
LT6 The Brentwood Centre
LT8 Use of Redundant Institutional, Recreational and Community Buildings
LT9 Highwood Hospital Site
LT10 Changes of Use or New Buildings for Institutional Purposes
LT11 Retention of Existing Local Community Facilities
LT15 Hotel Accommodation in the Urban Area
LT16 Bed & Breakfast and Self-catering Accommodation
LT19 Accessibility to Premises to which the Public are Admitted and to Employment Generating Developments
C3 County Wildlife Sites, Local Nature Reserves and Other Habitats and Natural Features of Local Value
C4 Management of Woodlands
C5 Retention and Provision of Landscaping and Natural Features in Development
C6 Tree Preservation Orders and Works to Preserved Trees
C7 Development Affecting Preserved Trees, Ancient Woodland and Trees in Conservation Areas
C8 Special Landscape Areas
C9 Ancient Landscapes and Historic Parks and Gardens
C10 Protected Lanes
C11 Thames Chase Community Forest
C12 Landscape Improvements
C14 Development Affecting Conservation Areas
C15 Listed Buildings – Demolitions, Alterations or Extensions
C16 Development within the Vicinity of a Listed Building
C17 Change of use of a Listed Building
C18 Ancient Monuments
C19 Secured by Design
C20 Shop Fronts
C21 Illuminated Advertisements
C22 Signs within Conservation Areas or on Listed Buildings
C23 Externally Illuminated Hanging Signs
C24 Non-Illuminated Advertisements
C25 Floodlighting and Other Forms of Illumination

## Superseded Replacement Local Plan 2005 Policies

IR2 Telecommunications

IR3 Protecting the Best and Most Versatile Agricultural Land

IR4 Recycling Facilities

IR5 Energy and Water Conservation and the Use of Renewable Sources of Energy in New Development

IR6 Renewable Energy Schemes

PC1 Land Contaminated by " Hazardous Substances

PC4 Noise

PC5 Traffic Noise

PC6 Transport Pollution

PC7 Areas of Poor Air Quality

TC1 Vacant and Redevelopment Sites within Residentially Allocated Areas

TC2 Residential Replacement

TC3 Mixed Use Development

TC4 Use of Upper Floors

TC5 Type of Accommodation

TC6 Small Scale Shops

TC7 Non-Retail uses

TC8 Professional/Financial Services

TC9 The Telephone Exchange

TC10 Site of the William Hunter Way Car Park

TC11 Traffic in the High Street

TC12 Landscaping in the Town Centre

TC13 Pedestrian Areas

TC14 Advertisements and Shop Fronts

TC15 Shop Fronts Facing William Hunter Way

TC16 Non-Illuminated Advertisements Fronting William Hunter Way

TC19 Medical/Health Uses

APP1 Extracts from the adopted Essex Design Guide for Residential and Mixed Use Areas

APP2 Vehicle Parking Standards

APP3 Advertisements and Shop Front Guidance: Additional Advice to Applicants

APP4 Access for Disabled Persons

APP5 Miscellaneous Residential Design Guidance

# Appendix 5



## Glossary

### ABBREVIATIONS

ACV	Assets of Community Value
AMR	Authority Monitoring Report
AQMAs	Air Quality Management Areas
ASELA	Association of South Essex Local Authorities
BRE	Building Research Establishment
BREEAM	Building Research Establishment Environmental Assessment Method
CDA	Critical Drainage Area
CHP	Combined Heat and Power
CIL	Community Infrastructure Levy
DEFRA	Department for Environment, Food & Rural Affairs
DH	District Heating and cooling systems
DM	Development Management
DPD	Development Plan Document
EA	Environment Agency
ECC	Essex County Council
EIA	Environmental Impact Assessment
ELR	Employment Land Review
EqIA	Equalities Impact Assessment
FTTP	Fibre to the Premises (broadband)
GBI	Green and blue infrastructure
GPDO	General Permitted Development Order
GTAA	Gypsy and Traveller Accommodation Assessment
HCA	Homes and Community Agency
HELAA	Housing and Economic Land Availability Assessment
HRA	Habitat Regulation Assessment
IDP	Infrastructure Delivery Plan
JSP	(South Essex) Joint Strategic Plan



LAA	Local Area Agreement
LCA	Landscape Character Assessment
LCAP	Landscape Conservation Action Plan
NPPF	National Planning Policy Framework
OAHN	Objective Assessment of Housing Need
ONS	Office of National Statistics
PPG	Planning practice guidance
PPTS	Planning Policy for Traveller Sites
RAMS	Recreational disturbance Avoidance Mitigation Strategy
SA/SEA	Sustainability Appraisal/Strategic Environmental Assessment
SCI	Statement of Community Involvement
SFRA	Strategic Flood Risk Assessment
SHLAA	Strategic Housing Land Availability Assessment
SHMA	Strategic Housing Market Assessment
SoCG	Statement of Common Ground
SPD	Supplementary Planning Document
SSSI	Site of Special Scientific Interest
SuDS	Sustainable Drainage Systems
SWMP	Surface Water Management Plan Note: This abbreviation is sometimes used for Site Waste Management Plans.

## GLOSSARY

Affordable housing	Social rented, affordable rented and intermediate housing which is provided to specific eligible households whose housing needs are not met by the market housing on offer (including housing that provides a subsidised route to home ownership and/or is for essential local workers). Eligibility is determined with regard to local incomes and local house prices.
Air Quality Management Areas (AQMAs)	Areas designated by local authorities because they are not likely to achieve national air quality objectives by the relevant deadlines.
Ancient woodland	An area that has been wooded continuously since at least 1600 AD. It includes ancient semi-natural woodland and plantations on ancient woodland sites (PAWS).
Archaeological interest	There will be archaeological interest in a heritage asset if it holds, or potentially holds, evidence of past human activity worthy of expert investigation at some point.
Biophilic design	Biophilic Design responds to the well documented knowledge that humans have an innate connection to nature and natural processes. It offers an approach to creating buildings and spaces that respond to our human needs – thereby making design 'human-scale'. Incorporating biophilic design principles to the design of places and buildings not only means integrating nature (green infrastructure) into design proposals, but also incorporating natural analogues into the design of the built elements; these can include using elements that use references to, representations of, or mimic aspects of nature such as natural materials, colours, textures, natural geometries (fractals and curves), organic forms and patterns.
Brownfield sites	Land which is or has been previously developed as opposed to greenfield land which has never been developed. See 'previously developed land'.
Climate change adaptation	Adjustments made to natural or human systems in response to the actual or anticipated impacts of climate change, to mitigate harm or exploit beneficial opportunities.
Climate change mitigation	Action to reduce the impact of human activity on the climate system, primarily through reducing greenhouse gas emissions.
Community forest	An area identified through the England Community Forest Programme to revitalise countryside and green space in and around major conurbations.
Community Infrastructure Levy (CIL)	A mechanism by which charging authorities can set a standard charge on specified development in their area to pay for the new infrastructure required to support growth.
Community Right to Build Order	An Order made by the local planning authority (under the Town and Country Planning Act 1990) that grants planning permission for a site-specific development proposal or classes of development.
Conservation	The process of maintaining and managing change to a heritage asset in a way that sustains and, where appropriate, enhances its significance.

Conservation Area	An area of special architectural or historic interest, the character or appearance of which it is desirable to preserve or enhance, designated under Section 69 of the Planning (Listed Buildings and Conservation Areas) Act 1990.
Critical Drainage Areas (CDA)	A discrete geographical area (usually a hydrological catchment) where multiple or interlinked sources of flood risk cause flooding during a severe rainfall event thereby affecting people, property or local infrastructure. The CDA comprises the upstream contributing catchment, the influencing drainage catchments, surface water catchments and, where appropriate, a downstream area if this can have influence on CDA.
Curtilage	The area, usually enclosed, encompassing the grounds and buildings immediately surrounding a home that is used in the daily activities of domestic life.
Decentralised energy	Local renewable and local low-carbon energy sources that generate energy close to where it will be used, rather than at a large plant elsewhere and be sent through the national grid. This local generation reduces transmission losses and lowers carbon emissions. Examples are combined heat and power (CHP) plants and district heating (DH) schemes.
Deliverable	To be considered deliverable, sites for housing should be available now, offer a suitable location for development now, and be achievable with a realistic prospect that housing will be delivered on the site within five years. Sites that are not major development, and sites with detailed planning permission, should be considered deliverable until permission expires, unless there is clear evidence that homes will not be delivered within five years (e.g. they are no longer viable, there is no longer a demand for the type of units or sites have long term phasing plans). Sites with outline planning permission, permission in principle, allocated in the development plan or identified on a brownfield register should only be considered deliverable where there is clear evidence that this housing will be completed on site within five years.
Design and build with nature	Sometimes also referred to as 'nature-based solutions' it calls on design and building approaches to account for natural systems and ecosystem services, and to harness these natural processes to create smart and sustainable infrastructure to manage resources and climate impacts (such as sustainable urban drainage, passive heating and cooling, energy efficiency and waste management, etc). The approach is gaining traction with a number of guides starting to emerge <sup>73</sup>
Design code	A set of illustrated design requirements that provide specific, detailed parameters for the physical development of a site or area. The graphic and written components of the code should build upon a design vision, such as a masterplan or other design and development framework for a site or area.
Designated heritage asset	A World Heritage Site, Scheduled Monument, Listed Building, Protected Wreck Site, Registered Park and Garden, Registered Battlefield or Conservation Area designated under the relevant legislation.
Developable	To be considered developable, sites should be in a suitable location for housing development with a reasonable prospect that they will be available and could be viably developed at the point envisaged.
Duty to Co-operate	This is a legal duty that requires Local Planning Authorities and other prescribed public bodies to 'engage constructively, actively and on an ongoing basis' to develop strategic policies. It is a statutory test and a key issue when assessing the soundness of Local Plans.
Employment land review	Assesses the likely demand for, and supply of, land for employment uses including land currently in use for employment purposes; land currently allocated for employment purposes; and land with the potential to be suitable for employment purposes.
Environmental impact assessment	A procedure to be followed for certain types of project to ensure that decisions are made in full knowledge of any likely significant effects on the environment.
Five-year housing land supply	The new Local Plan must ensure that enough homes are provided and identify enough land to maintain a steady supply of housing over the plan period. This is commonly called maintaining a five-year housing land supply.
Green and blue infrastructure	Green and Blue Infrastructure (GBI) can be summarised as a network of multi-functional green space, both new and existing, both rural and urban, which supports the natural and ecological processes and is integral to the health and quality of life of sustainable communities. Green and Blue Infrastructure also encompasses river systems and coastal environments (these are sometimes also refer to as Blue Infrastructure). The Local Plan uses Green-Blue Infrastructure (GBI) and Green Infrastructure (GI) interchangeably).

<sup>73</sup> Building with Nature (2017). Available at: <https://www.buildingwithnature.org.uk/>

	<p>Component elements of Green and Blue Infrastructure include natural and semi-natural green spaces such as parks, private gardens, agricultural fields, hedges, trees, woodland, green roofs, green walls, rivers and ponds. The term covers all land containing these features, regardless of its ownership, condition or size.</p> <p>Green and Blue Infrastructure in the widest sense will be accepted in line with key institutional definitions including Natural England<sup>74</sup>, Landscape Institute, Green Infrastructure Partnership<sup>75</sup>, Ecosystems Knowledge Network<sup>76</sup></p>
Green Belt	A national planning policy designation given to land. Green Belts were designated to stop the uncontrolled growth of large cities and towns. The Green Belt can include both greenfield and brownfield (previously developed) sites in areas with both good and poor landscape value.
Green Belt assessment	An assessment of the Green Belt to determine the strategic role of the Green Belt in the District, whether the Green Belt fulfils its purpose as set out in the National Planning Policy Framework.
Greenfield sites	Land that has not been previously developed or undeveloped pieces of land. Greenfield sites are typically outside existing built-up areas, but areas such as open spaces and residential gardens are considered greenfield regardless of where they are located.
Gypsy and Traveller Pitch / Plot	Area of land on a site/development generally home to one household. Can be varying sizes and have varying caravan numbers. Pitches refer to Gypsy and Traveller sites and Plots to Travelling Showpeople yards.
Gypsy and Traveller Site	An area of land on which Gypsies, Travellers and Travelling Showpeople are accommodated in caravans/chalets/vehicles. Can contain one or multiple pitches/plots.
Habitat Regulations Assessment (HRA)	The Habitat Regulation Assessment forms part of the Local Plan evidence base. The Habitat Regulation Assessment is a statutory requirement under the Conservation (Natural Habitats) (Amendment) (England and Wales) Habitat Regulations Assessment Regulations 2006. An HRA is required for a plan or project which, either alone or in combination with other plans or projects is likely to have a significant effect on the integrity of a European site (one that forms part of the Natura 2000 (N2K) network), plus Ramsar sites (collectively 'international sites').
Harmonic design	Refers to composition of design elements such as balance, pattern, repetition, proportion, scale, rhythm, right amount of variety and detail, unity, etc, that come together to create a space that affords healthy functional qualities; different combinations will create spaces that are calming, versus spaces that afford social interaction and activity, without being overpowering and jarring.
Healthy-by-design	Healthy by Design promotes the ethos of incorporating healthier design considerations into masterplanning and place-making decisions. It is a process which ensures that all elements known to promote health and wellbeing are given due consideration when designing places and buildings to avoid adverse health impacts. There are numerous guides on how to deliver healthy environments, including a selection promoted by Public Health England <sup>77</sup> .
Heritage Asset	A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest. Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing).
Housing and Economic Land Availability Assessment (HELAA)	The HELAA is a technical study which is used to assist in the monitoring of whether there is an adequate supply of deliverable housing land. It informs planning process in terms of identifying land that is suitable, available and achievable for housing and economic development uses over the Plan period. It identifies sites and broad locations with potential for development, assesses their development potential and assesses their suitability for development and the likelihood of that development coming forward.
Infrastructure	Infrastructure means any structure, building, system facility and/or provision required by an area for its social and/or economic function and/or well-being.

<sup>74</sup> Natural England (2014) Green Infrastructure Guidance. Available at:

<http://publications.naturalengland.org.uk/publication/35033>

<sup>75</sup> Green Infrastructure Partnership Resource Library <https://www.tcpa.org.uk/pages/category/green-infrastructure-partnership>

<sup>76</sup> Ecosystems Knowledge Network Resources. <https://ecosystemsknowledge.net/resources/tools-guidelines/green-infrastructure>

<sup>77</sup> Guidance on Healthy Places <https://www.gov.uk/government/publications/phe-healthy-places>

	Any structure, building, system facility and/or provision required by an area for its social and/or economic function and/or wellbeing including (but not exclusively): footways, cycleways and highways; public transport; drainage, SuDs and flood protection; waste recycling facilities; education and childcare; healthcare; sports, leisure and recreation facilities; community and social facilities; cultural facilities, including public art; emergency services; green infrastructure; open space; affordable housing; live/work units and lifetime homes; broadband and facilities for specific sections of the community such as youth or the elderly.
Infrastructure Delivery Plan (IDP)	This document forms part of the evidence base for the Local Plan. It assesses the infrastructure capacity and needs of Brentwood, and provides an overview of the way infrastructure is planned and the agencies involved in its delivery. It also looks at costs and likely funding mechanisms for infrastructure, and forms the basis for assessing contributions that would be sought to meet the needs of new development.
Landscape Character Assessment	An assessment which describes the main types of landscape in an area and gives advice about the management and planning of the landscape.
Listed Building	A building is listed, on the National Heritage List for England, when it is of special architectural or historic interest considered to be of national importance.
Living landscapes	Key areas of landscape identified by Essex Wildlife Trust, which form ecological networks that allow wildlife to move through them and increase their resilience to threats such as climate change, floods drought, sea-level rise and development pressure. These areas are promoted for nature conservation, wildlife habitats, public enjoyment and adaptation to climate change.
Main town centre use	Retail development (including warehouse clubs and factory outlet centres); leisure, entertainment and more intensive sport and recreation uses (including cinemas, restaurants, drive-through restaurants, bars and pubs, nightclubs, casinos, health and fitness centres, indoor bowling centres and bingo halls); offices; and arts, culture and tourism development (including theatres, museums, galleries and concert halls, hotels and conference facilities).
Major development	For housing, development where 10 or more homes will be provided, or the site has an area of 0.5 hectares or more. For non-residential development it means additional floorspace of 1,000m <sup>2</sup> or more, or a site of 1 hectare or more, or as otherwise provided in the Town and Country Planning (Development Management Procedure) (England) Order 2015.
Market housing	Private rented and housing for sale where prices are set in the open market.
Mineral Consultation Area	A geographical area based on a Mineral Safeguarding Area, where the district or borough council should consult the Mineral Planning Authority for any proposals for non-minerals development.
Minerals Safeguarding Area	An area of land overlying or in the immediate vicinity of a mineral resource that is defined on a map and is recognised through policy as an area that needs consideration if a non-mineral development is submitted for determination.
Multi-functional green space	Multi-functional refers to the ecosystem services that Green Infrastructure provides to tackle impacts of climate change, flood risk, water management, heat risk, food supply, providing efficient and renewable energy and creating comfortable, attractive places in which to live.
National Planning Policy Framework (NPPF)	A document that sets out the Government's planning policies for England and how these are expected to be applied.
Natural play area	Natural play areas are outdoor spaces designated for adventure play that are made of natural materials and incorporate natural components such as plants, logs, water, sand, mud, boulders, hills and trees. Natural Play does not just mean leaving a few logs on the ground, but is a combination of integrating quality structured play equipment in a natural context as well as interweaving nature and natural elements to create spaces where children can use their imagination to play thereby giving a wide range of play and learning experiences. Refer to guides by the National Trust, Woodland Trust as well as Play England.
Neighbourhood plans	A plan prepared by a Parish Council or Neighbourhood Forum for a particular neighbourhood area (made under the Planning and Compulsory Purchase Act 2004).
Non-designated heritage asset	Buildings, monuments, sites, places, areas or landscapes identified as having a degree of significance meriting consideration in planning decisions but which are not statutorily recognised (i.e. they are not listed, not within a Conservation Area and not part of a Scheduled Monument).
Older people	People over or approaching retirement age, including the active, newly-retired through to the very frail elderly; and whose housing needs can encompass accessible, adaptable general needs housing through to the full range of retirement and specialised housing for those with support or care needs.

Open space	All open space of public value, including not just land, but also areas of water (such as rivers, canals, lakes and reservoirs) which offer important opportunities for sport and recreation and can act as a visual amenity.
Permitted development rights	Permission to carry out certain limited forms of development without the need to make an application to a local planning authority, as granted under the terms of the Town and Country Planning (General Permitted Development) Order.
Planning condition	A condition imposed on a grant of planning permission (in accordance with the Town and Country Planning Act 1990) or a condition included in a Local Development Order or Neighbourhood Development Order.
Planning obligation	A legal agreement entered into under section 106 of the Town and Country Planning Act 1990 to mitigate the impacts of a development proposal.
Planning Practice Guidance (PPG)	Guidance on best practice for implementing the Government's planning policies set out in the National Planning Policy Framework.
Policies map	A Ordnance Survey based map showing where policies and designations within the Local Plan apply.
Previously developed land	Land which is or was occupied by a permanent structure, including the curtilage of the developed land (although it should not be assumed that the whole of the curtilage should be developed) and any associated fixed surface infrastructure. This excludes: land that is or was last occupied by agricultural or forestry buildings; land that has been developed for minerals extraction or waste disposal by landfill, where provision for restoration has been made through development management procedures; land in built-up areas such as residential gardens, parks, recreation grounds and allotments; and land that was previously developed but where the remains of the permanent structure or fixed surface structure have blended into the landscape.
Protected lane	Lanes identified as being of special historic or landscape value in the countryside.
Quietway cycle routes	Continuous, high-quality and well-signed cycle routes using mainly less-trafficked or traffic-free routes, such as side streets, parks and waterways.
Ramsar sites	Wetlands of international importance, originally designated under the 1971 Ramsar Convention.
Registered Parks and Gardens	Sites included in the Register of Parks and Gardens of Special Historic Interest compiled and maintained by English Heritage, which make a significant contribution to the diversity of the local and/or national landscape and/or which are of particular historical importance.
Renewable and low carbon energy	Includes energy for heating and cooling as well as generating electricity. Renewable energy covers those energy flows that occur naturally and repeatedly in the environment – from the wind, the fall of water, the movement of the oceans, from the sun and also from biomass and deep geothermal heat. Low carbon technologies are those that can help reduce emissions (compared to conventional use of fossil fuels).
Self-build and custom-build housing	Housing built by an individual, a group of individuals, or persons working with or for them, to be occupied by that individual. Such housing can be either market or affordable housing. A legal definition, for the purpose of applying the Self-build and Custom Housebuilding Act 2015 (as amended), is contained in section 1(A1) and (A2) of that Act.
Sites of Special Scientific Interest (SSSI)	Land notified under the Wildlife and Countryside Act 1981 as an ecosystem of flora and/or fauna considered by Natural England to be of significant national value and interest to merit its conservation and management.
Strategic Flood Risk Assessment (SFRA)	This provides an overview of flood risk from all sources within a defined area and provides general guidance on flood risk and issues associated with flooding for the area being studied.
Strategic Housing Land Availability Assessment (SHLAA)	A technical study which identifies sites with development potential for housing and assesses their developability, deliverability and capacity.
Strategic Housing Market Assessment (SHMA)	A technical study prepared for the Council which assesses the overall state of the housing market and advises on future housing policies used to inform the Council's Housing Strategy.
Sustainable Drainage Systems (SuDS)	This is a natural approach to managing drainage by slowing down and reducing the quantity of surface water run-off from a developed area to manage downstream flood risk and reducing the risk of the run-off causing pollution.
Sui generis	Planning uses falling outside the standard use classes, which can include betting offices, theatres, hostels, scrap yards, petrol stations, nightclubs, launderettes, casinos.

Supplementary Planning Document (SPD)	Documents which add further detail to the policies in the development plan. They can be used to provide further guidance for development on specific sites, or on particular issues, such as design. Supplementary planning documents are capable of being a material consideration in planning decisions but are not part of the development plan.
Surface Water Management Plan (SWMP)	Plan produced by the Lead Local Flood Authority (LLFA) that outlines the preferred surface water management strategy in a given location. These plans focus on areas of highest surface water flood risk and consider flooding from sewers, drains, groundwater and runoff from land, small water courses and ditches that occurs as a result of heavy rainfall. Note: This abbreviation is sometimes used for Site Waste Management Plans.
Sustainable Transport Modes	Any efficient, safe and accessible means of transport with overall low impact on the environment, including walking and cycling, low and ultra-low emission vehicles, car sharing and public transport.
Universal design	Universal Design is the design of buildings, products or environments to be aesthetic and usable to the greatest extent possible by everyone and therefore accessible to all people, regardless of age, disability or other factors. Detailed guidance can be found on the website for Centre for Excellence in Universal Design (CEUD), by the National Disability Authority (NDA) Ireland <sup>78</sup> .
Use Class	The Town and Country Planning (Use Classes) Order 1987 (as amended) puts uses of land and buildings into various categories known as 'Use Classes' e.g. A1 Shops, B1 Business and D1 Non-Residential institutions. Planning permission is generally required to change from one use class to another, although there are some exceptions.
Wider determinants of health	Wider Determinants of Health draws attention to the broad range of individual, social, economic and environmental factors which influence our health <sup>79</sup> . An understanding of the wider determinants of health ensures we take a holistic approach to planning and designing places. It acknowledges that healthy, cohesive communities are the result of not just places with accessible health care and green spaces, but also where the social, cultural and economic wellbeing factors are also in place to allow individuals to achieve their full potential, thereby bringing about the total wellbeing of their community. Therefore, it is important to ensure access to facilities like jobs and community spaces is fundamental to place-making. For more details, view Government guidance <sup>80</sup> .

<sup>78</sup> Centre for Excellence in Universal Design (CEUD) by the National Disability Authority (NDA)

<http://universaldesign.ie/>

<sup>79</sup> Public Health England (2017). Chapter 6: Social Determinants of Health

<https://www.gov.uk/government/publications/health-profile-for-england/chapter-6-social-determinants-of-health>

<sup>80</sup> Wider Determinants of Health - <https://www.gov.uk/government/statistics/wider-determinants-of-health-may-2018-update>



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## **Report to Brentwood Borough Council**

**by Yvonne Wright BSc (Hons) Dip TP DMS MSc MRTPI  
and Mike Worden BA (Hons) Dip TP MRTPI**

Inspectors appointed by the Secretary of State

Date: 23 February 2022

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Planning and Compulsory Purchase Act 2004 (as amended)

Section 20

## **Report on the Examination of the Brentwood Borough Local Plan**

The Plan was submitted for examination on 14 February 2020

The examination hearing sessions were held between 1 December 2020  
and 28 July 2021

File Ref: PINS/H1515/429/10

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## Abbreviations used in this report

dpa	Dwellings per annum
dph	Dwellings per hectare
Framework	National Planning Policy Framework
GTAA	Gypsy, Traveller and Travelling showpeople Accommodation Assessment
Ha	hectares
HELAA	Housing and Economic Land Availability Assessment
HRA	Habitats Regulations Assessment
IDP	Infrastructure Delivery Plan
MM	Main modification
PPG	Planning Policy Guidance
PPTS	Planning Policy for Traveller Sites
RAMS	Recreational Disturbance Avoidance and Mitigation Strategies
SA	Sustainability appraisal
SoCG	Statement of common ground
sqm	square metres

## Non-Technical Summary

This report concludes that the Brentwood Local Plan Pre-Submission Document and the Addendum of Focussed Changes to the Pre-Submission Local Plan, which together form the Plan, provide an appropriate basis for the planning of the Borough of Brentwood, provided that a number of main modifications [MMs] are made to it. Brentwood Borough Council has specifically requested that we recommend any MMs necessary to enable the Plan to be adopted.

Following the hearing sessions, the Council prepared schedules of the proposed modifications and, where necessary, carried out sustainability appraisal (SA) and habitats regulations assessment (HRA) of them. The MMs were subject to public consultation over a six-week period. In some cases we have amended their detailed wording and/or added consequential modifications where necessary. We have recommended their inclusion in the Plan after considering the SA and HRA and all the representations made in response to consultation on them.

The Main Modifications can be summarised as follows:

- Clarifying which existing development plan policies are superseded;
- Clarifying which policies are strategic;
- Merging policies to clearly set out the spatial strategy;
- Inserting new policies on the settlement hierarchy and the need for an immediate Plan update;
- Amending the stepped housing requirement;
- Deleting, merging and amending development management policies including on Green Belt, heritage, transport and design;
- Amending the site allocation policies to remove ambiguity and clarify development requirements;
- Updating the housing supply figures and housing trajectory to reflect the evidence;
- Deleting housing allocations that have gained planning permission;
- Amending the gypsy and traveller policies;
- Replacing the monitoring framework; and
- A number of other modifications to ensure that the plan is positively prepared, justified, effective and consistent with national policy.

## Introduction

1. This report contains our assessment of the Brentwood Local Plan Pre-Submission Document and the Addendum of Focussed Changes to the Pre-Submission Local Plan (which together form 'the Plan') in terms of Section 20(5) of the Planning and Compulsory Purchase Act 2004 (as amended). It considers first whether the Plan's preparation has complied with the duty to co-operate. It then considers whether the Plan is compliant with the legal requirements and whether it is sound. The National Planning Policy Framework 2021 (paragraph 35) (the Framework) makes it clear that in order to be sound, a Local Plan should be positively prepared, justified, effective and consistent with national policy.
2. The starting point for the examination is the assumption that the local planning authority has submitted what it considers to be a sound and legally compliant plan. The Brentwood Local Plan Pre-Submission Document and the Addendum of Focussed Changes to the Pre-Submission Local Plan, both submitted in February 2020, form the basis for our examination. The former was published for consultation in February 2019. The latter document sets out five focussed changes to five site allocation policies, and consequential changes to the rest of the Plan, and was published for consultation in October 2019.

## Main Modifications

3. In accordance with section 20(7C) of the 2004 Act the Council requested that we should recommend any main modifications [MMs] necessary to rectify matters that make the Plan unsound and /or not legally compliant and thus incapable of being adopted. Our report explains why the recommended MMs are necessary. The MMs are referenced in bold in the report in the form **MM1**, **MM2** etc, and are set out in full in the Appendix.
4. Following the examination hearing sessions, the Council prepared a schedule of proposed MMs and carried out SA and HRA of them. The MM schedule was subject to public consultation for six weeks. We have taken account of the consultation responses in coming to our conclusions in this report and in this light we have made some amendments to the detailed wording of the main modifications and added consequential modifications where these are necessary for consistency or clarity. None of the amendments significantly alters the content of the modifications as published for consultation or undermines the participatory processes and SA/HRA that has been

undertaken. Where necessary we have highlighted these amendments in the report.

## **Policies Map**

5. The Council must maintain an adopted policies map which illustrates geographically the application of the policies in the adopted development plan. When submitting a local plan for examination, the Council is required to provide a submission policies map showing the changes to the adopted policies map that would result from the proposals in the submitted local plan. In this case, the submission policies map comprises the set of plans identified as Proposed Changes to Policies Map as set out in document A8.
6. The policies map is not defined in statute as a development plan document and so we do not have the power to recommend MMs to it. However, a number of the published MMs to the Plan's policies require further corresponding changes to be made to the policies map.
7. These further changes to the policies map were published for consultation alongside the MMs as Proposed Changes to the Submitted Policies Map.
8. When the Plan is adopted, in order to comply with the legislation and give effect to the Plan's policies, the Council will need to update the adopted policies map to include all the changes proposed in the Proposed Changes to Policies Map and the further changes published alongside the MMs in the Proposed Changes to the Submitted Policies Map.

## **Context of the Plan**

9. The Brentwood Local Plan Pre-Submission Document and the Addendum of Focussed Changes to the Pre-Submission Local Plan, are together proposed to replace the saved policies of the Brentwood Replacement Local Plan (2005). Along with other relevant development plan documents, including the Essex and Southend on Sea Waste Local Plan and the Essex Minerals Local Plan, it will form the development plan for Brentwood Borough. Whilst reference is made in the Plan to the emerging South Essex Joint Strategic Plan, this is at a very early stage of production, and therefore has had no influence on the Plan submitted for examination.

10. The Borough is approximately 20 miles north-east of central London and has a resident population of around 75,600. At the heart of the Borough lies the market town of Brentwood and its wider urban area. This is surrounded by countryside and a number of villages. There are two key transport corridors running through the Borough, offering access to London and surrounding areas by means of road and rail.
11. All of the Borough's countryside is set within the Metropolitan Green Belt of London. In addition the Thames Chase Community Forest Area covers the south and south-western part of the Borough. There are a range of other natural and built assets including country parks, local wildlife sites, conservation areas and listed buildings.

## **Public Sector Equality Duty**

12. We have had due regard to the aims expressed in S149(1) of the Equality Act 2010. This has included our consideration of several matters during the examination including the Equalities Impact Assessment of the Plan and specific policy matters such as the provision of gypsy and traveller sites to meet need and accessible and adaptable housing.

## **Assessment of Duty to Co-operate**

13. Section 20(5)(c) of the 2004 Act requires that we consider whether the Council complied with any duty imposed on it by section 33A in respect of the Plan's preparation.
14. The Duty to Co-operate Statement dated February 2019 and additional evidence submitted during the examination, sets out the various steps the Council has taken to co-operate with neighbouring authorities, prescribed bodies and other public organisations, at key stages in the preparation of the Plan. Several cross-boundary strategic planning issues have been identified and considered during the Plan preparation process, including housing, Green Belt, flooding, green and blue infrastructure, education, health and wellbeing, and transport and travel.
15. The positive engagement undertaken by the Council is documented in detail in the above statement and other documents, including the agreed statements of common ground (SoCG). These demonstrate the significant number of collaborative meetings and amount of joint working that has taken place between the Council and relevant bodies, since the start of the plan making process.

16. Existing joint working arrangements with neighbouring and nearby local authorities include the Essex Planning Officers Association, the Co-operation for Sustainable Development Group, the A127 Corridor Economic Task Force and the Association of South Essex Local Authorities.
17. Discussions with neighbouring authorities have also included the issue of whether any of their housing need should be taken account of in setting the housing requirement for Brentwood, but none has been highlighted to the Council. Basildon Borough Council has not asked the Council to accommodate any of its housing need in this Plan, and this was confirmed through the SoCG and at the hearing sessions. There is no compelling evidence that needs from any other neighbouring authority should be met in Brentwood. Similarly, the Council is not seeking to meet its own needs in neighbouring authorities.
18. Whilst there have been disagreements between the Council and neighbouring Thurrock Borough Council over the implications of growth in the West Horndon area and the proposed new settlement at Dunton Hills, we are nevertheless satisfied that the Council has made considerable efforts to engage actively and constructively with Thurrock Borough Council on this issue, in preparing the Plan.
19. The evidence also demonstrates there has been ongoing close working and co-operation with prescribed bodies such as the Highways Authority, National Highways, Transport for London, Natural England, the Environment Agency, and Historic England, particularly on strategic infrastructure matters that are considered necessary to deliver the Plan. In addition, the Council has co-operated with a number of other public bodies, including Sport England, Network Rail and rail operators, Crossrail and water utility providers, as demonstrated in the evidence.
20. We have carefully considered all relevant evidence presented both in writing and orally at the hearing sessions on the duty to co-operate. When viewed in the context of what has been realistic and achievable, we consider the engagement and cooperation that has taken place has maximised effectiveness in the preparation of the Plan. Overall, therefore, the evidence illustrates that the Council has made considerable efforts to engage with all relevant organisations and prescribed bodies throughout the Plan's preparation.
21. We are therefore satisfied that, where necessary, the Council has engaged constructively, actively and on an on-going basis in the preparation of the Plan and that the duty to co-operate has been met.



## **Assessment of Other Aspects of Legal Compliance**

### **Sustainability appraisal**

22. The Council has carried out detailed SA of the Plan through its various stages of preparation. Interim versions of the SA were published in 2009, 2013 and 2015 alongside early versions of the Plan. This was followed by the SA Report in January 2019 and an Addendum in October 2019 which appraised the submitted Plan including the Focussed Changes. A further Addendum was published in September 2021 which appraised the MMs and updated the 2019 findings.
23. The SA identifies 12 sustainability topics for the Borough from which a range of key objectives are presented. These were established through initial scoping and have been subject to consultation with relevant bodies in accordance with the Regulations. The SA has suitably assessed the sustainability baseline for each of these topics. Taken together, the SA objectives provide a robust framework for assessing the likely effects of alternative spatial options and the policies and site allocations in the Plan, both individually and cumulatively.
24. The SA has appraised various options and reasonable alternatives. At the initial Issues and Options stage of Plan preparation this included the assessment of four growth options for the spatial strategy: centralised, transport corridor-led, semi-dispersed and dispersed. An additional reasonable alternative focusing development primarily at Brentwood, Shenfield and West Horndon was added in 2013, as part of the Preferred Options version of the Plan. A range of 48 site options were also assessed at this stage.
25. The 2015 interim SA report assessed a number of larger scale strategic site options. Of these only Dunton Hills Garden Village and a strategic allocation at West Horndon were considered to be reasonable alternatives. The other strategic site options were appropriately ruled out for various reasons including concerns relating to site constraints and infrastructure and deliverability.
26. Seven strategic spatial options were assessed as reasonable alternatives in the 2019 SA, some of which were a combination of the other options. The preferred approach is Option 3 which is the Dunton Hills Garden Village community. The appraisal presents both positive and negative effects for this option, as is the case for all the other reasonable alternatives. On the whole, Option 3 performs well against the majority of the SA objectives. This option, in addition to the sites that were assessed as 'constants' across all the reasonable alternatives, forms the preferred spatial strategy.

27. Overall, the SA demonstrates that generally, the proposals in the Plan perform similar to, or better than, the reasonable alternatives considered, when assessed against the SA objectives. Whilst we acknowledge the different views about the accuracy or consistency of the scoring undertaken for individual sites, this is inevitably a matter of planning judgement and does not undermine the SA process.
28. The SA has been an integral part of the Plan's preparation, ensuring that the likely social, economic and environmental effects of the policies and proposals within it have been identified, described, appraised and communicated. Overall, it demonstrates that the implementation of the policies and proposals contained in the Plan, will result predominantly in positive effects on the SA objectives, particularly with regards to such factors as meeting housing and economic needs, promoting sustainable living, improving health and wellbeing and supporting sustainable modes of transport.
29. Whilst some negative effects have been identified, the process of appraisal has ensured that appropriate mitigation is included in the Plan's policies, in terms of both site allocations and general development management policies, to avoid or minimise such effects.
30. Furthermore, the 2021 SA Addendum concludes that, in respect of the Plan as a whole, having accounted for the potential MMs, the findings are broadly similar to the 2019 SA and Addendum, for most of the strategic objectives. Whilst the conclusions do differ in relation to housing and landscape, with the former worsening and the latter improving, this does not significantly affect the overall SA findings.
31. Overall, the SA has adequately considered reasonable alternatives and is suitably comprehensive and legally compliant.

### **Habitats Regulations Assessment**

32. The HRA of the Plan, which comprises reports dated January 2019 and October 2019, along with the September 2021 HRA report on the MMs, present the results of the screening and appropriate assessment stages of the HRA process. Whilst no European sites lie within the Borough, at the screening stage it was considered that some policies, when considered in combination, had the potential to result in likely significant effects on European sites relatively close to the Borough and which now form part of the national site network. Three impact pathways were subjected to appropriate assessment, comprising recreational pressure and water quality on the Essex Coast European sites and atmospheric pollution on the Epping Forest Special Area of Conservation.
33. All identified impacts and any measures necessary to avoid or reduce those impacts have been considered within the appropriate

assessment. This includes reference to the preparation of two Recreational Disturbance Avoidance and Mitigation Strategies (RAMS), one for the Essex Coast European sites and another for the Epping Forest Special Area of Conservation. These RAMS aim to deliver the mitigation necessary to avoid significant adverse effects from 'in-combination' impacts of new residential development.

34. At the time of the Plan's submission for examination the Essex Coastal RAMS was still in the process of being prepared by the Essex local planning authorities, in partnership with the County Council and Natural England. Since submission, the Essex Coastal RAMS has been completed and adopted by the Council as a Supplementary Planning Document (2020). The Epping Forest RAMS is currently still being prepared. Only small parts of Brentwood Borough lie within the Essex Coastal Zone of Influence and the Epping Forest RAMS Zone of Influence.
35. Policy NE02 within the Plan seeks to ensure that relevant development schemes contribute to the necessary RAMS mitigation measures. It is necessary to update this policy to reflect the adopted Essex Coast RAMS. We consider this and the consistency and effectiveness of the policy, in combination with Policy NE01, later in our report under main issue 10.
36. Focussing on the legal requirement at this stage, the HRA reports conclude, overall, that the Plan provides sufficient policy framework to ensure that there will be no adverse effects on the integrity of European protected sites, either alone or in-combination with other plans or projects. We are therefore satisfied that the legal requirement to undertake an appropriate assessment in accordance with the Habitats Regulations has been met.

### **Other legal requirements**

37. The Plan has generally been prepared in accordance with the Council's Local Development Scheme.
38. Consultation on the Plan and the MMs was carried out in compliance with the Brentwood Borough Statement of Community Involvement 2018.
39. The Plan, taken as a whole, includes policies to address the strategic priorities for the development and use of land in the local planning authority's area.
40. The Plan, taken as a whole, includes policies designed to secure that the development and use of land in the local planning authority's area

contribute to the mitigation of, and adaptation to, climate change. Specific policies on matters including carbon reduction, renewable energy, water efficiency, managing heat risk and sustainable drainage aim to achieve this. We consider these policies later in our report under issue 10.

41. The Council has confirmed that the Plan will supersede existing development plan documents. Therefore, to comply with Regulation 8 (5) of the Town and Country Planning (Local Planning) (England) Regulations 2012 it is necessary to make it clear within the Plan which plans and policies will be superseded on adoption. Council document F19 provides a list of the plans and policies to be superseded. This was made public prior to the first hearing session and discussed during the examination. As this is a legal requirement it is necessary for us to add this list as an appendix to the Plan. This is achieved through the addition of new **MM119** to the schedule of MMs. This addition does not undermine the participatory process.
42. The Plan complies with all other relevant legal requirements, including in the 2004 Act (as amended) and the 2012 Regulations.

## **Assessment of Soundness**

### **Main Issues**

43. Taking account of all the representations, the written evidence and the discussions that took place at the examination hearing, we have identified 10 main issues upon which the soundness of this Plan depends. This report deals with these main issues. It does not respond to every point or issue raised by representors. Nor does it refer to every policy, policy criterion or allocation in the Plan.

**Issue 1 – Whether the Plan’s vision, strategic objectives and spatial strategy provide a positive and soundly based framework for the delivery of sustainable development in Brentwood Borough that is justified and consistent with national policy. Whether the Plan period is consistent with national policy or otherwise justified.**

### **Vision, aims and objectives**

44. Chapter 3 of the Plan sets out a vision for Brentwood Borough for the end of the Plan period in 2033. This seeks to capitalise on the Borough’s distinctive environmental and village character and good connectivity, to provide for new economic opportunities and a

desirable place in which to live and visit. Overall, it presents a positive statement for the Borough from which the strategic objectives, spatial strategy and policies within the rest of the Plan flow.

45. Following this the Chapter sets out a wide range of different driving factors, overarching aims, strategic objectives and spatial development principles. These are rather fragmented and repetitious in places and it is not clear how they all relate to and have informed the Plan's priorities and overall spatial strategy. Accordingly, amendments are required to simplify the Chapter and ensure it is effective, by focussing on and clearly defining the strategic aims and objectives. This includes the need to incorporate clear links to the spatial strategy and ensure there is consistency with the Plan policies that follow. Other ineffective text is to be deleted. This is achieved by **MM2** which is necessary for effectiveness and to ensure the Plan is positively prepared and justified.
46. The Plan also includes an additional spatial vision, strategic aims and objectives and development principles specifically for the Dunton Hills Garden Village site allocation. We consider these elements later in our report.

### **Spatial strategy**

47. Two key growth areas for development within the Borough are defined in the Plan, as part of the strategic objectives sub-section in Chapter 3. These focus growth principally along the two main transit corridors that run through the Borough: the Central Brentwood Growth Corridor and the South Brentwood Growth Corridor. Within Chapter 4 Policy SP02 identifies that new development will be directed towards the site allocations within the Plan and highly accessible locations along transit/growth corridors. Altogether these elements form the Plan's overarching spatial strategy.
48. Focussing development within the two key transport corridors is a logical approach, providing access to sustainable forms of transport, services, facilities and employment opportunities. The Central Brentwood Growth Corridor runs north-east to south-west through the centre of the Borough along key rail and road routes and includes the main town of Brentwood and surrounding urban areas. Growth in this corridor would maximise the use of brownfield land and provide urban extensions that relate well to existing services, facilities and transport connectivity.

49. The South Brentwood Growth Corridor is focussed on a separate east-west road and rail transport route along which are existing employment sites and the settlement of West Horndon. The strategy seeks to enhance existing services and facilities by delivering supporting strategic employment and mixed use developments in this location, including a new self-sustaining garden village community. Development in areas outside these two growth area corridors is limited.
50. Overall, we are satisfied that the spatial strategy makes effective use of the Borough's assets and opportunities, aligns with the overarching strategic aims and objectives and provides a suitable framework to achieve sustainable development. Whilst site allocations and deliverability of the Plan are discussed in detail under the relevant sections elsewhere in the report, we consider that the Plan overall includes an appropriate strategy for the Borough.
51. Notwithstanding this, some changes are necessary to make the spatial strategy explicit within the Plan. Amendments to Chapter 3 are required so that it is clear that the growth areas form part of the spatial strategy and the wording is effective. Furthermore, for effectiveness and reasons of consistency, the Key Diagram needs to be modified to show these broad locations for development, as required by the Framework, and remove references to 'green wedges' which do not form part of the Plan. These changes are achieved through **MM2**.
52. In addition, Policy SP02 needs to be re-named and modified to ensure the spatial strategy is set out in a strategic policy (now proposed to be Strategic Policy MG01). This includes inserting the distribution of growth into the policy. **MM4** rectifies this so the Plan is positively prepared and effective in this regard. Other amendments to Strategic Policy SP02 are also necessary, but these are covered in other sections of this report.
53. Policy SP01 generally emulates the Framework's presumption in favour of sustainable development. However, as national policy should not be repeated in local development plans, the policy and its supporting text need to be deleted from the Plan to ensure it is consistent [**MM3**].

### **Settlement hierarchy**

54. A settlement hierarchy is included in an introductory Chapter of the Plan. Each settlement is categorised within Figure 2.3 of the Plan

according to its character, size and the range of services and facilities on offer to determine its role in delivering sustainable growth. At our request, during the examination, the Council submitted further updated evidence to justify the settlement hierarchy. This included identifying the existing facilities and services for each settlement, such as schools, healthcare, retail provision and the availability of public transport. Based on this, the settlement hierarchy is justified.

55. However, to be effective in the decision-making process this hierarchy needs to be set out within a new policy rather than introductory text and located within a policy Chapter of the Plan. Relevant text therefore needs to be incorporated into this new policy to ensure that the settlement hierarchy is succinctly and clearly defined.
56. Furthermore, the settlement hierarchy categories in the Plan confusingly include reference to development opportunities which are either unclear or conflict with other Plan policies. Accordingly, these inconsistencies need to be removed. Other amendments to the category descriptions and supporting text are also necessary for clarity and to provide overall Plan consistency.
57. To this end, Figure 2.3 of the Plan and relevant supporting text on the settlement hierarchy are moved to Chapter 4 and amended to form a new policy (Policy MG03) as defined in **MM5**. This ensures the Plan is effective. Changes to the policies map are also required to ensure the settlement boundaries and hierarchy categories are clearly defined in map form.

### **Strategic and non-strategic policies**

58. The Plan does not define whether policies are strategic or non-strategic. This is contrary to paragraph 21 of the Framework and therefore, in order to be effective and consistent with national policy, the Plan needs to be amended to include a list of strategic and non-strategic policies. This is achieved through **MM1** which adds appropriate wording to the introductory text of the Plan and **MM116** which adds a new appendix detailing the strategic and non-strategic policies. Other policies within the Plan are also amended to clarify when they are strategic, as set out in later MMs in our report.

### **Plan period**

59. Paragraph 22 of the Framework confirms that strategic policies should look ahead over a minimum 15 year period from adoption. The Plan

period is from 2016 to 2033. As the earliest possible adoption of the Plan would now be 2022, the strategic policies will only look forward 11 years, which would not accord with national policy. However, to extend the Plan period would require the Council carrying out additional work, resulting in a significant delay in the adoption of the Plan. This could frustrate sites in the Plan from coming forward in a timely manner and would be contrary to the Government's objective to significantly boost the supply of housing.

60. Moreover, the existing Brentwood Replacement Local Plan 2005 only sets out provision to meet development needs up to 2011, so without this new replacement Plan there are currently limited opportunities to bring forward development to contribute to meeting identified needs. It is therefore better to get this Plan in place now and provide certainty for site delivery, rather than delay adoption to extend the Plan period.
61. Furthermore, whilst the Council is required to review its policies at least once every five years to assess whether they need updating, we discuss the need for a new policy requiring an immediate review of the Plan later in our report. The extension of the Plan period can be considered further as part of this immediate review.

## **Conclusion**

62. In conclusion, subject to the above MMs, the Plan's vision, strategic objectives and spatial strategy provide a positive and soundly based framework for the delivery of sustainable development in Brentwood Borough that is justified and consistent with national policy. Furthermore, whilst the Plan period is not consistent with national policy we are satisfied that it is justified, for the reasons specified above.

## **Issue 2 – Whether the identified housing need and requirement have been positively prepared and are justified and consistent with national policy.**

### **Housing need**

63. The Framework, at paragraph 61, states that housing need 'should be informed by a local housing need assessment, conducted using the standard method in national planning guidance'. Alternative approaches should only be used in exceptional circumstances.



64. The Plan identifies the Borough's housing need as 456 dwellings per annum (dpa) for the Plan period which equates to 7,752 dwellings overall. This was based on a calculation using the 2019 version of the standard method, which was in place at the time, to which an additional supply buffer was added, to cover a potential increase to local housing need from a revised standard method which was being proposed.
65. Since submission of the Plan, the way of calculating local housing need using the standard method has been adjusted, as defined by revised national policy and guidance. The housing need calculated using this revised standard method is 452 dpa, which results in 7,684 dwellings for the Plan period, which is not materially different to the need set out in the Plan. Consequently, we consider that the Plan's figure of 456 dpa (7,752 overall) is broadly consistent with the revised approach to calculating housing need, has been positively prepared, and is justified.
66. The Planning Practice Guidance (PPG) advises that 'local housing need calculated using the standard method may be relied upon for a period of 2 years from the time that a plan is submitted to the Planning Inspectorate for examination.' As the Plan was submitted for examination on 14 February 2020, a more recent local housing need figure should be considered. However, the local housing need for the Borough, when assessed using the standard method at November 2021, equates to 459 dpa, which is only marginally higher than the Plan's identified housing need of 456 dpa. As such, although the Plan has been in examination for just over two years, the latest standard method calculation indicates that the local housing need set out in the Plan is not materially different to the most recent identified housing need figure. We are satisfied, therefore, that in this case, it can be relied upon as an appropriate calculation of housing need in the Borough.

### **Principle of exceptional circumstances to release Green Belt**

67. Currently, approximately 89% of the Borough is within the London Metropolitan Green Belt. Paragraph 140 of the Framework states that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans.
68. The Council's Green Belt Study 2018 provides a comprehensive strategic assessment of the effects that potential development may have on the first four of the five purposes of the Green Belt, as

defined in paragraph 138 of the Framework. The fifth purpose, 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land', was not assessed, as the Council considered that all Green Belt land performs this purpose equally. This is a logical approach.

69. The Green Belt Study divides the Borough's Green Belt into 70 separate land parcels using existing man-made or natural physical boundaries. Whilst the size of these parcels varies quite widely, the approach used to define the boundaries is appropriate. Furthermore, the assessment criteria, to determine the contribution each parcel makes to the Green Belt purposes, both individually and overall, are reasonable. We are therefore satisfied that the Green Belt Study sets out a clear methodology and robust evaluations of the identified strategic land parcels.
70. Notwithstanding this, we requested further written evidence from the Council on demonstrating exceptional circumstances at the strategic level for the removal of land from the Green Belt. The resultant Green Belt Topic Paper 2020 explains why the Council considers it is necessary to release land from the Green Belt and explains how the Plan, and the spatial strategy within it, seeks to minimise harm to the Green Belt as far as is reasonably possible.
71. Based on the identified growth needs there is an obvious requirement to provide development land in the Borough. In accordance with paragraph 141 of the Framework, the Council has carried out a thorough assessment of urban capacity as part of the Plan process, based on evidence in the Housing and Economic Land Availability Assessment (HELAA), to determine the extent of development opportunities on non-Green Belt land. Whilst this shows the availability of a significant proportion of sites within a number of settlements, this is insufficient to deliver all the planned growth on non-Green Belt land.
72. In addition, the density of development has been optimised through the HELAA and appropriately adjusted to take account of site specific constraints. The Council has also held discussions with neighbouring authorities about accommodating need, but they are also constrained by Green Belt land. The Council has therefore examined all other reasonable options for meeting its identified need for development outside the Green Belt.

73. The delivery of new development within the Borough would contribute significantly towards meeting local housing requirements including the provision of much needed additional affordable housing. This is against a background of persistent under delivery of housing within the Borough and worsening affordability. Without the release of Green Belt land in the Borough of Brentwood, a substantial level of new dwellings would not be delivered.
74. Moreover, the spatial strategy seeks to locate the majority of development along the two main transport corridors, so most Green Belt land releases would be adjacent to existing built-up areas and transport infrastructure. Furthermore, the scale of overall development proposed would require the release of around 435 hectares of land from the Green Belt, which amounts to approximately 3% of the total Green Belt land area in the Borough. This is a relatively small reduction. Therefore, whilst the release of some land parcels would inevitably result in harm, development could be accommodated without having significant effects on the overall integrity of the Green Belt within the Borough.
75. Therefore, in the absence of reasonable alternatives, and given the benefits associated with local housing growth, we are satisfied that exceptional circumstances exist in principle to justify the release of land from the Green Belt.
76. Whilst the need for the release of land from the Green Belt has been demonstrated in principle at the strategic level, the demonstration of exceptional circumstances on a site by site basis is considered later in this report.

### **Housing requirement**

77. Policy SP02 of the Plan identifies the housing requirement as 7,752 net new homes to be provided during the Plan period. This reflects the identified housing need and is therefore justified.
78. The requirement is set out in the policy as a stepped requirement with an annual average of 310 new homes between 2016 and 2023 and 584 new homes between 2023 and 2033. This is justified because a greater proportion of the allocated sites are proposed to be delivered later in the Plan period, particularly the strategic sites.
79. As set out later in our report, we conclude that lead-in times and delivery rates for a range of site allocations should be revised to

reflect the evidence. Consequently, this impacts on the ability of the Plan to deliver the stepped housing requirement as set out in the submitted Plan, and results in necessary amendments to Policy SP02 (now proposed to be Strategic Policy MG01) to alter the stepped requirement figures. **MM4** achieves this to ensure the policy is justified.

80. For the reasons specified, the housing requirement of 7,752 dwellings for the Plan period is sound.

## **Conclusion**

81. We conclude that, subject to the above MMs, the identified housing need and requirement have been positively prepared and are justified and consistent with national policy.

## **Issue 3 – Whether the identified employment and retail development needs have been positively prepared and the employment land and retail floorspace requirements in the Plan are justified and effective.**

### **Employment need**

82. The employment need for the Borough has been assessed in the Economic Futures 2013-2033 study (January 2018). Four different scenarios have been used based on economic forecasts from Experian and the East of England Forecasting Model, the identified housing need and past historic take-up of employment floorspace. The employment forecasts used in the scenarios have taken account of the supply and demand for labour, an approach recommended by the PPG.

83. Based on the four scenarios, the Borough is forecast to require between 33,300 square metres (sqm) and 106,400 sqm of new employment floorspace. This equates to a gross employment land need of between 8.1 ha hectares (ha) and 20.3 ha over the Plan period. Overall, we are satisfied that the identified employment need has been positively prepared and is justified.

### **Principle of exceptional circumstances to release Green Belt land for employment use**

84. As set out in issue 2, we are satisfied that the Green Belt Study sets out a clear methodology and robust evaluations of the identified

strategic land parcels. In addition the Green Belt Topic Paper explains why the Council considers it is necessary to release land from the Green Belt. The delivery of new development within the Borough would contribute significantly towards meeting economic needs offering a range of new job opportunities. Without the release of Green Belt land, a substantial level of employment floorspace would not be delivered.

85. Therefore, as set out in issue 2, given the absence of reasonable alternatives, along with the benefits associated with economic growth, we are satisfied that exceptional circumstances exist in principle to justify the release of land from the Green Belt for employment use.
86. Whilst the need for the release of land from the Green Belt has been demonstrated in principle at the strategic level, the demonstration of exceptional circumstances on a site by site basis is considered later in this report.

### **Employment requirement**

87. In addition to the above identified need, the Plan includes proposed and forecast losses of existing employment land. This consists of 21.01 ha of existing employment land which is proposed to be allocated for alternative uses in the Plan and 4.65 ha of land which is forecast to be lost through other means such as permitted development. In total, the Plan identifies the employment land requirement as a range between 33.76 and 45.96 ha.
88. The Council has since carried out further employment land monitoring, and confirms that between 1 April 2016 and 31 March 2020, the combined loss from other means has increased from 4.65 ha to 9.3 ha. This is due to an additional loss of two employment sites. Therefore in total the employment requirement now ranges from 38.41 ha to 50.61 ha. The Plan needs updating to reflect this revised evidence.
89. Policy PC02 presents the employment requirement as 'circa 47.39 ha of new employment land', which sits within the need range. This is based on an assessment of land provision. Whilst this figure needs correcting to 46.64 ha to reflect updated survey evidence, it still sits near the top of the need range. It is justified because it ensures that lost employment sites are replaced, a sufficient range of employment opportunities are provided within the Borough to align with housing

and workforce needs and it provides sufficient flexibility to respond to any rapid changes.

90. Overall, the approach used to assess the employment need and overarching requirement is in line with the Framework and the PPG and is based on credible evidence.
91. Nevertheless, for reasons of effectiveness and to ensure the Plan is positively prepared and justified, development requirements are to be brought together in Policy SP02 to form a spatial strategy policy (proposed to be Strategic Policy MG01). The updated employment land requirement is therefore added to this policy as set out in **MM4**. This MM includes moving relevant supporting text from Policy PC02.
92. As a consequence Policy PC02 is deleted through **MM57** to remove unnecessary duplication. We have also added the total employment land loss of 9.3 ha and revised requirement range of 38.41 to 50.61 ha to the MM, to update paragraph 7.19 in the Plan. This MM also amends remaining supporting text to accord with the 2020 changes to the Use Classes Order. This modification is necessary for effectiveness.

### **Retail need and requirement**

93. The identified need for convenience and comparison retail development has been assessed within the Brentwood Retail and Commercial Leisure Study (2014) (2014 Retail Study) and robustly updated in the 2020 Brentwood Retail Study Update: Addendum. This Addendum concludes a need for additional net convenience retail floorspace of 4,438 sqm and 1,604 sqm net of comparison retail floorspace within the Borough. This evidence forecasts that this, together with the delivery of the additional employment land, will enable the creation of at least 5,000 additional jobs during the Plan period. We are satisfied that the approach used to assess the retail need is appropriate and based on robust evidence.
94. The retail need and requirement for comparison and convenience retail floorspace in the Plan are based on the 2014 Retail Study. Whilst these are clearly set out in Policy PC07, it is necessary for the figures to be amended to reflect the updated 2020 evidence.
95. Furthermore, as set out above, for reasons of effectiveness and to ensure the Plan is positively prepared and justified, development requirements are to be brought together in a new spatial strategy policy (Policy MG01). The updated comparison and convenience retail development requirement is therefore to be removed from Policy

PC07 through **MM62** and included within Policy SP02 (proposed to be Strategic Policy MG01) as set out in **MM4**.

## **Conclusion**

96. We conclude that, subject to the above MMs, the identified employment and retail development needs have been positively prepared and the employment land and retail floorspace requirements in the Plan are justified and effective.

## **Issue 4 – Whether the Plan's approach to the provision of affordable housing, Gypsy, Traveller and Travelling showpeople accommodation and the housing needs of other groups, is justified, effective and consistent with national policy.**

### **Affordable housing**

97. Part 2 of the Strategic Housing Market Assessment (SHMA) identifies a need for 107 affordable homes per annum. The definitions and method used for assessing affordable housing needs, accord with the PPG, and we are satisfied that the approach used is proportionate and robust.

98. To achieve the required need, Policy HP05 seeks 35% of dwellings to be provided as affordable housing on 'proposals of 11 or more (net) units or sites of 10 units or less which have a combined gross internal floorspace in excess of 1,000 sqm'. This is a higher percentage than the 30.6% requirement set out in the SHMA, in recognition that not all sites will deliver affordable housing, as some will not meet the thresholds. This is an appropriate response, which will assist in meeting the identified needs.

99. The required tenure mixes in the policy are based on the SHMA evidence, and the 35% requirement has been suitably tested and found to be viable. Overall, we are satisfied that the policy approach for requiring 35% affordable housing is justified. Nevertheless, to be consistent with the Framework, the requirement should apply to residential schemes of 10 or more units rather than the thresholds set out above. Furthermore, for effectiveness, clarification is needed in Part D of Policy HP05 to set out the circumstances whereby off site provision of affordable housing, or a financial contribution in lieu of on-site provision, would be acceptable. In addition, in order to be consistent with the Framework, the supporting text should be

amended to clarify when viability assessments would be acceptable at the decision making stage. All these necessary changes are set out in **MM39**.

## **Gypsy, traveller and travelling showpeople accommodation**

### **Identified needs**

100. The need for gypsy, traveller and travelling showpeople accommodation has been assessed through the Brentwood Borough Council Gypsy, Traveller and Travelling showpeople Accommodation Assessment (2017) (GTAA). This uses a jointly commissioned GTAA methodology prepared for the Essex local authorities and Southend-on-Sea and Thurrock Councils.
101. The GTAA identifies a need for 12 additional nomadic gypsy and traveller pitches, to be developed by 2033, for those who meet the national Planning Policy for Traveller Sites (PPTS) definition. Since the GTAA was completed, one existing gypsy and traveller pitch within the Borough has been lost, increasing the need to 13 pitches for the Plan period.
102. No needs have been identified for travelling showpeople or transit sites. However, in relation to transit sites the GTAA recommends that further work at the Essex wide level be undertaken to identify any need for future transit provision. This is a reasonable approach and the research findings can be taken into account at a future review of the Plan.
103. Additional needs for gypsies and travellers who do not meet the PPTS planning definition will be provided for through Policy HP04 which sets out criteria for the provision of specialist accommodation. We consider the specific wording of this policy later in our report. Overall, the GTAA applies a robust methodology that accords with national policy and the needs identified are justified.

### **Pitch supply**

104. The Plan sets out at Figure 6.4 the approach that has been used to identify suitable sites to accommodate the identified gypsy and traveller accommodation needs for 13 pitches. No suitable non-Green Belt sites were identified through the Council's site assessment process and as demonstrated through the HELAA. Suitable sites in the Green Belt have therefore been assessed with the focus on the



proposed new settlement and existing unauthorised sites. The assessment has identified that 8 pitches can be provided on two existing unauthorised sites and that 5 serviced pitches can be brought forward as part of the Dunton Hills Garden Village allocation. The Council has confirmed that the two existing unauthorised sites at Oaktree Farm and Hunters Green have not formed part of the GTAA and therefore their identification as gypsy and traveller sites within the Plan is reasonable in contributing to meeting the identified pitch needs.

105. The siting of 5 pitches within the Garden Village is being considered through the ongoing site masterplanning process. This approach will ensure that the pitches are integrated within the planned new settlement to support inclusive communities, and is justified.
106. Policy HP07 clearly sets out the identified gypsy and traveller need for 13 pitches and seeks to identify how this will be met. Whilst the policy states that 5 pitches will be provided as part of the Dunton Hills Garden Village allocation, the requirement to accord with Policy HP11 is not justified or effective as this only relates to windfall sites.
107. Policy HP07 is also unclear on how the remaining 8 pitches are to be delivered as it only requires 'consideration of the regularisation of 8 pitches' on the sites set out in Policy HP08. Whilst Policy HP08 lists the two unauthorised sites at Oaktree Farm and Hunters Green it does not allocate them. Instead it supports planning applications for Gypsy and Traveller accommodation on the identified sites.
108. The Plan confirms that these sites would remain within the Green Belt. Accordingly, any future planning applications for gypsy and traveller accommodation on these sites would amount to inappropriate development which would require the demonstration of very special circumstances. This policy approach and resultant uncertainty in provision is inconsistent with national policy and the Plan is neither positively prepared nor effective in this regard. Moreover, it is at odds with the Plan's approach to other forms of residential development where sites are proposed to be allocated and removed from the Green Belt.
109. These soundness issues are rectified through **MM41** which merges Policies HP07 and HP08 to form one cohesive policy (Policy HP07) that allocates the three gypsy and traveller sites within the Plan and removes them from the Green Belt. In this regard we are satisfied that exceptional circumstances have been demonstrated for the reasons set out above, namely, the lack of any suitable alternatives on non-Green Belt land to meet identified need. The MM also makes consequential amendments to the supporting text for reasons of

consistency and effectiveness. Changes to the policies map are required to show the sites are removed from the Green Belt.

110. Subject to these modifications, we are satisfied that the Plan's approach for the provision of gypsy and traveller accommodation for the Plan period is justified by robust evidence and meets the identified needs. The provision of 8 pitches on existing sites also clearly demonstrates that there is a five year supply of deliverable sites.

### **Development management policies**

111. Policy HP09 seeks to safeguard 15 existing temporary and permanent permitted gypsy and traveller sites from alternative uses. The Council has confirmed that these sites all lie within the Green Belt and are proposed to remain as such within the Plan.
112. National policy clearly states that traveller sites in the Green Belt are inappropriate development and should not be approved except in very special circumstances. Accordingly, any further planning applications for gypsy and traveller related development within these sites, including applications for permanent use of temporary sites, would have to be considered against Green Belt policy. This is despite the policy actively supporting permanent use of permitted temporary sites, subject to occupants meeting the PPTS definition.
113. Overall, the retention of existing gypsy and traveller sites within the Green Belt undermines the effectiveness of the policy and the Plan is not consistent with national policy in this respect. **MM42** rectifies this by amending Policy HP09 to state that the sites are removed from the Green Belt. Moreover, changes to the policies map are necessary to clearly show the inseting of these sites in the Green Belt. In this regard we are satisfied that exceptional circumstances have been demonstrated.
114. Policy HP10 provides a list of criteria to be met when considering proposals for the sub-division of authorised gypsy and traveller pitches and travelling showpeople plots.
115. Criterion A c of the policy requires that the sub-division of sites does not result in 'more than 10 pitches on a site'. Criterion B includes requiring need for any additional provision to be demonstrated. The PPTS requires that criteria based policies should be fair and effective in facilitating the traditional and nomadic life of travellers while

respecting the interests of the settled community. The available evidence does not demonstrate why sites should be restricted to 10 pitches, nor why need must be demonstrated to sub-divide existing pitches or plots. Furthermore, the policy contains other criteria against which the impact and scale of any proposals within the site would be clearly considered. For these reasons, and given the lack of evidence, the criteria relating to a 10 pitch limit and need are not justified, effective or consistent with national policy and must be deleted from the policy.

116. If additional sites within the Green Belt came forward during the Plan period, the sub-division of these plots and pitches would need to be considered against Green Belt policy. This needs to be clarified within the policy for reasons of effectiveness and consistency with national policy.

117. For the reasons stated above, **MM43** makes necessary changes to both Policy HP10 and relevant supporting text. We have also corrected the wording of the MM to ensure that paragraph 6.77 of the Plan refers to the PPTS.

118. Policy HP11 provides a list of criteria to be met for gypsy, traveller and travelling showpeople development proposals on windfall sites. As gypsy and traveller sites are inappropriate development in the Green Belt, it is necessary to amend the policy so that it clearly states that such proposals will need to demonstrate very special circumstances, in accordance with the Framework. **MM44** rectifies this to ensure the policy is effective and is consistent with national policy. It also removes duplicate criteria and makes consequential changes to the supporting text for reasons of effectiveness.

### **Other housing needs**

119. The SHMA Part 2 has assessed the housing needs of other particular groups in the community, including older people, families with children, people with disabilities, people wishing to build their own homes, and people in the private rented sector. This comprehensive evidence base is in line with national policy and guidance and therefore other housing needs have been robustly assessed. These needs are to be provided for through various site allocation policies and development management policies, as discussed under issues 6 and 7 below.

### **Conclusion**

120. We conclude that, subject to the above MMs, the Plan's approach to the provision of affordable housing, gypsy, traveller and travelling

showpeople accommodation and the housing needs of other groups, is justified, effective and consistent with national policy.

## **Issue 5 – Whether the housing, employment and mixed use development site allocations are justified, effective and consistent with national policy.**

### **Site assessment process**

121. The methodology and assessment criteria used to assist the selection of potential housing and employment sites for inclusion in the Plan, is summarised within the Council's Site Selection Methodology and Summary of Outcomes document.
122. Identified sites were initially assessed through the 2010 Employment Land Review and 2011 Strategic Housing Land Availability Assessment. Following 'Call for Sites' between 2015 and 2017 these initial assessments were updated and superseded by the 2018 HELAA. This process has provided adequate opportunities for submitting sites for assessment alongside consultation during the Plan's preparation.
123. In accordance with the PPG, sites in the HELAA have been assessed against a number of reasonable criteria to establish site suitability, availability and achievability for development. Following this the findings of the Green Belt Study 2018 and SA assisted the selection of sequentially preferable sites.
124. The Green Belt Study provides a comprehensive strategic assessment of the effects that potential development may have on the first four of the five purposes of the Green Belt, as defined in paragraph 138 of the Framework. The fifth purpose, 'to assist in urban regeneration, by encouraging the recycling of derelict and other urban land', was not assessed, as the Council considered that all Green Belt land performs this purpose equally. This is a logical approach.
125. The Green Belt Study divides the Borough's Green Belt into 70 separate land parcels using existing man-made or natural physical boundaries. Whilst the size of these parcels varies quite widely, the approach used to define the boundaries is appropriate. Furthermore, the assessment criteria, to determine the contribution each parcel makes to the Green Belt purposes, both individually and overall, are reasonable. We are therefore satisfied that the Green Belt Study sets

out a clear methodology and robust evaluations of the identified strategic land parcels.

126. Overall, we are satisfied that the Council's approach to site assessment and selection is appropriate and is justified. All allocated sites are considered in further detail below, including those which are proposed for removal from the Green Belt.

### **General site allocation matters**

127. The Plan, in Chapter 9, proposes a number of site allocations. The Chapter sets out introductory text which identifies that each allocation policy provides the key site requirements against which proposals would be considered. As any proposals will also be considered against other relevant Plan policies, this needs to be made explicit. The introductory text also lists the sites as either housing or employment allocations, when in fact most are residential-led or mixed-use. **MM83** amends this introductory text to provide consistency and ensure the Plan is effective.
128. Appendix 2 in the Plan shows in map form each proposed site allocation and provides additional details including delivery forecasts. Appendix 4 lists some proposed changes to the adopted policies map. Appendix 5 shows maps of two gypsy and traveller sites. These duplicate other parts of the Plan or the policies map and in most cases now require updating to reflect amended boundaries and delivery timescales, as set out elsewhere in this report. These appendices are therefore unnecessary and their deletion provides clarity and ensures Plan effectiveness. **MM115** and **MM118** achieve this.
129. The site allocation policies all specify that development proposals 'should consider' the criteria identified for that site. This includes the amount and type of development proposed, development principles and infrastructure requirements. This does not provide sufficient clarity for a decision-maker when considering how to react to development proposals, as required by paragraph 16 of the Framework. Accordingly, each site allocation policy is amended so that the development requirements are succinctly and unambiguously set out. These necessary changes are incorporated into each site allocation policy MM, as specified below, to ensure the Plan is consistent with national policy and is effective.

130. In terms of determining the site capacities for each allocation, the Council has based this on evidence in the HELAA, and where relevant has revised these to take account of any additional site constraints or local characteristics. The Council has generally used higher development densities in urban areas and lower densities on greenfield sites. The former optimises use of previously developed land, whilst the latter generally reflects the characteristics of the locality.
131. The identification of 'around' housing figures for the capacity of each relevant site allocation allows for an appropriate degree of flexibility in provision. Furthermore, it does not prevent higher density development from being brought forward if this conforms with other policies in the Plan as a whole. The approach to site capacity within the Plan is therefore justified.
132. Estimated housing delivery rates for all relevant sites are contained in the housing trajectory in Appendix 1 of the Plan. The rates used have been based on local evidence of historic delivery rates and on information provided by infrastructure providers, developers and site promoters. However, having considered the available evidence, including the SoCG and hearing statements, we consider that, for a number of the sites, particularly the larger ones, the lead-in times are likely to be greater and annual delivery rates lower, than set out in the Plan. Indeed, the housing trajectory shows delivery of some of the site allocations from 2020/21, but as this is now not possible, the delivery rates need amending. Where relevant, this is discussed further below for each site.
133. We appreciate that highway and other transport-related concerns have been raised about several sites. We consider specific details for relevant individual sites below, and provide an overall conclusion on the provision of transport and other infrastructure later in this report.
134. Many of the proposed sites are located within a Critical Drainage Area, as assessed through the Borough's Strategic Flood Risk Assessment and Surface Water Management Plan. It is therefore key that development proposals, particularly those in Critical Drainage Areas, minimise and mitigate surface water runoff in accordance with Policy BE08 on sustainable drainage (now proposed to be BE05). However, the relevant site allocation policies do not succinctly set this out. To rectify this, amendments are incorporated into each relevant site allocation policy MM, as specified below, for reasons of effectiveness.

135. As identified earlier in our report, land is proposed to be released from the Green Belt to accommodate planned growth. During the examination we requested further written evidence from the Council on site specific exceptional circumstances to demonstrate whether the release of proposed allocation sites from the Green Belt was justified.
136. The subsequent document includes a summary of each relevant site's contribution to the Green Belt purposes and identifies the extent to which the impacts on these purposes 'may be ameliorated or reduced to the lowest reasonably practicable extent'. It also identifies other factors, where relevant, including the level of accessibility to everyday services and facilities, the extent of physical and visual site containment, a comparison of local character, and an assessment of site boundary defensibility.
137. In most instances the Green Belt boundary follows the site allocation boundaries precisely. However, in some instances this approach would result in small areas of isolated Green Belt land remaining. In these cases the approach taken is to set new boundaries along distinguishable and permanent features in the landscape, such as a road or field boundary. This is to ensure that boundaries are 'defensible' against future alterations. We find these modest boundary alterations to be logical and appropriate and determine that exceptional circumstances have been demonstrated in this regard.
138. We consider specific details for relevant sites below, in order to determine whether exceptional circumstances have been demonstrated and the amended Green Belt boundary overall is therefore justified.

### **Strategic Residential-Led Site Allocations**

139. The Plan allocates four strategic housing-led sites within the Borough.

#### *Policies R01 (I), (II) and (III) Dunton Hills Garden Village*

140. The Plan provides a specific spatial vision, strategic aims and objectives and development principles for the Dunton Hills Garden Village allocation. These flow from the overall provisions in the Plan and are justified.

141. Policy R01 (I) allocates approximately 259 ha of land for the creation of a new sustainable Garden Village settlement at Dunton Hills, based on Garden Community principles. The site is within the Green Belt and is located to the south-east of the Borough with West Horndon village to the west and the Boroughs of Basildon and Thurrock immediately to the east and south respectively. The site consists of fields, woodlands and a golf course.
142. The policy specifies that, for the Plan period, the development will deliver a mix of uses including at least 2,770 new homes, a gypsy and traveller site for five serviced pitches, 5.5 ha of employment land and associated infrastructure to serve and support the site. This includes the provision of a new village centre and neighbourhood hubs, healthcare, schools, sustainable transport and significant green infrastructure. Ultimately the development is proposed to deliver an additional 1,300 new homes beyond the Plan period.
143. The Green Belt Study has assessed the development as making a moderate to high contribution overall to the purposes of the Green Belt. The site is well-contained by existing transport infrastructure, being bounded by the A128 to the west, the A127 to the north and the railway line to the south. A gas mainline runs along the eastern boundary of the site creating a significant constraint, requiring a substantial undeveloped landscape buffer along this boundary. This would reinforce the eastern boundary as a permanent defensible boundary. Furthermore, the proposal seeks to deliver 50% of the site area as multi-functional green infrastructure.
144. Dunton Hills Garden Village is the largest allocation within the Plan and as such it will make a significant contribution to meeting identified housing and economic needs within Brentwood for the Plan period. As well as the designated employment land, it proposes flexible working space, along with community services and facilities within the Garden Village centre and neighbourhood hubs. In addition, the proposed mobility hub and mobility corridor will facilitate bus, walking and cycling connections within the locality, particularly to West Horndon railway station which is in relatively close proximity. This will assist in maximising the provision and utilisation of sustainable transport modes, ensure the delivery of other infrastructure that is necessary to serve and support the new neighbourhoods.
145. We acknowledge that the amount of housing development planned for this location is substantial and that concerns about the loss of



Green Belt and other impacts on the locality, including the effect on the local and strategic road networks have been raised. However, the proposal seeks to deliver a development using sustainable Garden Community principles. We consider that this and the elements highlighted above will assist in the proposal contributing towards mitigating, as far as possible, its moderate to high impact on the purposes of the Green Belt. We are therefore satisfied that exceptional circumstances exist for the site's removal from the Green Belt and that the allocation is justified.

146. We have carefully considered the anticipated timescale for the delivery of Dunton Hills Garden Village within the Plan period. The trajectory in the Plan shows housing being delivered from 2022/23, which is clearly not achievable. The site does not have planning permission, though we note that a planning application has recently been submitted to the Council, and does not meet the definition of deliverable within the Framework. As it therefore does not form part of the five year housing land supply, but is clearly developable, the delivery rates on the housing trajectory need to reflect this. This reduces the amount of housing to be delivered from the site during the Plan period from 2,770 to 1,650 dwellings. Policy R01 (I) needs to be amended to reflect this, to ensure the policy is positively prepared and justified in this regard.
147. Whilst some of the development and infrastructure requirements set out in the Policy R01 (I) are, on the whole, justified, most need amending and clarifying so that they are clearly defined and unambiguous, accord with updated infrastructure evidence, including on early years, nursery and school provision, and are consistent with other Plan policies. Additional requirements for a sustainable transport hub, a district shopping centre and local centres also need incorporating in the policy to ensure such facilities are provided as part of the development.
148. **MM84** provides these necessary changes, to ensure the Plan is consistent with national policy and is justified and effective.
149. Policy R01 (II) is a lengthy criteria-based policy, that sets out spatial design requirements for Dunton Hills Garden Village, on a range of different areas, including green and blue infrastructure, views, transport, heritage, street hierarchy and social infrastructure. A significant proportion of these requirements duplicate other policies in the Plan or national policy. Furthermore, the evidence confirms that the proposal is subject to an approved masterplan, providing

clear design and layout details. The deletion of the policy and replacement with succinct design requirements to be delivered through a masterplanning process, provides necessary clarity, justification and effectiveness and ensures the policy is consistent with national policy. This is achieved through **MM85**.

150. This MM also deletes Policy R01 (III) as it is ineffective and insufficiently precise on scheme delivery and future management of the development. Instead, criteria setting out requirements for the delivery of the scheme and the long-term stewardship of the public facilities to be provided within the development, are incorporated into Policy R01 (II). This is a justified approach and ensures the Plan is effective and consistent with national policy. **MM85** also amends the supporting text to provide consistency with these changes. We have also revised the MM to clarify that reference to public rights of way is to the network, which should be retained and enhanced. We have also removed criterion 3 relating to the timing of education provision as this is ineffective and unjustified, as confirmed by Essex County Council.

#### *Policy R02 Land at West Horndon Industrial Estate*

151. The site is a large industrial estate lying on the western side of West Horndon village, opposite the railway station. Much of the site is still in existing industrial and employment use. Policy R02 allocates the site for around 580 new homes, 2 ha of employment land and a residential care home.
152. The site comprises previously developed land and in principle its redevelopment for a residential-led scheme incorporating employment and service provision, in a location well served by public transport, accords with the Framework's objective of making the best and most effective use of brownfield land within settlements.
153. As most of the site is currently in use and unavailable and there is no planning consent in place for its redevelopment, it does not meet the Framework's definition of being deliverable, and therefore its inclusion within the five year housing land supply is not justified. Indeed, the evidence before us indicates that there is a considerable

amount of planning and site preparation work to be completed before development could commence. This will inevitably take some time, and we heard during the examination that work relating to detailed arrangements for securing access from St Marys Lane and the site's relationship with the station access, are still being considered by the relevant parties.

154. Nevertheless, we acknowledge there are short leases for existing businesses on the site that would allow the development to come forward in phases during the Plan period, and a vacant field close to the proposed access point which could be brought forward first. On the basis of the evidence, the site is clearly in a suitable location for housing development, with a reasonable prospect that it will be available and viably developed within the Plan period. As such, the evidence justifies the site being allocated as a strategic residential-led development.
155. A number of changes to Policy R02 are required for effectiveness and consistency with national policy. These include more specific policy wording on the scale and nature of care home provision and the transport infrastructure and service facility requirements that are necessary, including improvements to West Horndon railway station. Clarification is also necessary on the required employment use classes within the policy. In addition, due to the site's proximity to a Registered Park and Garden and Conservation Area, a requirement for development to conserve the significance of these designated heritage assets and their settings, needs to be added as a criterion to the policy, to ensure there is consistency with national policy. These changes are set out within **MM86**.

### *Policy R03 Land North of Shenfield*

156. Policy R03 allocates land north of Shenfield for around 825 new homes, 2 ha of employment land, a residential care homes and around 2.1 ha for a co-located early years and childcare nursery. The proposed mix of development is reasonable for this strategic site, including the provision of employment land, though the policy should refer to 'around 2 ha and clarify what forms of employment uses are acceptable.
157. The Green Belt Study has assessed the site as making a moderate contribution overall to the purposes of the Green Belt. The site is well

contained on all sides by existing main transport infrastructure which forms strong defensible boundaries and severs the site from the countryside beyond. Existing urban development lies to the south and south-east of the site, and residential ribbon development runs along Chelmsford Road to the west.

158. The site is a key gateway location and provides a logical extension of the built up area of Shenfield, close to existing facilities including schools, shops and the Shenfield railway station which now incorporates the Elizabeth Line. The policy seeks to bring development forward through a comprehensive masterplan, and to enhance sustainable transport connections to local services and the wider area. Furthermore, landscaping and buffers are required along relevant boundaries and new green infrastructure and open space incorporated into the design, which would contribute to mitigating the impact on the Green Belt. Taking account of these factors, we are satisfied that exceptional circumstances exist for the site's removal from the Green Belt and that the allocation is justified.
159. We have carefully considered the anticipated timescale for the delivery of the site within the Plan period. It is clear from the SoCG that the site is able to move forward fairly quickly and we are satisfied that it can accommodate the development proposed and can be fully developed in the Plan period. Furthermore, based on the SoCG there is a realistic prospect that some housing will be delivered on the site within five years. However we consider the delivery rates per year as identified in the Plan, are overly optimistic and need to be reduced, to reflect more realistic rates. This needs to be amended in the policy supporting text and the housing trajectory.
160. A number of other changes to the text of Policy R03 are also required for effectiveness. These include clarifying the requirement for off-site infrastructure improvements and ensuring an appropriate level of playing field provision is incorporated within the site.
161. The site boundaries include existing ribbon development on Chelmsford Road. It is therefore necessary for the policy to require that the design of the development has a functional relationship with this existing development and make it clear that the policy does not apply to these properties.
162. All of the above changes to Policy R03 and its supporting text are set out in **MM87**, which are necessary for effectiveness and to ensure the Plan is justified and consistent with national policy.

*Policy R04 and R05 Ford Headquarters and Council Depot Warley*

163. This is one policy which proposes two adjacent sites as one allocation. To remove any confusion it should be set out as one policy allocation, Policy R04. Both sites lie within the urban area of Warley, adjacent to the Green Belt. The allocation includes the conversion of the former Ford office building and the redevelopment of land adjacent to it and an existing Council depot. The office building has deemed consent and conversion works are underway. This part of the site allocation has therefore now become a housing commitment. As such, it is necessary to reduce the expected provision from the remainder of the allocation to around 133 dwellings.
164. As well as housing, the policy allocates a residential care home and 2 ha of employment land within the site. Whilst these provisions are justified, the policy needs to revise the use classes specified and clarify that other specialist accommodation to meet identified need could also be provided instead of a care home. There is also a need for the policy wording and the supporting text to require high quality design and to conserve the significance of the nearby listed buildings and their settings. These elements are set out in **MM88** and are necessary for consistency with national policy and effectiveness.
165. A scheme to bring the remaining part of the site forward is currently being progressed and is anticipated to commence in 2022/23. The site is available now, offers a suitable location for housing and is clearly deliverable as the site overall is currently under construction. The allocation positively re-uses an existing brownfield site, which is consistent with the Framework. The site allocation is therefore justified.

**Housing allocations: Brentwood Town**

166. The Plan allocates seven housing allocations within Brentwood Town.

*Policy R06 Land off Nags Head Lane*

167. This policy allocates land to the west of the Brentwood Town urban area for around 125 new homes. The site is located in the Green Belt and the Plan seeks to remove it from this designation. It is well contained by existing commercial and residential development to the north and east, the railway line to the south and Nags Head Lane to the west. This level of containment would, altogether, provide a new

strong defensible Green Belt boundary. Furthermore, the site proposes landscape buffers and public open space. This, together with its topography and close proximity to existing urban development, would contribute to mitigating the moderate impact of the development on the purposes of the Green Belt overall. We are therefore satisfied that exceptional circumstances exist for the site's removal from the Green Belt and that the allocation is justified.

168. Whilst the amount of development to be provided on the site, the development principles and infrastructure requirements are justified by the evidence, amendments are necessary so that the development requirements are succinctly and unambiguously set out and references made to other Plan policies are updated. A further criterion, requiring development to conserve the nearby Grade II listed public house and its setting, is required to provide consistency with national policy. The site is deliverable from 2022/23 rather than the 2021/22 period referenced in the supporting text so this requires updating. **MM89** is necessary for these reasons and to make the policy wording effective and justified. In addition, consequential changes are made to the supporting text for clarity and consistency.

*Policies R10, R11, R13 and R14 Brentwood car parks*

169. These sites comprise four existing surface level car parks, one in the control of Transport for London at Brentwood railway station and three within the ownership of the Council, at Westbury Road, Chatham Way and William Hunter Way. All four policies allocate the car parks for housing with Policy R14 also including some retail provision as well. Confusingly all the policies also require that current levels of Town Centre public parking spaces are maintained. In response to our questions on this and our request for further evidence, the Council produced further evidence in the form of Examination Notes, which set out the Council's approach to the sites.
170. Policy R10 allocates land at the Brentwood railway station car park, for around 100 new homes. It is a long and relatively thin site, bounded by the railway line to the south, residential development to the north and Warley Hill (B186) to the east, with the railway station beyond.
171. The density of the site is low, when compared to the capacity of the site, as assessed through the HELAA. The evidence indicates that around 200 new homes could easily be accommodated on the site, with the remainder of the site still sufficient for long term car parking

needs. This would maximise the use of previously developed land in a town centre location that is well served by public transport, in accordance with the Framework. This needs amending in the policy.

172. Other changes are required to ensure parking on the site is sufficient to meet existing and future rail traveller needs and to clarify the infrastructure contributions. These changes are rectified through **MM93** to ensure the policy is consistent with national policy, justified and effective. The site boundary also requires slight adjustments on the policies map, to ensure it includes all available land for development, that is not required for car parking purposes.
173. The Westbury Road, Chatham Way and William Hunter Way sites (Policies R11, R13 and R14), all offer opportunities to provide new homes on previously developed land within the town. However, as these are existing town centre car parks, it is necessary to ensure that the number of residual car parking spaces will be sufficient to meet overall town centre parking needs, in combination with each other and other car parks. It is therefore necessary for Policies R11, R13 and R14 to clearly reflect this requirement in order that they are justified and effective. Changes to each of these policies are also required to clarify the infrastructure contributions that are necessary. These amendments are rectified through **MM94**, **MM96** and **MM97**.
174. Whilst the available evidence indicates that the Westbury Road car park site is deliverable within the next five years, the evidence demonstrates that the delivery of new homes would occur in 2023/24. This needs to be amended within the Plan. Policy changes are also required to clarify the development requirements so that they are unambiguous. These are achieved by **MM94** which is necessary to ensure that Policy R211 is justified and effective.
175. Policy R13 allocates land at the Chatham Way car park car park for around 31 new homes. The site is developable, when considered against the Framework definitions, and this needs to be reflected in the Plan by removing delivery from the five year housing land supply. Delivery therefore needs to be moved to 2026/27 within the Plan. Policy changes are also required to clarify the development requirements so that they are unambiguous. These are achieved by **MM96** which is necessary to ensure the policy is justified and effective.
176. Policy R14 allocates land at the William Hunter Way car park for around 300 new homes and retail use. The site is developable, when

considered against the Framework definitions, and this needs to be reflected in the Plan by removing delivery from the five year housing land supply. Delivery is therefore moved to 2026/27. Policy changes are also required to clarify the development requirements so that they are unambiguous. These are achieved by **MM97** which is necessary to ensure Policy R14 is justified and effective.

*Policy R12 Land at Hunter House*

177. This brownfield site lies within the Town Centre and is proposed to be redeveloped for around 48 new dwellings. It is surrounded by existing commercial and residential development. The evidence demonstrates that the site is deliverable and achievable, with a realistic prospect that housing will commence delivery in 2025/26, rather than 2024/25. The supporting text needs to be amended to reflect this change.

178. The policy also needs to clarify that the development needs to conserve the significance of the Brentwood Conservation Area and its setting. Other changes are necessary to provide clarity on infrastructure contributions. **MM95** rectifies these issues for effectiveness and to ensure the policy is justified.

*Policy R15 Wates Way Industrial Estate*

179. The Wates Way Industrial Estate is located within Brentwood Town Centre and is allocated for around 80 new homes and retail/commercial use. Since the submission of the Plan, a more detailed scheme for the site has been drawn up and it is now expected that the site would be predominantly used for retail, commercial and leisure purposes, but include around 46 residential units. The site is also expected to be delivered by 2023/24, which is a year earlier than the supporting text indicates. Other changes are necessary to provide clarity on infrastructure contributions. **MM98** rectifies these issues for effectiveness.

**Housing allocations: Shenfield**

180. The Plan allocates three housing sites in Shenfield.

*Policy R18 Land off Crescent Drive, Shenfield*

181. This site lies within the Shenfield urban area, adjacent to the Green Belt. As this site has now secured planning permission, the allocation



is not required for effectiveness and therefore the policy and supporting text is deleted (**MM100**). The site allocation will also need removing from the policies map.

*Policy R19 Land at Priests Lane, Shenfield*

182. The Plan allocates land at Priests Lane for around 45 new homes and a care home. The site is bounded by existing residential development, a school and a railway line. It relates well to the existing urban development and is located close to services and facilities. On the basis of the evidence, the allocation is justified.
183. However, the proposed yield from the site of around 45 dwellings is very low for such an urban site. Indeed the 12 dph density of the site is lower than the prevailing density for the locality of 14 dph.
184. In order to make effective use of land and accord with national policy, the density of the site should be increased to that set out in the Pre-Submission version of the Plan, before the focussed changes were applied. This means increasing the capacity in Policy R19 to 'around 75 dwellings'. Whilst this would still provide a relatively low yield for the site, when compared to other urban sites, this figure has previously been assessed and consulted on as part of the Pre-Submission version of the Plan. This includes consideration of impacts on such matters as infrastructure, flood risk and viability.
185. Whilst concerns have been about the impact of the proposal on the local highway network and on the safety of pedestrians and other users on Priests Lane, the highway authority has raised no objection to the higher capacity of 75 new homes. Furthermore, the detailed design of the access point and any off-site transport measures would be a matter for the planning application stage.
186. Furthermore, and as discussed earlier in this report, the inclusion of an 'around' figure for housing provision on the site does not prevent higher density development from being brought forward, if this conforms with other policies in the Plan as a whole.
187. As regards the proposed care home, there is no demonstrable evidence to support the requirement in this location, or determine whether it is achievable or viable. Accordingly this provision should be deleted from Policy R19.

188. Other changes to the policy and the supporting text are required to provide clarity on infrastructure and replacement playing field financial contributions. Whilst the site is considered to be deliverable and achievable with a realistic prospect that it will be delivered within five years, the supporting text needs to be amended to clarify that the anticipated delivery would now be between 2022 and 2024, rather than between 2020 and 2023.
189. The above issues are rectified by **MM101**, which are necessary to ensure the policy is effective, justified and consistent with national policy.

*Policy R20 The Eagle and Child Public House*

190. This site lies within the Shenfield urban area. As the site has now secured planning permission, the allocation is not required for effectiveness and therefore the policy and supporting text is deleted (**MM102**). The site allocation will also need removing from the policies map.

**Urban neighbourhood site allocations**

191. The Plan allocates four housing sites in other urban neighbourhoods.

*Policy R07 Sow and Grow Nursery, Pilgrims Hatch*

192. Policy R07 allocates land for the provision of around 38 new homes. It is a brownfield site within the Green Belt, and forms a relatively small extension to the existing urban area of Pilgrims Hatch, lying in close proximity to existing services and facilities. The site itself is already urban in character due to the presence of existing development, and it therefore relates well to the surrounding built form.
193. The site is well contained by existing defensible boundaries, including Ongar Road to the east, existing residential development to the north, allotments to the west and established field boundaries to the south, with a large woodland beyond forming part of a local wildlife site. This significant self-containment separates the site from the wider countryside. Furthermore, the policy requires landscaping along some of its boundaries which would contribute to mitigating the impact on the Green Belt. Taking account of these factors, we are

satisfied that exceptional circumstances exist for the site's removal from the Green Belt and that the allocation is justified.

194. There is a need for the policy wording and the supporting text regarding the nearby South Weald Park, a registered park and garden, to be amended, to ensure that the significance of this heritage asset and its setting are conserved. Other changes are necessary to provide clarity on infrastructure contributions. It is also necessary for the supporting text to be amended as delivery is proposed to be during 2022/23 rather than between 2020 and 2022, as evidenced by the hearing statements. **MM90** rectifies these issues and is required to ensure the policy is justified, effective and consistent with national policy.

*Policy R08 Land at Mascalls Lane, Warley*

195. This is a small undeveloped site within the Green Belt, allocated for around 9 dwellings. It has been assessed as making a low to moderate contribution to the purposes of the Green Belt, as set out in the Green Belt Study. The site is well contained by Mascalls Lane to the south and existing development to the north, east and west, which form strong defensible boundaries. The site relates well to the existing Warley urban area and is located close to existing services and facilities.
196. Overall, the site would form a natural small scale extension to the existing built-up form along Mascalls Lane. Furthermore, the policy requires landscaping along its boundaries which would contribute to mitigating the impact on the Green Belt. Taking account of these factors, we are satisfied that exceptional circumstances exist for the site's removal from the Green Belt and that the allocation is justified.
197. Changes to the policy text are required to provide clarity on the landscape provision. Whilst the site is considered to be deliverable and achievable with a realistic prospect that it will be delivered within five years, the supporting text needs to be amended to clarify that the anticipated delivery would now be in 2022/23 rather than 2020/21. These changes, as set out in **MM91**, are necessary to ensure the policy is justified and effective.

*Policy R09 Land off Warley Hill, Warley*

198. Policy R09 allocates land off Warley Hill for around 43 new homes. The site is part of the former hospital site within the Green Belt and is partly previously developed. The proposed development has been assessed as having a moderate impact on Green Belt purposes overall.
199. The western boundary of the site would be contained by the existing woodland and a wildlife site. The eastern boundary would be contained by a road whilst to the north there is existing built development. The surrounding area, particularly to the east and south, has a predominantly urban character and the site is in close proximity to existing facilities including shops, schools and Brentwood railway station. The development would contribute towards meeting local housing need, is deliverable and achievable with a realistic prospect that it will be delivered within five years.
200. The use of appropriate landscaping throughout the site, as required by the policy, and the application of other Plan policies when planning applications are considered for the sites, would assist in mitigating the impacts on the Green Belt. Taking account of these factors, we are satisfied that exceptional circumstances have been demonstrated for the removal of the site from the Green Belt and that the allocation is justified.
201. There is a need for the policy wording and the supporting text to require the conservation of the significance of the listed buildings within the site and in the vicinity, including their settings. Specific reference should be made to the Water Tower within the site and the nearby Warley Hospital and Lodge House. Other changes are necessary to provide clarity on infrastructure contributions. It is also necessary for the supporting text to be amended as delivery is proposed to be between 2022 and 2024, rather than 2023 to 2025, as agreed in the SoCG. **MM92** rectifies these issues for reasons of effectiveness and to ensure the policy is justified and consistent with national policy.

*Policy R16 and R17 Land off Doddinghurst Rd, Pilgrims Hatch*

202. This is one policy which proposes two adjacent sites as one allocation to deliver around 200 new homes. To remove any confusion it should be set out as one policy allocation, Policy R16. The sites are located in the Green Belt and have been assessed as making a moderate contribution overall to the Green Belt purposes.

203. The sites lie either side of the A12 and are well contained by existing residential development and adjacent roads. They currently have a Green Belt role in extending the countryside into the urban area but that has been eroded by the presence of built development at the Brentwood Centre east of Doddinghurst Lane. Coalescence between Brentwood and Pilgrims Hatch has already occurred west of the sites. The sites are well located, close to existing facilities including shops and schools and would provide an important contribution towards meeting local housing need. The allocation is considered to be deliverable and achievable with a realistic prospect that it will be delivered within five years.
204. Whilst the sites are within close proximity to the A12, good design including the use of appropriate landscaping buffers, as required by the policy, and the application of other Plan policies when planning applications are considered for the sites, would assist in mitigating any adverse impacts in relation to air quality and noise. They would also contribute to mitigating the impact on the Green Belt. Taking account of these factors, we are satisfied that exceptional circumstances have been demonstrated for the removal of the sites from the Green Belt and that the allocation is justified.
205. Other changes are necessary to provide clarity on infrastructure contributions. It is also necessary for the supporting text to be amended as delivery is proposed to commence in 2022/23 rather than 2023/24, as agreed in the SoCG. **MM99** rectifies these issues for effectiveness and to ensure the policy is justified.

### **Village site allocations**

206. The Plan allocates six housing sites in three of the Borough's villages, at Ingatestone, Kelvedon Hatch and Blackmore.

#### *Policies R21 and R22 Ingatestone*

207. Policy R21 allocates the site of a former garden centre and highways depot for around 161 new homes. It is a triangular shaped area of brownfield land situated within the Green Belt, and has been assessed as making a low to moderate contribution to the purposes of the Green Belt. The site is wedged between and bounded by dominant transport infrastructure (the A12 and the railway line) and existing residential development, which form strong defensible boundaries. It is also near to existing facilities including Ingatestone railway station and would provide an important contribution towards

meeting local housing need. The use of appropriate landscaping and buffers, as required by the policy, would contribute to mitigating the impact on the Green Belt. Taking account of these factors, we are satisfied that exceptional circumstances have been demonstrated for the removal of the site from the Green Belt and that the allocation is justified.

208. During the examination, outline planning consent was granted on appeal for 110 homes on the former garden centre part of the site. Ordinarily, a committed site would be removed as an allocation from the Plan for consistency. However, in this case, keeping the whole site as an allocation ensures that all the land is removed from the Green Belt, and any reserved matters application accords with the policy requirements.
209. Changes to the policy and supporting text are required to provide clarity on infrastructure provision, and to require a heritage assessment to take account of archaeological potential in the proximity of Roman Road. Whilst the site is considered to be deliverable and achievable with a realistic prospect that it will be delivered within five years, the supporting text needs to be amended to clarify that the anticipated delivery would now be between 2022 and 2025 rather than 2021 and 2024. These changes, as set out in **MM103** and are necessary to ensure the policy is justified and effective. We have also added a change to the supporting text to ensure reference is made to Policy BE16 rather than Policy BE17 which is to be deleted.
210. Policy R22 allocates a small site within the Green Belt adjacent to the A12 for around 57 new homes. It is well contained, is bounded on four sides by roads and adjoins existing residential development. The A12 presents a strong defensible boundary to the wider countryside beyond. It makes low to moderate contributions to the Green Belt limited function in terms of meeting Green Belt objectives. It is close to existing facilities including Ingatestone railway station. The use of appropriate landscaping and buffers, as required by the policy, would contribute to mitigating the impact on the Green Belt. Taking account of these factors, we are satisfied that exceptional circumstances have been demonstrated for the removal of the site from the Green Belt and that the allocation is justified.
211. Changes to the policy and supporting text are required to provide clarity on infrastructure provision, and to require a heritage assessment to take account of archaeological potential in the

proximity of Roman Road. Whilst the site is considered to be deliverable and achievable with a realistic prospect that it will be delivered within five years, the supporting text needs to be amended to clarify that the anticipated delivery would now be between 2022 and 2024 rather than 2021 and 2024. These changes, as set out in **MM104** and are necessary to ensure the policy is justified and effective. We have also added a change to the supporting text to ensure reference is made to Policy BE16 rather than Policy BE17 which is to be deleted.

### *Policies R23 and R24 Kelvedon Hatch*

212. Policy R23 allocates an area of land at Brizes Field in Kelvedon Hatch for 23 homes. Policy R24 allocates an area of land off Stocks Lane, in Kelvedon Hatch, for 30 homes. Both are greenfield sites situated on the edge of the village and are located in the Green Belt. They have both been assessed as making moderate contributions to the purposes of the Green Belt. Development of the sites would encroach into the countryside, but they would appear as modest extensions to the village. They are relatively well contained and the inclusion of landscape buffers, as required by the policy, would ensure there would be defensible physical boundaries. The landscaping would also contribute to mitigating the impact on the Green Belt. Taking account of these factors, we are satisfied that exceptional circumstances have been demonstrated for the removal of the sites from the Green Belt and that the allocations are justified.
213. The Policy R24 site, at 18 dwellings per hectare (dph), has a low density, especially when compared with the Policy R23 site density of 29 dph. It is also lower than the prevailing density of 24 dph for Kelvedon Hatch overall. In order to make effective use of land and accord with the Framework, the density of development on the Policy R23 site should be increased to the prevailing figure for the village. This would give an expected yield of around 40 dwellings for the site, rather than 30 dwellings.
214. Changes to both policies are required to provide clarity on infrastructure provision. and to require a heritage assessment to take account of archaeological potential in the proximity of Roman Road. Whilst the sites are considered to be deliverable and achievable with a realistic prospect that they will be delivered within five years, the supporting text of both policies needs to be amended to clarify that the anticipated delivery would now be between 2022 and 2024 rather

than 2021 and 2023. These changes, as set out in **MM105** and **MM106**, are necessary to ensure the policy is justified and effective.

*Policies R25 and R26 Blackmore*

215. Policy R25 allocates land to the north of Woollard Way in Blackmore for around 30 dwellings. Policy R26 allocates land north of Orchard Piece for around 20 dwellings.

216. Both are greenfield sites within the Green Belt and lie adjacent to each other to the north of the village. Their development would extend the built up form of the village out to Redrose Lane. Redrose Lane would act as a strong defensible boundary to the north whilst other roads extending out of the village would form strong defensible boundaries to the west and east. They have both been assessed as making moderate contributions to the purposes of the Green Belt.

217. Development of the sites would encroach into the countryside, but this would be limited in extent. The sites would appear as modest extensions to the village. They are relatively well contained with defensible boundaries. Furthermore, the policies require the provision of good pedestrian and cycling connections and public open space. The development of the two sites would contribute to meeting local housing need and support the existing local services. Taking account of these factors, we are satisfied that exceptional circumstances have been demonstrated for the removal of the sites from the Green Belt and that the allocations are justified.

218. The density of both sites in the submitted Plan, as set out in the Addendum of Focussed Changes, is less than the prevailing density for Blackmore village of around 20dph overall. The density of the two sites are 12 and 13 dph. In order to make effective use of land and accord with national policy, the amount of housing proposed for the sites should be increased to that set out in the Pre-Submission version of the Plan, before the focussed changes were applied. This means increasing the capacity of the Policy R25 site to 'around 40 dwellings' and the Policy R26 site to 'around 30 dwellings'. Whilst both sites would still be at a density lower than the village as a whole, these densities have previously been assessed and consulted on as part of the Pre-Submission version of the Plan. This includes consideration of impacts on such matters as infrastructure, flood risk and viability. Indeed, the highway authority has raised no concerns on the grounds of highway safety for these higher capacities.



219. Furthermore, any development on the site would need to accord with all relevant Plan policies, including those on design, open space, heritage and drainage. Overall, the sites are considered to be deliverable and achievable with a realistic prospect that they will be delivered within five years.
220. Other changes to both policies and the supporting text are required to provide clarity on access, infrastructure provision and archaeological potential. Amendments are also necessary to delete unsupported and unjustified requirements restricting occupation of the properties. The above issues are rectified by **MM107** and **MM108**, which are necessary to ensure the policies are effective, justified and consistent with national policy. **As these two sites are not within Critical Drainage Areas we have amended the MMs by removing the criteria on drainage.** We have also added further changes so the supporting text refers to Policy BE16, rather than Policy BE17 which is to be deleted. These amendments are necessary for effectiveness.

### **Strategic employment site allocation**

221. The Plan allocates one strategic employment site at Brentwood Enterprise Park.

### ***Policy E11 Brentwood Enterprise Park***

222. Policy E11 allocates land south east of junction 29 of the M25 for 'at least 25.85 ha' for employment use and supporting ancillary uses. The site is located in the Green Belt and has been assessed as making a moderate contribution to the purposes of the Green Belt. Accordingly the development would have a moderate impact. The site is situated at a key strategic location, adjacent to the M25 junction 29 and the A127, within the South Brentwood Growth Corridor. It is associated with the former M25 works site and is predominantly previously developed land. Existing businesses currently occupy some of the site and it has a predominantly developed appearance.
223. The site is relatively well-contained with defensible boundaries to the north, east and west. The southern boundary comprises a ridgeline along which there is a public right of way. The proposed provision of landscape buffers along this boundary would strengthen this boundary. It would also assist in mitigating the moderate impact to the Green Belt.

224. The allocation would support the Plan's objectives of economic growth within the Brentwood Southern Growth Corridor. It would provide a positive re-use of a large brownfield site and bring some environmental enhancements to the site. Taking account of these factors, we are satisfied that exceptional circumstances exist for the site's removal from the Green Belt. The site is available and deliverable and the allocation, as a strategic employment site, is justified.
225. Whilst the Council put forward suggested changes to the boundary of the site during the examination, we are satisfied that the boundary in the submitted Plan is sound. Any changes to this boundary would need to be considered as part of a future Plan review. Any future additional landscaping and access proposals put forward, on land outside the site allocation, would need to be considered at that time, and determined in accordance with local and national Green Belt policy.
226. Changes to Policy E11 are required to update the use classes specified, to reflect the revised Use Classes Order, and to clarify the need for the development to provide high quality design, a high-quality landscaping scheme, and the provision of necessary off-site infrastructure contributions, including to West Horndon Station. The ancillary uses listed within the policy should also be deleted, and replaced with a requirement permitting 'ancillary supporting development within classes C1, E and F1 or other sui generis ancillary supporting development'. These are rectified by **MM109** which is necessary to ensure the policy is effective, justified and consistent with national policy. We have also removed the requirement for the early years and childcare nurseries, as these are not justified, as confirmed by Essex County Council.

### **Other employment site allocations**

227. The Plan allocates four other employment sites within the Borough.

#### *Policy E08 Land adjacent to A12 and slip road, Ingatestone*

228. Policy E08 allocates 2.06 ha of land, adjacent to the A12 and slip road in Ingatestone, for employment use. This small triangular shaped site is situated in the Green Belt. Whilst the site has been assessed as making a moderate contribution to the Green Belt, it is well contained by roads on all sides, with the A12 and its slip road presenting a particularly strong physical defensible boundary, that also substantially restricts views to the wider countryside beyond.

Development within the site would relate well to the urban form of the settlement, being within close proximity to existing residential development, the railway station and other facilities. Taking account of these factors, we are satisfied that exceptional circumstances exist for the site's removal from the Green Belt. The site is available and deliverable and the allocation is justified.

229. Clarification of the policy wording to reflect the recent changes to the Use Classes Order and to make clear the requirement for infrastructure contributions is necessary for effectiveness. These changes are set out in **MM113**. We have also added an additional criterion to this MM relating to drainage, as the site is located within a Critical Drainage Area. This is necessary for effectiveness.

#### *Policy E10 Land at Codham Hall Farm*

230. Policy E10 allocates 9.6 ha of land at Codham Hall Farm for employment use and an additional 8 ha for landscaping, amenity, access and ancillary uses. The entire site lies within the Green Belt and has been assessed as making a low to moderate contribution to the purposes of the Green Belt. The majority of the 9.6 ha of the employment part of the allocation is in existing use and the allocation proposes to remove this from the Green Belt. The remaining 8 ha of the allocation is proposed to remain in the Green Belt.
231. The site is well contained by the A127, distinct natural features including woodland and the Codham Hall Wood local wildlife site, and existing service roads. The landscaping proposed to be incorporated into the site would assist in reducing the impact on the Green Belt. Taking account of these factors, we are satisfied that exceptional circumstances exist for the 9.6 ha part of the site allocation to be removed from the Green Belt. The site is available and the allocation is justified.
232. Clarification of the policy wording to reflect the recent changes to the Use Classes Order and to make clear the requirement for infrastructure contributions, is necessary for effectiveness. These changes are set out in **MM111**.

#### *Policy E12 Childerditch Industrial Estate*

233. Policy E12 allocates 20.64 ha of land at the existing Childerditch Industrial Estate for employment use. The allocation includes the existing 11.25 ha industrial park, which is inset from the Green Belt, plus additional extensions of land to the south and west, totalling around 9.29 ha, which are in the Green Belt. As such the site allocation requires amending to 20.54 ha. The two additional extensions of land have been assessed as having moderate and low impacts on the Green Belt, as identified in the Green Belt Study.
234. A significant proportion of the site is in existing industrial use and the site overall is well-contained by established natural features including field boundaries, treelines and existing planting on the southern boundary, which form a strong defensible site boundary. The site is strategically placed in the South Brentwood Growth Corridor to support wider residential and mixed-use development in the locality and the extensions provide modest opportunities to expand the site's industrial use. Landscape buffers would be incorporated to reduce the impact on the Green Belt. Taking account of these factors, we are satisfied that exceptional circumstances exist for the site's removal from the Green Belt. The site is available and deliverable and the allocation is justified.
235. Due to the site's proximity to a Registered Park and Garden and Conservation Area, a requirement for development to conserve the significance of these designated heritage assets and their settings, needs to be added as a criterion to the policy, to ensure there is consistency with national policy. Criteria for the provision of justified infrastructure contributions, sustainable transport and landscaping also need to be added to the policy for effectiveness and consistency with other Plan policies. In addition, the use classes specified within the policy need updating to provide consistency with the revised Use Classes Order. These changes are achieved by **MM110**.

*Policy E13 Land at East Horndon Hall*

236. Policy E13 allocates 5.5 ha of land at East Horndon Hall for employment use. The site is located in the Green Belt and has been assessed as making a moderate contribution to the purposes of the Green Belt, as set out in the Green Belt Study. Since submission of the Plan, the site has gained planning permission for employment use. Accordingly, without this site allocation, any further applications for use of the site for employment purposes, would still need to be considered under local and national Green Belt policies. This is neither effective nor justified.

237. Furthermore, the site is adjacent to the proposed Dunton Hills Garden Village allocation, and has strong defensible boundaries on all sides, due to prominent existing highway infrastructure. Taking account of these factors we are satisfied that exceptional circumstances exist for the site's removal from the Green Belt and that the allocation is justified.

238. Whilst the development requirements in Policy E13 would only apply to any future planning applications for the site and not for the consent already given, clarification is needed on these to ensure the policy wording is consistent with national policy, is justified and effective. **MM112** achieves this by removing ambiguity, including provisions to conserve relevant listed buildings and their settings and make infrastructure contributions where relevant and updating the use classes to accord with the revised Use Classes Order.

### **Conclusion**

239. We conclude that, subject to the above MMs, the housing, employment and mixed-use development site allocations are justified, effective and consistent with national policy.

## **Issue 6 – Whether the Plan sets out a positively prepared strategy for the supply and delivery of housing development that is justified, effective and consistent with national policy.**

### **Overall housing supply**

240. The Plan identifies a supply of housing over the Plan period from a range of sources, including completions, commitments, windfall and allocations, equating to 7,752 new homes. During the examination, this housing supply evidence has been revised and updated to 31 March 2021, to reflect the Council's up to date monitoring data.

241. In relation to completions and commitments, there have been 977 new dwellings built since the start of the Plan period, and extant permissions now account for 1,036 dwellings.

242. In addition, windfall sites are now expected to come forward from Year 11 of the Plan in 2026. This means an allowance of 62 dpa is to be applied to the housing supply over the latter part of the Plan period, between 2026 and 2033. This is based on historic evidence. Between 2009 and 2021, net windfall completions have, on average, accounted for a rate of 84 dpa. On this basis, the assessment of windfall allowances is robust and as such, we are satisfied that

windfall sites will provide a reliable source of supply, as is required by the Framework. The inclusion of a cautious windfall allowance of 62 dpa in the housing supply, is therefore justified.

243. As regards the site allocations in the Plan, we have already considered and updated the lead in times and delivery rates for some of these, for the reasons identified under issue 5.
244. As a consequence to all the above, the housing trajectory within the Plan should be amended in accordance with this updated evidence. Appendix 1 of the Plan is therefore replaced by a revised version, as set out under **MM114**. This ensures the Plan is positively prepared, justified and effective.
245. Overall, this results in an updated housing land supply figure for the Plan period of 7,146 new dwellings. Accordingly, the Plan is not able to meet the identified housing requirement of 7,752 new dwellings, resulting in a shortfall of 606 dwellings over the Plan period.
246. The Framework requires planning policies to identify specific deliverable sites for years one to five of the Plan period, and specific, developable sites or broad locations for growth, for years 6-10 and where possible, for years 11-15 of the Plan. So, whilst the Plan does not make provision to meet all its housing need for the Plan period, it does identify sites to meet the housing requirement for the next 10 years, which is consistent with the Framework.
247. Fundamentally, the Plan supports the delivery of much needed housing within Brentwood, significantly boosting supply in accordance with Government policy. This includes providing more affordable housing, which has historically been under-delivered within the Borough, affecting overall affordability.
248. It is imperative that there is a Plan in place to enable housing to come forward now, including the removal of land from the Green Belt to facilitate this, otherwise there would be a significant shortage of housing land supply in the Borough, due to limited opportunities outside the Green Belt. This would not help to meet the identified housing need. Furthermore, we conclude later in this report, under issue 11, that an immediate review of the Plan needs to be carried out, with the objective of meeting in full the identified housing needs. This is a necessary and pragmatic approach.

## **Five year housing land supply**

249. Since the start of the Plan period there has been an under delivery of 523 dwellings against the 1,500 housing requirement over the same period.
250. The PPG states that any deficit or shortfall 'should be added to the plan requirements for the next 5 year period (the Sedgefield approach).....If a strategic policy-making authority wishes to deal with past under delivery over a longer period, then a case may be made as part of the plan-making and examination process....'.
251. The Council's spatial strategy relies on a number of strategic and other housing sites coming forward from land to be released from the Green Belt, or from brownfield site with known constraints. Some of these sites will inevitably take time to progress and deliver housing, particularly where infrastructure provision is required. To ensure that the overall spatial strategy is not put at risk, particularly the delivery of some of the larger and more strategic sites and their associated infrastructure, the delivery of the shortfall across the remaining Plan period (the Liverpool approach) is justified in this case. On this basis, the Council indicates it would have a 5.21 year supply of housing land on adoption of the Plan.
252. In accordance with the Housing Delivery Test, there has been significant under delivery of housing over the past three years. As such, in accordance with paragraph 74 of the Framework an additional 20% buffer needs to be applied to the housing requirement figure, when calculating the five year supply. The Council's calculation of its five year supply of housing land on adoption includes this 20% buffer. The evidence considered elsewhere in this report, in respect of the housing allocations and other housing provision, including sites with planning permission and windfall sites, within the 5 year supply, is robust and indicates that they would be deliverable.
253. Accordingly we conclude that there is a realistic prospect that the Council will be able to demonstrate a five year supply of deliverable housing sites upon adoption of the Plan.

## **Other housing policies**

254. Policy HP01 is a criteria based policy which defines thresholds for the provision of various housing mixes and standards. As the Council has confirmed that this is a strategic policy, this needs clarifying in

the Plan. The policy also needs to specify that decisions on proposed schemes will be based on the most up to date housing need evidence.

255. On residential development schemes of 10 or more dwellings, the policy requires that each unit meets the accessible and adaptable requirement M4(2) of the Building Regulations, unless it is built to the M4(3) standard of being wheelchair adaptable. On developments of 60 or more dwellings, the policy requires a minimum of 5% of new affordable dwellings to meet the M4(3) standard. This threshold is the minimum required to deliver one such unit. The Council has estimated that this requirement could deliver around 98 affordable dwellings built to M4(3) standards during the Plan period, which would broadly meet projected need. Overall, the available evidence demonstrates that the application of these optional standards is justified.
256. On larger development sites of 500 or more dwellings the policy seeks a minimum of 5% as self-build homes (including custom housebuilding), and the provision of specialist accommodation, in accordance with housing need and Policy HP04. However, due to this threshold, the policy would only apply to two of the allocated sites, limiting the availability and amount of self-build homes and specialist accommodation that could come forward over the Plan period. The reduction of the threshold to sites of 100 or more dwellings will assist in meeting these specific needs and is justified, subject to being based on the most up to date evidence on needs. These changes to Policy HP01 are made by **MM35** and are necessary for effectiveness and to ensure the Plan is justified.
257. Whilst Policy HP02 is justified, Part B requires amending so that decisions on proposed schemes are based on the most up to date housing need evidence. **MM36** rectifies this and is necessary for effectiveness. We have also added a change to the supporting text for consistency. This is set out in the same MM.
258. Policy HP03 emphasises the need for a design-led approach to residential density and seeks the efficient use of land. It generally requires residential proposals to achieve a net density of at least 35 dwellings per hectare unless local character or site constraints dictate otherwise. It also specifies that higher densities, generally above 65 dwellings per hectare are expected in designated retail centres and locations with good public transport connections. These densities are based on robust evidence set out in the SHMA and HELAA, and are justified. Notwithstanding this, the policy needs to clarify when the densities apply. This is rectified by **MM37** which is necessary for effectiveness.



259. Policy HP04 states that proposals for specialist accommodation will be encouraged and supported. This should be strengthened to provide a more definitive 'will grant permission' for effectiveness. Whilst the criteria-based policy approach is justified, changes are required to remove elements that unnecessarily duplicate other policies and clarify that proposals to meet gypsy, traveller and travelling showpeople needs will be determined through Policy HP10. These amendments are provided by **MM38** for reasons of effectiveness. This includes updating the supporting text as regards Supported Living.

260. Policy HP06 sets out internal and external space requirements for all residential development. It expects compliance with the internal nationally described space standards and seeks external private and/or communal outdoor space. The requirements are justified by the evidence and are viable. However, clarity needs to be provided as to what development proposals are required to deliver in relation to external space. The policy also sets out housing quality criteria which duplicates other Plan policies and therefore needs deleting. These amendments, including consequential changes to the supporting text are provided by **MM40**, for reasons of effectiveness.

## **Conclusion**

261. We conclude that, subject to the above MMs, the Plan sets out a positively prepared strategy for the supply and delivery of housing development that is justified, effective and consistent with national policy.

## **Issue 7 – Whether the Plan provides for identified employment and retail needs and the policies for employment and retail development are justified, effective and consistent with national policy.**

### **Employment land supply**

262. The Plan seeks to provide around 46.64 hectares of employment land through specific site allocations which are clearly defined in the Plan, as discussed under issue 5 above. This meets the identified need and requirement for employment land for the Plan period.

### **Employment development management policies**

263. Policy PC01 seeks to cultivate a strong and competitive economy within the Borough. It lists a range of criteria, but these are Council objectives, not specific development requirements. It is not clear how

a decision maker would use the policy when determining development proposals, as is required through paragraph 16 of the Framework.

**MM56** deletes the policy and relevant supporting text from the Plan and moves the policy wording to the supporting text to form employment development objectives. This ensures the Plan is effective and consistent with national policy.

264. New employment sites are allocated in the Plan through individual site allocation policies, which are discussed earlier in this report. Policy PC03 unnecessarily duplicates this by further allocating these new sites for general employment and office use. Confusingly the policy also allocates existing employment sites. The policy then sets out a list of criteria for when redevelopment or change of use of such sites would be acceptable. Some of the criteria are not effective or consistent with national policy.

265. The Council confirmed in the Hearing that the purpose of Policy PC03 is to be a strategic policy that seeks to protect employment sites from alternative uses unless certain criteria apply. This is in order to maintain an adequate employment land supply within the Borough. Accordingly, modifications are necessary to make this purpose clear and unambiguous within the policy and the supporting text, including in relation to relevant sites within the Green Belt. It is also necessary to reflect the new Use Classes Order. **MM58** makes these necessary modifications for reasons of effectiveness and consistency with national policy.

266. Policy PC04 seeks to encourage business and employment development by reference to certain locations. Policy PC05 seeks to encourage employment uses, subject to several amenity criteria being met. However, as the policies read as Council objectives rather than providing clear purposes and development requirements, it is unclear how a decision-maker should interpret them. The locational and development requirements for employment uses are set out in other policies within the Plan. The deletion of Policies PC04 and PC05 ensures the Plan is effective and consistent with national policy (**MM59** and **MM60**).

267. Policy PC06 seeks sustainable rural development through supporting small scale rural enterprise and the diversification and expansion of economic activities in rural areas. The policy includes Council objectives and a list of criteria.

268. The Council confirmed at the Hearing that farms and rural land are located within the Green Belt. As such, development proposals would be subject to national Green Belt policy, but this is not made clear within the policy. Overall there is ambiguity in the way the policy could be interpreted by a decision maker and it is therefore neither effective nor consistent with national policy. **MM61** rectifies this by removing the objectives and criteria from the policy and ensures that compliance with Green Belt policy is a clear requirement. It also modifies the supporting text to reflect these amendments and to ensure reference is made to the revised Use Class Order by changing B1 business use to office use.

### **Retail provision and development management policies**

269. The Plan does not effectively define in policy where the identified retail need is to be provided. Policy PC07 therefore requires modifying to clearly set out the specific mixed-use sites where retail development forms part of the proposal. The supporting text to the policy also needs to accord with the updated retail evidence and to include reference to the proposed new centres at West Horndon and Dunton Hills. This ensures the Plan is positively prepared in respect of the provision of new retail floorspace to meet the identified need. It is achieved by **MM62** so that the Plan is justified, effective and consistent with national policy.

270. Part A of Policy PC08 seeks to identify the retail hierarchy of designated centres, where main town centre uses are to be provided. However, for this to be effective the hierarchy needs to be moved from the supporting text to the policy and amended in relation to the proposed new retail centres at the Dunton Hills Garden Village. To ensure consistency with paragraph 90 of the Framework, Part F of the policy needs to clarify that both retail and leisure development outside town centres will be subject to an impact assessment. These issues are rectified by **MM63**. The policy threshold of 2,500 sqm aligns with national policy and is justified.

271. Policy PC09 sets out criteria for development within Brentwood Town Centre. It has been informed by the Brentwood Town Centre Design Plan 2017 which seeks to enhance the town through appropriate development on key opportunity sites and improved links and public realm. The policy includes general requirements and specific criteria for defined town centre areas, as well as

improvements to public realm and linkages to Brentwood railway station. Whilst the approach of the policy is justified, criteria that read as Council statements and duplicate other Plan policy requirements need to be amended or deleted respectively. This is achieved through **MM64** to ensure the Plan is effective.

272. Policy PC10 seeks to maintain and support mixed use development in designated centres. The policy refers back to Policy PC08 which clearly defines the retail hierarchy of designated centres. Part B of the policy should be amended to clarify that the loss of 'centre uses' means main town centre uses, and to include new criteria on marketing and the number of non-town centre use units present, against which proposals will be assessed. Other references in the policy to 'centre uses' should also be changed, as above.

273. Part C d of the policy includes restricting new hot food takeaways within 400 metres walking distance of primary and secondary schools, excluding the defined exceptions. It includes restricting opening hours to specific times. Whilst supporting the health and well-being of school pupils is a laudable objective, the restrictive approach in the policy is neither justified by evidence nor effective. Furthermore, it conflicts with Policy SP03 which requires health impact assessments to be provided for hot food takeaway proposals, to establish any impacts on health as part of the application process. Accordingly, Part C d of the policy should be deleted. Policy SP03 is discussed further in issue 10 below.

274. **MM65** makes these necessary amendments to Policy PC10 and its supporting text, for effectiveness and to ensure the policy is justified. It also changes the policy to reflect the revised Use Classes Order for consistency with national policy.

275. Policy PC11 seeks to retain retail use as the main type of use within primary shopping areas. Clear reference is made to Policy PC08 and the policies map where these areas are defined. **MM66** removes a number of criteria that are duplicated in other Plan policies for effectiveness and revises the policy to reflect the updated Use Classes Order for consistency with national policy.

276. Policy PC12 seeks to maintain and enhance the vitality and viability of town centres by requiring a balance to be struck between competing town centre and non-town centre uses. Whilst this approach is justified, the policy and Figure 7.8 in the supporting text require amending, to reflect the updated Use Classes Order, to

ensure that active frontages are in keeping with the designated centres, and to clarify how the policy will be applied. **MM67** provides these changes for reasons of Plan effectiveness and consistency with national policy.

277. Policy PC13 aims to manage the night-time economy, by supporting after-hours cultural, entertainment and leisure uses in designated centres, whilst balancing this with other main town centre uses and protecting the living conditions of local residents. It was clarified during the examination that the policy also relates to the evening economy so this needs to be added to the policy for effectiveness. As some of the criteria read as objectives, changes are necessary so the policy requirements are succinct and effective. There is very limited supporting text, the addition of which would explain the policy's purpose and ensure its effectiveness. These issues are rectified by **MM68**.

## **Conclusion**

278. We conclude that, subject to the above MMs, the Plan provides for identified employment and retail needs and the policies for employment and retail development are justified, effective and consistent with national policy.

## **Issue 8 – Whether the Plan's approach to infrastructure provision is justified, effective and consistent with national policy.**

279. The provision of necessary infrastructure to support planned growth is acknowledged as being important in the Plan's overarching strategic objectives, and requirements are identified within many of the Plan's policies. Infrastructure requirements are based on various evidence-based assessments and brought together in the Council's Infrastructure Delivery Plan (IDP). The IDP identifies the main items of infrastructure needed to mitigate the cumulative impacts of the planned development. Relevant new development is required to either deliver or contribute to the necessary infrastructure requirements as defined in the IDP and site allocation policies, where these are compliant with national policy and legislation. This approach is justified.
280. The preparation of the IDP has involved engagement with a variety of key stakeholders including infrastructure providers and developers. Based on the available information it includes estimated timings,

indicative costs and funding sources and lists the development sites relevant to the infrastructure requirement. As a live document it has been regularly updated. Overall, we are satisfied that the approach set out in the IDP for identifying necessary infrastructure, is justified and consistent with national policy.

281. The criteria for seeking developer contributions for necessary infrastructure are identified in Policy SP04 (now proposed to be Policy MG05), within the Plan. The policy needs amending to ensure it clearly identifies what contributions will be sought and when, by referring to other relevant Plan policies and guiding applicants and decision-makers to the IDP. Also a new criterion and supporting text needs adding so that proportionate contributions may be sought for any forward-funded infrastructure that may come forward that is relevant to development schemes. Clarification also needs to be provided on scheme viability and how this will be assessed if necessary. **MM7** modifies the policy and supporting text in this way to ensure it is justified and effective. It also includes other amendments to ensure consistency with other Plan policies.

## **Transport infrastructure**

282. The transport infrastructure necessary to support the planned growth, as set out in the IDP, is supported by several assessments and studies produced for the Council, including the Transport Assessment 2021, Cycling Action Plan 2018, and the South Brentwood Growth Corridor Sustainable Transport Integration Vision 2020.

283. The Transport Assessment has been prepared to appraise, at a strategic level, how the highway network is likely to operate with the additional planned growth, as defined in the Plan. The appraisal has considered the broad impact of the planned growth on local and strategic junctions, but detailed assessments relating to specific sites are expected to be carried out as part of the planning application process. This Transport Assessment has been prepared in consultation with National Highways and Essex County Council as Highway Authority.

284. A separate Model Build Report 2021 has been produced providing a comprehensive summary of the method used to develop the highway modelling used in the Transport Assessment. The assumptions and trip generation and distribution used within the modelling are appropriate for the assessment of the strategic road network.

285. It is clear from the available evidence, that several aspects of strategic highway infrastructure within the Borough will be at capacity by the end of the Plan period. This specifically includes junction 12 of the A12 and junctions 28 and 29 of the M25. The Plan seeks to mitigate the impacts of the planned growth on these and other local junctions. Whilst the principle of the proposed mitigation measures is accepted by National Highways and the Highway Authority, it became clear during the examination that additional work is necessary to agree the more technical details. We acknowledge that further joint working on this is progressing. We are satisfied that these can be appropriately considered as part of the required immediate review of the Plan, as discussed later in our report.
286. The Plan acknowledges that sustainable transport is a key component of sustainable development and seeks to promote and improve accessibility by focussing connectivity on sustainable transport options. As discussed under issue 1, the spatial strategy concentrates growth within the two main transit corridors, where the greatest range of existing or proposed sustainable transport options would be available. This approach helps to promote travel and overall accessibility via sustainable modes.
287. Policy BE11 (now proposed to be Strategic Policy BE08), provides a list of Council objectives on strategic transport infrastructure and in parts duplicates other Plan policies. The Council confirmed during the examination that the purpose of the policy should be to identify the strategic transport infrastructure that is critical to the delivery of the planned growth, as identified in the IDP. The deletion of the policy text and its replacement with new wording that identifies this strategic transport infrastructure is necessary to provide clarity and ensure the Plan is effective [**MM22**]. Consequential changes to the supporting text are also included in the MM for consistency and effectiveness.
288. Policy BE12, which seeks to encourage car-limited proposals in appropriate locations, should be deleted for effectiveness, to remove unnecessary repetition of other Plan policies [**MM23**].
289. The Plan seeks the provision of sustainable modes of transport, through Policy BE13 (now proposed to be BE09). Whilst the approach is justified, sustainable measure for walking, cycling and passenger transport should be provided where appropriate to the development scheme to ensure it is effective. This is rectified by **MM24** which also changes the supporting text for reasons of clarity and consistency.

290. Whilst the provisions for sustainable passenger transport are justified in Policy BE14 (now proposed to be BE10), amendments are required to clarify the requirement for pick up and drop off facilities for passenger transport. This is provided by **MM25** for effectiveness. Reference to the County Council's policies for sustainable passenger transport provision are also added to the supporting text for clarity.
291. Policy BE15 (now proposed to be BE11) seeks the provision of appropriate infrastructure for electric and low emission vehicles. For effectiveness, to ensure the requirements are clear, changes are necessary, as set out in **MM26**.
292. Policy BE16 (now proposed to be BE12) seeks to mitigate the transport impacts of development. The criteria within the policy require clarifying and amending, to ensure the requirements accord with the evidence and are effective. These changes are made by **MM27** which also amends the supporting text for clarity.
293. Policy BE17 (now proposed to be BE13) states that development proposals should comply with the most up-to date Essex Parking Standards and provides criteria setting out when deviations from the standards may be acceptable. Whilst parking quality and levels are important development management considerations, the standards do not form part of the Plan and are not before us for examination. **MM28** therefore amends the policy to clarify that regard should be had to these standards.

### **Green and blue infrastructure**

294. Policy BE18 (now proposed to be Strategic Policy NE02), states that green and blue infrastructure should be protected, enhanced and managed. However the majority of the policy criteria either read as objectives or lack clarity on what exactly is sought. It also contains some inconsistencies with other Plan policies and national policy, particularly paragraph 174 of the Framework. Accordingly, clear development requirements for the protection, provision and maintenance of green and blue infrastructure need to replace the existing policy text.
295. Moreover, in order to provide the necessary strategic approach in the Plan, the policy needs to be defined as a strategic policy. Consequential amendments to the supporting text are also required to reflect the policy changes. This includes clarifying the green and blue infrastructure definition and amending and updating the



typologies in Figure 5.3 of the Plan. These issues are rectified by **MM29** which makes the policy effective and consistent with national policy.

296. Policy BE19 unnecessarily duplicates criteria from other Plan policies, particularly Policies BE18 and NE03. Its deletion, including relevant supporting text provides clarity and ensures effectiveness of the Plan (**MM30**).

297. Policy BE20 relates to allotments and community food growing space, but the two criteria within it provide Council statements rather than clear development requirements. The policy needs amending to rectify this. It also needs to clarify that it applies to all allotment sites including those that are non-statutory. Consequential changes to the supporting text also need to be made to reflect the policy amendments. **MM31** achieves this for reasons of effectiveness.

298. Policy BE21 also includes the protection of allotments which duplicates Policy BE20. As such, reference to allotments in the policy and supporting text are deleted via **MM32**, to remove unnecessary duplication between policies and for effectiveness. This MM also modifies the policy to protect resident amenity and privacy and makes other consequential changes to the supporting text for clarification. These are necessary for the policy to be effective.

299. Policies BE22 and BE23 relate to the provision of open space and recreational facilities. To ensure the Plan is justified, effective and consistent with national policy, the policies are to be merged and amended to remove overlapping, duplicated or ineffective requirements. It is also necessary to clarify that existing open spaces and recreational facilities are to be protected in line with paragraph 99 of the Framework. The combined policy also needs to address how new provision or the enhancement of existing spaces and facilities will be considered when determining development proposals and to clearly set out management requirements for effectiveness. Consequential changes to the supporting text ensures consistency with these policy amendments. These are achieved by **MM33** and **MM34**.

## **Community infrastructure**

300. Policy PC14 seeks to protect and enhance community assets. It requires amendments to clarify it is a strategic policy and to ensure that the terms and criteria used accord with the Framework,

particularly in relation to community facility loss, change of use or replacement. Subsequent changes to the supporting text are also required for consistency, to clarify the position regarding Assets of Community Value and to make clear that the policy relates to buildings, as outdoor spaces and facilities are covered by a separate policy. This is achieved through **MM69** which ensures the policy is justified, effective and consistent with national policy.

301. In relation to Policy PC15 on education facilities, it is necessary to delete criteria that read as Council objectives and delete those requirements that are covered by other Plan policies in order to minimise repetition and remove inconsistencies. The supporting text also requires amending to provide clarity on the policy requirements. **MM70** makes these necessary modifications for effectiveness.

302. Policy PC16, which relates to buildings for institutional purposes, does not provide clear definitions and its overall purpose lacks clarity. Other policies within the Plan provide clear criteria for considering relevant development. The deletion of the policy and relevant supporting text aids overall clarity of the Plan and is necessary for effectiveness (**MM71**).

### **Communications infrastructure**

303. The Plan recognises that the provision of high quality communications infrastructure and digital connectivity as part of future development, are important for the Borough's economy and overall sustainable growth objectives. It seeks appropriate communications and digital infrastructure through Policies BE09 (now proposed to be Strategic Policy BE06), and BE10 (now proposed to be BE07). Whilst both policies are justified, some of the criteria require amending to ensure that the development requirements are clear and unambiguous. This ensures the Plan is effective in this regard and is achieved through **MM20** and **MM21**.

### **Conclusion**

304. We conclude that, subject to the above MMs, the Plan's approach to infrastructure provision is justified, effective and consistent with national policy.

**Issue 9 – Whether the Plan’s development management policies for the Green Belt, natural environment, historic environment, design and place-making, climate change and other environmental matters, are justified, effective and consistent with national policy.**

**Green Belt**

305. The management of development in the Green Belt is a key component of the Plan. The Framework clearly states that within the Green Belt inappropriate development should not be approved except in very special circumstances. Paragraphs 149 and 150 set out the types of development that form exceptions or are not inappropriate.
306. The Council has confirmed that Policy NE09 is the overarching strategic policy for Green Belt in the Plan. Accordingly, this needs to be made explicitly clear in the Plan. Whilst the policy states that all development proposals within the Green Belt will be considered in accordance with the Framework, it also provides a range of insufficiently precise criteria which either must be met or given ‘consideration’ when determining specific development schemes. This approach, and the terminology used in the criteria is ineffective and inconsistent with the provisions in the Framework. Accordingly, it is necessary to simplify and amend the policy and make consequential changes to the supporting text to ensure the Plan is effective and consistent with national policy. This is achieved through **MM81**.
307. The Plan sets out a number of other policies (Policies NE10 to NE15) for managing different forms of development in the Green Belt. Policy NE10, which provides criteria for new development, extensions and replacement buildings in the Green Belt, repeats national policy and includes additional requirements that are either not supported by evidence or are inconsistent with the Framework. It should be removed from the Plan, along with its supporting text.
308. Policy NE11 permits relevant residential development in seven defined areas of existing ribbon development that are located in the Green Belt. This includes allowing development on ‘genuine infill plots’ within these areas. However as these are not villages, this contradicts paragraph 149 of the Framework which clearly refers to ‘limited infilling in villages’ as an exception to the rule that buildings are inappropriate in the Green Belt. Furthermore, the supporting text at paragraph 8.110 states that ‘some relaxation of Green Belt policy’ will be allowed in these defined ribbon development areas due to their

urban character. This approach is clearly contrary to the Framework and therefore the policy and supporting text should be removed from the Plan. Development proposals within these areas can be effectively determined through other relevant Plan policies, particularly Policy NE09 and the Framework.

309. Policy NE12 sets out a number of criteria and permits development on brownfield land in the Green Belt. The approach is inconsistent with national policy and the policy requires deleting. The deletion of Policy NE13 is also necessary as it duplicates other policies. In addition, it seeks the provision of significant community benefits for both existing local communities and new residents for sites allocated for housing in the Green Belt, which does not accord with the Framework.

310. As all land within the Borough, outside the urban areas and identified villages is located in the Green Belt, any proposals for new agricultural workers dwellings and the re-use and conversion of rural buildings would need to be determined against relevant local and national Green Belt policy. Surprisingly, Policy NE14 makes no specific reference to this, and the requirements of the policy are generally covered by other local and national policies anyway. Whilst Policy NE15 refers to Green Belt, it similarly duplicates other Plan policies. The removal of these policies from the Plan would provide necessary clarification.

311. In response to the above issues **MM82** deletes Policies NE10 to NE15 and relevant supporting text from the Plan, for reasons of effectiveness, consistency with national policy and to ensure local policy on Green Belt is justified.

### **Natural environment**

312. The need to protect the natural environment forms an important part of the Plan's strategic objectives and Chapter 8 includes several specific policies to achieve this purpose.

313. Whilst the purpose of Policy NE01 to seek to protect and enhance the Borough's natural environment is justified, its approach regarding the hierarchy of protection for international, national and locally designated sites, securing net gains in biodiversity and compensatory measures, is imprecise and inconsistent with national policy. In addition, requirements for development proposals located within the RAMS zone of influence for relevant international sites, are

confusingly set out in a separate policy (Policy NE02) and do not reflect the adopted Essex Coast RAMS, as we have previously specified under the HRA section of this report.

314. This is rectified by **MM74** which deletes Policies NE01 and NE02 and replaces them with a single cohesive policy that ensures the development requirements are effective and consistent with national policy. Consequential amendments to the supporting text are also necessary to ensure consistency with the policy text and are included in this MM. We have also revised the MM so that it effectively reflects the RAMS requirements, clarifies that a small part of Brentwood Borough is within the Epping Forest Special Area of Conservation Zone of Influence and removes reference to the Habitats Directive.
315. It is also necessary to amend strategic objective SO4 to include the securing of measurable net gains for biodiversity so that there is consistency with national policy [**MM72**]. Other amendments to the 'Natural Environment' section's introductory text are required to update it and clarify references to green infrastructure, landscape, biodiversity, geodiversity and country parks, to ensure there is consistency with other policies in the Plan and to provide overall effectiveness [**MM73**].
316. Whilst Policy NE03 is titled 'Trees, Woodlands and Hedgerows' the policy wording goes beyond this requiring no detrimental effect on or loss of significant landscape heritage or features of ecological importance. This duplicates other policies in the Plan that protect such landscapes and features, particularly Policy NE01. Furthermore, no specific reference is made in the policy to ancient woodland and ancient or veteran trees. The wording in the policy also lacks clarity and direction on what is actually required from development proposals as regards trees, woodlands and hedgerows.
317. To ensure the Plan is positively prepared, effective and consistent with national policy, it is necessary to delete Policy NE03 and replace it with a new policy that identifies clear development requirements. This is achieved through **MM75**.
318. Policy NE04 relates to development proposals that fall within the Thames Chase Community Forest area. It is necessary to amend the policy and the supporting text to clearly define the purpose of the Community Forest, and its management and implementation through the Thames Chase Plan. This is achieved through **MM76** which ensures the Plan is effective in this regard.

## Historic environment

319. The Plan includes a section which contains several policies seeking to protect the Borough's heritage assets. However, as it is located in the housing Chapter, it is unclear whether the policies relate to other forms of development or not. To rectify this the section needs to be relocated to the built environment Chapter to clarify that it applies to all relevant development proposals.
320. Policies HP19-HP23 set out criteria for the historic environment, but lack clarity due to inconsistencies and duplication of requirements. They also do not accord with national policy, particularly in relation to some of the terminology used and the requirement that development conserves, sustains and enhances in all cases. Policy HP19 should therefore be amended so that it forms one cohesive strategic policy setting out succinct criteria for the historic environment that accord with national policy.
321. These changes are all achieved through **MM51** to ensure the Plan is effective and consistent with national policy. It also makes consequential changes to the policy's supporting text for consistency. We have also revised the MM in relation to non-designated heritage assets to ensure consistency with national policy.
322. Policies HP20-HP23 are therefore unnecessary and should be deleted and relevant supporting text amended and moved to support Policy HP19 as set out in **MM52, MM53, MM54 and MM55**. These MMs ensure the Plan is consistent with national policy and effective by removing duplication and inconsistencies.

## Design and place-making

323. The Plan's strategic objectives focus on managing growth sustainably to ensure there is a 'strong sense of place'. Key to this is good design and the creation of sustainable communities that provide healthy and resilient built environments and valued natural spaces.
324. The Plan includes a section on design and place-making which includes several policies seeking high quality and inclusive design for all development. Confusingly this is located in the housing Chapter. **MM45** rectifies this by relocating the section to the built environment Chapter. It also amends the introductory supporting text to provide clarity and remove outdated and unnecessary document and policy references. The MM is necessary for reasons of effectiveness.

325. Policy HP12 states that the Council will work with partners, stakeholders and developers to plan inclusive communities and sets out a list of objectives. To be effective the policy requires amending so that the objectives read as clear development requirements. This is achieved through **MM46**. It also amends the supporting text to ensure it is consistent with the policy.
326. Policies HP13-HP16 and Policy HP18 all relate to issues of design and place-making, but lack clarity due to inconsistencies and duplication of requirements between the policies. They also do not entirely accord with national policy. For effectiveness, and to ensure the Plan is consistent with national policy on design matters, criteria from these policies should be merged into Policy HP13 and amended, to form one cohesive strategic policy on design, that sets out robust development requirements. This is achieved through **MM47** which also amends the supporting text for consistency.
327. Furthermore, key design related requirements from Policy SP06 are also merged into Policy HP13 for effectiveness and Policy SP06 and its supporting text are deleted to avoid repetition [**MM9**].
328. Policies HP14-HP16 and Policy HP18 are therefore to be deleted and relevant supporting text amended as defined in **MM48**, **MM49** and **MM50**, to ensure the Plan is effective and consistent with national policy.
329. Policy HP17 sets out criteria for paving over front gardens, which duplicates development requirements in other policies, particularly those relating to design and flood risk. As such, to avoid any confusion and inconsistency and ensure the Plan is effective, **MM49** deletes the policy and relevant supporting text.

### **Climate change and other environmental matters**

330. The Plan seeks to ensure that the development and use of land will contribute to the mitigation of and adaptation to climate change, through the spatial strategy and a combination of Plan policies.
331. Several policies (Policies BE02-BE08) seek sustainable construction and resource efficiency requirements relating to carbon reduction, renewable energy, water efficiency, heat risk and sustainable drainage. Whilst incorporating such sustainable measures within the Plan is justified, there is significant duplication and some inconsistencies between some of these policies or with others in the

Plan, which is confusing and ineffective. It also results in several requirements being inconsistent with national policy.

332. Accordingly, Policy BE02 should be deleted as sustainable construction and resource efficiency requirements are set out in other more specific Plan policies, particularly Policies BE03, BE04 and BE08. The removal of this policy reduces repetition and ensures the Plan is clear and effective in this regard [**MM12**].
333. Changes are required to Policy BE03 (now proposed to be BE01), to clarify that it is a strategic policy within the Plan and to remove the separate standards for sustainable construction and carbon reduction that apply up to the year 2020. As the viability evidence demonstrates that a 10% reduction in carbon emissions above building regulations is achievable on all major development, not just residential proposals, the policy should be amended to reflect this. The BREEAM standards set out in the policy for new non-residential development also require updating.
334. There are several requirements for renewable energy within the policy which should be merged and simplified for reasons of effectiveness. It is also necessary to make it clear that any shortfall from on-site provision can be provided via funding contributions or off-site provision.
335. All these changes are achieved through **MM13** for effectiveness and consistency with national policy. Amendments to the supporting text are also included for consistency.
336. Moreover, to aid the reading of Policy BE03 and ensure overall effectiveness of the Plan and consistency with national policy in this regard, the MM also removes the requirements relating to water efficiency from the policy. Instead, these are merged with other relevant criteria from several other policies, to form a new policy (Policy BE02) on water efficiency and management, incorporating robust development requirements that accord with the Framework. This is achieved by **MM14** which is necessary for effectiveness and consistency with national policy.
337. Policy BE04 (now proposed to be BE03), encourages the provision of low carbon and renewable infrastructure networks, including stand-alone, decentralised and building scale technologies. However, some of the criteria duplicate other Plan policies, particularly in relation to Green Belt and design, and should be deleted for effectiveness.



Several other criteria also require merging and simplifying so that the requirements for energy infrastructure are clear and effective. **MM15** sets out these changes to both the policy and supporting text.

338. Policy BE05 unnecessarily and confusingly duplicates requirements identified in other relevant Plan policies. **MM16** deletes the policy and supporting text for reasons of effectiveness.
339. To contribute to carbon reduction targets within the Borough, Policy BE06 requires provision of improved energy efficiency measures in existing dwellings when relevant extensions or conversions are applied for. However, it is not the role of planning policy to duplicate building regulations. The policy and supporting text are therefore deleted to ensure the Plan is justified and does not conflict with other legislation [**MM17**].
340. Whilst Policy BE07 (now proposed to be BE04), which seeks to manage heat risk, is justified, some of the criteria need modifying to ensure the policy is effective. **MM18** makes the necessary amendments including clarifying that passive ventilation is to be maximised and other ventilation and active cooling systems are to be provided where necessary.
341. Policy BE08 (now proposed to be BE05) on sustainable drainage requires amending to clarify that mitigation schemes for development within a Critical Drainage Area must address appropriate issues and to set out clear sustainable drainage design criteria. Relevant guidance and other Plan policies also require referencing in the policy to provide clarity and consistency. Furthermore, the seeking of appropriate development surfaces to be permeable where possible, requires adding to the policy. **MM19** makes the necessary adjustments so that the policy is justified, effective and consistent with national policy. It also includes consequential amendments to the supporting text. We have also kept reference to the need for a Flood Risk Assessment within the policy for effectiveness.
342. Policy SP05 identifies construction management criteria. However, it is not the role of planning policy to duplicate matters that are covered by other legislation. Furthermore, the management of such factors as noise, vibration, light, dust and odours during construction can also be enforced through planning conditions. The policy and its supporting text are therefore deleted from the Plan to ensure it is justified and does not conflict with other legislation. **MM8** achieves this.

343. Policy BE01 seeks all applications to take into account various principles of future proofing, including in relation to climate change. However, the policy reads as a statement of intent and as such does not set out clear development requirements. Furthermore, the principles listed in the policy are identified in other Plan policies. **MM11** deletes the policy to remove unnecessary repetition and to ensure the Plan is effective.
344. Policy NE05 sets out a range of development requirements in relation to air quality, but these are not entirely consistent with national policy or effective. Hence, amendments are required so that development complies with the relevant national air quality standards and concise requirements added that clarify how the policy would be applied. This includes clarification on requirements for development proposals within air quality management areas and on cumulative impacts. This is achieved by **MM77**, which also amends the supporting text for consistency and effectiveness.
345. Policy NE06 (now proposed to be Strategic Policy NE09) provides a criteria-based approach to flood risk. To ensure it is both effective and consistent with national policy amendments are required to clarify how the policy is to be applied. This requires identifying the suitability of land use vulnerabilities within different flood zones, incorporating criteria for site specific flood risk assessments, and ensuring consistency with the sequential and exception tests set out within the Framework. Reference to the Borough's Critical Drainage Areas more logically aligns with the Plan policy on sustainable drainage. These changes are necessary to ensure that the policy accords with the 2018 Strategic Flood Risk Assessment recommendations, and national policy and guidance. This is achieved by **MM78**, which also amends the supporting text for consistency.
346. Policy NE07 sets out criteria for development proposals involving contaminated land and hazardous substances, but these are neither effective nor consistent with national policy. Accordingly, the wording of the policy and relevant supporting text is amended, to clearly set out the development requirements and when they would apply, to remove any ambiguity and to align with the Framework, as defined in **MM79**.
347. Whilst Policy NE08 on floodlighting and illumination is justified, some of the criteria are imprecise and require amending to provide clarity and ensure the policy is effective overall. **MM80** makes the necessary amendments to both the policy and supporting text.

348. For effectiveness, Policy SP03 (now proposed to be Policy MG04) requires amending so that it clearly defines the circumstances when a health impact assessment will be required. The policy therefore needs to specify that it applies to residential developments above the threshold size of 50 units or more (or less at the discretion of the local planning authority); non-residential development of 1,000 sqm or more; and certain hot food takeaway proposals, based on location.
349. In the submitted Plan, restrictions for hot food takeaway proposals are set out in Policy PC10. These are to be deleted from Policy PC10, as set out elsewhere in this report. The requirement for health impact assessments to be provided for hot food takeaway proposals, is justified, so that any impacts on health can be established as part of the application process.
350. However, to accord with the evidence submitted during the examination, it is necessary to make it clear that Policy SP03 would only be required for hot food takeaway proposals outside designated town, district or local centre and within 400 metres of a school entrance. **MM6** makes these changes to the policy for effectiveness. It also amends the supporting text to clarify the respective roles of the Council and Public Health England in this regard.

## **Conclusion**

351. We conclude that, subject to the above MMs, the Plan's development management policies for the Green Belt, natural environment, historic environment, design and place-making, climate change and other environmental matters, are justified, effective and consistent with national policy.

## **Issue 10 – Whether the Plan is viable and capable of being effectively implemented, monitored and reviewed.**

### **Viability**

352. The Council's viability assessment 2018 provides a robust assessment of the overall cumulative impact of the policies in the Plan, in accordance with national policy, good practice guidance and relevant regulations. It models appropriate development typologies that are likely to come forward over the Plan period. For residential development this includes 25 specific appraisals for different sized brownfield and greenfield modelled sites and four strategic sites, including the Dunton Hills Garden Village, which are appraised

separately. Other typologies include older people's housing, employment uses, retail and leisure.

353. The values and assumptions used within the assessment and overall approach to viability have been consulted on with the development industry. The Council has also had regular communications with all the site promoters/developers of the larger strategic growth sites. SoCG have been drafted for all large strategic sites, which conclude that the requirements set out in the Plan can be viably met.
354. The assessments include all policy impacts, including affordable housing, defined standards and the Council's proposed Community Infrastructure Levy rate. They conclude that, in most cases, development is viable, with some assessments demonstrating significant viability margins, well above the defined viability threshold. Whilst some non-residential uses are identified as being unviable, the viability assessment concludes that this is due to general market conditions, rather than the cumulative impact of the Plan policies.
355. Overall therefore we are satisfied that the evidence credibly indicates that the cumulative impact of the Plan's policies will not put implementation of the Plan at serious risk.

## **Monitoring**

356. The Plan is to be monitored through the key indicators and targets set out in the monitoring framework within Appendix 3 of the Plan. Whilst the monitoring tables provide key indicators and targets against each relevant policy, these do not provide sufficient detail and clarity to be effective. They also do not include actions and contingencies to be taken by the Council, should the policies not deliver the required outcomes.
357. We therefore consider it necessary for the Plan's monitoring framework to be amended to ensure that the indicators are appropriate and consistent with other MMs for the Plan and set appropriate triggers and actions. **MM117** rectifies this, by replacing the monitoring framework in Appendix 3 of the Plan providing necessary clarity so that the monitoring of relevant policies is effective.

## Implementation and review

358. Paragraph 33 of the Framework states that policies and spatial development strategies 'should be reviewed to assess whether they need updating at least every five years, and should then be updated as necessary.'
359. As set out earlier in this report, the identified housing need and requirement in the Plan, cannot be met in full during the Plan period. Accordingly, it is therefore essential that the Council commence work on producing an update of the Plan immediately on adoption and submit it for examination in a timely manner. To give this the prominence it needs within the Plan, a new 'Local Plan Review and Update' policy (Policy MG06) is required. This provides a clear 28 month timescale for submission of an update, from adoption of the Plan, which the Council has assured us can be resourced and met.
360. Also, as acknowledged earlier in this report, the extension of the Plan period can be considered further as part of this immediate update, along with the identified transport and highway infrastructure matters. The Council's commitment to undertaking this immediate update is critically important for meeting identified housing need over the Plan period.
361. **MM10** adds this new policy to the Plan, though we have amended it, as highlighted above, to accord with the wording in the Framework, as it is clear that an update is necessary. This MM ensures that the Plan is justified and consistent with national policy. A consequential change also needs to be made to the original **MM116** to reflect this amendment.

## Conclusion

362. In conclusion, subject to the above MMs, the Plan is viable and is capable of being effectively implemented, monitored and reviewed.

## Overall Conclusion and Recommendation

363. The Plan has a number of deficiencies in respect of soundness and legal compliance for the reasons set out above, which mean that we recommend non-adoption of it as submitted, in accordance with Section 20(7A) of the 2004 Act. These deficiencies have been explained in the main issues set out above.
364. The Council has requested that we recommend MMs to make the Plan sound and legally compliant and capable of adoption. We conclude that the duty to cooperate has been met and that with the

recommended MMs set out in the Appendix, the Brentwood Local Plan Pre-Submission Document and the Addendum of Focussed Changes to the Pre-Submission Local Plan, satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.

*Yvonne Wright and Mike Worden*

Inspectors

This report is accompanied by an Appendix containing the Main Modifications.

## Appendix – Main Modifications

The modifications below are expressed either in the conventional form of ~~strikethrough~~ for deletions and **underlined bold** text for additions, or by specifying the modification in words in *italics*.

### Chapter 1

MM Ref	Page	Policy / para.	Proposed modifications
MM1	18	Paragraph 1.39	<p><i>Insert new paragraphs after 1.39 to read:</i></p> <p><b><u>Strategic and Non-strategic Policies</u></b></p> <p><b><u>Chapter 3 sets out the borough priorities emanating from the Council’s Corporate Plan as well as a number of supporting studies, spatial challenges and opportunities which formed key considerations and drivers in deriving the borough’s spatial development strategy. The borough’s priorities are consolidated into four strategic objectives. Figure 1.1 – Document Structure, illustrates how the policies relate to each of the strategic objectives to help Brentwood address its strategic priorities and meet these objectives.</u></b></p> <p><b><u>Appendix 2 lists all policies and highlights those that are strategic as well as how they relate to the strategic objectives.</u></b></p> <p><b><u>Chapters 4 to 8 set out the Local Plan policies under five thematic topics (Managing Growth, Resilient Built Environment, Housing Provision, Prosperous Communities, and Natural Environment). Each of these chapters is sub-divided into sub-themes and each sub-section begins with the strategic policies with the prefix ‘Strategic’. Non-strategic policies follow these and provide more details on various development management matters.</u></b></p> <p><b><u>There are currently three Neighbourhood Plans under development. Further information about these can be found on the Council webpages<sup>1</sup>. These are required to be consistent with, and help support the delivery of strategic policies set out in this Local Plan.</u></b></p> <p>Footnote 1. <a href="https://www.brentwood.gov.uk/-/neighbourhood-planning">https://www.brentwood.gov.uk/-/neighbourhood-planning</a>.</p>

## Chapter 3

MM Ref	Page	Policy / para.	Main modifications
MM2	36-40	Paragraph 3.1 - 3.26 Figure 3.1 Figure 3.2 Figure 3.3	<p><i>Delete paragraphs 3.1-3.9 and add new paragraph:</i></p> <p><del>Spatial Strategy Driving Factors</del></p> <p><b><u>3.1 The vision for the development of the borough reflects and capitalises on Brentwood’s qualities (i.e. village character, heritage, environment), needs (i.e. liveable places, thriving enterprises), and opportunities (i.e. new economic opportunities, connectivity, thriving high streets for entertainment and culture).</u></b></p> <p><b><u>The vision is reinforced by strategic aims and four strategic objectives and related policies.</u></b></p> <p><i>Amend paragraphs 3.10 to 3.22 to read:</i></p> <p><b><u>Strategic Aims and Objectives</u></b></p> <p><del>Spatial Strategy Overarching Aims</del></p> <p>3.10 Driven by Brentwood’s Borough of Villages character, our <del>spatial strategy focuses on three main overarching driving forces</del> <b><u>aims are to: a) harness the connectivity opportunities offered by the borough’s accessible transit corridors; b) orientate proposals to consider and embed a ‘design and build with nature’ landscape-led approach; and c) ensure that proposals demonstrate how outcomes will deliver healthy communities on multiple levels.</u></b></p> <p><b><u>PROMOTING SUSTAINABLE MOBILITY THROUGH TRANSIT-ORIENTATED GROWTH</u></b></p> <p>3.11 <b><u>A key aim is ensuring sustainable mobility is maximised given the borough’s rural setting. Sustainable mobility is key in achieving a healthier environment, particularly in reducing air pollution from vehicular travel, but also in providing the necessary connectivity network to aid the local economy.</u></b> Brentwood has two key transit / <b><u>connectivity</u></b> corridors running through the</p>



MM Ref	Page	Policy / para.	Main modifications
			<p>borough <b><u>and these are identified in this Plan as the broad locations for growth to maximise these sustainable mobility opportunities:</u></b> ‘Central Brentwood Growth Corridor’, with the A12, the Great Eastern Main Line to London Liverpool Street Station, and the Elizabeth Line; and the ‘Southern Brentwood Growth Corridor’, with the A127 and the London, Tilbury and Southend Railway to London Fenchurch Street Station. <del>These form key connectivity axes.</del> Focusing growth along these axes <b><u>will ensure</u></b> that future development is sustainable, maximising the benefits of transport infrastructure. While some investment to improve the transport network <b><u>is necessary</u></b> <del>will be inevitable</del>, this growth strategy ensures economies of scale are reached, with the critical mass of development making it more viable for such investment to occur.</p> <p>DEVELOPING NATURALLY AND SUSTAINABLY</p> <p>3.12 Given Brentwood’s village feel and countryside setting, development must be mindful of the ecological sensitivity and disruption to ecosystem services. For this reason, development should take a ‘design and build with nature’ <b><u>landscape-led</u></b> approach <b><u>to drive design quality and create places which respond to their existing environment, work with natural assets, and create Environmental Net Gain wherever possible. Opportunities to embed green infrastructure in the public realm should be maximised to deliver multiple benefits, including ecosystem services to address the impacts of climate change as well as providing a liveable environment.</u></b> This will not only plan for resilient and smart infrastructure <b><u>to future-proof investment against climate change</u></b> but also create living environments conducive to human health.</p> <p>HEALTHY COMMUNITIES</p> <p>3.13 Growing from a market town to the diverse economy it is today, future development should capitalise on this evolution to ensure a diverse balance of employment opportunities for all alongside vibrant hubs of economic and social-cultural activity to provide attractive, resilient, connected, walkable, lively and stimulating destinations with the necessary facilities and services required to sustain healthy and active communities.</p>

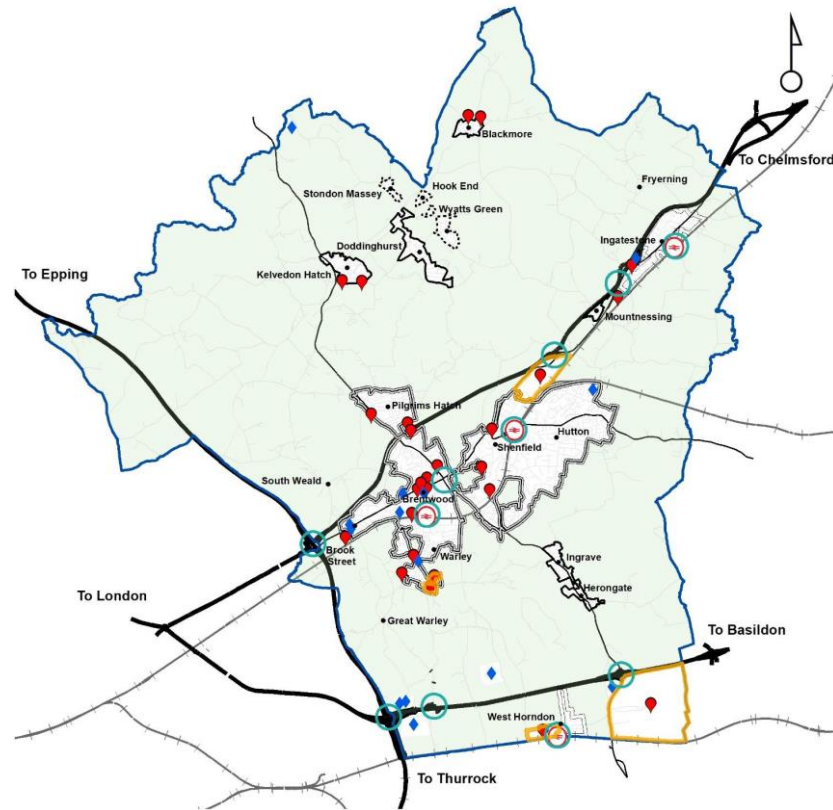
MM Ref	Page	Policy / para.	Main modifications
			<p data-bbox="719 188 2040 256">3.14 — These goals are supported by four strategic objectives and respective policies, as illustrated in Figure 1.1.</p> <p data-bbox="719 336 987 368">Strategic Objectives</p> <p data-bbox="719 392 2040 576">3.15 This section defines our four strategic objectives <b><u>which consolidate the Borough’s key priorities and help make the link between the vision and</u></b> and how the supporting policies align <b><u>which to help to deliver these. In reality there are many cross-overs between each objective and the policies which help delivery these, and should therefore not be treated in isolation when developing proposals.</u></b></p> <p data-bbox="719 655 2040 807">3.16 SO1: Manage Growth Sustainably, by directing development to the most sustainable locations <b><u>along identified transit growth corridors</u></b>, ensuring that the characteristics and patterns of our different settlements are protected and enhanced to provide a strong emphasis on ‘sense of place’, to be enjoyed by people living, working and visiting Brentwood.</p> <p data-bbox="719 887 2040 1110">3.17 SO2: Deliver a Healthy and Resilient Built Environment, one where our <b><u>a landscape-led design approach helps to protect and enhance areas of environmental and heritage value and</u></b> creates spaces that encourage social interaction, <b><u>sustainable connectivity and mobility</u></b> and healthy active lifestyles; mitigates, reduces impact or adapts to conditions of a changing climate through smart infrastructure; creates public realm and homes where both the internal and external spaces are conducive to human health.</p> <p data-bbox="719 1190 2040 1374">3.18 SO3: Deliver Sustainable Communities with Diverse Economic &amp; Social-cultural Opportunities for All, opportunities which flexibly respond to the changing economic climate and employment sector trends making citizens feel economically empowered to enjoy and benefit from the necessary community/social infrastructure that sustains inclusive, informed, vibrant, active and cohesive communities.</p>

MM Ref	Page	Policy / para.	Main modifications
			<p>3.19 Deliver Beautiful, Biodiverse, Clean and a Functional Natural Environment, where <b><u>resources are carefully managed to avoid adverse impact on, and to provide net gains for, the borough's natural environment and biodiversity; and where</u></b> our natural heritage is protected, and ecosystem services are restored, enhanced and integrated back into the built environment through multi-functional green and blue infrastructure <b><u>and opportunities are pursued for securing measurable net gains for biodiversity.</u></b></p> <p><i>Delete paragraph 3.20</i></p> <p><b><u>Spatial Strategy – Growth Areas</u></b></p> <p>3.21 Two key growth <b><u>corridors</u></b> areas have been identified, <del>considering</del> <b><u>to meet</u></b> our overarching aim to deliver sustainable development in <b><u>accessible and connected</u></b> transit corridors. <b><u>Along these corridors, a comprehensive</u></b> <del>through a process of sequential analysis and review of sites</del> <b><u>has been undertaken to select suitable site allocations.</u></b></p> <p><b><u>Central Brentwood Growth Corridor</u></b></p> <p><del>a In the</del> <b><u>The</u></b> Central Brentwood Growth Corridor, <b><u>runs through the main urban area of Brentwood (incorporating the neighbourhoods and towns of Brentwood, Shenfield, Hutton, Warley, Pilgrims Hatch) as well as the urban area of Mountnessing and Ingatestone villages further along the A12 corridor. The main central urban area is well served by public transport, with rail stations at Brentwood and Shenfield. It provides a range of shopping, employment areas, secondary schools, health and leisure facilities in close proximity to residential areas. It therefore offers scope to accommodate some growth.</u></b></p>

MM Ref	Page	Policy / para.	Main modifications
			<p><u>Here</u>, we will maximise every opportunity to bring forward brownfield land for development <b><u>has been maximised and brownfield regeneration will continue to be prioritised as and when it becomes available in future</u></b>, where appropriate, in Brentwood and Shenfield. This will take account of the arrival of the Elizabeth Line, and reflect our commitment to deliver brownfield development, in consistency with the NPPF (2018). However, brownfield land is limited <b><u>and so the spatial strategy in this growth area has also focused on delivering</u></b> ; and given the opportunity for new development to invest in infrastructure and facilities, we will grow the wider Brentwood Urban Area by providing urban extensions <b><u>of varying extents, including at Shenfield, Warley, Pilgrims Hatch and Ingatestone</u></b>, in places, and where Green Belt harm is minimized. This is in response to local housing needs and limited brownfield capacity, providing e-<u>Exceptional circumstances have been demonstrated to release</u> to consider limited use of <b><u>land from the Green Belt to allow these urban extensions</u></b>. In addition, opportunities to grow Ingatestone Village will be taken where contained sites can deliver an urban extension to the south, providing new housing and supporting employment.</p> <p><b><u>South Brentwood Growth Corridor</u></b></p> <p>b. In the <u>The</u> South Brentwood Growth Corridor <b><u>runs along the southern transit axes up to the borough boundary. This location has traditionally played an instrumental role in delivering the borough's economic growth, with the location of employment sites due to the good transport connections to wider markets. The spatial strategy continues to enhance employment land in this location, and delivers</u></b> we will deliver <b><u>two strategic allocations, one brownfield allocation at West Horndon Village and a new settlement at</u></b> Dunton Hills Garden Village, providing new <b><u>residential-led, mixed-use development</u></b>.</p> <p>A strategic <b><u>employment</u></b> allocation at M25 junction 29 (Brentwood Enterprise Park) will provide for most of the new employment land needed, bringing forward a modern business park <del>village</del> in the south-west of the borough with excellent access to the M25. This will also act as a focus for a wider M25/A127 employment cluster considering existing employment uses in the area.</p>

MM Ref	Page	Policy / para.	Main modifications
			<p>Brownfield <u>development</u> opportunities will be taken to effectively meet local needs, such as a residential-led, mixed-use redevelopment of existing industrial land in West Horndon, <u>will</u> create ing a new village centre with supporting services and facilities close to the village rail station. Developing here provides an opportunity to address conflicts arising from heavy freight traffic passing through the village. Residential-led development in the area will help strengthen the village centre and improve service provision. Significant improvements to infrastructure and services will be required to support growth within the Corridor.</p> <p><b><u>The new Garden Village will be in keeping with the Borough’s character as a ‘Borough of Villages’ and is of sufficient scale to provide the necessary infrastructure to support a self-sustaining community in the south-east of the borough. The Garden Village will be in line with the Government’s prospectus for garden communities, delivering the necessary quality and a significant contribution to meeting housing needs. It also provides an opportunity to contribute to the wider infrastructure investment requirements to support long-term growth within this Southern Growth Corridor, along with some capacity for future growth beyond the plan period to meet the evolving housing and economic needs of Brentwood. Exceptional circumstances have been demonstrated to release Green Belt to allow a new settlement in this location.</u></b></p> <p><b><u>Development Outside Growth Corridors</u></b></p> <p>e.——Development in areas outside these growth areas corridors is limited, to retain the local character, <b><u>with allocations at Kelvedon Hatch and Blackmore villages.</u></b> Brownfield opportunities will be encouraged where appropriate schemes help meet local needs and ensure that our villages remain thriving communities, in line with policies in this Plan. Where appropriate, this includes the redevelopment of previously developed sites in Green Belt, infill while improving links to nearby villages.</p> <p><b><u>The spatial strategy is set out in Strategic Policy MG01 Spatial Strategy.</u></b></p>

MM Ref	Page	Policy / para.	Main modifications
			<p>Key Diagram</p> <p>3.22 The Key Diagram shows the main aspects of the spatial strategy, <b><u>illustrating the broad locations and pattern of development and how these relate to the two main transit growth corridors and borough gateways.</u></b> set within the broader local context. This also includes some key aims of other policies in the Plan.</p> <p><i>Merge figures 3.2 and 3.3 into 3.1 (the Key Diagram) to include the growth areas and gateways.</i></p> <p><i>Delete paragraphs 3.23 to 3.26</i></p> <p><i>Remove reference to 'Green Wedge' from Figure 3.1 Key Diagram and update as below:</i></p>



**Settlement Pattern**

**Settlement Hierarchy**

- Settlement Category 1
- Settlement Category 2
- Settlement Category 3
- Settlement Category 4

**Green Belt**

**Broad Locations of Growth**

**Strategic Allocations**

- Residential-Led, Mixed-use Development

**Employment-Led Allocations**



**Residential-Led Allocations**



**Mobility & Connectivity**

**Transport Infrastructure**

- Key Roads
- Rail
- Railway Station
- Borough Gateways

## Chapter 4

MM Ref	Page	Policy / para.	Proposed modifications
MM3	46	Policy SP01 Paragraphs 4.1-4.21	Delete policy SP01 and supporting text in paragraphs 4.1 to 4.21.
MM4	50	Policy SP02 Figure 4.2	Insert a new paragraph before Policy SP02 to read:  <b><u>Delivering the Spatial Strategy</u></b>  <b><u>This chapter sets out two Strategic Policies and a number of supporting cross-cutting development management policies. Strategic Policy MG01 Spatial Strategy is the overarching strategic policy for the Local Plan to achieve the borough's Spatial Strategy and vision. It sets out the quantum and distribution of growth as described in Chapter 3. Strategic Policy MG02 Green Belt is also a key policy that informs the appropriate distribution of growth, given the predominance of Green Belt in the Borough.</u></b>
			Amend policy SP02 to read:  <b><u>STRATEGIC POLICY-SP02 MG01: Spatial Strategy</u></b>
			A. Provision is made for 7,752 new residential dwellings (net) to be built in the borough over the Plan period 2016-2033 at an annual average rate of 310 dwellings per year, to 2022/23, followed by 584 dwellings per year from 2023/24-2033.
			B. New development within the borough will be directed towards:



MM Ref	Page	Policy / para.	Proposed modifications
			a. <del>the site allocations set out in Chapter 9; and highly accessible locations along transit/growth corridors.</del>
			<b><u>Quantum of Development</u></b>
			<b><u>A. The Council will work positively and proactively with development industry and wider stakeholders to enable the development of the allocated sites identified on the Policies Map in order to meet the borough's housing and employment needs and targets. To facilitate a significant increase in the delivery of new homes as well as jobs to promote sustainable communities, provision is made for:</u></b>
			a. <b><u>7,752 new residential dwellings (net) to be built in the borough over the Plan period 2016-2033 at an annual average rate of 300 dwellings per year to 2023/24, followed by 400 dwellings per year to 2029/30 and then 984 dwellings per year to 2032/33.</u></b>
			b. <b><u>13 permanent pitches to accommodate Gypsy and Traveller accommodation needs, distributed across the borough as set out in Policy HP07.</u></b>
			c. <b><u>about 46.64 ha of new employment land, 1,604 square metres (net) of comparison retail floorspace and 4,438 square metres (net) of convenience floorspace, to enable the creation of at least 5,000 additional jobs.</u></b>
			<b><u>Growth Distribution</u></b>
			<b><u>B. The majority of new development is directed to the borough's two strategic transit growth corridors, as illustrated in the Key Diagram, ensuring the benefits resulting from their proximity to existing sustainable transport infrastructure. This strategy has required the release of land from the green belt. The geographic distribution and pattern of growth is planned as follows:</u></b>
			a. <b><u>Central Brentwood Growth Corridor comprising mainly brownfield infill and urban extensions. Three strategic residential-led, mixed-use sites in this location are allocated;</u></b>

MM Ref	Page	Policy / para.	Proposed modifications												
			<p><b><u>b.</u></b> <u>South Brentwood Growth Corridor comprising largely of employment provision, brownfield redevelopment and a new Garden Village settlement. Two strategic residential-led, mixed-use development sites in this location are allocated;</u></p>												
			<p><b><u>c.</u></b> <u>Limited growth is planned at suitable sites in two northern villages of Kelvedon Hatch and Blackmore;</u></p>												
			<p><b><u>d.</u></b> <u>The housing requirements for designated neighbourhood plan areas in the borough are outlined in the table of Figure 4.2.</u></p>												
			<p><i>Delete Figure 4.2 Demonstrating Housing Provision</i></p>												
			<p><i>Insert new paragraph and figure:</i></p> <p><b><u>Growth in Designated Neighbourhood Planning Areas</u></b></p> <p><b><u>Brentwood currently has three designated neighbourhood plan areas covering parish council areas as outlined on the Council Neighbourhood Planning webpages<sup>3</sup>. Housing requirements in the designated neighbourhood planning areas are set out in the table in Figure 4.2 below.</u></b></p> <table border="1"> <thead> <tr> <th><u>Parish/Designated Neighbourhood Plan Areas</u></th> <th><u>Date of Designation</u></th> <th><u>Housing Requirements</u></th> <th><u>Site Allocations</u></th> </tr> </thead> <tbody> <tr> <td><u>West Horndon CP</u></td> <td><u>Designated November 2014</u></td> <td><u>2530</u></td> <td><u>R01, R02</u></td> </tr> <tr> <td><u>Ingatestone and Fryerning CP</u></td> <td><u>Designated October 2017</u></td> <td><u>57</u></td> <td><u>R22</u></td> </tr> </tbody> </table>	<u>Parish/Designated Neighbourhood Plan Areas</u>	<u>Date of Designation</u>	<u>Housing Requirements</u>	<u>Site Allocations</u>	<u>West Horndon CP</u>	<u>Designated November 2014</u>	<u>2530</u>	<u>R01, R02</u>	<u>Ingatestone and Fryerning CP</u>	<u>Designated October 2017</u>	<u>57</u>	<u>R22</u>
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			<table border="1"> <tr> <td><u>Doddinghurst CP</u></td> <td><u>Designated December 2012</u></td> <td><u>0</u></td> <td><u>None</u></td> </tr> </table> <p><b><u>Figure 4.2: Housing Requirements in Neighbourhood Planning Parish Areas</u></b></p>	<u>Doddinghurst CP</u>	<u>Designated December 2012</u>	<u>0</u>	<u>None</u>																							
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MM5	52	New Policy MG03	<p><i>Insert a new policy before Policy SP03 to read:</i></p> <p><b><u>POLICY MG03: SETTLEMENT HIERARCHY</u></b></p>																											
		Figure 2.2 Figure 2.3 Paragraph 2.8 – Paragraph 2.17 Footnote 1 & 2	<p><i>Amend figure 2.3 as below, remove it from Chapter 2 and insert it to form part of the new policy MG03 (Settlement Hierarchy).</i></p> <table border="1"> <thead> <tr> <th>Settlement Category</th> <th>Settlement Name</th> <th>Population</th> </tr> </thead> <tbody> <tr> <td>Settlement Category 1: <b><u>This incorporates the Large towns and urban neighbourhoods that collectively form the main urban area of Brentwood Borough in compact urban settings that collectively form the Brentwood Urban Area. They provide a wide range of existing community infrastructure, services and opportunities for employment, retail, education, health and leisure facilities in designated Town, District and Local Centres for</u></b></td> <td>Main urban area of Brentwood comprising:</td> <td></td> </tr> <tr> <td></td> <td>Brentwood</td> <td>22,410</td> </tr> <tr> <td></td> <td>Shenfield</td> <td>20,790</td> </tr> <tr> <td></td> <td>Hutton</td> <td>1,405</td> </tr> <tr> <td></td> <td>Pilgrims Hatch</td> <td>5,632</td> </tr> <tr> <td></td> <td>Warley</td> <td>2,213</td> </tr> <tr> <td></td> <td>Brook Street</td> <td>1,093</td> </tr> <tr> <td><b><u>Development opportunities should focus on making the best use of land, with higher density and brownfield redevelopment being prioritised, consistent with local character. Infrastructure</u></b></td> <td></td> <td></td> </tr> </tbody> </table>	Settlement Category	Settlement Name	Population	Settlement Category 1: <b><u>This incorporates the Large towns and urban neighbourhoods that collectively form the main urban area of Brentwood Borough in compact urban settings that collectively form the Brentwood Urban Area. They provide a wide range of existing community infrastructure, services and opportunities for employment, retail, education, health and leisure facilities in designated Town, District and Local Centres for</u></b>	Main urban area of Brentwood comprising:			Brentwood	22,410		Shenfield	20,790		Hutton	1,405		Pilgrims Hatch	5,632		Warley	2,213		Brook Street	1,093	<b><u>Development opportunities should focus on making the best use of land, with higher density and brownfield redevelopment being prioritised, consistent with local character. Infrastructure</u></b>		
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			<p>capacity should inform the appropriate level of development and development contribution.</p>			
			<p>Settlement Hierarchy 2:</p> <p><b>This includes the</b> <del>£</del> larger villages in a rural setting, with high levels of accessibility and public transport provision, including rail services. They provide a range of services and facilities to the immediate residential areas and nearby settlements <b>in designated District and Local Centres.</b></p> <p><del>Appropriate urban extension and brownfield redevelopment opportunities will be encouraged to meet local needs. The level of development in these settlements should consider their infrastructure constraints and setting.</del></p>	West Horndon	1,537	
				Ingatestone	4,812	
				Dunton Hills (when delivered)	n/a	
			<p>Settlement Hierarchy 3:</p> <p>Villages in a sparse rural setting that provide day-to-day needs for local residents <b>in small local centres. These relatively larger villages also tend to have a primary school.</b> They generally have limited, often shared, community and health facilities, local jobs and a variable bus service.</p> <p><del>Brownfield redevelopment opportunities and limited urban extensions will be encouraged to meet local needs where appropriate. Development should be appropriate to the rural setting of the area.</del></p>	Blackmore	829	
				Doddinghurst	2,550	
				Herongate	648	
				Ingrave	1,198	
				Kelvedon Hatch	2,124	
				Mountnessing	494	

MM Ref	Page	Policy / para.	Proposed modifications														
			<p>Settlement Hierarchy 4: Remote and small rural villages and hamlets, with poor public transport, limited <b>or no</b> shops, jobs and community facilities; some of these settlements rely on nearby settlements for services. <del>Development opportunities are limited, although as with larger villages brownfield redevelopment opportunities will be encouraged to meet local needs where appropriate.</del></p> <table border="1" data-bbox="1294 201 1688 804"> <tr> <td data-bbox="1294 201 1525 284">Wyatts Green</td> <td data-bbox="1525 201 1688 284">936</td> </tr> <tr> <td data-bbox="1294 284 1525 365">Hook End</td> <td data-bbox="1525 284 1688 365">637</td> </tr> <tr> <td data-bbox="1294 365 1525 446">Stondon Massey</td> <td data-bbox="1525 365 1688 446">359</td> </tr> <tr> <td data-bbox="1294 446 1525 528">Fryerning</td> <td data-bbox="1525 446 1688 528">255</td> </tr> <tr> <td data-bbox="1294 528 1525 609">Great Warley</td> <td data-bbox="1525 528 1688 609">309</td> </tr> <tr> <td data-bbox="1294 609 1525 716">Little Warley</td> <td data-bbox="1525 609 1688 716">Data not available</td> </tr> <tr> <td data-bbox="1294 716 1525 804">South Weald</td> <td data-bbox="1525 716 1688 804">233</td> </tr> </table>	Wyatts Green	936	Hook End	637	Stondon Massey	359	Fryerning	255	Great Warley	309	Little Warley	Data not available	South Weald	233
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South Weald	233																
			<p><i>Delete paragraphs 2.8 to 2.17 and associated footnotes from Chapter 2 and insert and amend as necessary here in Chapter 4 as set out below.</i></p> <p><i>Insert paragraph 2.8 - 2.10 to support this policy and amend them as below.</i></p>														
			<p><del>To promote sustainable growth in rural areas, the NPPF (2018) paragraph 78 states that housing in rural areas should be located where it will enhance the vitality of rural communities, to ensure villages grow and thrive. To ensure the Local Plan responds to this, <b>Brentwood borough is characterised by a central urban area, and a number of scattered villages north and south of this main urban core. This has given rise to its principle character as a ‘Borough of Villages’ and the spatial strategy seeks to preserve this historic development pattern and the character of the villages. The main urban area includes the towns of Brentwood, Shenfield, Hutton, Warley, Pilgrims Hatch and Brook Street. Inset villages from the Green Belt include West Horndon, Ingatestone, Mountnessing, Ingrave, Herongate, Blackmore, Doddinghurst, Kelvedon Hatch, Wyatts Green, Hook End and Stondon Massey. Each village is considered a separate settlement each with its</b></del></p>														

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			<p><u>distinct settlement characteristics, the boundaries of which are wholly demarcated by the Green Belt. Other smaller more rural dispersed villages and hamlets remain washed over by the Green Belt and include Fryerning, Great Warley and others. New development should seek to enhance historic patterns and settlement characteristics of significance. For those settlements which are removed from the Green Belt, their boundary and category is shown on the Policies Map. Their distribution is also illustrated on the Key Diagram to aid an understanding of how each relates to sustainable growth locations.</u></p>
			<p><u>The Borough Profile<sup>1</sup> provides a general assessment of the different services and facilities across Brentwood's settlements. A This broad Ssettlement Hhierarchy Aassessment has been undertaken to understand the-describes the role, function and prominence of each villages within a broad hierarchy. The hierarchy is divided into four categories providing a broad indication of the settlement's ability to accommodate growth and reflects the indicative prominence of each village by its size (indicatively based on population and settlement area), and the range of services each village offers. The Settlement Hierarchy is tabulated and set out in Policy MG03.</u> relationship of Brentwood's dispersed settlements (Figures 2.2 &amp; 2.3). Figure 2.3 sets out the borough's settlement hierarchy categories, to identify their role (constraints and opportunities) for delivering sustainable growth and how their heritage character might inform future change. <u>The vitality of rural communities to ensure villages grow and thrive, in line with paragraph 78 of the NPPF, was a key consideration in defining the spatial strategy and where it was deemed possible, proportionate growth at key northern villages has been identified, as indicated in the Key Diagram.</u></p>
			<p>The settlement hierarchy should not be confused with the retail hierarchy detailed in Chapter 7.</p> <p><i>Amend footnote 1 to read:</i></p> <p>Office for National Statistics NOMIS Service (2011) Key Statistics KS102EW. Available at: <a href="https://www.nomisweb.co.uk">www.nomisweb.co.uk</a> <a href="https://www.brentwood.gov.uk/pdf/04022019155948000000.pdf">https://www.brentwood.gov.uk/pdf/04022019155948000000.pdf</a></p>

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			<i>Insert paragraph 2.11 to 2.12.</i>
			<p><i>Amend paragraph 2.13 to read:</i></p> <p>Ingatestone is the borough’s largest village; facilities here serve a significant catchment beyond the 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 <del>infrastructure constraints</del> and a lack of suitable sites.</p>
			<i>Insert paragraph 2.14 - 2.17.</i>
			<i>Delete figure 2.2</i>
MM6	52 - 54	Policy SP03 Paragraph 4.26	<p><i>Amend Policy to read:</i></p> <p><del>STRATEGIC POLICY SP03</del> <b><u>POLICY MG04: HEALTH IMPACT ASSESSMENTS (HIA)</u></b></p>
		Paragraph 4.28 - 4.30	A. <i>Delete part A and move to the supporting text</i>
			B. <i>Delete part B</i>
			<p><del>C.</del> <b><u>A. To ensure new development is designed to promote good health, a Health Impact Assessment, will be required for residential proposals that are of 50 or more units (or less than 50 units at the discretion of the planning authority where the number of the units could propose a significant impact on the community and infrastructure) and non-residential developments in excess of 1,000m2, or more, and hot food takeaways that are not within a designated town, district or local centre and are within 400 metres of a school entrance. The Health Impact Assessment will be prepared in accordance with the advice and best practice as published by Public Health England and locally through</u></b> are required to submit a Health and Well-being Impact Assessment, as required by the EPOA HIA Guidance Note, <b><u>using the most up to date guidance. The purpose of the Health Impact</u></b></p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p><u>Assessment is to identify opportunities of positive health impacts and potential negative impacts and how they might be mitigated.</u> <del>which will measure the impact on health and well-being, the demand on capacity of health and social care services and facilities arising from the development.</del></p>
			<p><b>B.</b> Where significant negative impacts are identified, planning permission will be refused unless infrastructure provision and/or funding to reasonably meet the health and well-being and service requirements of the development are provided and/or secured by planning obligations, or by CIL, as appropriate <u>reasonable mitigation or planning controls can be secured.</u></p> <p><del>D.</del> <i>Delete part D and move portion of the text to the supporting text.</i></p>
			<p><i>Amend paragraph 4.26 to read:</i></p> <p>Chapter 9 of the National Planning Policy Framework (2018-<del>21</del><b>21</b>) acknowledges that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Local planning authorities (LPAs) are expected to use their planning powers to ensure that health and well-being inequalities are reduced and mitigated where appropriate, to ensure positive social, economic, and environmental benefits are achieved. <b><u>Brentwood Borough Council is committed to ensuring all new developments promote healthier and inclusive environments. This includes regeneration proposals. The design of the built environments and use of the natural environments play a key role in ensuring that health inequalities are not exacerbated and can support people to live healthier lives. The following issues impact on the physical, social, and mental health and well-being of communities and should be addressed in accordance with policies within this Plan:</u></b></p> <p><b><u>a. the location, density and mix of land use;</u></b></p> <p><b><u>b. street layout and connectivity;</u></b></p> <p><b><u>c. access to public services, employment, local fresh food, education, leisure and recreation activities, and other community services;</u></b></p>



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			<p><u>d. safety and security;</u></p> <p><u>e. open and green space;</u></p> <p><u>f. affordable and energy efficient housing;</u></p> <p><u>g. air quality and noise;</u></p> <p><u>h. extreme weather events and climate change;</u></p> <p><u>i. community interaction; and</u></p> <p><u>j. transport.</u></p> <p><i>Amend paragraph 4.28 to read:</i></p> <p>In response to the government’s priorities placed on health and well-being, the Essex Planning Officers Association (EPOA) published a guidance note on Health Impact Assessments (2008) which set out targets for all local authorities to ensure that their Local Development Frameworks (or equivalent development plan documents) contain a policy requiring HIA for relevant planning applications. The EPOA Guidance Notes on HIA is currently being update <b><u>was update in 2019</u></b>; once published, <b><u>Public Health England (PHE) also published further guidance on Health Impact Assessments in spatial planning (September 2020) [6] which provides information on the process for undertaking an HIA and additional resources which may be helpful to applicants required to prepare an HIA as part of their planning application.</u></b> Developers should refer to the most up to date guidance to ensure that health and well-being impacts have been fully considered as part of the proposal.</p> <p><i>Add additional paragraphs following 4.29 to read:</i></p> <p><b><u>PHE’s guidance Using the Planning System to Promote Healthy Weight Environments (February 2020) suggests that limiting the availability of takeaways within walking distance of schools can contribute to tackling the rising levels of obesity and other health impacts such as cardiovascular disease. 400 metres has been considered a reasonable walking distance and is</u></b></p>

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			<p><u>outlined within the Urban Design Compendium 2 and CIHT Guidelines for providing journeys on foot.</u></p> <p><u>PHE's Obesity Profile illustrates that where there are concentrations of hot food takeaways within Brentwood Borough, there is an increase in the number of children who are overweight and obese. The Borough's current obesity rates are approximate 14% which is below the National average of 20%. However, in areas where there is a concentration of hot food takeaways, the average overweight and obesity rates increase to 15-24%, which is higher than the National average.</u></p> <p><u>Each application will be considered on its own merits and the 400m zone must be considered in the context of the local topography and context of the individual application. There are mitigating factors that can be considered, for example the potential for natural or man-made barriers that limit accessibility from schools, even within the 400m direct line exclusion zone.</u></p> <p><i>Add additional paragraph following 4.30 to read:</i></p> <p><u>Developers will be expected to contact the Council at pre-application stage to complete the Healthy Communities Checklist (as part of the validation checklist), to enable joint discussions to take place on the likely health and well-being impacts and environmental impacts of proposals. This is an opportunity to strengthen the process of spatial planning through partnership working, community engagement, evidence sharing and coordination.</u></p> <p><i>Add footnote [6] to include link to document:</i></p> <p><u>Public Health England. Health Impact Assessment in spatial planning. A guide for local authority public health and planning teams (2020).</u>  <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/929230/HIA_in_Planning_Guide_Sept2020.pdf">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/929230/HIA_in_Planning_Guide_Sept2020.pdf</a></p>

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MM7	56-57	Policy SP04  Paragraphs 4.31 – 4.35	<p><i>Amend policy to read:</i></p> <p><del>STRATEGIC POLICY SP04</del> <b><u>POLICY MG05</u></b>: DEVELOPER CONTRIBUTIONS</p>
			<p>A. All new development should be supported by, and have good access to, all necessary infrastructure. Permission will only be granted if it can be demonstrated that there is sufficient appropriate infrastructure capacity to support the development or that such capacity will be delivered <b><u>in a timely and, where appropriate, phased manner</u></b> by the proposal. <del>It must further be demonstrated that such capacity as is required will prove sustainable over time both in physical and financial terms.</del></p>
			<p>B. Where a development proposal requires additional infrastructure capacity, to be deemed acceptable, mitigation measures must be agreed with the local planning authority and the appropriate infrastructure provider. Such measures may include (not exclusively):</p> <ul style="list-style-type: none"> <li>a. financial contributions towards new or expanded facilities and the maintenance thereof;</li> <li>b. on-site provision <b><u>of new facilities</u></b> <del>(which may include building works);</del></li> <li>c. off-site capacity improvement works; and/or</li> <li>d. the provision of land.</li> </ul>
			<p>C. Developers and land owners must work positively with the Council, neighbouring authorities and other infrastructure providers throughout the planning process to ensure that the cumulative impact of development is considered and then mitigated, at the appropriate time, in line with their published policies and guidance.</p>
			<p>D. Applicants proposing new development will be expected to make direct provision or contribute towards the delivery of relevant infrastructure as required by the development either alone or cumulatively with other developments, <b><u>as set out in the Infrastructure Delivery Plan and other policies in this Plan, where such contributions are compliant with national policy and the legal tests. Where necessary, D</u></b><del>developers</del> <b><u>may will</u></b> be required to:</p>

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			<p>a. <del>pay Community Infrastructure Levy (CIL) charges in order to mitigate onsite and off-site impacts of growth, as required by the Council's charging schedules; and</del></p>
			<p><del>b.</del> <u>a.</u> enter into Section 106 (S106) agreements to make provisions to mitigate the impacts of the development where necessary <del>or appropriate</del>. Section 106 will remain the appropriate mechanism for securing land and works along with financial contributions where a sum for the necessary infrastructure is not secured via CIL; <u>and/or</u></p>
			<p><u>b.</u> <b><u>make a proportionate contribution on a retrospective basis towards such infrastructure as may have been forward-funded from other sources where the provision of that infrastructure is necessary to facilitate and/or mitigate the impacts of their development (including the cumulative impacts of planned development).</u></b></p>
			<p>E. For the purposes of this policy the widest reasonable definition of infrastructure and infrastructure providers will be applied. Exemplar types of infrastructure are provided in the glossary appended to this Plan</p>
			<p>F. <del>Where proposals do not meet planning policy requirements or do not propose to deliver required S106 planning obligations, applicants will be required to</del> <b><u>Exceptions to this policy will only be considered if:</u></b></p>
			<p>a. <b><u>Prove it is proven</u></b> that the benefits of the development proceeding without full mitigation outweigh the collective harm;</p>
			<p>b. <del>submit a fully transparent open book Financial Viability Assessment to the Council</del> <b><u>has proven that the full mitigation cannot be afforded, allowing only the minimum level of developer profit and land owner receipt necessary for the development to proceed.</u></b> The viability assessment may be subject to an independent scrutiny by appointed experts, at the applicant's cost <b><u>and will be required to be updated upon completion of the development through a planning obligation;</u></b></p>

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			<p>c. <del>prove that</del> a full and thorough investigation has been undertaken to find innovative solutions to issues and all possible steps have been taken to minimise the residual level of <del>unmitigated impacts</del> <b>harm</b>; and</p>
			<p>d. <b><u>enter into planning</u></b> obligations <del>to</del> <del>are entered into by the developer that</del> provide for appropriate additional mitigation <b><u>and/or contributions (as the case may be)</u></b> in the event that viability improves prior to completion of the development.</p>
			<p><i>Amend paragraph 4.31 to read:</i></p> <p>The spatial vision and strategic objectives emphasise the importance of managing growth and shaping change sustainably. This puts <b><u>Planning</u></b> for appropriate and adequate infrastructure <b><u>is</u></b> at the heart of sustainable development. <del>In ensuring that the policies of the Local Plan are delivered in a manner that achieves sustainable development,</del> <b><u>Provision of appropriate and timely strategic infrastructure will be central to the continuing prosperity, attractiveness and sustainability of Brentwood. Plan-led growth provides the opportunity to address infrastructure needs, maximise the efficient use of existing infrastructure capacities and explore opportunities for new sustainable infrastructure.</u></b></p> <p><b><u>In addition, the Council has prepared an Infrastructure Delivery Plan (IDP) to inform the Local Plan, this sits alongside the Local Plan and identifies the main items of infrastructure needed to mitigate the cumulative impacts of and support planned development; the site allocation policies also identify key pieces of site-specific infrastructure needed to support the development. New development will be expected to deliver or contribute to the necessary infrastructure requirements of the development as identified by the Council's IDP and site specific requirements, where such contributions are compliant with national policy and the legal tests. The</u></b> Council will seek contributions from developers to fund improvements to existing infrastructure and the environment, or where necessary, new infrastructure. Contributions will be made through the Community Infrastructure Levy, which applies a standard charge to developers to fund supporting infrastructure such as transport, schools, community facilities and health facilities, and/or Section 106 agreements which address the provision of affordable housing and more site-specific infrastructure requirements. <b><u>the necessary infrastructure requirements through the use of planning condition and/or planning obligation and/or financial contributions through</u></b></p>

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			<p><b><u>Community Infrastructure Levy (CIL) charges in accordance with The Community Infrastructure Regulations 2019.</u></b></p> <p><i>Amend paragraph 4.32 to read:</i></p> <p>The Council <del>wishes to</del> <b>will</b> work collaboratively with relevant infrastructure providers, our partners and developers to <b>facilitate the timely delivery of</b> the infrastructure necessary to support the level of growth required. <del>to meet objectively assessed housing need.</del></p> <p><i>Amend paragraph 4.33 to read:</i></p> <p>The Infrastructure Delivery Plan (IDP) <b>Part B: Schedule</b> identifies the types of infrastructure required to support the anticipated growth in the borough and includes a summary of the currently identified infrastructure projects <b><u>and their phasing, costing, delivery mechanism, priority ranking and relevant site allocations.</u></b></p> <p><i>Amend paragraph 4.34 to read:</i></p> <p>The IDP will be required regularly and where necessary updated in consultation with both the internal and external stakeholders such as other service areas and infrastructure providers.</p> <p><b><u>In negotiating planning obligations, the Council will also take into account strategic infrastructure (category 1 items in the IDP). The Council will use planning conditions or legal agreements to facilitate the provision of strategic infrastructure. Where necessary this will involve suitable phasing of development and forward funding of its supporting infrastructure. In addition to developer funding, where necessary, the Council will collaborate with its partners to lobby central Government and funding partners for additional funding sources for strategic infrastructure projects.</u></b></p> <p><b><u>Early delivery of certain strategic and necessary infrastructure (category 1 and category 2 items in the IDP) in advance of all contributions having been collected may be required to support the level of growth planned. It will therefore be necessary to obtain funding from alternative sources and to collect developers' contributions retrospectively for these projects. In those instances, the Council and its partners including relevant landowners/developers will consider forward-funding wholly or partly to deliver critical infrastructure items. Therefore, in order to appropriately recover such forward-funding, when planning applications for development which</u></b></p>

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			<p><u>will be enabled by and/or benefit from such infrastructure do come forward, the Council may seek retrospective planning obligation contributions from all relevant development, at the appropriate contribution rate, even if those applications are not made until after the relevant infrastructure has been completed and/or fully or partially funded. Where an item of infrastructure has been forward funded or provided by a relevant landowner/developer, the retrospectively collected planning contributions may be used to reimburse to such landowner/developer. As the final costs of the relevant item of infrastructure may not be known at the time, planning obligations requiring a contribution towards that infrastructure may also, where appropriate, contain a mechanism for review once the relevant item(s) of infrastructure has been fully paid for and constructed so as to secure payment of the appropriate level of contributions to cover the costs of the infrastructure. The CIL Regulations prohibit borrowing against future CIL receipts, so this method of forward-funding only applies to planning obligations.</u></p> <p><u>Applicants should refer to Essex County Council's Developers' Guide to Infrastructure Contributions which sets out ECC's standards for the receipt of relevant infrastructure funding.</u></p> <p><u>The Council will take into account financial viability to ensure that the cumulative impact of planning policy, standards and infrastructure requirements do not render the sites and development identified in the Local Plan unviable and therefore undeliverable.</u></p> <p><i>Amend paragraph 4.35 to read:</i></p> <p>This policy must be read in conjunction with Policy NE01. <del>2-Recreational Disturbance avoidance Mitigation Strategy (RAMS).</del> <u>The Council intends to progress the introduction of the Community Infrastructure Levy (CIL) as soon as possible after the Local Plan Examination. CIL is a charge, used to fund borough wide and local infrastructure projects for the benefit of local communities. The CIL Charging Schedule is subject to independent Examination. CIL is payable upon the granting of planning consent. This enables the Council to raise funds from developers and provide some certainty 'up front' about how much money developers will be expected to contribute.</u></p>
MM8	58	Policy SP05	<p><i>Delete Policy SP05.</i></p> <p><i>Delete paragraphs 4.36 to 4.43.</i></p>

MM Ref	Page	Policy / para.	Proposed modifications
		Paragraph 4.36 – Paragraph 4.43	
MM9	60	Policy SP06  Paragraph 4.44 – Paragraph 4.47	<i>Delete Policy SP06.</i>  <i>Delete paragraphs 4.44 to 4.47.</i>
MM10	61	Paragraph 4.50  New Policy MG06	<p><i>Amend paragraph 4.50 to read:</i></p> <p>4.50 Therefore, we will monitor the implementation of policies and proposals of the Local Plan using key indicators and targets set out in the Monitoring Framework (Appendix 3). The Council are committed to undertaking an early <del>review</del> update of the Local Plan to ensure it looks ahead over a minimum 15-year period from adoption. Such a <del>An earlier than five-year</del> review may <b>also</b> be required to address the implications of the national standardised approach to calculating local housing need, when adopted.</p> <p><i>Insert new strategic policy after paragraph 4.50 to read:</i></p> <p><b><u>POLICY MG06: LOCAL PLAN REVIEW AND UPDATE</u></b></p> <p><b><u>The Council will bring forward a partial update of the Plan with the objective of meeting the full Objectively Assessed Housing Needs. The review will commence immediately upon the adoption of this Plan with submission of the update for examination within 28 months. Specific matters to be addressed by the update shall include the following (amongst all other matters that need to be assessed and taken into account for the purposes of plan preparation):</u></b></p>
			<b><u>A. an update of Objectively Assessed Housing Needs in accordance with the NPPF 2021 and related guidance;</u></b>



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			<u>B.</u> <u>an updated full green belt review and an updated spatial strategy (informed by the green belt review) in turn to inform the sustainable allocation of further sites to meet the full Objectively Assessed Housing Needs as assessed in part A above;</u>
			<u>C.</u> <u>the allocation of further sites to meet as a minimum the full Objectively Assessed Housing Needs in accordance with the updated spatial strategy for the full period of the plan review;</u>
			<u>D.</u> <u>a review of transport and highway issues to cater for local plan growth throughout the period of the review (in consultation with National Highways and Essex County Council) taking into account:</u>
			<u>i.</u> <u>the optimisation of existing, and the introduction of further, sustainable transport measures where appropriate along with the need to provide improvements to and around:</u>
			<u>a.</u> <u>A12 junction 12;</u>
			<u>b.</u> <u>M25 Junction 28;</u>
			<u>c.</u> <u>M25 junction 29</u>
			<u>ii.</u> <u>any additional transport and highways infrastructure that will be needed to meet in full the updated Objectively Assessed Housing Needs and facilitate the further allocations taking into account implemented and committed highway schemes.</u>

## Chapter 5

MM Ref	Page	Policy / para.	Proposed modifications
MM11	64	Policy BE01 Paragraph 5.8 – 5.12	Delete policy BE01 and paragraphs 5.8 to 5.12.
MM12	67 - 68	Policy BE02	Delete Policy BE02.
MM13	67 - 76	Policy BE03 Paragraph 5.17 - 5.19 Paragraph 5.23 - 5.36 Figure 5.1 Figure 5.2	Move paragraph 5.17 - 5.19 and Figure 5.1 to sit after paragraph 5.35 to support Policy BE03: Carbon Reduction and Renewable Energy (now Policy BE01).
			Amend Policy to read: <b>STRATEGIC POLICY BE03 BE01: CARBON REDUCTION, AND RENEWABLE ENERGY AND WATER EFFICIENCY</b>
			A. <del>Proposals for renewable, low carbon or decentralised energy schemes will be supported provided they can demonstrate that they will not result in adverse impacts, including cumulative and visual impacts which cannot be satisfactorily addressed.</del>
			<del>B. A.</del> <b><u>Carbon Reduction and Construction Standards</u></b> Development should meet the following minimum standards of sustainable construction and carbon reduction <b><u>as set out below:</u></b>
			a. <del>New residential</del> <b>All major</b> development: <b><u>will be required to achieve</u></b> at least a 10% reduction in carbon dioxide emissions above the requirements of Part L Building Regulations; <b><u>and</u></b> <del>Minimum sustainable construction standards: In line with Part L Building Regulations.</del>

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			<p><del>On-site carbon reduction: in line with national nearly zero carbon policy. If national nearly zero carbon policy is unavailable, the previous target applies. However, the minimum improvement over the Building Regulations baseline may be increased to reflect the reduction in costs of more efficient construction methods.</del></p> <p><del>Water efficiency: 110 litres per person per day limit. Major development is expected to provide more substantial water management measures, such as rain/grey water harvesting.</del></p> <p><del>Delete the table under B.a</del></p>
			<p>b. <del>New non-residential development: <b><u>will be required to achieve a certified</u></b> BREEAM ‘Excellent’ rating <b><u>under the BREEAM New Construction (Non-Domestic Buildings) 2018 scheme, or other equivalent standards</u></b> to be achieved in the following categories: Man 02; Ene 04; Mat 03; Wst 01; Wst 03; LE 03.</del></p> <p><del>On-site carbon reduction: in line with national nearly zero carbon policy. If national nearly zero carbon policy is unavailable, the previous target applies. However, the minimum improvement over the Building Regulations baseline may be increased to reflect the reduction in costs of more efficient construction methods.</del></p> <p><del>Water efficiency: BREEAM ‘Excellent’ rating to be achieved in category Wat 01. Major development is expected to provide more substantial water management measures, such as grey water harvesting.</del></p> <p><del>Delete the table under B.b.</del></p>
			<p><del>C. <b><u>B.</u></b> <b><u>Renewable Energy</u></b></del></p> <p><del>Application of <b><u>Wherever possible</u></b>, major development, where feasible, will be required to provide a minimum of 10% of the predicted energy needs of the development from renewable energy; <b><u>Where on-site provision of renewable technologies is not appropriate, or where it is clearly demonstrated that the above target cannot be fully achieved on-site, any shortfall should be provided through:</u></b></del></p>

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			<b>a.</b> <u>'allowable solutions contributions' via Section 106 or CIL. 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; or</u>
			<b>b.</b> <u>off-site provision, provided that an alternative proposal is identified, and the measures can be secured.</u>
			<b>D. C.</b> Applications for major development, including <b>proposals involving the</b> redevelopment of existing floor space, should be accompanied by a Sustainability Statement ( <del>see Figure 5.1 Areas to be covered in the Sustainability Statement</del> ) as part of the Design and Access Statement submitted with their planning application, outlining their approach to the following issues: <ul style="list-style-type: none"> <li>i. adaptation to climate change;</li> <li>ii. carbon reduction;</li> <li>iii. water management;</li> <li>iv. site waste management; and</li> </ul> use of materials.
			<b>E. D.</b> Where <b>it is not possible to meet</b> these standards <del>are not met</del> , applicants must demonstrate compelling reasons and provide evidence, as to why achieving the sustainability standards outlined above for residential and non-residential developments would not be technically feasible or economically viable.;
			<b>F.</b> <i>Merge clause F with the former clause C (now clause B).</i>
			<i>Amend paragraph 5.18 and 5.19 to read:</i>  5.18 Sustainable design and construction are concerned with the implementation of sustainable development in individual sites and buildings. It takes account of the resources used in construction, and of the environmental, social and economic impacts of the construction process itself and how buildings are designed and used. <del>Major development should also refer to Policy SP05 Construction Management.</del>

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			<p>5.19 The choice of sustainability measures and how they are implemented may vary substantially from development to development. However, the general principles of sustainable design and construction should be applied to all scales and types of development. <b><u>The Sustainability Statement should demonstrate how proposals avoid increased vulnerability to the impacts arising from climate change through sustainable and resilient design. The Sustainability Statement should be proportionate to the proposed scale of development and clearly set out, providing sufficient detail on how sustainable design solutions have been integrated for both the construction and operation phases of the development.</u></b> More guidance on areas to be covered in the Sustainability Statement is set out in Figure 5.1.</p> <p><i>Amend Figure 5.1 to remove reference to Figure 5.2 and amend the paragraph under section Use of Materials to read:</i></p> <p>[...] <b><u>Although this is not a policy requirement, the Council will encourage all developers</u></b> All new developments should be designed to maximise resource efficiency and identify, source, and use environmentally and socially responsible materials. [...]</p>
			<p><i>Delete paragraphs 5.24, 5.25, 5.27, 5.28, 5.31, 5.33, 5.36 and Figure 5.2</i></p> <p><i>Amend paragraph 5.23, 5.26, 5.29, 5.30, 5.32 to read:</i></p> <p>5.23 <del>Transport emission in the borough is also higher than the national average due to increased car ownership and access to vehicles. Over the period of the Plan, energy use and carbon emissions may increase by 10% following a 'business as usual' trajectory.</del></p> <p>5.26 <del>However, the</del> <b><u>The Climate Change Act 2008 (2050 Target Amendment) Order 2019</u></b> commits the UK Government by law to reducing greenhouse gas emissions <del>by at least 80% of 1990 levels</del> <b><u>to zero</u></b> by 2050. In addition, as long as the UK is a member of the EU, it still has to comply with the EU's Energy Performance of Buildings Directive, which requires that by 2020 the demand from all new buildings in Member States is 'nearly zero-energy'. The Paris Agreement also has implications on the UK carbon reduction target.</p> <p>5.29 <del>The government originally set targets to ensure all new homes are zero carbon by 2016 and all new non-residential buildings are zero carbon by 2019. Improvements in resource efficiency to meet</del> <b><u>this the government's carbon</u></b> target was were made through Building Regulations which set</p>

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			<p>standards for design and construction that applies to most new buildings, regardless of type. In 2016, Part L of the Building Regulations introduced a change to the energy efficiency standard, raising it to the equivalent of Code for Sustainable Homes Level 4.</p> <p>5.30 <b><u>However, local authorities can still require energy efficiency standards above Building Regulation, as allowed by t</u></b><del>The Planning and Energy Act 2008 allows local authorities to set local targets for carbon emissions above Building Regulations. The Deregulation Act 2015 (S43) which removes this right has not been enacted, meaning authorities can continue to set policy above Building Regulations.</del><b><u>and confirmed by the government in its summary response to the NPPF 2018 consultation.</u></b></p> <p>5.32 <del>To contribute to these targets</del> <b><u>As such</u></b>, this policy requires an on-site reduction of at least 10 per cent beyond the baseline of part L of the current Building Regulations <b><u>on major development</u></b>. The minimum improvement over the Target Emission Rate (TER) will be increased in 2020 and over a period of time in line with the national zero-carbon policy and reflect the costs of more efficient construction methods. <b><u>This takes into account the Local Plan Viability Assessment (2018)'s recommendation that the Council to only seek standards that are over and above those set out in Building Regulation in the case of major development where there is a requirement for 10% renewable energy.</u></b></p>
MM14	77	New Policy BE02 Paragraph 5.38 - 5.40	<p><i>Insert a new policy to read:</i></p> <p><b><u>POLICY BE02: WATER EFFECIENCY AND MANAGEMENT</u></b></p>
			<p><b><u>A. Water Efficiency</u></b></p> <p><b><u>Development should incorporate water conservation measures in the proposals and meet the minimum standards for water efficiency as set out below:</u></b></p>
			<p><b><u>a. New residential development will be required to achieve limits of 110 litres per person per day.</u></b></p>
			<p><b><u>b. New non-residential development is expected to meet BREEAM 'Excellent' rating in category Wat 01.</u></b></p>

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			<u>c.</u> <u>Major developments and high or intense water use developments (such as hotels) is expected to provide more substantial water management measures such as rain/and grey water harvesting.</u>
			<u>B.</u> <u>Waste Water and Sewage</u> <u>Development proposals should:</u>
			<u>a.</u> <u>seek to improve the water environment and demonstrate that adequate wastewater infrastructure capacity is provided;</u>
			<u>b.</u> <u>ensure that misconnections between foul and surface water networks are eliminated and not easily created through future building alterations;</u>
			<u>c.</u> <u>incorporate measures such as smart metering, water saving and recycling, including retrofitting and rain/grey water harvesting, to help to achieve lower water consumption rates and to maximise futureproofing;</u>
			<u>C.</u> <u>Applications will need to demonstrate that the sewerage network has adequate capacity both on and off-site to serve the development and to assess the need to contribute to any additional connections for the development to prevent flooding or pollution of land and water courses. Where sewerage capacity is identified as insufficient, development will only be permitted if it is demonstrated that improvements will be completed prior to occupation of the development.</u>
			<u>D.</u> <u>Water Quality</u> <u>All development proposals should have regard to the Water Cycle Study and:</u>
			<u>a.</u> <u>seek to improve water quality;</u>
			<u>b.</u> <u>not cause deterioration in the quality of a water course or groundwater;</u>
			<u>c.</u> <u>not lead to adverse impacts on the natural functioning of the watercourse, including quantity, flow, river continuity, groundwater connectivity, or biodiversity impacts;</u>

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			<p><b><u>d.</u></b> <b><u>where development is likely to have an impact, proposals must set out how impacts will be mitigated.</u></b></p> <p><i>Move paragraph 5.38 – 5.40 on water efficiency to follow new Policy BE02 Water Efficiency and Management</i></p>
MM15	77	Policy BE04 Paragraph 5.43 Paragraph 5.47 Paragraph 5.48	<p><i>Amend policy to read:</i></p> <p>POLICY BE04 <b><u>BE03</u></b>: ESTABLISHING LOW CARBON AND RENEWABLE INFRASTRUCTURE NETWORK</p> <p>A. <del>Stand alone</del> <b><u>R</u></b>enewable energy infrastructure</p> <p><del>Community-led initiatives for renewable and low carbon energy, including developments outside areas identified in this Local Plan or other strategic policies that are being taken forward through neighbourhood planning, will be encouraged, subject to the acceptability of their wider impacts, including on the Green Belt.</del></p> <p><b><u>Innovative approaches to the installation and/or construction of energy generation facilities or low carbon homes which demonstrate sustainable use of resources and high energy efficiency levels will be supported.</u></b></p> <p>B.</p> <p>a. <del>The Council will work with developers and energy providers to seek opportunities to expand Brentwood’s decentralised energy infrastructure.</del></p> <p><del>Strategic development that could play a key role in establishing a decentralised energy network should engage at an early stage with the Council, stakeholders and relevant energy companies to establish the future energy requirements and infrastructure arising from large scale development proposals and clusters of significant new development. Applicants of these sites will prepare energy masterplans which establish the most effective energy strategy and supply options.</del></p>



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			<p>b. New development <b>proposals</b> of over 500 dwelling units, <del>or</del> <b>including</b> brownfield and urban extensions at 500 units or more, or where the clustering of neighbouring <b>new</b> sites totals over <b>more than</b> 500 units, <del>will be expected to</del> <b>should include energy masterplans to</b> incorporate decentralised energy infrastructure in line with the following hierarchy:</p> <ul style="list-style-type: none"> <li>i. where there is an existing <b>decentralised</b> heat network <b>with sufficient capacity or the capacity to expand</b>, new development will be expected to connect to it;</li> <li>ii. where there is no existing <b>decentralised</b> heat network <b>with sufficient capacity or the capacity to expand</b>, new development will be expected to deliver an onsite heat network, unless <b>it can be</b> demonstrated <b>to the Council's satisfaction</b> that this would render the development unviable;</li> <li>iii. where a developer is unable to deliver the <b>a decentralised</b> heat network, <del>they need to</del> <b>it will need to be</b> demonstrated <b>to the satisfaction of the Council</b> that they <b>applicant has</b>ve worked in detail with third parties (commercially or community) to fully assessed <b>all reasonably available options for its incorporation and delivery and has</b> the opportunity; iv. <del>where a heat network opportunity is not currently viable and no third party is interested in its delivery, the development should be designed</del> <b>the development</b> to facilitate <b>allow</b> future connection to a heat network unless it can be demonstrated that a lower carbon alternative has been put in place.</li> </ul>
			<p><del>e.</del> <b>C.</b> New development will be expected to demonstrate that the heating and cooling systems have been selected according to the following heat hierarchy:</p> <ul style="list-style-type: none"> <li>i. connection to existing CHP/CCHP distribution network;</li> <li>ii. site-wide renewable CHP/CCHP;</li> <li>iii. site-wide gas-fired CHP/CCHP;</li> <li>iv. site-wide renewable community heating/cooling;</li> <li>v. site-wide gas-fired community heating/cooling;</li> <li>vi. individual building renewable heating.</li> </ul>
			<p><del>G.</del> <i>Move Part C to A</i></p>

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			D- Delete Part D
			<p><i>Amend paragraphs 5.43, 5.47 and 5.48 to read:</i></p> <p>5.43 According to the International Renewable Energy Agency (IRENA, 2018), renewable energy will be cheaper than fossil fuels by 2020 thanks to <b>as a result of</b> improvements in technology. <del>The recent Global Status Report by REN21 (2018) also states that renewable energy currently makes up a fifth of the world's electrical power supply, and its capacity has doubled over the past ten years.</del> Renewables are experiencing a virtuous cycle of technology improvement and cost reduction. <del>How policies can support the ability to connect with supply grid, rather than viability, will be the main challenge in the transition towards the low carbon future.</del></p> <p>5.47 The East of England resource assessment and the Brentwood Renewable Energy Study 2014 suggest that there are unlikely to be major anchor and high heat density areas in the borough suitable for retrofit-only DH networks. New development will therefore play an important role in heat network development in the borough. Strategic allocations could <b>play a key role in establishing a decentralised energy network</b>, offering great opportunities to <b>create or</b> expand the borough's decentralised energy infrastructure <del>and were identified in the Brentwood IDP, these include:</del></p> <ul style="list-style-type: none"> <li><del>i. Sites in the South Brentwood Growth Corridor masterplan area including Brentwood Enterprise Park and Dunton Hills Garden Village;</del></li> <li><del>ii. Warley extension masterplan area;</del></li> <li><del>iii. Officer's Meadows masterplan area.</del></li> </ul> <p>5.48 According to the Brentwood Renewable Energy Study (2014), DH is a viable low and zero carbon energy solution for new development; the viability of DH and CHP schemes are improved with increased scale, density and mix of uses. Smaller sites close to large exiting loads, on the other hand, provide opportunities for collaboration which provides cost effective, energy efficient, low carbon heat and electricity. <b><u>Therefore, applicants of strategic sites should engage at an early stage with the Council, stakeholders and relevant energy</u></b></p>

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			<p><b><u>companies to establish the future energy requirements and infrastructure arising from large-scale development proposals and clusters of significant new development.</u></b></p> <p>5.52 Brentwood Borough has relatively high levels of domestic gas and electricity consumption, therefore building-scale technologies have <b>the</b> potentials to meet the borough's domestic energy demands. Building scale technologies often comprise permitted development and can be included in new development or retro-fitted to existing units. Building scale technologies with the greatest potential include rooftop solar technologies and biomass boilers in the commercial and industrial sector.</p>
MM16	82	Policy BE05 Paragraphs 5.53 - 5.56	<i>Delete Policy BE05 and supporting text paragraphs 5.53 to 5.56.</i>
MM17	83	Policy BE06 Paragraphs 5.57 - 5.61	<i>Delete Policy BE06 and supporting text paragraphs 5.57 to 5.61.</i>
MM18	84	Policy BE07	<p><i>Amend Policy to read:</i></p> <p>POLICY <del>BE07</del> <b>BE04</b>: MANAGING HEAT RISK</p> <p>A. <b>All</b> <del>Dd</del> development proposals should minimise internal heat gain and the risks of overheating through design, layout, <b>building</b> orientation and <b>use of appropriate</b> materials.</p> <p>B. Major development proposals should demonstrate how they will reduce the potential for overheating and reliance on air conditioning systems by:</p> <p>a. minimising internal heat generation through energy efficient design;</p> <p>b. reducing the amount of heat entering a building through orientation, shading, albedo, fenestration, insulation and the provision of green roofs and walls;</p>

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			<p>c. managing the heat within the building through exposed internal thermal mass and high ceilings;</p> <p>d. <del>provide</del> <b>maximising</b> passive ventilation; <b>and</b></p>
			<p>e. <b>where necessary</b>, providing mechanical ventilation and <b>active cooling systems</b> <del>providing active cooling systems.</del></p>
MM19	85	Policy BE08 Paragraph 5.68	<p><i>Amend policy to read:</i></p> <p>POLICY BE08 <b>BE05</b>: SUSTAINABLE DRAINAGE</p> <p>A. All developments should incorporate appropriate Sustainable Drainage Systems (SuDS) for the disposal of surface water, in order to avoid any increase in <b>surface water</b> flood risk or adverse impact on water quality.</p> <p><b>B. <u>Development within areas identified as a Critical Drainage Area (CDA) on the policies map, should optimise the use of Sustainable Drainage Systems by providing an individually designed mitigation scheme to address the site-specific issues and risk, as informed by a site specific Flood Risk Assessment. This could be provided as part of the Drainage Strategy and must address any issues highlighted in the Surface Water Management Plan, where relevant.</u></b></p> <p><del>B.</del> Applications must meet the following requirements:</p> <p>a. Quantity</p> <p><del>i.</del> <b>C. <u>Greenfield developments, major development and all development within a Critical Drainage Area must achieve a greenfield runoff rate. Where it is demonstrated that this is not possible</u></b> on brownfield developments, SuDS features will be required to reduce discharge to previous greenfield rates or achieve a <b>then a runoff reduction of 50% minimum should be achieved. The technical approach should be justified in the Drainage Strategy.</b> <del>reduction of brownfield run-off rates;</del></p> <p><del>ii</del> <b>D</b> sites over 0.1 hectares in Flood Zone 1 will be <b>Applicants are</b> required to submit a surface water <del>d</del><b>Drainage s</b>Strategy and <del>.</del> Larger sites over 1 hectare in Zone 1 or all schemes in Flood Zone 2 and 3</p>

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			<p><del>must be accompanied by a Flood Risk Assessment (FRA);</del> <b><u>for all major development as well as for all development within a Critical Drainage Area. The Drainage Strategy must include a SuDs Management Plan setting out the long-term management and maintenance arrangements.</u></b></p>
			<p><del>b.</del> <b><u>E. Quality SuDs will be required to meet the following design criteria:</u></b></p>
			<p><del>i.</del> <b><u>a.</u></b> the design must follow an index-based approach when managing water quality. Implementation in line with the updated CIRIA SuDS Manual[1] is required. Source control techniques such as green roofs, permeable paving and swales should be used so that rainfall runoff in events up to 5mm does not leave the site;</p>
			<p><del>e.</del> <b><u>Amenity and Biodiversity</u></b></p>
			<p><del>i.</del> <b><u>b.</u></b> SuDS should be sensitively designed <b><u>and integrated into the Green and Blue infrastructure to create high quality public open space and landscaped public realm, in line with Strategic Policy NE02: Green and Blue Infrastructure;</u></b></p>
			<p><b><u>c.</u></b> <b><u>maximise opportunities to enhance</u></b> <del>and located to promote improved biodiversity</del> <b><u>net-gain;</u></b></p>
			<p><b><u>d.</u></b> <b><u>improve the quality of water discharges and be used in conjunction with</u></b> <del>water use efficiency</del> <b><u>measures;</u></b> <del>river water quality, enhanced landscape and good quality spaces that benefit public amenities in the area;</del></p>
			<p><del>ii.</del> <del>redeveloped brownfield sites should disconnect any surface water drainage from the foul network;</del></p>
			<p><b><u>e.</u></b> <b><u>function effectively over the lifetime of the development;</u></b></p>
			<p><del>iii.</del> <b><u>f.</u></b> the preferred hierarchy of managing surface water drainage from any development should be managed in accordance with this hierarchy: firstly, is through infiltration measures, secondly attenuation and discharge to watercourses, and if these cannot be met, through discharge to surface water only sewers;</p>
			<p><b><u>g.</u></b> <b><u>have regard to Essex County Council SuDS Design Guide 2020, or as amended.</u></b></p>

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			<p data-bbox="620 261 2072 360"><del>iv.</del> <b>F.</b> <u>When discharging surface water to a public sewer, developers will be required to provide evidence that adequate capacity exists in the public sewerage network fully to serve the proposed development, in line with policy requirements in BE02 Water Efficiency and Management.</u></p> <p data-bbox="620 443 2072 576"><b>G.</b> <u>Development proposals should be designed to include permeable surfaces wherever possible. Proposals for impermeable paving, including on small surfaces such as front gardens and driveways, will be strongly resisted unless it can be suitably demonstrated that this is not technically feasible or appropriate.</u></p> <p data-bbox="725 616 1137 644"><i>Amend paragraph 5.68 to read:</i></p> <p data-bbox="725 663 2047 831"><u>SuDS must have regard to the criteria outlined in the Essex County Council SuDS Guide.</u> <del>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.</del></p>
MM20	88	Policy BE09	<p data-bbox="725 868 1016 896"><i>Amend Policy to read:</i></p> <p data-bbox="725 920 1738 949"><b><u>STRATEGIC</u></b> POLICY <del>BE09</del> <b>BE06</b>: COMMUNICATIONS INFRASTRUCTURE</p> <p data-bbox="725 978 2018 1086">A. The Council will support investment in <b><u>proposals for</u></b> high quality communications infrastructure and superfast broadband, including community-based networks, particularly where alternative technologies need to be used in rural areas of the borough.</p> <p data-bbox="725 1094 2051 1359">B. <del>Applications</del> <b><u>Proposals</u></b> from service providers for new or the expansion of existing communications infrastructure (including telecommunications masts, equipment and associated development, and superfast broadband) <del>are</del> <b><u>will be</u></b> supported subject to the following criteria:</p> <ol style="list-style-type: none"> <li data-bbox="775 1209 2051 1318">a. evidence is provided to demonstrate, to the Council's satisfaction, that the possibility of mast or site sharing has been fully explored and no suitable alternative sites are available in the locality including the erection of antennae on existing buildings or other suitable structures;</li> <li data-bbox="775 1326 1995 1359">b. evidence is provided to confirm that the proposals would cause no harm to highway safety;</li> </ol>

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			<ul style="list-style-type: none"> <li>c. the proposal has <del>sympathetic design and camouflage, having regard to other policies in the Local Plan</del> <b><u>no unacceptable impact on the character and appearance of the area, landscape or heritage impacts or unacceptable impacts on the natural environment;</u></b></li> <li>d. the proposal has been designed to minimise disruption should the need for maintenance, adaption or future upgrades arise;</li> <li>e. the proposal will not cause significant and irremediable interference with other electrical equipment, air traffic services or instrumentation operated in the national interest; and</li> <li>f. the proposal conforms to the latest International Commission on Non-Ionising Radiation Protection (ICNIRP) guidelines, taking account of the cumulative impact of all operator equipment located on the mast/site where appropriate (i.e. prevent location to sensitive community uses, including schools).</li> </ul>
MM21	89	Policy BE10	<p><i>Amend Policy to read:</i></p> <p>POLICY <del>BE10</del> <b><u>BE07</u></b>: CONNECTING NEW DEVELOPMENTS TO DIGITAL INFRASTRUCTURE</p>
			<p>A. To support Brentwood’s economic growth and productivity now and in the future, all development proposals should:</p>
			<p>a. <del>Provision of Provide</del> up to date communications infrastructure <del>should be designed and installed</del> as an integral part of development proposals. As a minimum, all new developments must be served by the fastest available broadband connection, installed on an open access basis. This includes installation of appropriate cabling within <del>dwelling dwellings or and</del> business units <del>as well as a fully enabled and</del> full connection of the developed areas to the full-main telecommunications network;</p>
			<p>b. ensure that sufficient ducting space for future digital connectivity infrastructure (such as small cell antenna and ducts for cables, that support fixed and mobile connectivity and therefore underpins smart technologies) is provided <del>where</del> <b><u>wherever appropriate possible;</u></b></p>

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			<p>c. support the effective use of the public realm, such as street furniture and <del>bins</del> <b><u>other installations</u></b>, to accommodate <b><u>new state of the art</u></b> well-designed and <del>located</del> <b><u>integrated</u></b> mobile digital <b><u>communication</u></b> infrastructure;</p> <p>B. When installing new and improving existing digital communication infrastructure in new development, proposals should:</p> <p>a. identify and plan for the telecommunications network demand and infrastructure needs from first occupation;</p>
			<p><del>b.</del> <del>include provision for connection to broadband and mobile phone coverage across the site on major developments;</del></p>
			<p><del>e.</del> <b><u>b.</u></b> <b><u>take into account the Highway Authority's land requirements so as not to impede or add to the cost of the highway mitigation schemes where</u></b> the location and route of new utility services is in the vicinity of the highway network or proposed new highway network;</p>
			<p><del>d.</del> <b><u>c.</u></b> ensure the scale, form and massing of the new development does not cause unavoidable interference with existing communications infrastructure in the vicinity. If so, opportunities to mitigate such impact through appropriate design modifications should be progressed including measures for re-siting, re-provision or enhancement of any relevant communications infrastructure within the new development;</p>
			<p>e. <b><u>d.</u></b> demonstrate that the siting and design of the installation would not have a detrimental impact upon the visual and residential amenity of neighbouring occupiers, the host building (where relevant), and the appearance and character of the area;</p> <p>f. <b><u>e.</u></b> seek opportunities to share existing masts or sites with other providers; and</p>
			<p><del>g.</del> <b><u>f.</u></b> all digital communication infrastructure should <del>be capable of</del> <b><u>have the capacity to respond responding</u></b> to changes in technology requirements over the <b><u>period life</u></b> of the development.</p>
			<p>C. Where applicants can demonstrate, through consultation with broadband infrastructure providers, that superfast broadband connection is not practical, or economically viable:</p>



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			a. the developer will ensure that broadband service is made available via an alternative technology provider, such as fixed wireless or radio broadband; and
			b. ducting to all premises that can be accessed by broadband providers in the future, to enable greater access in the future. <del>Or D.</del> The <b><u>Only where this is not practicable or viable, the</u></b> Council will seek developer contribution towards off-site works to enable those properties access to superfast broadband, either via fibre optic cable or wireless technology in the future <b><u>to provide like capacity.</u></b>
MM22	92	Policy BE11 Paragraphs 5.90-5.93 Paragraph 5.96 b. Paragraph 5.102	<p><i>Delete Policy BE11 and replace with the below text:</i></p> <p><b><u>STRATEGIC POLICY BE11 BE08: STRATEGIC TRANSPORT INFRASTRUCTURE</u></b></p> <p><b><u>In order to support and address the cumulative impacts of planned and other incremental growth, allocated development within the Local Plan and any other development proposals shall (where appropriate) provide reasonable and proportionate contributions to required mitigation measures to strategic transport infrastructure, including:</u></b></p> <p><b><u>a. circulation arrangements, public realm and multimodal integration around Brentwood, Shenfield and Ingatestone stations;</u></b></p> <p><b><u>b. circulation arrangement and public realm around West Horndon station, and the creation of associated multimodal interchange through phases to support new residents and employees;</u></b></p> <p><b><u>c. improvements to the highway network as deemed necessary by transport evidence or as agreed by National Highways and Essex County Council as appropriate, other statutory bodies, stakeholders and passenger transport providers; and</u></b></p> <p><b><u>d. additional and/or improved pedestrian, cycling infrastructure and bus services connecting development to key destinations such as railway stations, education facilities, employment, retail and leisure.</u></b></p> <p><i>Insert the following paragraph at the beginning of paragraph 5.90:</i></p> <p><b><u>Strategic transport infrastructure is that which is critical to the delivery of the Local Plan as such their timely provision must be in place in order to support development. Strategic transport infrastructure are assigned a priority category 1 in the Infrastructure Delivery Plan.</u></b></p>

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			<p><i>Insert the following paragraph after paragraph 5.91:</i></p> <p><b><u>The Council’s positive approach to planning may require it to use its compulsory purchase powers under section 226 of the Town and Country Planning Act 1990. That power gives the Council a positive tool to help bring forward necessary works to support planned growth in the borough, where strong planning justifications for the use of the power exist and statutory requirements are satisfied.</u></b></p> <p><i>Amend final sentence of paragraph 5.92 to read:</i></p> <p>The Council will work with partners to improve the station environment at both Brentwood and Shenfield stations, specifically in terms of non-motorised users and enhanced public transport access, with new <b>improved</b> forecourt and pedestrian crossing facilities.</p> <p><i>At the end of the first sentence of paragraph 5.93 update reference to Transport Assessment from 2018 to 2021.</i></p>
			<p><i>Insert an additional sentence at the end of paragraph 5.96 point b. to read:</i></p> <p><b><u>Where appropriate contributions will therefore be sought from nearby developments.</u></b></p>
			<p><i>Insert a new point (iv) under paragraph para 5.102 to read:</i></p> <p><b><u>iv. The A127 Task Force has representation from all South Essex authorities including BBC. This Task Force will oversee much of the public affairs interaction between the Councils and Government to ensure that the route is seen as strategic and as a potential candidate for re-trunking in order to bring about the long-term improvement required for an area of South Essex with over 600,000 residents. The planning and design work for any improvement of this scale will of necessity require a short-term, medium and long term phasing. Whilst the A127 is the main focus ECC would be looking to work collaboratively with BBC and other councils in the area.</u></b></p>
MM23	99 100	Policy BE12 Para 5.108-5.110	<p><i>Delete Policy BE12.</i></p> <p><i>Move paragraphs 5.108, 5.109 and 5.110 to after 5.141</i></p>
MM24	100 101	Policy BE13	<p><i>Amend Policy to read:</i></p> <p>POLICY BE13-09: SUSTAINABLE MEANS OF TRAVEL AND WALKABLE STREETS</p>

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		Paragraph 5.112 - 5.115 Paragraph 5.118	<p>A. Sustainable modes of transport should be <del>facilitated through</del> <b>prioritised in</b> new developments to promote accessibility and integration <del>into</del> <b>with</b> the wider community and existing networks. Priority should be given to cycle and pedestrian movements and access to public transport.</p> <p>B. Development proposals should <del>seek to provide appropriate provision for</del> the following sustainable measures <b>as appropriate</b>:</p> <ol style="list-style-type: none"> <li>the provision of pedestrian, cycle, public transport and where appropriate, bridleway connections within development sites and to the wider area, including key destinations;</li> <li>the criteria of safe, secure, well connected and attractive layouts which minimise the conflict between traffic, cyclists, and pedestrians, and allow good accessibility for <b>passenger transport bus services</b> within sites and between sites and adjacent areas, <b>and where appropriate</b> improve areas where <b>passenger</b> public transport, pedestrian or cycle movement is difficult or dangerous.</li> <li>the provision of community transport measures promoting car pools, car sharing, voluntary community buses, cycle schemes;</li> <li>safeguarding existing and proposed routes for walking, cycling, and public transport, from development that would prejudice their continued use and/or development; and</li> <li>any development requiring a new road or road access, walking and cycling facilities and public transport, will be required to have regard to the adopted Essex County Council's Development Management Policies or successor documents, in order to assess the impact of development in terms of highway safety and capacity for both access to the proposed development and the wider highway network.</li> </ol> <p><i>Amend supporting text paragraph 5.112- 5.115 to read:</i></p> <p>5.112 This policy seeks to <del>encourage</del> <b>ensure that development proposals will be designed to promote</b> people to make sustainable travel choices by improving choices and making development easily accessible by different modes of transport, especially walking, cycling and public transport. An important policy tool to achieve this is the modal hierarchy. All <del>major</del> development should follow the modal hierarchy by providing access for all of the following (most preferable first, least preferable last):</p> <ol style="list-style-type: none"> <li>walking and providing access for all, including people with mobility impairment;</li> <li>cycling;</li> </ol>

MM Ref	Page	Policy / para.	Proposed modifications
			<ul style="list-style-type: none"> <li>c. public transport;</li> <li>d. powered two wheelers;</li> <li>e. commercial vehicles and taxis;</li> <li>f. car sharing;</li> <li>g. electric and low emission vehicles;</li> <li>h. private cars.</li> </ul> <p>5.113 <del>Streets account for a major part of public spaces; high quality streets are therefore fundamental to the character and efficient functioning of a place and play a fundamental role in moving people around safely, improving public realm and providing spaces for people to come together. New major development should create permeable, accessible, inclusive and multifunctional streets that promotes active lifestyle and integrates different modes of transport in line with Policy HP13 Creating Successful Places.</del> Barriers to walking should be addressed in development proposals, to ensure that walking is promoted and that street conditions, especially safety/security and accessibility for disabled people, are enhanced. Walking networks and facilities in and around all new developments should be direct, safe, attractive, accessible and enjoyable.</p> <p>5.114 Cycling is a space efficient mode compared to cars so making streets attractive for cycling can bring benefits to all road users while also improving the experience of living, working and getting around. <del>Although further consultation will be required, once finalised the Brentwood Cycling Action Plan (2018) can:</del></p> <ul style="list-style-type: none"> <li>a. <del>identify how cycling levels can be increased in the borough;</del></li> <li>b. <del>enable any funding for new cycling schemes in Brentwood to be prioritised;</del></li> <li>c. <del>create a usable, high quality cycle network that connects residential areas with key employment locations, rail stations and town centres; and</del></li> <li>d. <del>create opportunities to increase recreational cycling in Brentwood.</del></li> </ul> <p>5.115 Cycling <del>will</del> <b>should</b> 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, <del>in association with planning permission for new development.</del></p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p><del>Development should facilitate and encourage cycling to reduce car dependency and the health problems it creates.</del> When providing for cycle parking, cycle parking areas should be secure and covered, and allow easy access for occupiers and their visitors, and provide facilities for all, including disabled cyclists. This could include identifying and reserving specific spaces which provide step-free cycle parking and opportunities for people using adapted cycles, as well as providing facilities for other non-standard cycles such as tricycles, cargo bicycles and bicycles with trailers. Space for folding bicycles should be provided as well as space for conventional bikes to cater for rail commuters. However, space for folding bicycles is not an acceptable alternative to conventional cycle parking as these are less popular in some areas, tend to be less affordable and present difficulties for some users. Surface level parking is preferable to stacked parking which may be difficult for some people to use. Visitor parking should be quickly and easily accessible to front entrances of buildings and not require cyclists to visit parts of a site restricted to occupiers only. <del>Developers should refer to the vehicle parking standards set out in the Essex Parking Standards (2009) or as amended, in line with Policy BE17 Parking Standards.</del></p> <p><i>Amend paragraph 5.118 to read:</i></p> <p><b><u>The design of streets, parking areas, and other transport elements should reflect current national guidance, including the National Design Guide and the National Model Design Code.</u></b></p> <p>The Essex County Council's Transportation Development Management Policies provide further detail on requirements relating to accessibility and access, including Transport Assessment and Statement thresholds for each land use category.</p>
MM25	103	Policy BE14 Paragraph 5.119	<p><i>Amend Policy to read:</i></p> <p>POLICY <del>BE14</del> <b>BE10</b>: SUSTAINABLE PASSENGER TRANSPORT</p> <p><del>A.</del> The Council will facilitate and support sustainable passenger transport services operating in Brentwood to help deliver the vision of the Local Plan. <del>B.</del> Development proposals should protect and enhance existing passenger transport and their capacity. <del>C.</del> <b>Proposed new</b> community facilities, schools, and specialist older persons housing, where reasonable and proportionate, <del>should</del> <b>are required to</b> provide pick-up and drop-off facilities (with appropriate kerbs) for passenger transport close to the principal entrance suitable for minibuses, school buses, taxis, and/or ambulances.</p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p><i>Insert an additional paragraph after paragraph 5.119 to read:</i></p> <p><b><u>Consideration should be given to sustainable passenger transport provision as set out within Essex County Council Development Management Policies.</u></b></p>
MM26	104	Policy BE15	<p><i>Amend Policy to read:</i></p> <p>POLICY <del>BE15</del> <b>BE11</b>: ELECTRIC AND LOW EMISSION VEHICLES</p> <p>A. The Council will seek appropriate infrastructure for <b><u>All development proposals should wherever possible maximise the opportunity of occupiers and visitors to use</u></b> electric and low emission vehicles at new developments B. This could include, but is not limited to, <b><u>and maximise the provision of</u></b> electric vehicle charging / plug-in points <b><u>and/or the space and</u></b> infrastructure required to provide this <b><u>them</u></b> in the future.</p>
MM27	107	Policy BE16 Paragraph 5.128 – 5.132	<p><i>Amend Policy to read:</i></p> <p>POLICY <del>BE16</del> <b>BE12</b>: MITIGATING THE TRANSPORT IMPACTS OF DEVELOPMENTS</p> <p>A. Developments <b><u>must</u></b> <del>should seek to ensure that they will not have an unacceptable transport impact and/or any significant impact from the development on the transport network (in terms of <b><u>highway safety</u></b>, capacity and congestion) and on highway safety can be effectively mitigated to an acceptable degree.</del></p> <p>B. New development <b><u>proposals</u></b> will be required to <b><u>be supported by:</u></b></p> <p>a. <del>Submit</del> Travel Plans, Transport Assessments and/or Statements in accordance with the thresholds and detailed requirements for each land use category as set out in the Essex County Council's Development Management Policies or its successors; <b><u>and engage in an appropriate and proportionate assessment process with National Highways where development has a likelihood to have a material impact on the Strategic Road Network which is not otherwise catered for by programmed works or improvements;</u></b></p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p>b. <u>where necessary</u>, provide reasonable and proportionate financial contributions <u>and/or take reasonable measures</u> <del>mitigation measures necessary to:</del></p> <p><u>i.</u> mitigate the <u>cumulative</u> transport impact of the development to an acceptable degree, <u>including relevant highways measures identified in the IDP Part B; and</u></p> <p><u>ii.</u> <u>accommodate the use of sustainable modes of transport.</u> <del>This could include</del> <u>ing borough-wide sustainable transport measures identified in the IDP Part B,</u> investment in infrastructure, services, Low Emission Zone, or <u>measures to promote</u> behavioural change <del>measures</del> (including enforcement) <del>to encourage the use of sustainable modes of transport. Such measures should be provided to meet the first or early occupation of a site in order to influence travel behaviour from the outset.</del></p>
			<p><i>Move paragraph 5.129 to precede 5.127, and amend to read:</i></p> <p>5.129 Development resulting in an unacceptable impact on highway safety, or significant and harmful residual cumulative impacts on the road network will be prevented or refused on highways grounds, unless any impact will be effectively mitigated to an acceptable degree, in line with the NPPF (2018).</p> <p><i>Amend paragraph 5.128 to read:</i></p> <p>5.128 Joint working is being <u>has been</u> undertaken with Highways England <u>National Highways</u>, Essex County Council (highways authority), developers and all relevant partners to identify necessary mitigations at key junctions, to <del>consider</del> <u>address</u> the cumulative impact of growth within the borough over the Plan period, <del>and to consider the wider planned growth on the local and strategic route network.</del> <u>In addition to strategic transport infrastructure, a number of highways junction improvements will need to be made to facilitate new growth, these are assigned a priority category 2 in the Infrastructure Delivery Plan.</u></p> <p><i>Delete paragraph 5.130</i></p> <p><i>Amend paragraph 5.131 to read</i></p> <p>5.131 As noted earlier in this chapter, providing physical improvements to the highway will only have a short-term impact; therefore it is important to invest in long term alternatives. The Council will work with developers, <u>highways authority</u> and service providers to consider potential sustainable transport measures that could assist in reducing the impact of developments on the overall road network. <del>The Transport Assessment (PBA, 2018)</del> <u>The Transport Assessment (Stantec, 2021)</u> identifies a number of</p>

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			<p>non-highway mitigation measures <b><u>sustainable transport measures package</u></b> that could be implemented in Brentwood Borough; feasibility analysis for some of these measures are being considered in the in the Brentwood IDP as part of a long term assessment. These include: <b><u>are listed in the IDP with priority category 3 which may be revised from time to time.</u></b></p> <ul style="list-style-type: none"> <li>i. School Clear Zone;</li> <li>ii. Park and Ride/ Cycle/ Stride;</li> <li>iii. 'Quietway' cycle routes;</li> <li>iv. Low Emission Zone;</li> <li>v. Banning all large freight vehicle from stopping deliveries within the Central Brentwood zone and A128 corridor during AM/PM peaks;</li> <li>vi. Car limited development at appropriate locations;</li> <li>vii. Pedestrian wayfinding system;</li> <li>viii. Multiple service app making access to smart car hire/ community buses/ booking bikes/ bike hire schemes etc. easier;</li> <li>ix. Encourage clean vehicles and introduce electrical parking points to encourage use of such vehicles and plan and deliver other IT infrastructure required to allow future implementation of emerging SMART systems;</li> <li>x. Multi-modal integration at rail stations.</li> </ul>
			<p><i>Delete paragraph 5.132.</i></p> <p><i>Insert an additional paragraph after 5.132 to read:</i></p> <p><b><u>Applicants are expected to consult with the Highways Authority on transport matters and adhere to Essex County Council's development management policy requirements (or equivalent) in respect of Travel Plans, Residential Travel information Packs and other highways considerations. Please refer to the Essex County Council Highways Authority Development Management Policies.</u></b></p>



MM Ref	Page	Policy / para.	Proposed modifications
MM28	107	Policy BE17 Paragraph 5.136	<p><i>Amend policy to read:</i></p> <p>POLICY BE17 <b>BE13</b>: PARKING STANDARDS</p> <p>A. <del>The Council will refer developers to the Development proposals should comply with</del> <b><u>must take account of the Essex Parking Standards – Design and Good Practice (2009), or as subsequently amended</u></b> set out in the most up-to-date Essex Parking Standards. Schemes should comply with design standards and provision levels for uses and transport modes specified. <b><u>The decision-maker will have regard to these standards when determining planning applications.</u></b></p> <p>B. <del>In the following circumstances, the parking standards may be flexible to minimise pressure on land and encourage alternative modes of transport:</del></p> <p>a. <del>office developments in urban areas that are well-connected by public transport and have good accessibility through walking and cycling;</del></p> <p>b. <del>retail and mixed-use development in the Town Centre, District Shopping Centres and Local Centres that has access to shared car parks with different facilities/users at different times; and</del></p> <p>c. <del>commuter parking provision at train stations.</del></p> <p><del>C.</del> <b><u>B.</u></b> Proposals which do not conform to <b><u>make provision below</u></b> these standards should be supported by evidence detailing the local circumstances that justify deviation from the standard. <b><u>should be supported by evidence detailing the local circumstances that justify deviation from the standard.</u></b></p> <p><i>Amend paragraph 5.136 to read and update NPPF reference from July 2018 to 2021:</i></p> <p>Brentwood Borough Council adopted the Essex Parking Standards – <b><u>Design and Good Practice (2009)</u></b> as a Supplementary Planning Document (SPD) in 2011 and will expect these standards to apply until such time as they are revoked or superseded by other standards.</p>
MM29	111	Policy BE18 Paragraph 5.142	<p><i>Move Policy BE18 and its supporting text in chapter 8.</i></p> <p><b><u>STRATEGIC</u></b> POLICY BE18 <b>NE02</b>: GREEN AND BLUE INFRASTRUCTURE</p>

MM Ref	Page	Policy / para.	Proposed modifications
		Paragraph 5.144	<i>Delete the existing wording and replace with the following new wording to read:</i>
		Paragraph 5.145	<p>A. <b><u>Brentwood’s network of green and blue infrastructure (GBI) will be protected, enhanced and managed to provide a multi-functional, high quality open space resource, capable of delivering opportunities for recreation, health and wellbeing, ecological connectivity, biodiversity net-gain as well as wider ecosystem services for climate change adaptation.</u></b></p> <p>B. <b><u>New development is expected, where possible and appropriate, to maximise opportunities to enhance or restore existing GBI provision and/or create new provision on site that connects to the wider GBI network. Its design and management should also respect and enhance the character and distinctiveness of the local area.</u></b></p> <p>C. <b><u>Developments on sites containing or are adjacent to a water course or water body (Blue Infrastructure) are required to ensure there is no adverse impact on the functioning or water quality of the Blue Infrastructure. Proposals that maximise opportunities to enhance or restore Blue Infrastructure and incorporate these features into the public realm of the development will be supported. An adequate undeveloped buffer zone should be applied as necessary to mitigate flood risk, in line with Policy NE09 and/or support sustainable drainage, in line with Policy BE05.</u></b></p> <p>D. <b><u>Proposals should provide appropriate specification and maintenance plans for the proposed green and blue infrastructure throughout the life of the development.</u></b></p>
		Figure 5.3	
		Paragraph 5.146	
		Paragraph 5.157	
			<p><i>Amend paragraphs 5.142 to read:</i></p> <p>Green and Blue Infrastructure</p> <p>5.142 <del>There are a number of definitions of g</del> Green and blue infrastructure (GBI) <b><u>is a network of multi-functional</u></b> <del>share the same notion in which GBI can be understood as natural or semi-natural networks of green (soil covered or vegetated) and blue (water covered) spaces and corridors, in either an urban or rural setting, that connects, maintains and enhances ecosystem services. <b><u>GBI should thread through and surround the built environment and connect the urban area to its wider rural hinterland.</u></b></del> It is capable of <b><u>delivering a wide range of environmental and quality of life benefits</u></b></p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p><u>for local communities by</u> providing recreational or cultural experiences. <u>It can also help support a number of strategic objectives across policy areas, such as promoting public health and wellbeing, mitigating and adapting to climate change (heat risk, flood risk, sustainable drainage), improving water and air quality, as well as conserving habitats and contributing to biodiversity net-gain.</u> <del>supporting and enhancing biodiversity and geodiversity, improving air and/or water quality, enhancing and conserving the historic environment, as well as enriching the quality of life of local communities.</del> <u>Figure 5.3 defines the different types of GBI. They include those found in Brentwood, but also additional types that could be delivered as part of new development.</u></p> <p><i>Delete paragraph 5.144</i></p> <p><i>Amend paragraph 5.145 to read:</i></p> <p>5.145 <u>A well connected GBI network will play a crucial role in maintaining the Borough’s distinctive ‘Borough of Villages’ character. The Council will take a strategic approach to maintaining and enhancing networks of GBI, ensuring a variety of managed, multi-functional open spaces, coherent ecological green corridors, water courses and water bodies to promote a resilient and sustainable built environment.</u> <del>The Council will protect and enhance local distinctiveness and plan positively for the creation, preservation and enhancement of networks of biodiversity and GBI in line with the Council’s Green Infrastructure Strategy (2015). As part of planning for infrastructure provision, t</del> <u>The Council will work with statutory bodies and wider stakeholders, including developers to conserve, enhance and maintain the natural environment.</u> <del>infrastructure providers, including Essex County Council and utilities companies and consider the roles of developers in providing and maintaining the GBI that is required as a result of new growth.</del></p>
			<p><i>Insert a new paragraph after paragraph 5.145 to read:</i></p> <p>Open Spaces</p> <p><u>Open spaces take many forms and all are an integral component of the GBI network, forming key destinations. The designated Urban Open Spaces, as depicted on the Policies Map, represent green spaces in urban settlements that provide an important multi-functional local resource to residents and therefore, are to be protected. They are made up of different types of open spaces, including parks, sports grounds and playing fields (including playing fields forming part of an education establishment), woodlands, and amenity green space. However, Brentwood has direct access, via the Public Rights of Way network, to extensive publicly</u></p>

MM Ref	Page	Policy / para.	Proposed modifications												
			<p><u>accessible parks, including Country Parks such as Hutton, South Weald and Thorndon within the surrounding countryside also identified on the Policies Map. There will be a presumption against the development of open spaces which provide a significant amenity resource.</u></p> <p><i>Amend figure 5.3 to read:</i></p> <table border="1" data-bbox="728 387 1715 1415"> <thead> <tr> <th data-bbox="728 387 1131 499">Type of GI GBI Typologies</th> <th data-bbox="1131 387 1715 499">Key Policy Elements GBI sub-types</th> </tr> </thead> <tbody> <tr> <td data-bbox="728 499 1131 743"><u>Urban Open Spaces</u></td> <td data-bbox="1131 499 1715 743"> <p><u>Designated green spaces in existing settlement (urban) areas, of various typologies that are to be protected.</u></p> <p><i><u>NB. These were previously partly identified by the 'Protected Open Space' designation in the replacement Local Plan 2005.</u></i></p> </td> </tr> <tr> <td data-bbox="728 743 1131 839">Parks and Gardens</td> <td data-bbox="1131 743 1715 839">Country Parks, Borough Parks and Recreation Grounds, <del>Historic</del> <u>Registered</u> Parks and Gardens.</td> </tr> <tr> <td data-bbox="728 839 1131 999">Ecological assets and natural and semi-natural greenspaces (urban / rural)</td> <td data-bbox="1131 839 1715 999">Special Sites of Scientific Interest (SSSI), Local Nature Reserves (LNR), Local Wildlife Sites (LoWS), Woodlands, Geological Assets, <del>Grasslands</del>, Thames Chase Forest, <del>other assets.</del></td> </tr> <tr> <td data-bbox="728 999 1131 1190"><u>Green Corridors</u></td> <td data-bbox="1131 999 1715 1190"><u>Hedgerows, amenity grasslands/greenspace or green verges along major road corridors and major rail corridors, cycling routes/ network, pedestrian paths and rights of way, and Protected Lanes.</u></td> </tr> <tr> <td data-bbox="728 1190 1131 1415"><del>Green and b-Blue e</del> <u>Corridors</u></td> <td data-bbox="1131 1190 1715 1415">Main rivers (<u>e.g. Rivers Roding, Ingrebourne, Wid and Mardyke</u>), large ordinary/non-main river watercourses, major tributaries, wetland. <del>hedgerows, major road corridors, major rail corridors, cycling routes/ network, pedestrian paths and rights of way, Protected Lanes.</del></td> </tr> </tbody> </table>	Type of GI GBI Typologies	Key Policy Elements GBI sub-types	<u>Urban Open Spaces</u>	<p><u>Designated green spaces in existing settlement (urban) areas, of various typologies that are to be protected.</u></p> <p><i><u>NB. These were previously partly identified by the 'Protected Open Space' designation in the replacement Local Plan 2005.</u></i></p>	Parks and Gardens	Country Parks, Borough Parks and Recreation Grounds, <del>Historic</del> <u>Registered</u> Parks and Gardens.	Ecological assets and natural and semi-natural greenspaces (urban / rural)	Special Sites of Scientific Interest (SSSI), Local Nature Reserves (LNR), Local Wildlife Sites (LoWS), Woodlands, Geological Assets, <del>Grasslands</del> , Thames Chase Forest, <del>other assets.</del>	<u>Green Corridors</u>	<u>Hedgerows, amenity grasslands/greenspace or green verges along major road corridors and major rail corridors, cycling routes/ network, pedestrian paths and rights of way, and Protected Lanes.</u>	<del>Green and b-Blue e</del> <u>Corridors</u>	Main rivers ( <u>e.g. Rivers Roding, Ingrebourne, Wid and Mardyke</u> ), large ordinary/non-main river watercourses, major tributaries, wetland. <del>hedgerows, major road corridors, major rail corridors, cycling routes/ network, pedestrian paths and rights of way, Protected Lanes.</del>
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			<p><b>Sports and Recreation Grounds</b>  <del>Outdoor sports facilities and provision for children and teenagers</del></p> <p><b>Natural green surfaces: <u>Play pitches that are green/permeable in nature such as:</u></b> tennis courts, bowling greens, sports pitches/fields, golf courses, school and other institutional playing fields, and other outdoor sports areas. Green formal/informal recreation areas <del>for children/teenagers.</del></p>
			<p><del>Amenity greenspace</del></p> <p><del>Amenity greenspace, village greens, commons, other informal greenspace, Protected Urban Open Space, Local Green Space.</del></p>
			<p><del>Allotments</del></p> <p><del>Typically Parish and Council owned/ managed.</del></p> <p><b><u>Statutory and Non-statutory allotments: community gardens</u></b></p>
			<p><del>Cemeteries and churchyards</del></p> <p><del>Public and privately-owned facilities.</del></p>
			<p><del>Classified Landscapes and accessible urban fringe countryside</del></p> <p><del>Ancient Landscapes, <u>fringe countryside</u></del></p>
			<p><b><u>Garden Land</u></b></p> <p><b><u>Private back gardens, private amenity green space on estates or private communal gardens that are entirely to the rear or within the curtilage of a dwelling or dwellings, as originally designed</u></b></p>
			<p><del>Other GI</del></p> <p><del>Private gardens, <u>green walls, green roofs, estate greenspace, etc</u></del></p>
			<p><i>The supporting text following Policy BE18 is proposed to be amended as follows:</i></p> <p><i>Amend paragraph 5.146 to read:</i></p> <p>5.146 This policy is in line with the NPPF, as well as the government’s latest environment plan: A Green Future: Our 25 Year Plan to Improve the Environment which sets out a <del>long-term</del> vision for England’s environment post-Brexit, <del>along with some medium-term aspirations for progress, and some shorter-term actions.</del> The <b><u>25 Year Environment</u></b> plan stresses the importance of good-quality green and blue infrastructure (GBI) and commits to creating a ‘national framework of green infrastructure</p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p>standards, ensuring that new developments include accessible green spaces and that any area with little or no green space can be improved for the benefit of the community'. <del>The Local Plan policies</del> <b>This policy will seek</b> to achieve <b>well managed, high quality multi-functional Green and Blue Infrastructure to ensure opportunities are maximised for recreation, health and wellbeing</b>, a net gain for biodiversity, <b><u>as well as help achieve additional benefits for air quality and climate adaptation.</u></b> <del>by providing new green spaces including</del> <b>High quality green and blue infrastructure should be built into the designs proposals and/or masterplans of new development, <u>wherever possible.</u></b></p> <p><i>Retain paragraphs 5.147 to 5.156</i></p> <p><i>Amend paragraph 5.157 to read:</i></p> <p>5.157 This policy should be read in conjunction with Policy BE08 <b>BE05</b> Sustainable Drainage, Policy HP18 <del>Designing Landscape and the Public Realm</del>, Policy BE19 Access to Nature, Policy NE01 Protecting and Enhancing the Natural Environment, <b><u>Policy NE03 Trees, Woodlands and Hedgerows</u></b> and Policy NE06 <b>NE09</b> Flood Risk.</p>
MM30	115 116	Policy BE19 Paragraph 5.158-5.161	<i>Delete Policy BE19 and supporting text paragraphs 5.158 to 5.161 as repeats provision in other policies, including Policy BE18 (now Strategic Policy NE02) Green and Blue Infrastructure and Policy NE03 Trees, Woodlands, Hedgerows.</i>
MM31	116	Policy BE20 Paragraph 5.162 - Paragraph 5.173	<p><i>Move Policy BE20 to Chapter 8 after the new Policy NE05 (originally Policy BE22) Open Space and Recreation Provision.</i></p> <p><i>Amend Policy BE20 to read:</i></p> <p>POLICY <del>BE20</del> <b>NE06</b>: ALLOTMENTS AND COMMUNITY FOOD GROWING SPACE</p> <p>A. Planning for <b><u>The provision of</u></b> allotment space should, <b><u>where possible and appropriate,</u></b> be an integral part of the green and blue infrastructure provision in residential development.</p> <p>B. Provision of space <b><u>areas</u></b> for personal and community gardening and food growing will be favourably considered.</p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p><b><u>C.</u></b> <b><u>The change of use or development of designated allotment sites will not be permitted unless it can be demonstrated that provision is no longer required or that an alternative provision can be provided.</u></b></p> <p><i>Amend paragraphs 5.162 to 5.164 to read:</i></p> <p>5.162 <del>Local e</del>Community food growing space not only helps to improve social integration and community cohesion but can also contribute to improved mental and physical health and well-being. It supports healthy living by enabling residents make more sustainable food choices, protects local ecosystems and fosters community spirit and enterprise. It also helps reduce the carbon footprint of food production by minimising CO2 emissions from transporting food and is beneficial for air quality by helping to reduce pollution.</p> <p>5.163 The wider benefits of growing produce are identified in the Brentwood Open Space, Sport and Leisure Assessment (2016) which highlights that providing opportunities for people to grow their own food contributes to sustainability, health and social inclusion.</p> <p>5.164 The Council therefore aims to safeguard land for garden and <b><u>its existing</u></b> allotments, <del>promotes local food growing by</del> <b><u>and</u></b> encourage <del>ing</del> development proposals to include spaces for residents and communities to grow their own food. <del>This would enable and support healthy lifestyles, in line with the NPPF (2018, paragraph 91).</del></p> <p><i>Delete paragraphs 5.165 to 5.167 and 5.169 and 5.172.</i></p> <p><i>Amend paragraphs 5.168, 5.170, 5.171, 5.173 to read:</i></p> <p>5.168 <b><u>There are currently 16 known allotment sites in Brentwood, as illustrated on the Policies map. Ten of these sites have</u></b> <del>The Council are proposing to declare all existing Council owned allotment sites in the borough as having statutory status so they enjoy the</del> <b><u>and are therefore, afforded additional</u></b> legal protection provided by the Allotments Act 1925. <b><u>Policy NE06 applies to all statutory and non-statutory allotments equally.</u></b> <del>Further engagement work is also required to understand whether the current allotment infrastructure have opportunities to accommodate additional growth or additional provision will be needed.</del></p>

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			<p>5.170 When allotments <b>or community gardens</b> are provided on site as part of a development, developers <b>should also provide sufficient information to address the long-term maintenance, in line with the requirements of STRATEGIC Policy NE02: Green and Blue Infrastructure.</b> <del>should pay for the future maintenance and management of the allotments and arrange for a management body to undertake that responsibility for the life of the development. Where, land is transferred to the Borough or Parish Councils, an agreed maintenance contribution should be made. It is expected that the developer will maintain the allotment for twelve months before it transfers it to the borough or relevant parish council with the payment of a commuted sum to cover 20 years maintenance. Developer contributions for off-site provision could include the enhancement of nearby allotment facilities.</del></p> <p>5.171 Innovative solutions to small scale food growing space <del>will be</del> <b>are</b> encouraged, such as green roofs/walls, re-utilising existing under-used spaces and incorporating spaces for food growing in new schools.</p> <p>5.173 This policy should be read in conjunction with <b>STRATEGIC</b> Policy <del>BE48</del> <b>NE02: Green and Blue Infrastructure.</b> <del>, Policy BE23 Open Space, Sport and Recreational Facilities.</del></p>
MM32	117	Policy BE21 Paragraph 5.174 - 5.177	<p><i>Move Policy BE21 to Chapter 8. Amend Policy to read:</i></p> <p>POLICY <del>BE21</del> <b>NE07: PROTECTING LAND FOR GARDENS</b></p> <p>Proposals for development on sites that form part of an existing <del>allotment</del>, garden, or group of gardens will only be permitted where:</p> <ol style="list-style-type: none"> <li>a. sufficient garden space and space around existing dwellings is retained, especially where these spaces and any trees are worthy of retention due to their contribution to the character of the area and their importance for biodiversity;</li> <li>b. the form, height and layout of the proposed development is appropriate to the surrounding pattern of development and the character of the area <del>in line with Policy HP14 Responding to Context</del>;</li> <li>c. the amenity and privacy of neighbouring, existing and new <b>residents</b> <del>properties is</del> <b>are</b> protected; <b>and</b></li> </ol>



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			d. provision is made for adequate amenity space, vehicular access arrangements and parking spaces for the proposed and existing properties. <del>;</del> and
			e. <del>there is no detrimental effect on the potential comprehensive development of the wider area.</del>
			<p><i>Amend paragraphs 5.174 to 5.177 to read:</i></p> <p>5.174 <del>As the <b>The</b> definition of Previously Developed Land within the NPPF excludes private residential gardens. and allotment, inappropriate <b>The</b> development of garden <b>land</b> and allotment sites will be resisted, <del>–P</del> <b>unless</b> proposals that are considered to be appropriate on garden or allotment sites in <b>fulfil the requirements of</b> accordance with the criteria set out in this policy <b>and</b> will still be assessed against other <b>relevant</b> policies within this Plan.</del></p> <p>5.175 <del>Allotments and gardens</del> <b><u>Garden Land (includes private back gardens and private amenity areas or private communal gardens) forms an important part of the network of Green Infrastructure and an integral part of the urban layout and assist in defining the character of the residential area. Garden Land</u></b> provides a semi-natural habitat for local wildlife and corridors for the movement of wildlife in the urban area. Collectively, they help to mitigate fluvial and surface water flooding in the built-up parts of Brentwood. <b><u>Private gardens also form an important amenity resource for private dwellings as well as</u></b> They form part of an area's development pattern, providing a setting for buildings. They are an important environmental resource and are a vital component of Brentwood's character.</p> <p>5.176 <del>However, it should also be noted that, <b>If designed appropriately,</b> some forms of redevelopment and infill development, which are well designed and which makes efficient use of land, will continue to be a valuable additional source of housing supply, and need not be inappropriate.</del> <b><u>Proposals will be considered on a case-by-case basis, taking into account the nature and scale of the proposed use, its context and the quality of the design and whether the remaining area of garden is sufficient to meet occupier needs. This will depend upon the size of the dwelling and the Council will take into account the relevant guidance in the Essex Design Guide in making its assessment as well as other relevant policies in this plan.</u></b></p> <p>5.177 <del>For policies and guidance relating to garden and open space, <b>In this regard,</b> applicants should <b>also</b> refer to Policy HP06 Standards for New Housing, <b>and</b> Policy BE23-<b>NE05</b> Open Space, Sport and</del></p>

MM Ref	Page	Policy / para.	Proposed modifications
			Recreational Facilities, <b>and Recreation Provision</b> , as well as the Brentwood Town Centre Design Guide, and Essex Design Guide.
MM33	119	Policy BE22 Paragraph 5.178 – 5.183	<p>Merge Policy BE22 and BE23, and move the policy to Chapter 8.</p> <p>Amend policy to read:</p> <p>POLICY BE22 <b>NE05: OPEN SPACE <u>AND RECREATIONAL FACILITIES</u></b> <del>IN NEW DEVELOPMENT</del></p> <p><b><u>A.</u></b> <b><u>All open spaces, including the designated Urban Open Spaces, as identified will be protected and where necessary enhanced to ensure access to a network of high quality provision and opportunities for sport, play and recreation within the borough. The loss of Open Spaces and any ancillary facilities, such as sports, play and recreation provision, will not be permitted unless it can be demonstrated that:</u></b></p> <p><b><u>a.</u></b> <b><u>an assessment has been undertaken which clearly shows the provision and the function it performs is surplus to requirements; or</u></b></p> <p><b><u>b.</u></b> <b><u>the loss resulting from the proposed development would be replaced by equivalent or better provision in terms of quantity and quality in a suitable, accessible location within the local catchment area; or</u></b></p> <p><b><u>c.</u></b> <b><u>the development is for alternative sports and recreational provision, the benefits of which clearly outweigh the loss.</u></b></p> <p><del><b><u>A.-B.</u></b></del> New development proposals are expected to provide functional on-site open space and/or recreational amenities and may, where appropriate, be required to also provide a financial contribution towards new or improved facilities within the borough <b><u>is required to maximise opportunities to incorporate new publicly accessible, high quality and multi-functional open space and/or, where appropriate, enhance existing provision that will serve the new and existing community, through improved connections, biodiversity net-gain and high quality sport, play and recreational amenities.</u></b></p> <p><del><b><u>B.-C.</u></b></del> The amount and type of provision required will be determined according to <del>the size, nature and location of the proposal, quantity and type of open space needed, and existing provision accessible to the</del></p>

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			<p>proposal. All payments will be in line with the Policy BE23 Open Space, Sport and Recreational Facilities. <u>the Council's identified needs, as set out in its Open Space and Play Pitch Strategy and adopted open space standards; with regard to children's play space, the Council will seek proposals which meet the Fields in Trust minimum standards (see Figure 5.5).</u></p>
			<p><b><u>C.-D.</u></b> <b><u>Where it can be clearly demonstrated that proposals are not able to incorporate new provision or enhance existing provision to serve the new community, then a</u></b> A-commuted sum may be requested <del>for</del> <b><u>in line with Policy MG05 Developer Contributions where such contributions will provide alternative or enhanced and conveniently accessible off-site open space provision.</u></b></p>
			<p>a. <del>proposals where strategic open space requirements cannot be met within the site;</del></p>
			<p>b. <del>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); or</del></p>
			<p>c. <del>a Town Centre, District Shopping Centre or Local Centre location within Brentwood or where</del></p>
			<p>d. <del>it is justified by an outstanding urban design approach based on site constraints and opportunities.</del></p>
			<p><b><u>D.-E..</u></b> All open space provision should be fully equipped to meet the needs of users as agreed by the Council, reflecting acceptable distance and minimum size criteria for different types of open space as set out in the Council's Open Space Standards (refer to Figure 5.4). <b><u>Proposals for the inclusion or enhancement of supporting and ancillary uses and facilities on open space, such as sport, play and other supporting recreational provision, should meet the following criteria:</u></b></p>
			<p><b><u>a.</u></b> <b><u>the proposed facilities help improve the quality of the open space and promote inclusive access to a wide range of users and recreational interests;</u></b></p>
			<p><b><u>b.</u></b> <b><u>are demonstrably ancillary to the use of open space and its primary function, e.g. play/sports fields;</u></b></p>

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			<p><u>c.</u> <u>help to contribute to both the character and amenity of the area and are appropriate and proportionate to the function and nature of the open space;</u></p>
			<p><u>d.</u> <u>do not have a detrimental impact on the environmental function of the open space.</u></p>
			<p><u>F.</u> 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. <u>to ensure their long-term quality and management.</u></p> <p><i>Delete clause E</i></p> <p><i>Move paragraph 5.178 to 5.179 to after Policy BE22 (now Policy NE05), to precede paragraph 5.180.</i></p> <p><i>Delete paragraph 5.180-5.183</i></p>
MM34	120	Policy BE23 Paragraphs 5.184 – 5.185	<p><i>Delete Policy BE23, merge key requirements and relevant supporting text with Policy BE22.</i></p> <p><i>Amend the below supporting text and move all to Policy BE22 after 5.183 to form the new Policy NE05.</i></p> <p><i>Delete paragraph 5.184</i></p> <p><i>Insert new paragraph to precede paragraph 5.185 to read:</i></p> <p><b><u>Open Space Needs and Adopted Standards</u></b></p> <p><b><u>The Council’s Open Space, Play Pitch and Leisure Assessments provide an overview of the existing provision across the borough, as well as known deficiencies. All major development proposals should investigate and maximise opportunities to enhance open space, play, sport and recreation facilities where possible and appropriate, particularly in areas of deficiency in quantity and quality. New development can help to enhance provision even where it is not feasible to deliver new public open space on site. This could include improving access, through public realm enhancements, to existing nearby facilities or alternatively, contributions will be sought where appropriate.</u></b></p>

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			<p><i>Amend paragraph 5.185 to read:</i></p> <p>5.185 All proposals, where appropriate, will be required to comply with the Council's <b>identified needs and</b> open space standards as set out in Figure 5.4 <b>or any subsequent update, to inform the design of the proposals and planning application process.</b> These take account of recommendations in the <del>O</del>open <del>S</del>space and <del>S</del>sports facilities evidence, <b>i.e.</b> Brentwood Play Pitch Strategy (2018), Brentwood Open Space Strategy (2008-2018), the <b>Leisure Strategy</b> and Play Strategy (2018). With regard to children's play space, the Council will seek proposals which meet the Fields in Trust minimum standards as set out in Figure 5.5.</p>

## Chapter 6

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MM35	124	Policy HP01	<i>Amend Policy to read:</i>
	126	Paragraph 6.13	<p><b><u>STRATEGIC</u></b> POLICY HP01: HOUSING MIX</p> <p>A. All new <b>residential</b> development should deliver an inclusive, accessible environment throughout.</p> <p>a. <b><u>A.</u></b> On residential development proposals of 10 or more (net) additional dwellings the Council will require:</p> <p>—i. <b><u>a.</u></b> an appropriate mix of dwelling types, sizes and tenures to meet the identified housing needs in the borough as set out in the <b>Council's most up to date housing need evidence</b> <del>Strategic Housing Market Assessment or any similar evidence for market and affordable units (such as the Council's Housing Strategy)</del>, to provide choice, and contribute towards the creation of sustainable, balanced and inclusive communities; and</p>

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			<p>—ii.<del>b.</del> each dwelling to be constructed to meet requirement M4(2) accessible and adaptable dwellings, unless it is built in line with M4(3) wheelchair adaptable dwellings of the Building Regulations 2015, or subsequent government standard.</p>
			<p><del>b.</del><b>B.</b> On developments of 60 or more (net) dwellings the Council will require all of the above, and:</p>
			<p>—i. a minimum of 5% of new affordable dwellings should be built to meet requirement M4(3) wheelchair accessible dwellings of the Building Regulations 2015, or subsequent government standard.</p>
			<p><del>6.</del><b>C.</b> On development sites of <del>500</del> <b>100</b> or more dwellings the Council will require all of the above, and:</p>
			<p>—i.<del>a.</del> a minimum of 5% self-build homes which can include custom housebuilding <b><u>provided there is a need as justified within the Council's most up to date evidence</u></b>; and</p>
			<p>—ii.<del>b.</del> provision for <b><u>other forms of</u></b> Specialist Accommodation taking account of local housing need in accordance with the criteria set out in Policy HP04 Specialist Accommodation.</p>
			<p><del>B.</del><b>D.</b> Where a development site has been divided into parts, or is being delivered in phases, the area to be used for determining whether this policy applies will be the whole original site.</p>
			<p><del>C.</del><b>E.</b> The inclusion of self-build and custom build homes and Specialist Residential Accommodation on smaller sites will also be encouraged.</p>
			<p><i>Amend paragraph 6.13 to read:</i></p> <p>The Council will also seek the provision of Specialist Accommodation on strategic residential schemes of <del>500</del> <b>100</b> dwellings or more, to ensure there will be sufficient housing to accommodate identified local need.</p>

MM Ref	Page	Policy / para.	Proposed modifications
MM36	127	Policy HP02	<p><i>Amend part B to read:</i></p> <p>In justifying any change of use between residential use classes, proposals must demonstrate how they are responding to established housing need as demonstrated in <b>the</b> Council's most up to date <b>housing need evidence</b> Strategic Housing Market Assessment.</p>
MM37	128	Policy HP03	<p><i>Amend Policy to read:</i></p> <p><b><u>Proposals for new residential developments not allocated in the Plan:</u></b></p> <p><b>A. a.</b> <del>Proposals for new residential development</del> should take a design led approach to density which ensures schemes are sympathetic to local character and make efficient use of land</p> <p><b>B. b.</b> <del>Residential development proposals will generally</del> be expected to achieve a net density of at least 35 dwellings per hectare net or higher, unless the <del>special</del> character of the surrounding area suggests that such densities would be inappropriate, or where other site constraints make such densities unachievable.</p> <p><b>C. c.</b> <del>Development proposals will</del> be expected to achieve a higher density, generally above 65 dwellings per hectare net in the Town Centre, District Shopping Centres, <del>and Local Centres</del> listed below <b><u>Strategic Policy PC08 4 Retail Hierarchy of Designated Centres</u></b>, or other locations with public transport accessibility, subject to <del>Policy HP14 Responding to Context and Policy HP16 Building Design</del> <b><u>Strategic Policy BE14 Creating Successful Places.</u></b></p> <p><i>Delete paragraph 6.21</i></p>
MM38	129	Policy HP04	<p><i>Amend Policy to read:</i></p>
		Paragraph 6.25	<p>A.</p> <p>The Council will <b><u>grant permission for</u></b> <del>encourage and support</del> proposals which contribute to the delivery of Specialist Accommodation, provided that the development:</p>
			<p>a.</p> <p>meets demonstratable <del>established local community</del> need;</p>

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			b. is readily accessible to public transport, shops, local services, community facilities and social networks and, where appropriate, employment and day centres;
			c. would not result in the over concentration of any one type of accommodation;
			d. <del>where appropriate, provides suitable landscaping and amenity space; and</del>
			e. <del>where appropriate, is in accordance with Policy NE10 New Development, Extension and Replacement of Buildings in the Green Belt.</del>
			B. Subject to viability, where accommodation falls within use class C3 an appropriate proportion of affordable housing in accordance with Policy HP05 Affordable Housing will be required with <del>the</del> <b>a</b> mix of tenures <b><u>to meet identified needs</u></b> <del>negotiated by the Council.</del>
			C. A condition may be imposed restricting occupation to persons requiring specialist accommodation where deemed necessary.
			<b><u>D. Where a need for Gypsy and Traveller pitches are identified by the Council, Policy HP10: Proposals for Gypsies, Travellers and Travelling Showpeople Windfall Sites would apply.</u></b>
			<i>Insert new paragraph after paragraph 6.25 to read:</i>  <b><u>In terms of housing, new potential builds for Supported Living could be beneficial to supply demand for this type of accommodation, and any specialist accommodation provision for people with disabilities could meet the need of the local population or individuals who would move to this area. The demand for adults with disabilities is considered under the Independent Living programme.</u></b>



MM Ref	Page	Policy / para.	Proposed modifications
MM39	131-132	Policy HP05 Paragraph 6.34	<p><i>Amend policy to read:</i></p> <p>POLICY HP05: AFFORDABLE HOUSING</p>
			<p>A. The Council will require the provision of 35% of the total number of residential units to be provided and maintained as affordable housing within all new residential development sites on proposals of <b>10</b> 44 or more (net) units <del>or sites of 10 or less units which have a combined gross internal floorspace in excess of 1,000 square meters.</del></p>
			<p>B. In considering the suitability of affordable housing, the Council will require that:</p> <p>a. the tenure split be made up of 86% Affordable/Social Rent and 14% as other forms of affordable housing (this includes starter homes, intermediate homes and shared ownership and all other forms of affordable housing as described by national guidance or legislation) or regard to the most up to date <b><u>housing evidence</u></b> SHMA;</p>
			<p>b. the affordable housing be designed in such a way as to be seamlessly integrated to that of market housing elements of a scheme (in terms of appearance, build quality and materials) and distributed throughout the development so as to avoid the over concentration in one area; and</p>
			<p>c. the type, mix, size and cost of affordable homes will meet the identified housing need as reported by the Council's most up-to-date <b><u>housing evidence</u></b> <del>Strategic Housing Market Assessment and Housing Strategy.</del></p>
			<p>C. In seeking affordable housing provision, the Council will have regard to scheme viability; only where robust viability evidence demonstrates that the full amount of affordable housing cannot be delivered, the Council will negotiate a level of on-site affordable housing that can be delivered taking into account the mix of unit size, type and tenure and any grant subsidy received.</p>
			<p>D. The Council will only accept <b><u>off-site provision, or an appropriate</u></b> financial contribution in lieu of on-site provision where it can be <b><u>robustly satisfactorily</u></b> demonstrated that on-site provision is <b><u>not possible and that, in the individual case and to the satisfaction of the Council, the objective of creating mixed and balanced communities can be effectively and equally met through either off-</u></b></p>

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			<p><u>site provision or an appropriate financial contribution in lieu or a combination of the two neither feasible nor viable.</u></p>
			<p>E. Where a site has been sub-divided or is not being developed to its full potential so as to fall under the affordable housing threshold, the Council will seek a level of affordable housing to reflect the provision that would have been achieved on the site as a whole had it come forward as a single scheme for the allocated or identified site.</p>
			<p><i>Amend paragraph 6.34 to read:</i></p> <p>The local plan viability assessment demonstrates that the thresholds of affordable housing contributions identified in the Local Plan are achievable and the cumulative impact of policies in the local Plan will not put development at risk. <u>The use of further viability assessments at the decision-making stage should not be necessary. It is up to the applicant to demonstrate whether particular circumstances relevant to the characteristics of the site and the proposed development justify the need for a viability assessment at the application stage.</u></p> <p><i>Add new paragraph after 6.34 to read:</i></p> <p><u>Where an applicant formally requests the Council to consider a reduced level of affordable housing, it will need to demonstrate that it is not possible to meet the full quota of affordable housing without prejudicing the delivery of housing on the site. It will also need to demonstrate to the satisfaction of the Council that, in the individual case, the objective of creating mixed and balanced communities can be effectively and equally met through either off-site provision or an appropriate financial contribution in lieu or a combination of the two. To this end, and in demonstrating the above, a full viability assessment would need to be submitted with a planning application which is based upon, and refers to, the Brentwood Local Plan Viability Assessment. Such an assessment should include evidence of what has changed since the adoption of the Plan which has impacted on viability and should reflect the government’s recommended approach to defining key inputs as set out in National Planning Guidance.</u></p>

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MM40	134-138	Policy HP06 Paragraph 6.50 Paragraph 6.51	<p><i>Amend Policy to read:</i></p> <p>All residential development shall comply with the following:-</p> <p>Internal Residential Space</p>
			A. All new build housing will achieve appropriate internal space through compliance with the nationally-described space standard <b><u>as summarised in Figure 6.3 or as may be superseded.</u></b>
			External Residential Space
			B. New residential units will be expected to have direct access to an area of private and/or communal amenity space. The form of amenity space will be dependent on the form of housing and could be provided in a variety of ways, such as a private garden, roof garden, communal garden, courtyard balcony, or ground-level patio with defensible space from public access. In providing appropriate amenity space, development <b><u>proposals</u></b> should:-
			a. <del>consider the location and context of the development, including the character of the surrounding area;</del>
			b. <del>take into account the orientation of the amenity space in relation to the sun at different times of year;</del>
			c. <del>address issues of overlooking and enclosure, which may otherwise impact detrimentally on the proposed dwelling and any neighbouring dwellings; and</del>
			d. <b><u>be designed to provide</u></b> the amenity space to be of a shape, size and location to allow effective and practical use of and level access to the space by residents.
			<i>Delete part C-F (Housing Quality) of the policy</i>
			<p><i>Amend paragraph 6.50 to read:</i></p> <p>Applicants are also encouraged to consider external residential space size specifications as set out by the <b><u>most up to date</u></b> Essex Design Guide, prepared by Essex County Council.</p>

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MM41	139 - 142	Policy HP07 Policy HP08 Paragraph 6.62 Paragraph 6.65 Paragraph 6.67 Paragraph 6.69 Paragraph 6.71 Paragraph 6.72	<p><i>Merge Policies HP07 and HP08 into one policy and amend to read as follows:</i></p> <p>POLICY HP07: PROVISION FOR GYPSIES AND TRAVELLERS</p> <p>In order to meet identified need, a total of 13 permanent pitches for Gypsies and Travellers as defined by national planning policy for the period 2016-2033 will be provided.</p> <p><i>Delete criteria a and b of Policy HP07.</i></p> <p><i>Delete Policy HP08 title.</i></p> <p>The Council will support an application for planning permission on the following sites <b>are removed from the green belt and are allocated</b> for permanent Gypsy and Traveller accommodation, as shown on the Brentwood Policies Map and Appendix 5, and listed below, subject to compliance with identified. <b>Proposals for these sites must comply with the specified</b> requirements:</p>
			A. Site Ref GT16
			a- Site Address: Oaktree Farm (Greenacres), Chelmsford Road
			b- Number of Pitches: 7 <b><u>Allocated for 7 pitches</u></b>
			c- Proposals for development at this site <del>should comply with the following site-specific requirements:</del> <b><u>require</u></b>
			—i. A <b><u>a</u></b> landscape framework to be submitted to provide suitable boundary treatment to include a mixture of native trees and shrubs around the site to safeguard the character and appearance of the area.
			—ii. <del>Given the location of the site within the Green Belt for expansion will not be allowed.</del>
			B. Site Ref GT17
			a- Site Address: Hunters Green, Albyns Lane, Navestock

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			b. Number of Pitches: 1 <u>Allocated for 1 pitch</u>
			e. <del>Proposals for development at this site should comply with the following site-specific requirement:</del>
			<del>i. Given the location of the site within the Green Belt any proposals for expansion will not be allowed.</del>
			<b><u>C. Site Ref R01 (I) Dunton Hills Garden Village Strategic Allocation</u></b>
			<b><u>Site Address: Dunton Hills Garden Village, West Horndon, Brentwood</u></b>
			<b><u>Allocated for 5 pitches</u></b>
			<b><u>Proposals for development at this site should comply with the site-specific requirements set out in policy R01(i).</u></b>
			<i>Delete Appendix 5</i>
			<i>Amend paragraph 6.62 to read:</i> The Gypsy and Traveller Accommodation Assessment finds no evidence of need for a transit site specifically within Brentwood Borough. Further work is currently being undertaken by Essex County Council to consider the need for transit provision across Essex as a whole. Should such a need be identified within Brentwood in the future this will be considered through the review of the Local Plan, <b><u>taking into account the Essex Planning Officers' Association Protocol for Unmet Gypsy, Traveller and Travelling Showpeople Needs 2018 which has been developed collaboratively across Essex under the Duty to Cooperate.</u></b>
			<i>Include following text as new paragraph after 6.65:</i> <b><u>A total of 13 permanent pitches for Gypsies and Travellers as defined by national planning policy for the period 2016-2033 will be provided through the incorporation of a minimum of 5 serviced Gypsy and Traveller pitches as part of the Dunton Hills Garden Village allocation, to be delivered in the first five years of development. A further 8 existing pitches are to be regularised in accordance with Policy HP07.</u></b>
			<i>Amend paragraph 6.67 to read:</i>

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			<p>The Council has carried out an assessment of potential Gypsy, Traveller and Travelling Showperson sites for allocation through its Housing and Economic Land Availability Assessment (HELAA) and found some to be suitable in HELAA terms. However, it is recognised all <b>are were</b> in the Green Belt. <b><u>To be consistent with national planning policy, these sites have been removed from the green belt for the use as gypsy and traveller pitches only.</u></b></p> <p><i>Amend reference in paragraph 6.69 from Policy HP08 to HP07</i></p> <p><i>Amend paragraph 6.71 to read:</i></p> <p>The approach not only secures the planning status of the current occupants, contributing to the specified needs, but also provides certainty in relation to the delivery of sites to meet the needs <b>of the borough (13 pitches as identified in policy HP07)</b> in Policy HP07 Provision for Gypsies and Travellers.</p> <p><i>Amend reference in paragraph 6.72 from Policy HP08 to HP07</i></p>
MM42	143 - 144	Policy HP09	<p>POLICY <del>HP09</del> <b>HP08</b> SAFEGUARDING PERMITTED SITES</p> <p><i>Amend Part A of Policy to read:</i></p> <p>The existing Gypsy and Traveller sites listed below, <del>and as shown on the Brentwood Policies Map,</del> <b>are removed from the Green Belt and</b> will be safeguarded from alternative development, unless it can be demonstrated that the site is no longer required to meet any identified Traveller need across the borough, or acceptable replacement accommodation can be provided.</p>
MM43	144-145	Policy HP10 Paragraph 6.75 Paragraph 6.77	<p><i>Amend Policy to read:</i></p> <p>POLICY <del>HP10</del> <b>09</b>: SUB-DIVISION OF PITCHES OR PLOTS</p> <p>A.</p> <p>a. The local planning authority will <b>allow</b> consider proposals for the sub-division of <b>allocated or</b> authorised Gypsy, Traveller and Travelling Showpeople sites on a case by case basis, <del>and provided that all the following criteria are met:</del></p> <p>a. the living environment of residents on the proposed site and neighbouring land is protected;</p> <p>b. sites are of a suitable size to enable the creation of additional pitches or plots;</p>

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			<p>c. <del>the sub-division of Gypsy and Traveller sites do not result in a total of more than 10 pitches on a site;</del></p>
			<p>d. there is no significant loss of soft and hard landscaping and amenity provision within the existing site, particularly where conditioned by a previous consent;</p>
			<p>e. there is no significant adverse impact on the intrinsic character and beauty of the countryside; and</p>
			<p>f. there is no adverse impact in terms of highways access and vehicle movement.</p>
			<p><del>B. It will be necessary for the application to demonstrate the need for the additional provision in relation to the requirement of Policy HP07, the lack of alternative provision and specific circumstances of the applicant.</del></p>
			<p><b><u>B. The sub-division of plots/pitches on additional sites that might come forward within the green belt will be considered against green belt policy.</u></b></p>
			<p><i>Amend paragraph 6.75 to read:</i></p> <p>It is recognised that during the Plan period, there may be a demonstrable need for additional pitches on those sites safeguarded or allocated through the Local Plan, to meet the changing needs of the households on the sites. <b><u>This policy applies to existing pitches and plots listed in Policy HP08 as well as those identified for allocation in Policy HP07.</u></b></p>
			<p><i>Amend paragraph 6.77 to read:</i></p> <p><del>As All safeguarded sites (with exception to Dunton Hills Garden Village allocation) remain washed over by</del> <b><u>are removed from the Green Belt, as required by the National Planning Policy Framework and Planning Policy for Traveller Sites.</u></b> <del>very special circumstances will have to be demonstrated at the development management stage. Therefore, in the application of this policy, a key issue will be establishing a demonstrable need for an additional pitch coupled with a lack of suitable alternative accommodation; as such the Council will require the applicant to clearly demonstrate the need for an additional pitch, and the lack of alternative accommodation requires an additional pitch. Only if such</del></p>

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			<del>need can be demonstrated will the Council look into support such an application in accordance with criteria set out in Policy HP10.</del>
MM44	146-147	Policy HP11 Paragraph 6.78 Paragraph 6.79	<p><i>Amend Policy to read:</i></p> <p><b>POLICY HP11-10: PROPOSALS FOR GYPSIES, TRAVELLERS AND TRAVELLING SHOWPEOPLE ON WINDFALL SITES</b></p>
			<p>A.</p> <p>a. Planning permission for Gypsy and Traveller caravan sites and sites for Travelling Showpeople (as defined in the governments Planning Policy for Travellers) on unallocated land <del>outside development frameworks, and</del> outside the Green Belt, will only be granted in accordance with all the following criteria:</p> <p>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;</p>
			<p>b. safe and convenient vehicular access to the local highway network can be provided;</p>
			<p>c. essential services (water, electricity and foul drainage) are available on site or can be made available on site;</p>
			<p>d. there is no significant adverse impact on the intrinsic character and beauty of the countryside;</p>
			<p>e. the site would not lead to the loss of, or adverse impact on, important historic and natural environment assets;</p>
			<p>f. there is no significant risk of land contamination or unacceptable risk of flooding;</p>
			<p>g. the site provides a suitable living environment for the proposed residents and there is no significant adverse impact on the amenity of nearby residents;</p>
			<p>h. the site is of sufficient size to accommodate the proposed number of caravans, vehicles and ancillary areas; <b>and</b></p>



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			<p>i. <del>the capacity of the site does not exceed 10 pitches or plots; and</del></p> <p><del>f. i.</del> plots for Travelling Showpeople should also be of sufficient size to enable the storage, repair and maintenance of equipment.</p> <p>B. <b><u>Sites within the Green Belt will need to demonstrate very special circumstances which clearly outweigh the harm to the Green Belt and any other harm in addition to the criteria A above.</u></b>  <del>Gypsy and Traveller sites are inappropriate development in the Green Belt. Any proposals in the Green Belt would have to demonstrate they comply with National and Local Policy regarding development in the Green Belt. If, through the application of such Policy, provision of a Gypsy and Traveller site in the Green Belt is considered acceptable in principle, the proposed development is required to comply with the criteria set out within this policy.</del></p>
			<p><i>Amend paragraph 6.78 to read:</i></p> <p><b><u>It is recognised that during the Plan period, there may be a demonstrable need for additional pitches to those safeguarded or allocated through the Local Plan.</u></b> This policy applies to non-allocated or safeguarded sites which may come forward during the Plan period in built-up areas and the countryside.</p> <p><i>Amend paragraph 6.79 to read:</i></p> <p><del>The policy excludes land in the Green Belt.</del> National planning policy establishes a general presumption against inappropriate development in the Green Belt. The definition of inappropriate development includes Gypsy and Traveller sites and Travelling Showpeople sites. Subject to the best interests of the child, personal circumstances and unmet need are unlikely to clearly outweigh harm to the Green Belt and any other harm so as to establish very special circumstances.</p>
MM45	147-148	Design and Place-making section Paragraph 6.81 - 6.118	<i>Move the section on Design and Place-making including all relevant policies and supporting text to sit within 'Chapter 5 – Resilient Built Environment'.</i>
			<i>Reorder and amend paragraphs 6.81 through 6.84 to read as follows (Numbering to be determined):</i>

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			<p>6.83 The Council attaches great importance to high quality and inclusive design for all development, <b><u>irrespective of size</u></b>- including individual buildings, public and private spaces and wider area development schemes.</p> <p>6.81 Good design is a key aspect of sustainable development and is intrinsic to good planning. <del>The built environment, the architecture and sense of place that it comprises of, are things that no one can avoid, and upon which people from every age and background have a view.</del> The form, layout and character of buildings and public spaces contribute greatly <b><u>to</u></b> <del>in building communities,</del> creating quality of life, improving health and well-being, making effective use of land, and facilitating activities and services.</p> <p>6.82 The term 'high quality design' is frequently used yet is frequently misunderstood as architectural styles. Although visual appearance and the architecture of individual buildings are very important factors, high quality and inclusive design go beyond aesthetic considerations and address the connections between people and places and <b><u>the coherent</u></b> <del>integration</del> <b><u>of</u></b> new development into the natural, built and historic environment.</p> <p>6.84 The Essex Design Guide 2018 is a useful starting point for a development and provides guidance regarding amenity standards, layouts and case studies. The Essex Design Guide also contains five cross cutting themes (ageing population, digital &amp; smart technologies, health &amp; wellbeing, active design, garden communities). For <b><u>area developments</u></b> within or in the vicinity of Brentwood Town centre, applicants <del>should also refer to</del> <b><u>take into account</u></b> the Brentwood Town Centre Design Plan and Design Guide. The Design Plan sets out how future development opportunities can collectively enhance Brentwood Town Centre, whilst Design Guide provide specific design guidance for development proposals in the area. <del>6.118 Proposals should refer to</del> <b><u>also take into account</u></b> the most up to date <del>urban design principles and guidance, including Brentwood Town Centre Design Guide, Essex Design Guide 2018, Manual for Streets, Building for</del> <b><u>a Healthy Life and Secured by Design</u></b>. <del>This policy should be read in conjunction with Policy HP06 Standards for New Housing, Policy HP13 Creating Successful Places, Policy BE18 Green and Blue Infrastructure and Policy 22 Open Space in New Development.</del></p>
MM46		Policy HP12	<p><i>Amend the policy to read:</i></p> <p>POLICY HP12-<b><u>BE15</u></b>: PLANNING FOR INCLUSIVE COMMUNITIES</p>

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			To plan for and build inclusive environment that supports our residents and communities, the Council will <b><u>require new development proposals</u></b> <del>work with partners, stakeholders and developers to:</del>
			a. provide access to good quality community spaces, services and amenities and infrastructure that accommodate, encourage and strengthen communities <b><u>and social interaction for all users;</u></b>
			b. create places that foster a sense of belonging and <del>social interaction</del> <b><u>community</u></b> , where <del>communities</del> <b><u>individuals and families</u></b> can develop and thrive;
			c. ensure that streets and public spaces are planned for everyone to move around and spend time in comfort and safety, are convenient and welcoming with no <b><u>disabling</u></b> barriers <b><u>to the disabled</u></b> <b><u>or</u></b> impaired, providing independent access without additional undue effort, separation or special treatment;
			d. ensure buildings and places are designed in a way that everyone regardless of their ability, age, income, ethnicity, gender, faith, sexual orientation can use confidently, independently, with <b><u>dignity and without engendering a sense of</u></b> <del>choice and dignity, avoiding separation or segregation; and</del>
			e. ensure that new buildings and spaces are designed to reinforce inclusivity of neighbourhoods and are resilient and adaptable to changing community requirements.
			<p><i>Include paragraphs 6.87 to 6.88 as supporting text after policy HP12 (now the new Policy BE15) and amend as follows:</i></p> <p>6.87 A key aspect of design that should be integral in all development proposals is its role in creating a safe and accessible environment, <del>which minimises the opportunities for terrorism, crime and disorder, anti-social behaviour and the fear of crime, without being overbearing or undermining community cohesion.</del> <b><u>Inclusive and safe design principles should therefore be integral to the design and layout of the scheme, ensuring that people of all ages and abilities are able to benefit from high quality, accessible, safe and secure environments.</u></b> This can be achieved by good natural surveillance, well-used <b><u>accessible and legible</u></b> walkways, appropriate lighting, <b><u>and active frontages</u></b> and a lack of potential hiding places. <del>Optimising site layout and building design are also effective</del></p>

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			<p><del>measures.</del> <b><u>The Council strongly encourage the use of ‘Secured by Design’ principles to help reduce crime and improve perceptions of safety.</u></b></p> <p>6.88 Inclusive design approach should be integrated in proposals in the outset. Enabling everyone to have safe access to places regardless of their age, ability, ethnicity, gender, faith, economic circumstance will create more inclusive communities, and improve the quality of life for people with a range of health conditions and older people. The Essex Design Guide 2018 provides guidance on residential development which is flexible and adaptable throughout its lifetime.</p>
MM47	149-150	Policy HP13 Paragraph 6.85 – 6.117	<p><i>Amend Policy to read:</i></p> <p><b><u>STRATEGIC POLICY HP13-BE14: CREATING SUCCESSFUL PLACES</u></b></p> <p>A. Proposals that <b><u>will be required to</u></b> meet high design standards to <b><u>and</u></b> deliver safe, inclusive, attractive and accessible places <del>will be supported.</del> They <b><u>Proposals</u></b> should:</p> <p>a. provide a comprehensive design approach that delivers <b><u>a</u></b> high quality, safe, attractive, inclusive, durable and healthy places <b><u>in which</u></b> to live and work <del>in</del>;</p> <p>b. <b><u>make</u></b> support the efficient use of land and infrastructure, <del>through uses, mix and density/development intensity;</del></p> <p>c. deliver <b><u>sustainable</u></b> buildings, places and spaces that can adapt to changing social technological, economic, and environmental <b><u>and climate</u></b> conditions;</p> <p>d. <del>consider sustainable design and layout at the earliest stage of design, where landscaping, public frontages, building orientation and the impact of microclimate can be considered within the layout to positively enhance the townscape and provide attractive places that improve people’s health and sense of vitality;</del></p> <p><del>e.</del> <b><u>d.</u></b> create permeable, accessible and multifunctional streets and places that promotes active lifestyles <b><u>and</u></b> <del>integrates different modes of transport, parking and servicing;</del></p>

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			<p><u>e. respond positively and sympathetically to their context and build upon existing strengths and characteristics, and where appropriate, retain or enhance existing features which make a positive contribution to the character, appearance or significance of the local area (including natural and heritage assets);</u></p> <p><u>f. integrate and enhance the natural environment by the inclusion of features which will endure for the life of the development, such as planting to enhance biodiversity, the provision of green roofs, green walls and nature based sustainable drainage;</u></p> <p><u>g. where applicable, ensure that new streets are tree-lined and opportunities are taken to incorporate trees elsewhere in developments;</u></p>
			<p><u>h. employ the use of high quality street furniture, boundary treatments, lighting, signage, high quality materials and finishes to help create a durable development with local distinctiveness;</u></p>
			<p><u>i. avoid unacceptable overlooking or loss of privacy;</u></p>
			<p><u>j. safeguard the living conditions of future occupants of the development and adjacent residents;</u></p>
			<p><u>k. sensitively integrate parking places and functional needs for storage, refuse and recycling collection points;</u></p>
			<p><u>l. mitigate the impact of air, noise, vibration and light pollution from internal and external sources, especially in intrinsically dark landscapes and nature conservation, as well as residential areas;</u></p>
			<p><del>f. access, routes and connectivity for cyclists and pedestrians through and out from development sites should be superior to that provided for motorists so that walking and cycling becomes the natural choice for journeys around the locality;</del></p> <p><del>g. ensure public and private amenity spaces of both existing and future development are inclusive, usable, safe and enjoyable; these include indoor and outdoor space, outlook, natural lighting, ventilation, matters of privacy, overlooking;</del></p>

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			h. create a range of opportunities for natural surveillance and observation;
			j. integrate a mix of building typologies that meet the diverse needs of people in the borough;
			k. meet the principles of inclusive design, active design principles, and facilitate an inclusive environment for people of all abilities and age, ethnicity, gender, economic circumstances, and faith;
			t. be designed to minimise criminal activities or perceived threat of crime and improve community safety; and
			m. respond positively to the context, for example by reusing sustainable materials, finishes and street furniture that are suitable to the location and context.
			B. Successful <b><u>Proposals for major</u></b> development of the sites will require <b><u>should be supported</u></b> ing documents such as a strategic masterplan, <b><u>by an</u></b> area specific masterplan, <b><u>Where appropriate, the Council will consider the use of a</u></b> complementary design guide/code, to help guide the necessary <b><u>design</u></b> coherence across the entire development site, <b><u>irrespective of who delivers the different locations or components of the scheme.</u></b> <b><u>Design proposals will be expected to:</u></b>
			<b><u>a. demonstrate early, proactive, inclusive and effective engagement with the community and other relevant partners;</u></b>
			<b><u>b. have regard to Supplementary Planning Documents and Guidance published by the Council, Essex County Council and other relevant bodies;</u></b>
			<b><u>c. address feedback from the Council through its Pre-application Advice Service and where appropriate, feedback from an independent Design Review Panel.</u></b>
			A. Development proposals for large complex allocation sites will be expected to be developed in partnership with the Council, infrastructure providers and other relevant organisations, through a collaborative masterplanning approach.

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			<p><del>C.</del> The Council may, at its discretion, appoint an independent Quality Design Review Panel to review the detailed design proposals, to provide additional rigour to the design-thinking process, thereby ensuring the longer-term sustainable success of the development.</p>
			<p><del>C</del> <del>D</del> Development proposals should submit <b>be supported by</b> a supporting statement setting out the sustainable long-term governance and stewardship arrangements for <b>the maintenance of supporting infrastructure including</b> community assets, <b>and open spaces</b>; the statement should be proportionate with <b>to</b> the scale of the scheme and quantum of infrastructure being delivered.</p>
			<p><del>In addition, proposals should reflect the requirements of Brentwood Borough's Masterplan requirements where applicable.</del></p>
			<p><i>Delete paragraphs 6.86, 6.89, 6.90</i></p>
			<p><i>Reorder and amend paragraphs 6.85, 6.91, 6.92, 6.93, 6.94, 6.95, 6.96 as follows (Note: paragraph numbering used for this are those found in the Pre-Submitted Plan but will be changed – numbering to be determined):</i></p> <p>Delivering High Quality Design</p> <p>[unnumbered paragraph above 6.96] <b><u>Achieving well-designed places is fundamental to creating distinctive and sustainable communities. It also ensures the development will function well over the lifetime of the development, ensuring that the design of the buildings and places have taken a proactive approach to mitigating and adapting to climate change. All proposals must clearly demonstrate that a comprehensive design approach has been used to inform the development and</u></b> <del>The Council expects all the</del> <b><u>that all</u></b> issues within this policy <del>to be</del> <b><u>are</u></b> positively addressed through the Design and Access /Planning Statements that accompany applications. <b><u>Additionally, sustainable development must also factor in how supporting infrastructure will be maintained throughout the life-time of the development. The design should therefore, factor in the lifespan of materials being used, and provide details for how these assets will be maintained over time, such as stewardship arrangements, where necessary.</u></b></p>

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			<p>6.93 The Council will require design to be addressed <b><u>through early engagement</u></b> in the pre-application process on major <b><u>and strategic</u></b> developments and in connection with all heritage sites. <b><u>Where appropriate, the Council will require the use of masterplans and design codes to clearly set out the design rationale of the development site.</u></b> <del>For major sites/strategic sites and complex developments, design codes will need to be prepared in</del> <b><u>Applicants should work collaboratively with those affected by their proposals to evolve designs that take account of the views of the community</u></b> <del>conjunction with the Council and local stakeholders to</del> <b><u>and ensure proposals have responded positively to local knowledge and context of the site</u></b> <del>appropriate character and high-quality design is delivered throughout. Reference to existing Masterplans must be made, as applicable.</del></p> <p><del>6.85—</del>The NPPF is clear that applicants will be expected to work closely with those directly affected by their proposals to evolve designs that take account of the views of the community. Therefore, early discussion with the Council and the local community about the design of emerging schemes is important for clarifying expectations and reconciling local and commercial interests. <b><u>Applicants that can demonstrate early, proactive, inclusive and effective engagement with the community will be looked on more favourably than those that cannot.</u></b> Design codes will usually be prepared between outline and reserved matters stage on larger sites, especially those whose development will be spread over long periods. <b><u>Where a site</u></b> <del>and involves</del> <b><u>more than one developer, a collaborative masterplanning approach is expected</u></b> <del>to set out</del> <b><u>ensure the coherent application of</u></b> design principles <del>for the</del> <b><u>across the whole</u></b> <del>development of the site.</del> The level of prescription will vary according to the nature of the site <b><u>and the development proposed.</u></b> <b><u>The Council may, at its discretion, appoint an independent Quality Design Review Panel to review the detailed design proposals, to help provide additional rigour to the design-thinking process, thereby ensuring the longer-term sustainable success of the development.</u></b></p>
			<p>Local Character and Context</p> <p>6.91 An important part of making successful places is to ensure that new buildings are attractive, appropriate in their setting and fit for purpose. Their massing, scale and layout should enhance, activate and appropriately frame the public realm, complement the existing streetscape and surrounding area.</p>



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			<p>6.96 Where development is in the vicinity of any of Brentwood's distinctive natural, cultural or historic assets, delivering high quality design that complements the asset will be essential. <del>6.94 Brentwood's environment, its significant</del> <b>These</b> natural and historic features are of high value and need to be protected and enhanced by <del>means of improving</del> the quality of development. Proposals that show a thorough understanding of the context of the site and demonstrate how the design proposal is sympathetic to its context, reinforcing local distinctiveness and sense of place are more likely to be successful.</p> <p>6.92 <del>The Council expects issues within Policy HP13 Creating Successful Places, Policy HP14 Responding to Context, Policy HP15 Permeable and Legible Layout, Policy HP16 Building Design and Policy HP18 Designing Landscape and the Public Realm, to be positively addressed through the Design and Access Statements that accompany applications.</del> The Design and Access Statements will <b>should clearly</b> show an analysis of the site context, <b>indicating the opportunities and constraints</b>, and an explanation and justify <del>ication</del> of the principles that have informed the design rationale.</p> <p>6.101 Existing landscape features on site such as trees, ponds and built-forms of value could also be integrated in the layout to establish a sense of place and/or a sense of legibility. The incorporation of existing landscape features is particularly important to people with dementia, as familiar landmarks can serve as visual cues to aid in wayfinding.</p> <p>6.95 <del>The context of a development is the setting of a site or area, a proposal that responds positively to its context is one that will</del> <b>Proposals should</b> either enhance <b>local distinctiveness</b> it or <del>will</del> seek to introduce distinctiveness to <b>poor quality</b> <del>areas lack of character</del>. When undertaking context appraisals and <del>Design and Access Statements</del>, applicants should consider <b>and set out in the Design and Access Statement the following:</b></p> <ol style="list-style-type: none"> <li data-bbox="748 1114 1995 1219">i. the built context: providing a demonstrable appreciation of built form in the vicinity covering analyses of building style, form, height and as well as the pattern of streets and spaces, morphology, skylines and landmarks;</li> <li data-bbox="748 1230 1995 1294">ii. the environmental context: open spaces, bio-diversity structure, landscape character, areas liable to flood;</li> <li data-bbox="748 1305 1995 1417">iii. the functional context: examining the existing activities and functions in the vicinity of the site including the existing pattern of uses, economic development initiatives, health, education &amp; community facilities and public art;</li> </ol>

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			<ul style="list-style-type: none"> <li>iv. the spatial context: identifying the development site's position within the urban hierarchy;</li> <li>v. the operational context: showing how infrastructure and facilities are used and their capacity to accommodate further demands;</li> <li>vi. the community context: seeking to determine the reasonable and realisable needs and demands for space within an area and to associate these demands with the known existence of vacant or under-used space and the potential for creating new space; and</li> <li>vii. the historic context: seeking to encourage new development that respects, <b><u>incorporates</u></b> and <b><u>fits</u></b> and is informed in with <b><u>by</u></b> the character of <b><u>and</u></b> traditional historic form <b><u>of the settlement in which</u></b> of the Essex towns and villages the development will take place within.</li> </ul>
			<p>Design Considerations</p> <p>6.98 Permeable and legible layout is at the heart of good design and making successful places. Applicants are encouraged to optimis<u>z</u>e the layout, including spaces between and around buildings, to form a <b><u>legible, safe and</u></b> coherent pattern of streets and blocks. The overarching layout of a site should be informed by its context rather than technical demands of traffic.</p>
			<p>6.102 Attention should be paid to the design of the parts of a building that people most frequently see or interact with, i.e. the ground plane and its legibility, use, detailing, materials and entrances.</p> <p>6.103 New developments should be designed and managed so that online deliveries and goods deliveries can be received without causing unacceptable disturbance to residents and traffic.</p> <p>6.104 Bin storage for dry recyclables and waste should be considered in the early design stages to help improve recycling rates, reduce smell and vehicle movements, and improve street scene and community safety.</p> <p>6.116 Stimuli targeted at each of the senses (sight, scent, touch, sound and taste) should be incorporated into the landscape structure from the outset, to ensure that the development caters for people of all physical and mental abilities. This relates to both the natural, soft elements of the landscape – such as planting – and hard elements like sculptures, water features and furniture. Planning for users of all abilities and ages from the beginning can reduce the need for costly future adaptations.</p>

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			<p>6.117 The lighting of the public realm needs careful consideration to ensure it is appropriate to address safety and security issues and make night-time activity areas and access routes welcoming and safe, while also minimising light pollution.</p> <p>Insert the following paragraph after 6.117 to read:</p> <p><b><u>Trees that line new streets are considered part of the GBI of the developments and as such proposals should provide appropriate long-term maintenance of newly-planted trees throughout the life of the development, in line with Strategic Policy NE02 Green and Blue Infrastructure</u></b></p>
MM48	151	Policy HP14 Policy HP15 Policy HP16 Paragraph 6.94 – 6.106	<p><i>Delete Policy HP14 – HP16.</i></p> <p><i>Move their supporting text to support policy HP13.</i></p> <p><i>Delete paragraph 6.97, 6.99, 6.100, 6.105, 6.106.</i></p>
MM49	155-156	Policy HP17 Paragraph 6.107 - 109	<p><i>Delete Policy HP17 and supporting text paragraphs 6.107, 6.108, 6.109 as covered by heritage and flood risk policies within the Plan.</i></p>
MM50	156-158	Policy HP18 Paragraph 6.110 – 6.118	<p><i>Delete Policy HP18</i></p> <p><i>Move paragraphs 6.116, 6.117, 6.118 to support HP13</i></p> <p><i>Delete paragraphs 6.110, 6.111, 6.112, 6.113, 6.114, 6.115</i></p>
MM51	159-161	Heritage section Paragraph 6.125 Policy HP19 Paragraph 6.128 - 6.131	<p><i>Move the section on Heritage including all relevant policies and supporting text to Chapter 5.</i></p> <p><i>Amend paragraph 6.125 to read:</i></p> <p>Non-designated heritage assets can include buildings, places, lanes or areas of cultural and/or local significance, <b><u>or non-designated archaeological sites and deposits</u></b> which whilst not nationally</p>

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		Appendix 6	designated make a positive contribution to the Historic Environment and its understanding. In decision making, proposals which affect locally listed heritage assets and/or their setting, must take into account the strong requirement for their retention and the enhancement of their significance locally.
			<p><i>Amend Policy HP19 to read:</i></p> <p><b>STRATEGIC POLICY HP19-<u>BE16</u>: CONSERVATION AND ENHANCEMENT OF HISTORIC ENVIRONMENT</b></p>
			<b><u>1. All Designated Assets</u></b>
			A. <b><u>Great weight will be given to the preservation of a designated heritage asset and its setting. All development proposals that affecting a designated heritage assets, including a listed building, conservation area, registered parks and gardens, or scheduled monument, and their settings will be required to:</u></b>
			a.-i. <del>conserve, sustain and</del> <b><u>wherever possible</u></b> <del>enhance designated and non-designated heritage</del> <b><u>the significance of the</u></b> <del>assets</del> <b><u>and its settings</u></b> <del>(including views into and out of conservation areas and their settings); and be sensitively sited and integrated in accordance with advice in accordance with national policy and guidance;</del>
			b.-ii. <del>submit</del> <b><u>be supported by</u></b> a Heritage Statement providing sufficient information on the significance of the heritage asset <b><u>(according to its importance)</u></b> , the potential impacts of the proposal on their character and <b><u>significance of the asset and its</u></b> setting, <b><u>and</u></b> how <b><u>the</u></b> a proposal has been <b><u>designed</u></b> <del>modified to</del> <b><u>take these factors into account. The Statement should make an assessment of the impact of the development on the asset and its setting and the level of harm that is likely to result, if any, from the proposed development;</u></b> <del>mitigate harm; where archaeological potential is identified this should include an appropriate desk-based assessment and, where necessary, a field evaluation; and</del>
			c.-iii. <del>provide clear justification for any works that would lead to</del> <b><u>any</u></b> <del>harm or substantial harm to</del> <b><u>the</u></b> <del>a</del> heritage asset through detailed analysis.

MM Ref	Page	Policy / para.	Proposed modifications
			B. Proposals that make sensitive <b>and appropriate</b> use of heritage assets, particularly where these bring redundant or under used buildings or <b>buildings</b> areas, especially any on <b>the English Heritage's at At Risk Register</b> , into appropriate use consistent with their conservation status will be <b>supported</b> encouraged.
			C. <del>When considering proposals for development that affect non-designated heritage assets the Council will take into account the scale of any harm or loss and the significance of the heritage asset as set out in accordance with national policy and guidance.</del> <b><u>Proposals designed to enhance an asset and/or its setting and which reinforce its significance and contribution to the character of an area will be supported.</u></b>
			<b><u>D.</u></b> <b><u>Development proposals that would be likely to cause either less than substantial or substantial harm to, or loss or partial loss of, a designated asset or its setting will be assessed in accordance with the statutory framework and national planning policy.</u></b>
			<b><u>E.</u></b> <b><u>Where a proposed development involves the loss or partial loss of a designated asset, applicants will be required to record and advance understanding of the asset in a manner proportionate to its importance and the impact which will be caused.</u></b>
			<b><u>2.</u></b> <b><u>Conservation Areas</u></b>
			<b><u>In addition to satisfying the relevant criteria in 1 above:</u></b>
			<b><u>i</u></b> <b><u>permission for proposals which involve the demolition or partial demolition of a building in a conservation area will only be granted subject to a condition and/or a planning obligation (as appropriate) that no demolition will take place until an enforceable contract has been let for the carrying out of the new development.</u></b>
			<b><u>ii.</u></b> <b><u>development will be permitted in a conservation area where the siting, design and scale of the proposed development would preserve or enhance its character or appearance and important views into and out of the area are preserved or enhanced.</u></b>

MM Ref	Page	Policy / para.	Proposed modifications
			<p><b><u>3. Non-Designated Heritage Assets</u></b></p> <p><u>Development proposals that affect non-designated heritage assets and their settings, including protected lanes, should seek to preserve and wherever possible enhance the asset and its setting. When considering proposals which are likely to cause harm to such an asset consideration will be given to:</u></p>
			<p><b><u>i. the significance of the asset and its setting; and</u></b></p> <p><b><u>ii. the extent to which the scale of any harm or loss harm has been minimised.</u></b></p>
			<p><b><u>4. Specific Requirements</u></b></p> <p><u>Specific requirements in relation to particular heritage assets identified in housing allocation policies should be read alongside the overarching requirements of this policy.</u></p>
			<p><i>Insert additional paragraphs before paragraph 6.128 to read:</i></p> <p><b><u>Historic Records</u></b></p> <p><u>All development proposals should be based on a full understanding of the significance of heritage assets, both within the proposed development site and within the surrounding area. This should be established by reference to relevant and available sources of historic environment information. Heritage assets are depicted on the Policies Map, however applicants are advised to consult the Essex Historic Environmental Record held by Essex County Council as well as any records held by Historic England and other sources to ensure the most up to date records are reviewed before submitting an application. It is also advised that early engagement is sought with the Council’s Historic Buildings Advisor through pre-application consultation.</u></p> <p><u>The Council recognise that on occasion heritage assets are not always documented of fully understood and could be identified through the development process; for example revealed by local groups through the consultation process or during preliminary site investigations undertaken by an applicant. In these circumstances the Council expect a positive approach to ensure the significance of these non-designated heritage assets are appropriately conserved and enhanced.</u></p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p><i>Amend paragraph 6.128 and insert new paragraph after to read:</i></p> <p><b><u>Heritage Statement</u></b></p> <p>6.128. <b><u>All development proposals that are likely to have an impact on a heritage asset or its setting must be accompanied by a</u></b> Heritage Statement that <del>When submitting planning applications, applicants are required to</del> <b><u>clearly</u></b> describes the significance <b><u>of both the</u></b> heritage assets and <b><u>the setting</u></b> as well as <b><u>proportionately</u></b> and <b><u>assesses how the proposal impacts upon it, in relation to its</u></b> form, fabric, setting, <b><u>architectural or historic relevance.</u></b> The level of detail needed should be proportionate to the scale and nature of the proposal and the importance of the asset itself. <del>affected, together with a-</del> <b><u>A</u></b> schedule of works <b><u>should be included.</u></b> <del>analysing the impact of the proposal on the form, fabric and setting of the heritage asset and any features of historic or architectural interest. As a minimum the relevant historic environment record should have been consulted and the heritage assets assessed, using</del></p> <p><b><u>The Council advise that applicants seek advice from specialist historic environment consultants where necessary, to carry out appropriate assessments.</u></b> <del>appropriate expertise where necessary.</del></p> <p><b><u>In respect of the loss of any asset the Council will require applicants to record the significance of any asset to be lost in a manner proportionate to its importance and the impact. The applicant should deposit such evidence to the Essex Historic Environment Record.</u></b></p> <p><i>Delete paragraphs 6.129 to 6.131</i></p> <p><i>Amend definition of 'Heritage Asset' in Appendix 6 - Glossary as follows:</i></p> <p><del>Any structure, building, system facility and/or provision required by an area for its social and/or economic function and/or wellbeing including (but not exclusively): footways, cycleways and highways; public transport; drainage, SuDs and flood protection; waste recycling facilities; education and childcare; healthcare; sports, leisure and recreation facilities; community and social facilities; cultural facilities, including public art; emergency services; green infrastructure; open space; affordable housing; live/work units and lifetime homes; broadband and facilities for specific sections of the community such as youth or the elderly.</del></p> <p><b><u>A building, monument, site, place, area or landscape identified as having a degree of significance meriting consideration in planning decisions, because of its heritage interest.</u></b></p>

MM Ref	Page	Policy / para.	Proposed modifications
			<u>Heritage assets include designated heritage assets and assets identified by the local planning authority (including local listing).</u>
MM52	161-163	Policy HP20	Delete Policy HP20 Retain paragraph 6.132 to 6.139 to support Policy HP19 (now BE16)
MM53	161-163	Policy HP21 Paragraph 6.141 Paragraph 6.144	Delete Policy HP21 and paragraph 6.141 Retain paragraph 6.140, 6.142 to 6.144 to support Policy HP19 (now BE16) Amend paragraph 6.144 to read: 6.144 In order to ensure a high standard of design and materials, outline applications will <b>not</b> be accepted.
MM54	164-167	Policy HP22 Paragraph 6.151 Paragraph 6.152	Delete Policy HP22 Retain paragraphs 6.145 to 6.152 and Figure 6.5 to support Policy HP19 (now BE16) Amend paragraph 6.151 to read: 6.151 <del>In line with other policies within the Local Plan,</del> <b>M</b> aterial increases in motorised traffic using a Protected Lane due to development proposals must be assessed and action/infrastructure to influence user behaviour and encourage more sustainable modes of transport, will be required. <b><u>Any proposals that would have a materially adverse impact on the physical appearance of Protected Lanes or generate traffic of a type or amount inappropriate for the traditional landscape and nature conservation character of a Protected Lane, will not be permitted.</u></b> Retain paragraph 6.152 and insert new paragraphs after to read: <b><u>Mitigating Impacts</u></b> <b><u>The heritage environment should be considered as an integral component of Brentwood's public realm and contribute positively to maintaining sustainable communities and must therefore, meaningfully inform the design of development. Any harm to, or loss of, the significance of a designated heritage asset (from its alteration or destruction, or from development within its setting), requires clear and convincing justification. Applicants are expected to demonstrate how the heritage assessment (as documented in the Heritage</u></b>



MM Ref	Page	Policy / para.	Proposed modifications
			<p><u>Statement) has appropriately informed and guided the design of the proposal to ensure they do not impact the architectural details and qualities of the asset. Proposals should be of the highest architectural and urban design quality, having regard to and respecting local character and other policies in this plan. Development proposals that appropriately preserve or help to better reveal and enhance heritage assets and their setting will be supported.</u></p> <p><u>Heritage-led Regeneration</u></p> <p><u>A Heritage at Risk programme has been implemented by Historic England. It protects and manages the historic environment so the number of ‘at risk’ historic places and sites across England is reduced. The Heritage at Risk Register identifies those sites that are most at risk of being lost as a result of neglect, decay or inappropriate development. Proposals which seek to bring such assets back into appropriate use and help revitalise neighbourhoods in accordance with national policy will be supported.</u></p>
MM55	167-168	Policy HP23 Paragraphs 6.156 – 6.158	<p><i>Delete Policy HP23.</i></p> <p><i>Move paragraphs 6.153 to 6.158 to support policy HP19 (now BE16), amend paragraph 6.156 as follows:</i></p> <p>6.156 As a finite and non-renewable resource, archaeology can become highly fragile and vulnerable to damage or destruction. The Council will <b><u>need to be satisfied by the applicant that the significance of the archaeological remains adopt a presumption against proposals which would harm the setting of archaeological remains</u></b> of national or local importance, whether scheduled or not, <b><u>are conserved.</u></b></p>

## Chapter 7

MM Ref	Page	Policy / para.	Proposed modifications																														
MM56	172	Policy PC01 Paragraph 7.6-7.12	<i>Delete Policy PC01 and transfer its content to the supporting text</i>  <i>Delete paragraph 7.6-7.12.</i>																														
MM57	174	Policy PC02	<i>Delete Policy PC02 as this is proposed to merge with Policy SP02 (now MG01). Move paragraph 7.13 to support Policy MG01</i>  <i>Retain the remaining supporting text and amend as below.</i>																														
	176	Paragraph 7.13 Figure 7.4 Figure 7.5 Paragraph 7.19-7.20																															
			<i>Amend Figure 7.4 as follows:</i>																														
<table border="1"> <thead> <tr> <th colspan="5">Employment Land (ha)</th> </tr> <tr> <th>Uses</th> <th>Scenario A: Experian</th> <th>Scenario B: EEFM</th> <th>Scenario C: OAN (380)</th> <th>Scenario D: Past rates</th> </tr> </thead> <tbody> <tr> <td>Offices (<del>B1a/b</del>)</td> <td>9.4</td> <td>7.7</td> <td>5.6</td> <td>0.4</td> </tr> <tr> <td>Manufacturing (<u>coming within classes E and B1c/B2</u>)</td> <td>4.4</td> <td>0.1</td> <td>3.1</td> <td>3.5</td> </tr> <tr> <td>Warehousing (B8)</td> <td>6.5</td> <td>0.7</td> <td>4.4</td> <td>4.2</td> </tr> <tr> <td>Total</td> <td>20.3</td> <td>8.5</td> <td>13.1</td> <td>8.1</td> </tr> </tbody> </table>				Employment Land (ha)					Uses	Scenario A: Experian	Scenario B: EEFM	Scenario C: OAN (380)	Scenario D: Past rates	Offices ( <del>B1a/b</del> )	9.4	7.7	5.6	0.4	Manufacturing ( <u>coming within classes E and B1c/B2</u> )	4.4	0.1	3.1	3.5	Warehousing (B8)	6.5	0.7	4.4	4.2	Total	20.3	8.5	13.1	8.1
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MM Ref	Page	Policy / para.	Proposed modifications
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*Amend Figure 7.5 as follows:*

New Requirements	(ha)
Forecast requirement for employment land <b>for the specified employment uses above</b> ( <del>B-Class Uses</del> )	+ 8.1 ha to 20.3 ha
Forecast loss of employment land by re-allocations for other uses	+ 21.01 ha
Forecast loss of existing employment allocations through structural change, changes in allocation threshold and permitted development	+ 4.65 ha
<b>Combined Requirement</b>	<b>33.76 ha to 45.96 ha</b>

*Amend paragraph 7.19 as follows:*

iii. ....This loss of employment space equates to ~~about 4.6~~ 9.3 ha.

iv. These elements combined result in a total additional land requirement range from ~~33.76~~ 38.41 to ~~45.96~~ 50.61 to ha .

*Amend paragraph 7.20 to read:*

Overall a total of circa ~~47.39~~ **46.64** ha of new employment land is proposed to be allocated, **in addition to existing commitments**. It should be noted that ~~suggested employment allocations exceed requirements~~. At a high level, the amount of employment land allocations is broadly sufficient to ensure that the Council meets its overall forecast employment land needs (~~forecast new needs and losses from~~

MM Ref	Page	Policy / para.	Proposed modifications
			allocations and structural change) <u>up to 2033</u> . It is also recognised that the future restructuring of employment sites and businesses may change floorspace requirements.
MM58	177-182	Policy PC03 Supporting text Figure 7.6 Paragraph 7.22b Paragraph 7.24 Paragraph 7.27	<p><i>Amend Policy PC03 to read:</i></p> <p><b><u>STRATEGIC</u> POLICY PC03 <u>PC01: SAFEGUARDING</u> EMPLOYMENT LAND ALLOCATIONS</b></p> <p><b><u>A.</u></b> <b><u>In order to maintain sufficient employment land supply to meet identified needs, w</u></b>Within those areas allocated <b><u>designated</u></b> for general employment and office development, set out in Figure 7.6 and <b><u>as shown</u></b> on the Brentwood Policies Map, the Council will seek to achieve and retain a wide range of employment opportunities. <b><u>only approve R</u></b>redevelopment <b><u>proposals</u></b> or change of use of business, office, general industry and distribution for non-B-class uses will only be permitted where <b><u>from offices, light industrial, research and development (within Class E), B2, B8 or sui generis employment uses to non-employment uses where one or more of the following criteria apply:</u></b></p> <p>a. the proposal is for employment generating sui generis uses or other <b><u>ancillary</u></b> 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 B-class uses <b><u>reasonable prospect for the site to be used for the above purposes; or</u></b></p> <p>b. the proposal is wholly for affordable housing, the site is vacant, and development would not prejudice continuation of adjacent employment uses;</p> <p>e. <b><u>b.</u></b> the proposal is for any other use and the application is supported by <b><u>reliable evidence</u></b> a statement of <b><u>reasonable</u></b> efforts made to secure re-use for class B1-B8 or similar <b><u>for all of the above</u></b> uses and other <b><u>including ancillary non-residential</u></b> uses that provides employment <b><u>and</u></b>, which evidence demonstrates there is no realistic prospect of the site or buildings being used or re-used <b><u>for these purposes in their own right or</u></b>, including through refurbishment, adaptation, <b><u>subdivision</u></b> or redevelopment., <del>for these purposes; or</del></p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p>d. <del>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.</del></p> <p><b><u>B.</u></b> <b><u>Development proposals (including the redevelopment of existing developed areas) on designated employment land within the Green Belt will be considered in line with national and local green belt policy.</u></b></p>
			<p><i>Add the following supporting paragraphs immediately after Policy PC01:</i></p> <p><b><u>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, identified on the Policies Map and Appendix 2, the presumption is that employment uses and 'sui generis' uses of a similar employment nature will be retained, and that proposals entailing loss of employment premises and sites without replacement will be resisted.</u></b></p> <p><b><u>To enable flexibility for business operation, it is recognised that complementary and ancillary uses to support employment uses can be appropriate where they provide employment, adding to the character, mix and vitality of the area. As offices, research and development and light industrial uses are now falling under use class E together with retail and other main town centre uses, this may result in unintended consequence where they can either individually, or collectively, harm other policy objectives of the Local Plan including the objective to protect the retail function of Brentwood Town Centre and other designated centres. A proliferation of retail uses therefore will be resisted, with the exception of small scale proposals (in terms of floorspace) and it being ancillary in nature by supplementing the predominant employment offering within the employment area. It may be necessary to impose planning conditions to restrict movement within use class E as necessary, a judgement will be made on a case by case basis. The scale of new employment allocations and acceptable uses are set out in the relevant site allocation policies.</u></b></p>

Delete the table in Figure 7.6 and replace with the following:

<u>Site Ref</u>	<u>Site Name</u>	<u>Indicative employment area (ha)</u>
<u>111</u>	<u>Upminster Trading Park</u>	<u>2.6</u>
<u>228</u>	<u>Peri Site, Warley Street, Great Warley</u>	<u>5.36</u>
<u>E02</u>	<u>Brook Street Employment Area</u>	<u>1.25</u>
<u>E03</u>	<u>BT Offices, London Road, Brentwood</u>	<u>3.5</u>
<u>E04</u>	<u>Hubert Road Industrial Estate</u>	<u>3.78</u>
<u>E05</u>	<u>Warley Hill Business Park (excl. Regus)</u>	<u>2.5</u>
<u>E06</u>	<u>OCE offices, Chatham Way, Brentwood</u>	<u>0.45</u>
<u>E07</u>	<u>Hutton Industrial Estate</u>	<u>10.48</u>

MM Ref	Page	Policy / para.	Proposed modifications	
			<u>E08</u>	<u>Land adjacent to Ingatestone by-pass (part bounded by Roman Road)</u> <u>1.6</u>
			<u>E09</u>	<u>Hallsford Bridge Industrial Estate</u> <u>3.41</u>
			<u>E10</u>	<u>Land at Codham Hall</u> <u>9.62</u>
			<u>E11</u>	<u>Brentwood Enterprise Park (M25 Junction 29 works)</u> <u>25.85</u>
			<u>E12</u>	<u>Childerditch Industrial Estate</u> <u>20.54</u>
			<u>E13</u>	<u>Land at East Horndon Hall</u> <u>5.5</u>
			<u>Part of R01</u>	<u>Dunton Hills Garden Village Strategic Allocation</u> <u>5.5</u>
			<u>Part of R02</u>	<u>West Horndon Industrial Estate</u> <u>2.0</u>
			<u>Part of R03</u>	<u>North of A1023</u> <u>2.0</u>
			<u>Part of R05</u>	<u>Ford Offices and Council Depot</u> <u>2.0</u>
			<u>Total:</u>	<u>107.94</u>

MM Ref	Page	Policy / para.	Proposed modifications
			<p>Figure 7.6: <u>Designated</u> Employment Site Allocations <u>Land and Indicative Site Areas</u></p> <p><i>Amend paragraph 7.22 b. to read:</i></p> <p>b. period during which it has been actively marketed for such purposes, which includes the possibility of redevelopment and provides evidence (not normally less than 24 months). Evidence should show where the property has been publicly marketed including publications and property journals as well as clear advertisement on site;</p> <p><i>Amend paragraph 7.24 to read:</i></p> <p>The proposed land at Brentwood Enterprise Park and land south of East Horndon Hall will accommodate mixed <b>office, light industrial and research and development and B-uses</b>. The excellent access onto the strategic highway network, makes them a very desirable place for certain businesses. In addition, the size of Brentwood Enterprise Park provides benefits by way of supplying for a large amount of employment need while bringing along new infrastructure and supporting services. Brentwood Enterprise Park will provide an opportunity for high-end modern premises at a key gateway to the borough and into Essex. Appropriate accompanying uses will be considered appropriate where these meet local needs, such as hotel and associated restaurant options. Retail will not be considered appropriate, in line with the retail strategy and sequential approach. Specific site policies for the Enterprise Park are within Policy E11, in Chapter 9.</p> <p><i>Amend paragraph 7.26 to read:</i></p> <p>The potential relocation of industrial activities from London could create additional demand for <b>offices, light industrial, research and development, and B1C/B2 and B8</b> premises in wider South East local authorities. Brentwood is well located to take advantage if firms do relocate outside of London. <del>New B1C/B2 and B8 premises would be required to take advantage of relocation, given the borough's existing small stock.</del> Delivery of the Brentwood Enterprise Park could provide a significant area of the floorspace that meets the needs of relocating businesses<sup>4</sup>.</p> <p><i>Amend paragraph 7.27 to read:</i></p>



MM Ref	Page	Policy / para.	Proposed modifications
			The Economic Futures report (2018) indicates that in terms of other 'B uses' for example - manufacturing (B1C/B2) and warehousing / logistics <u>uses</u> , (B8) the portfolio of sites put forward is likely to be attractive to the market and provide a sufficient range and high-quality offer.
MM59	181	Policy PC04 Paragraph 7.32	<i>Delete Policy PC04 and supporting text.</i>
MM60	182 - 184	Policy PC05 Paragraph 7.34 – 7.35	<i>Delete Policy PC05 and supporting text.</i>
MM61	183- 184	Policy PC06 Paragraph 7.38 - 7.41	<p><i>Amend Policy PC06 to read:</i></p> <p>POLICY <del>PC06</del> <b>PC02</b>: SUPPORTING THE RURAL ECONOMY</p> <p>The Council will promote a sustainable rural economy by supporting appropriate, small scale rural enterprise. The Council will seek to retain Class B uses or other 'sui generis' uses of a similar employment nature. Proposals to diversify the range of economic activities on a farm or in a rural area will be supported where proposals: <b><u>do not comprise retail uses unless they are of a limited nature, small-scale and intended to support the farming enterprise. This is subject to compliance with green belt policy where relevant.</u></b></p> <p><i>Delete criteria a-h</i></p>
			<p><i>Amend second sentence of paragraph 7.37 to read:</i></p> <p>These might include converting redundant barns for B1-business <b>office</b> use or workshops, storage, farm shops, bed and breakfast, energy crops, or acceptable sport and leisure uses like campsites.</p>

MM Ref	Page	Policy / para.	Proposed modifications
			Delete paragraphs 7.38, 7.39, 7.40, 7.41.
MM62	185 - 186	Policy PC07 Paragraph 7.47 Paragraph 7.48 Paragraph 7.50 – 7.53	<p>Amend Policy PC07 to read:</p> <p><b><u>STRATEGIC</u></b> Policy PC0307: Retail and Commercial Leisure Growth</p> <p><del>Provision is made for 4,844 square metres (net) of comparison retail floorspace and 3,833 square metres (net) of convenience floorspace to be provided in the borough over the plan period.</del></p> <p><b><u>In order to meet identified retail floorspace needs as set out in Policy MG01, retail floorspace will be provided on the following sites as part of mixed-use development:</u></b></p> <p><b><u>a. Dunton Hills Garden Village (R01);</u></b></p> <p><b><u>b. Land at West Horndon Industrial Estate (R02);</u></b></p> <p><b><u>c. William Hunter Way Car Park (R14);</u></b></p> <p><b><u>d. Wates Way Industrial Estate (R15).</u></b></p> <p>Amend paragraph 7.47 to read:</p> <p>The principles <b><u>Paragraph 86</u></b> of the NPPF states <del>that the Council's policy approach should aim to at least fully meet retail needs</del> <b><u>in meeting anticipated needs for retail, leisure, office and other main town centre uses, planning polices should look at least ten years ahead</u></b>, so that the local economy is not constrained, and potential investment is not diverted elsewhere or lost.</p> <p>Amend paragraph 7.48 to read:</p> <p>The Council is required to positively promote competitive town centre environments and manage their</p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p>growth. It is important to provide for Retail, Commercial and Leisure uses that are appropriate and realistic to the role of centres in the borough's settlement hierarchy, set out in <del>Policy SP02 Managing Growth</del> <b>Figure 2.3</b>, and the retail hierarchy, set out in <b>STRATGIC Policy PC08 PC04</b> Retail Hierarchy of Designated Centres. These should be based on the current state of centres and opportunities to meet development needs in full. In this regard, meeting retail needs and planning for the future of town and district centres are intrinsically linked.</p> <p><i>Amend paragraph 7.50 to read:</i></p> <p><del>Short to medium</del> <b>Medium</b> term capacity figures up to <del>2020</del> <b>2028</b> suggest a surplus of available convenience goods expenditure could support an additional <del>4,061</del> <b>2,454</b>-sqm net (<del>5,801</del> <b>3,074</b> sqm gross), primarily concentrated in Brentwood Town Centre <b>and in new centres proposed at West Horndon and Dunton Hills</b>. In the long term, surplus expenditure at 2033 could support <del>4,438</del> <b>3,833</b> sqm net (<del>6,339</del> <b>5,475</b> sqm gross) in the borough as a whole.</p> <p><i>Amend paragraph 7.51 to read:</i></p> <p>For comparison goods, the surplus expenditure could support an additional <del>972</del> <b>4,493</b> sqm net (<del>1,296</del> <b>4,594</b>sqm gross) by 2028 across the borough. The surplus expenditure at 2033 could support <del>1,604</del> <b>4,844</b> sqm net (<del>2,139</del> <b>6,458</b> sqm gross). The vast majority of this surplus is for Brentwood Town Centre <b>and new centres proposed at West Horndon and Dunton Hills</b>, with very limited amount identified for the rest of the borough.</p> <p><i>Amend paragraph 7.52 to read:</i></p> <p>There is also requirement for <del>2,286</del> <b>2,954</b>sqm gross of food and drink (<b>pubs, bars, restaurants and takeaway</b>) (A3-A5) floorspace and <del>1,196</del> <b>4,654</b>-sqm gross of other <b>non-retail (including commercial leisure)</b> class A1 services up to <del>2030</del> <b>2033</b> <b>primarily concentrated in Brentwood Town Centre and in new centres proposed at West Horndon and Dunton Hills</b>. <del>No specific provision is made for these uses as these needs can be met through the planning application process in line with other policies in the Plan.</del></p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p><i>Amend paragraph 7.53 to read:</i></p> <p><del>As available sites in Brentwood cannot accommodate full</del> <b>The identified</b> retail floorspace needs, <del>the remaining amount of retail floorspace would need to be allocated in smaller</del> <b>would be met via windfall development in the</b> Designated Centres or strategic residential allocations <b>as well as provision of retail floorspace as part of development proposals on the following sites:</b></p> <p><b><u>a. Site R01: Dunton Hills Garden Village</u></b></p> <p><b><u>b. Site R02: West Horndon Industrial Estate</u></b></p> <p><b><u>c. Site R14: William Hunter Way Car Park</u></b></p> <p><b><u>d. Site R15: Wates Way Industrial Estate</u></b></p> <p><del>Residential-led allocations creating new and improved village centres at Dunton Hills and West Horndon will contribute to the borough's remaining local retail needs. New retail floorspace will serve the local community and Residential-led mixed use development at West Horndon will provide the opportunity to create an improved village centre near to the railway station. This will include new retail floorspace to serve the village and local area. This will need to complement rather than compete directly with the existing local shops.</del></p>
MM63	187-189	Policy PC08 Figure 7.7 Footnote 10 Footnote 11	<p><i>Amend policy name to read:</i></p> <p><b><u>STRATEGIC POLICY PC08 PC04: RETAIL HIERARCHY OF DESIGNATED CENTRES</u></b></p> <p><i>Amend part A and part F of Policy PC08 (now Policy PC04) including moving Figure 7.7 of the supporting text into the policy as follows:</i></p> <p>A. The Council will promote the continued roles and functions of the Designated Centres to positively contribute towards their viability, vitality, character and structure. The following <del>Designated</del> centres and <b><u>their associated</u></b> Primary Shopping Area, <b><u>as</u></b> are detailed in Figure 7.7 and shown on the Brentwood Policies Map, <b><u>are designated for retail, leisure and other main town centres uses.</u></b></p>

Designated Centres	Primary Shopping Area
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### Town Centre

The principal market town of Brentwood Borough that provides a wide range of social, cultural and economic facilities and services for local residents as well as visitors. The Town Centre must have good access to major roads and public transport links and benefits from a high quality retail environment. A Town Centre is often the principal centre(s) in a local council area. In rural areas, they are likely to be market towns or other centres of similar size and role which provide a range of facilities and services.

Brentwood Town Centre	Brentwood High Street
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### District Shopping Centres

~~District Shopping Centres usually comprise g~~ Groups of shops often containing at least one supermarket or superstore, and a range of non-retail services, such as banks, building societies, and restaurants, as well as local public facilities such as a library.

Shenfield Hutton Road	Hutton Road
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Warley Hill	n/a
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Ingatestone High Street	Ingatestone High Street
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The main service centre of Dunton Hills Garden Village (DHGV) <sup>10</sup>	<del>(to be informed by the South Brentwood Growth Corridor Masterplan)</del> <b>to be considered by the future Local Plan review <sup>10</sup></b>
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MM Ref	Page	Policy / para.	Proposed modifications
			<p><b>Local Centres</b></p> <p>Local Centres usually include a <b>A</b> range of small shops of a local nature, serving a small catchment. Typically, Local Centres might include, amongst others, shops, a small supermarket, a newsagent, a sub-post office and a pharmacy. Other facilities could include a hot food takeaway and a laundrette.</p>
			<p>West Horndon Village Centre</p> <p>n/a</p> <p>Blackmore Village Centre</p> <p>245-267 Ongar Road</p> <p>Brook Street Post Office</p> <p>Church Lane</p> <p>Doddinghurst Post Office, Doddinghurst Road</p> <p>Herongate Post Office, Brentwood Road</p> <p>1-23 Eastham Crescent</p> <p>200-216 Rayleigh Road</p> <p>60-74 Woodland Avenue</p> <p>Hanging Hill Lane Post Office, Hanging Hill Lane</p> <p>Blackmore Road</p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p>Kelvedon Common Post Office, Church Road</p> <p>Danes Way/Hatch Road</p> <p>2-8 Harewood Road</p> <p>245-267 Ongar Road</p> <p>Stondon Post Office, Ongar Road</p> <p>The Keys, Eagle Way</p> <p><b><u>The two neighbourhood hubs at Dunton Hills Garden village</u></b> <sup>10</sup></p>
			<p><i>Amend part F of Policy PC08 to read:</i></p>
		F.	<p>Any retail <b>and leisure</b> developments proposed outside these centres must be subject to a retail impact assessment, where the proposed gross floorspace is greater than 2,500 sqm. A retail impact assessment may be required below this threshold where a proposal could have a cumulative impact or an impact on the role or <del>health</del> <b>vitality</b> of nearby centres within the catchment of the proposal:</p>
			<p><i>Amend footnote 10 to read:</i></p> <p>The <b>boundary</b> designation of DHGV service centre(s) as a District Shopping Centre and/or <b>two</b> Local Centre(s) and any subsequent Primary Shopping Area <b>within its District Shopping Centre</b> will be informed by the South Brentwood Masterplan and further retail evidence. <b><u>considered as part of the future Local Plan review.</u></b></p> <p><i>Delete footnote 11 which reads:</i></p> <p><del>Please note the retail hierarchy could be updated as development come forward and as part of future Local Plan review.</del></p>

MM Ref	Page	Policy / para.	Proposed modifications
MM64	191	Policy PC09 Paragraph 7.60	<p><i>Amend Policy to read:</i></p> <p><i>Policy <del>PC09</del> <b>PC05</b>: Brentwood Town Centre</i></p>
			<p>A. The Council will <b>require development to</b> conserve the positive qualities of Brentwood Town Centre while enhancing and improving negative aspects of function and appearance <b>where relevant</b>.</p>
			<p><del>B.</del> Development in the Town Centre should contribute to the Council's aim of improving the capacity and quality of the public realm throughout Brentwood Town Centre, contribute to a vibrant High Street and the surrounding Conservation Area in line with the Town Centre Design Guide <b>SPD</b>.</p>
			<p><del>C.</del> <b>B.</b> Shopfronts and signage have significant impacts on its surroundings therefore proposals are required to incorporate high quality, attractive shopfronts that enhance the street scene, in line with the Council's adopted Town Centre Shopfront Guidance SPD.</p>
			<p><del>D.</del> <del>Where necessary, design must incorporate technology and property management, parking and traffic movement mitigations to reduce congestion.</del></p>
			<p><b>C.</b> Chapel Ruins, Baytree Centre and South Street areas; <del>E.</del> This area provides a link to strategic sites on the High Street therefore improving its permeability and integration into the wider public realm network will create a more welcoming and flexible space at the heart of the Town Centre, enable its historical settings to be celebrated. Proposals should <del>demonstrate how they:</del></p>
			<p>a. contribute to the enhancement of public realm around Chapel Ruins and the Conservation Area, retain and enhance their significance and character;</p>
			<p>b. complement the retail function and maintain or add to the vitality, viability and diversity of the Town Centre, by means such as mixed-use schemes that include retail, leisure and residential;</p>



MM Ref	Page	Policy / para.	Proposed modifications
			<p>c. facilitate safe and pleasant pedestrian movement through improved alleyways, lighting, wayfinding and landscaping; and</p>
			<p>d. assist in uplifting and transforming the Baytree Centre and integrate it with the other parts of the Town Centre.</p> <p><u>D.</u> William Hunter Way, Chatham Way Car Park and Crown Street; <del>F.</del> The Council will work with developers and partners to improve the public realm links in these areas, and through the redevelopment of the car parks, create a mixed-use scheme to provide new residential, retail, flexible working space and commercial floorspace. <del>G.</del> Proposals in these areas should demonstrate how they:</p>
			<p>a. contribute to the improvements to frontages and public realm through landscaping and redevelopment;</p>
			<p>b. provide additional shopfronts and double fronted shops, if development involves the rear of premises on the north side of the High Street;</p>
			<p>c. facilitate safe and pleasant pedestrian movement through improved alleyways lighting, wayfinding and landscaping; and</p>
			<p><del>d. re-provide an appropriate quantum of parking, ensure that parking is well designed and integrated into the public realm.</del></p> <p><u>E.</u> Linkages to Brentwood station; <del>H.</del> Improvements to the rail service to London will increase Brentwood Town Centre’s regional public transport accessibility. The Council will seek to enhance public realm and way finding around Brentwood station, foster a stronger sense of place and sense of arrival, improve the linkages from the Town Centre to the station, with Kings Road being the primary focus. <del>I.</del> Proposals should demonstrate how they:</p>

MM Ref	Page	Policy / para.	Proposed modifications
			a. contribute to the enhancement of public realm around Brentwood station, Kings Road and Kings Road junction through design, landscaping and redevelopment;
			b. facilitate safe and convenient traffic movement with priority given to <b>passenger transport</b> , pedestrians and cyclists, by means such as improved junctions, cycle paths, lighting and wayfinding;
			c. add to the vitality and vibrancy of the Town Centre by providing an appropriate mix and balance of uses including residential, employment, commercial and amenity spaces; and
			d. <del>provide an appropriate quantum of parking, whilst ensure that parking is well designed and integrated into the public realm.</del>
MM65	195	Policy PC10	<i>Amend Policy to read:</i>
	196	Paragraph 7.72	POLICY <del>PC10</del> <b>PC06</b> : MIXED USE DEVELOPMENT IN DESIGNATED CENTRES
		Paragraph 7.73	Within the boundary of Designated Centres as set out in Policy PC <del>0408</del> Retail Hierarchy of Designated Centres and defined on the Brentwood Policies Map:
		Paragraph 7.75	A. Mixed use development will be supported if it:
			a. is in proportion to the scale and function of the centre;
			b. contains an appropriate mix of ground floor uses; and
			c. makes efficient use of the site and is considered to be of sufficient density.

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			<p>B. Proposals resulting in the loss of <b>main town</b> centre uses at ground floor level to non-centre uses, as defined in Figure 7.8, which results in an unacceptable mix of uses will not be permitted. <b><u>Proposals resulting in the loss of main town centre uses at ground floor must demonstrate that:</u></b></p>
			<p>a. <b><u>the use is no longer viable, by evidence of active marketing to the public for at least 12 months, showing that the premises are not reasonably capable of being used or redeveloped for a main town centre use; and</u></b></p>
			<p>b. <b><u>development would not result in 3 or more adjacent non-centre use units.</u></b></p>
			<p>C. Non-retail development that are classed as <b>main town</b> centre uses, as defined in Figure 7.8, should:</p>
			<p>a. complement the retail <b>and service</b> function and maintain or add to the vitality, viability and diversity of the centre;</p>
			<p>b. <b>provide</b> provision is made for an active frontage, such as a window display, which is in keeping with the character of the shopping area;</p>
			<p>c. <del>would</del> not give rise to a detrimental effect, individually or cumulatively, on the character or amenity of the area through smell, litter, noise or traffic problems; and</p>
			<p>d. <del>proposals for new hot food takeaways (use class A5) within 400m walking distance from the entrance points of primary or secondary schools will be restricted in order to promote the health and well-being of school pupils. Exceptions will apply to Primary Shopping Areas within this 400m buffer zone. Hours of opening will be limited to after 5pm on school days and lunch time opening will only be permitted where schools within 400m do not allow pupils to freely leave school premises during lunch breaks.</del></p>

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			<p>D. Changes of use from <b>retail class E</b> to another <b>main town</b> centre use as set out in Figure 7.8 will only be permitted where the development would satisfy the above criteria and retain an appropriate mix and balance of uses which will provide for the needs of local residents.</p>
			<p>E. Proposals for separate units of retail, offices, leisure, cultural, community facilities and residential on upper floors are supported provided that the use would have a safe and convenient access, a separate refuse and recycling store, and would not inhibit the functioning of the ground floor use. <b>Main town centre</b> uses and employment uses should be given priority over residential uses unless it can be demonstrated that this would lead to an imbalance of uses.</p> <p><i>Amend paragraph 7.72 to read:</i></p> <p>Too great a concentration of non-retail <b>centre</b> uses can undermine the primary role of the Designated Centres for <b>as the main locations for retailing retail, leisure and business uses</b>, 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 <b>therefore</b> important to consider <b>their</b> location and siting and ensure incorporation of window displays to overcome potential problems associated with the creation of 'dead frontages'.</p> <p><i>Amend paragraph 7.73 to read:</i></p> <p>Policy <del>PC10</del> <b>PC06</b> is written in the context of the need to retain retail <b>a mix of appropriate uses</b> for the benefit of a centre, but it is also recognised that the transition to online shopping and a high number of vacant units are damaging their vitality. For this reason, changes in shopping trends and technology need to be taken into account as part of future development assessment.</p> <p><i>Delete paragraph 7.75</i></p>
MM66	197	Policy PC11	<p><i>Amend Policy to read:</i></p> <p>POLICY <del>PC14</del> <b>PC07</b>: PRIMARY SHOPPING AREAS</p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p>A. Retail use should remain the predominant use in Primary Shopping Areas as set out in Policy PC0408 Retail Hierarchy of Designated Centres, and defined on the Brentwood Policies Map. <del>B.</del> Proposed retail development <b>should</b> will be supported if they:</p>
			<p>a. contribute to the area's attractiveness, accessibility and vibrancy by adding to or providing a range of shops to meet local needs, including opportunities for small, independent shops;</p>
			<p>b. <del>would</del> not result in subdivision of an existing large retail unit;</p>
			<p>c. be fully integrated with the existing shopping area; and</p>
			<p>d. facilitate safe, convenient and pleasant pedestrian movement through improved lighting and landscaping.</p>
			<p><del>C. Proposals resulting in the loss of retail uses at ground floor must demonstrate that:—</del></p>
			<p>a. <del>the use is no longer viable, by evidence of active marketing to the public for at least 12 months, showing that the premises are not reasonably capable of being used or redeveloped for a retail use; and—</del></p>
			<p>b. <del>development would not result in 3 or more non-retail use units in adjoining premises.—</del></p>
			<p><del>D. Proposals for retail and commercial leisure development outside the borough's Primary Shopping Areas over 2,500 square metres will only be permitted provided an accompanying impact assessment can satisfactorily demonstrate that:—</del></p>
			<p>a. <del>associated travel demand can be satisfactorily accommodated by the transport network with appropriate mitigation;—</del></p>

MM Ref	Page	Policy / para.	Proposed modifications
			b. <del>the proposal does not give rise to any detrimental impact on amenities in the surrounding area; and</del>
			e. <del>travel by more sustainable forms of transport than the private car will be achieved</del>
MM67	199	Policy PC12 Figure 7.8	<p><i>Amend Policy to read:</i></p> <p>POLICY PC<del>08</del><b>12</b>: NON-CENTRE USES</p> <p>Proposals for non-centre uses in the Designated Centres <b><u>will only be permitted if</u></b> <del>should demonstrate how they:</del></p> <p>a. complement the retail <b><u>and service</u></b> function and makes a positive contribution to the vitality, viability and diversity of the Designated Centre it is located within;</p> <p>b. would not create an over-concentration of non-centre uses which are harmful to the function of the centre;</p> <p>c. <b><u>provide</u></b> <del>provision is made for</del> an active frontage in keeping with the character of the <b><u>Designated Centre</u></b> <del>shopping area;</del></p> <p>d. would not give rise, either alone or cumulatively, to a detrimental effect on the character or amenity of the area through smell, litter, noise or traffic problems. Demonstrates any potential related problems 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; and</p> <p>e. for proposals creating more than two residential flats above ground floor level, the development would not result in the loss of ancillary storage space or other beneficial use to the extent that it would make a</p>

MM Ref	Page	Policy / para.	Proposed modifications				
			<p>ground floor unit unviable, and the development would not prevent off street servicing of any ground floor unit.</p> <p><i>Amend figure 7.8 as follows:</i></p> <table border="1"> <thead> <tr> <th data-bbox="725 395 1317 555">Main town centre uses (uses suitable at ground floor level in the Designated Centres and Primary Shopping Areas)</th> <th data-bbox="1317 395 1697 555">Non-centre uses (uses not suitable at ground floor level in the Designated Centres and Primary Shopping Areas)</th> </tr> </thead> <tbody> <tr> <td data-bbox="725 555 1317 1385"> <ul style="list-style-type: none"> <li>• <del>Shops (A1 uses)</del></li> <li>• <del>Financial and professional services (A2 uses)</del></li> <li>• <del>Cafés and restaurants (A3 uses)</del></li> <li>• <b><u>Business uses, including offices and research and development</u></b></li> <li>• <del>Drinking establishments (A4 uses)</del></li> <li>• <del>Takeaways (A5 uses)</del></li> <li>• <del>Hotels (C1 uses)</del></li> <li>• <b><u>Learning and non-residential institutions</u></b> such as <del>healthcare, nurseries, schools,</del> <b><u>museums, public libraries, public hall,</u></b> and places of worship <del>(D1 uses)</del></li> <li>• <b><u>Creche, day nurseries or day centre</u></b></li> <li>• <b><u>Provision of medical or health services</u></b></li> </ul> </td> <td data-bbox="1317 555 1697 1385"> <ul style="list-style-type: none"> <li>• <del>Business uses, including offices, research and development (Class (B1))</del></li> <li>• General industry (<b><u>class B2</u></b>)</li> <li>• Storage and distribution (<b><u>class B8</u></b>)</li> <li>• Residential institutions (<b><u>class C2</u></b> and <b><u>class C2a</u></b>)</li> <li>• Residential (<b><u>class C3</u></b>)</li> <li>• Houses in multiple occupation (<b><u>class C4</u></b>)</li> <li>• Other <del>su</del> <b><u>generis uses which do not provide services direct to the public.</u></b></li> </ul> </td> </tr> </tbody> </table>	Main town centre uses (uses suitable at ground floor level in the Designated Centres and Primary Shopping Areas)	Non-centre uses (uses not suitable at ground floor level in the Designated Centres and Primary Shopping Areas)	<ul style="list-style-type: none"> <li>• <del>Shops (A1 uses)</del></li> <li>• <del>Financial and professional services (A2 uses)</del></li> <li>• <del>Cafés and restaurants (A3 uses)</del></li> <li>• <b><u>Business uses, including offices and research and development</u></b></li> <li>• <del>Drinking establishments (A4 uses)</del></li> <li>• <del>Takeaways (A5 uses)</del></li> <li>• <del>Hotels (C1 uses)</del></li> <li>• <b><u>Learning and non-residential institutions</u></b> such as <del>healthcare, nurseries, schools,</del> <b><u>museums, public libraries, public hall,</u></b> and places of worship <del>(D1 uses)</del></li> <li>• <b><u>Creche, day nurseries or day centre</u></b></li> <li>• <b><u>Provision of medical or health services</u></b></li> </ul>	<ul style="list-style-type: none"> <li>• <del>Business uses, including offices, research and development (Class (B1))</del></li> <li>• General industry (<b><u>class B2</u></b>)</li> <li>• Storage and distribution (<b><u>class B8</u></b>)</li> <li>• Residential institutions (<b><u>class C2</u></b> and <b><u>class C2a</u></b>)</li> <li>• Residential (<b><u>class C3</u></b>)</li> <li>• Houses in multiple occupation (<b><u>class C4</u></b>)</li> <li>• Other <del>su</del> <b><u>generis uses which do not provide services direct to the public.</u></b></li> </ul>
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MM Ref	Page	Policy / para.	Proposed modifications
			<ul style="list-style-type: none"> <li>• Assembly and leisure (<del>D2 uses</del>)</li> <li>• <b>Other</b> <del>Certain sui generis</del> uses typically found in centres, including <b>hot food takeaways, pub or drinking establishment, cinemas, concert halls, bingo halls, dance halls,</b> theatres, nightclubs, amusement arcades, launderettes, tattooists, beauty parlours</li> </ul>
MM68	200	Policy PC13 Paragraph 7.82	<p><i>Amend Policy to read:</i></p> <p>POLICY PC13 <b>PC09: <u>EVENING AND</u></b> NIGHT-TIME ECONOMY</p>
			<p><del>After hours</del> <b>Development proposals for</b> cultural, entertainment and leisure uses in Designated Centres will be encouraged as part of mixed use development. <del>After hours leisure should</del> <b>where appropriate, contribute to the diversity</b> <del>raise standards and broaden the appeal of the</del> <b>evening and</b> night-time economy. Proposals <del>should</del> <b>are required to:</b></p>
			<p>a. <del>be safe and welcoming;</del></p>
			<p>b. <del>allow people to walk and cycle around the centre with ease;</del></p>
			<p>c. <del>offer a vibrant choice of leisure and entertainment for a diversity of ages, lifestyles and cultures, including families and older people;</del></p>
			<p>d. <del>provide a mix of activities that reinforce local character and identity;</del></p>



MM Ref	Page	Policy / para.	Proposed modifications
			<p>e. <u>a.</u> would not give rise, either alone or cumulatively, to a detrimental effect on the character or amenity of the surrounding residential area through smell, litter, noise or traffic problems. Proposals <del>should</del> <b>are required to</b> demonstrate any potential related problems can be overcome satisfactorily to protect amenities of surrounding residents; and</p> <p>f. <u>b.</u> provide evidence of responsible management and stewardship arrangements to ensure there is no disturbance to surrounding properties and residents or harm to surrounding area amenity.</p>
			<p><i>Amend paragraph 7.82 as follows:</i></p> <p><b><u>'Main town centre uses' as defined in the NPPF include those that are part of the evening and night time economy (ENTE). ENTE is recognised to allow town centres to diversify and is an opportunity for economic and social development. This policy therefore seeks to strike the right balance between supporting the evening economy and protecting the living conditions of residents and nearby uses in terms of anti-social behaviour, noise pollution, health and wellbeing and other issues.</u></b> <del>This 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.</del></p>
MM69	201-203	Policy PC14 Paragraphs 7.83 – 7.92	<p><i>Amend Policy to read:</i></p> <p><b><u>STRATEGIC POLICY</u> <del>PG14-10</del> PROTECTING AND ENHANCING COMMUNITY <u>FACILITIES</u> <del>ASSETS</del></b></p>
			<p>A. The Council recognises the importance of community <b>facilities</b> assets, including those registered as Assets of Community Value (ACV), as part of social infrastructure and seeks to ensure that:</p>
			<p>a. existing community assets will be protected from inappropriate changes of use or redevelopment;</p>

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			<p>b. new facilities should be easily accessible by public transport, cycling and walking <del>and will be prioritised in Designated Centres;</del></p>
			<p>c. development proposals that provide high quality, inclusive community assets that addresses a local or strategic need and supports service delivery strategies will be supported;</p>
			<p>d. development proposals <b>should</b> that seek to make best use of land, including, <b>where possible</b>, the co-location of different forms of community <b>facilities</b> assets and the rationalisation or sharing of facilities, <del>will be encouraged and supported;</del></p>
			<p>e. development proposals that would result in <b>the unnecessary</b> a loss of community <del>assets</del> <b>facilities</b> will <b>not</b> be discouraged <b>permitted</b> unless it can be demonstrated that:</p> <p><b>i.</b></p> <p><del>there are realistic proposals for re-provision that</del> <b>they will be replaced by alternative and well located facilities that will</b> continue to serve the <b>similar</b> needs of the neighbourhood and wider community; or</p> <p><b>ii.</b></p> <p><del>the loss is part of a wider public service transformation plan which requires investment in modern, fit for purpose infrastructure and facilities to meet</del> <b>a consequence of the genuine need to rationalise existing facilities in an area in order to provide for existing and</b> future population <b>community</b> needs or to sustain and improve services.</p>
			<p>f. <b>The development or change of use of</b> redundant community <b>facilities</b> assets should be considered <b>only after it is established that there is no reasonable prospect of them being put to alternative community uses</b> <del>for full or partial use as other forms of social infrastructure before alternative developments are considered.</del></p>
			<p><i>Amend paragraphs 7.83 to 7.92 to read:</i></p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p>7.83 Community assets <b>facilities and services can include any provision that provides social, recreational and cultural facilities to meet the day-to-day needs of the community.</b> <del>can cover a wide spectrum and include land, services and facilities</del> <b>It can include</b> facilities such as village halls, community centres, libraries, parks, green spaces, and buildings for sports, leisure, healthcare, education, social, <b>and arts venues, amongst others. Applicants should take into account the Council's Built Facilities Strategy and Leisure Strategy when considering indoor sports and leisure facilities. While recreational facilities can include those outdoors in parks and open spaces, Policy PC14 applies to facilities and services related to buildings only; it excludes any outdoor sport or recreation facilities, which is covered by Policy BE22 Open Space and Recreation Facilities.</b> <del>and cultural activities. However, not all land and buildings are community assets. Locality, the nationwide network for community-led organisations, suggests that land and buildings are only community assets if they are capable of generating a profit that can be reinvested into activities that benefit the community<sup>4</sup>.</del></p> <p>7.84 Community assets <b>facilities</b> are a part of social infrastructure and play an important role in <del>improving</del> <b>providing</b> a good quality of life, stimulating and supporting social cohesion and interaction, as well as developing strong and inclusive communities. They provide opportunities to bring different groups of people together, contributing to social integration and the desirability of a place.</p> <p>7.85 <del>For example, the provision of childcare facilities including nurseries, integrated nursery centres, playgroups, crèches and child-minding networks, is are important to increase economic activity rates, to improve the quality of life of parents and children and to reduce social exclusion.</del> Good quality leisure and sport facilities support and encourage people to lead healthy lifestyles, raising the quality of life for local residents. Leisure, cultural and entertainment facilities help attract people to the borough as a place to work, visit and live. <del>7.86</del> It is therefore important that new and replacement facilities support new and existing communities, respectively. These should also facilitate the growth of the borough by providing sufficient capacity to accommodate community need and demand.</p> <p>7.87 The Council will work collaboratively with service providers, developers and relevant stakeholders, including the local community, to fully understand existing and future social infrastructure needs and plan appropriately for these, including through the Community Infrastructure Levy.</p> <p>7.88 The loss of social infrastructure can have a detrimental effect on a community. The Council seeks to protect its existing community <b>facilities</b> <del>assets through other relevant Local Plan policies.</del> Where a</p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p>development proposal leads to the loss of a facility, a replacement that continues to meet the needs of the neighbourhood it serves will be required.</p> <p>7.90 Proposals for new and replacement facilities will be supported where there is a local need. This need will be demonstrated through a local need assessment. This is particularly important where existing deficits in community or leisure provision have already been identified <b><u>in line with the Council's Leisure Strategy and Built Facilities Strategy.</u></b></p> <p>7.91 When new developments generate the need for new community facilities, the need should be met by on and off-site provision, in line with Policy SP04 <b><u>MG05</u></b> Developer Contributions.</p> <p><b><u>Assets of Community Value</u></b></p> <p>7.89 It should be noted that Assets of Community Value (ACV) are subject to additional protection from development <b><u>as designated</u></b> under the Localism Act 2011 <b><u>will be a material consideration in any proposal for redevelopment.</u></b> The Localism Act 2011 introduced the Community Right to Bid which provides a new right for residents to nominate certain local public or privately-owned buildings or land as being an <b><u>Asset of Community Value.</u></b> The Council is obliged to consider all nominations received and include the building or land on the ACV list, if the current use or a recent past use of the asset has furthered the social well-being or social interests of the community and can continue to do so. Once an asset is included in the ACV list it will remain on that list for five years, after that, re-application will be necessary. During this time, the owner cannot dispose of <b><u>the asset</u></b> <del>it other than to a</del> <b><u>without giving the</u></b> community interest group <b><u>the opportunity to bid for it.</u></b> <del>The</del> <b><u>without the community having</u></b> <del>are</del> <b><u>then given</u></b> six months to put together a bid to buy the asset. The Brentwood most up to date ACV list and how to nominate an asset are available to view in the Council's information database, DataShare<sup>2</sup>.</p> <p>7.92 This policy should be read in conjunction with Policy SP04 <b><u>MG05</u></b> Developer Contributions, Policy HP42 <b><u>BE15</u></b> Planning for Inclusive Communities, <del>Policy PC15 Education Facilities,</del> and Policy PC16 <del>Buildings for Institutional Purposes.</del></p>
MM70		Policy PC15  Paragraph 7.93	<p><i>Amend Policy to read:</i></p> <p>POLICY <del>PC15</del> <b><u>PC11</u></b>: EDUCATION FACILITIES</p>

MM Ref	Page	Policy / para.	Proposed modifications
		Paragraph 7.94 Paragraph 7.95	A. The change of use or re-development of existing or proposed educational establishments and/or their grounds <b><u>for alternative purposes</u></b> will not be permitted unless:
		Paragraph 7.97	a. it can be clearly demonstrated that the use of the site is genuinely redundant <b><u>for educational purposes</u></b> and no other alternative educational or community use can be found <b><u>for the site in question</u></b> ; or
			b. satisfactory alternative and improved facilities will be provided; or
			c. <b><u>in the case of playing fields or open space associated with educational establishments, any proposals that involve their loss or change in use will be subject to Policy NE05</u></b> the area of the site to be redeveloped is genuinely in excess of government guidelines for playing field provision, taking into account future educational projections.
			B. Where there is a demonstrable need for new educational facilities, planning permission will be granted for appropriate and well-designed proposals which broadly meet the criteria for new education facilities set out in the ECC's Developers' Guide to Infrastructure Contributions.
			<del>C. The Council recognises the differences in location and design requirements between rural and urban based new education proposals in the borough and will assess applications accordingly.</del>
			<del>D. Where necessary, the Council will utilise planning obligations or CIL to help mitigate any adverse impacts on an educational facility and assist in delivering development that has a positive impact on the community.</del>
			<del>E. <b><u>C.</u></b> Developers should engage with the Local Education Authority at the earliest opportunity and work cooperatively to ensure the phasing of residential development and appropriate mitigation, <b><u>Developments that generate a need for additional education facilities should make appropriate provision for their timely delivery as part of the development or through financial</u></b></del>

MM Ref	Page	Policy / para.	Proposed modifications
			<p><del><b>contributions if appropriate and</b> in line <b>accordance</b> with ECC's Developers' Guide to Infrastructure Contributions, is identified in a timely manner to ensure appropriate education provision can be secured.</del></p> <p>F. <del>Proposals for educational facilities in the Green Belt will be looked into positively where a requirement for a Green Belt location is demonstrated and with regard to Green Belt policies, including Policy NE09 Green Belt, and NE10 New Development, Extension and Replacement of Buildings in the Green Belt.</del></p>
			<p><b><u>D.</u></b> <b><u>New educational establishments should plan and design their playing fields and sports facilities to be used for community use when not required for their own use, provided always that any such use must not detract from the safety of pupils or their learning environment.</u></b></p> <p><i>Amend paragraph 7.93 to read:</i></p> <p>7.93 Further information regarding requirements for educational facilities over the Plan period is detailed in the Council's Infrastructure Delivery Plan. This policy should be read in conjunction with Policy SP04 <b>MG05</b> Developer Contributions, <b>and Policy NE05 Open Space and Recreational Facilities</b> <del>Policy PC14 Protecting and Enhancing Community Assets</del>, as well as infrastructure requirements set out under site-specific policies in Chapter 9. <b><u>Applicants should engage with the Local Education Authority at the earliest opportunity and work cooperatively to ensure educational requirements are identified early on and are delivered at the appropriate time in line with the phasing of development.</u></b></p> <p><i>Retain paragraph 7.94 and amend to read:</i></p> <p>Education in this section relates to early years <b>and childcare</b>, primary, secondary and further education provision for all children and young people, including those with special educational needs and/or disabilities, and where residential elements may form part of the provision. Higher education and other types of education such as language schools are not included in this policy.</p> <p><i>Amend paragraph 7.95 to read:</i></p> <p>7.95 <b><u>New and</u></b> <del>E</del>established schools and <b><u>their</u></b> related educational facilities <b><u>including playing field and sports facilities</u></b>, make a major contribution to community use and provide essential support to</p>

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			<p>increased housing growth. Education providers and institutional users will be encouraged to improve facilities and make efficient use of their assets and landholdings. Where feasible, providers will be encouraged to share their assets with the wider community to improve health and social well-being, subject to site specific context and wider impacts.</p> <p><i>Retain paragraphs 7.96 to 7.103</i></p> <p><i>Amend paragraph 7.97 to read:</i></p> <p>Essex County Council (ECC) as the Local Education Authority has the responsibility for early years <b><u>and childcare</u></b> and school place planning. Through this process, ECC identifies the need for school places and identifies surpluses or deficits through a 10 Year Plan for School Places currently covering the period 2019-2028. Whether the change of use or redevelopment of independent schools would be considered surplus to educational requirements will be considered on a case by case basis.</p>
MIM71	206	Policy PC16  Paragraph 7.104-7.105	<p><i>Delete Policy PC16 and supporting text paragraphs 7.104 to 7.105.</i></p>

## Chapter 8

MM Ref	Page	Policy / para.	Proposed modifications
MM72	207	SO4 Paragraph 8.1	<p><i>Amend Strategic Objective 4 under paragraph 8.1 to read:</i></p> <p>SO4: Deliver Beautiful, Biodiverse, Clean and a Functional Natural Environment, <b><u>where resources are carefully managed to avoid adverse impact on, and to provide net gains for, the borough's natural environment and biodiversity; and where</u></b> our natural heritage is protected, and ecosystem services are restored, enhanced and integrated back into the built environment through multi-functional green and blue infrastructure <b><u>and opportunities are pursued for securing measurable net gains for biodiversity.</u></b></p>
MM73	207-209	Paragraph 8.2 Paragraph 8.4 Paragraph 8.5 Paragraph 8.6 Paragraph 8.7 Paragraph 8.10	<p><i>Amend paragraph 8.2 to read:</i></p> <p>8.2 The borough of Brentwood currently enjoys a varied built and natural landscape. <del>From</del> <b><u>At its core</u></b> is the main urban area <b><u>with the settlements</u></b> of Brentwood, <del>with its green wedges, and the settlements of</del> Shenfield, Pilgrims Hatch and Hutton <del>at its core, to</del> <b><u>along with</u></b> the dispersed, yet neighbouring northern villages and the more distant villages in the south; it is set within the varied landscape of intrinsic character and beauty within the Essex countryside. This enables Brentwood residents to enjoy the best of both worlds – the urban and the rural benefits - leading to the descriptive reference as the Borough of Villages.</p> <p><i>Amend paragraph 8.4 to read:</i></p> <p>8.4 The Council is committed to the conservation and enhancement of the natural environment in line with the NPPF (2018 <b><u>2021</u></b>, Section 15). 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 <b><u>including</u></b> the positive conservation management of Local Wildlife Sites (LWS) within the borough.</p>



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			<p><i>Amend paragraph 8.5 to read:</i></p> <p>Future growth is planned in sustainable locations to ensure that the quality of our environment is valued and sustained. Consideration for integration, conservation and enhancement of the natural and built environment to promote the health and well-being of inhabitants is paramount. This will be achieved through the considered management of development in line with the government's 25 Year Environment Strategy<sup>1</sup> and NPPF<sup>4</sup> <b><u>with a commitment to improving green infrastructure connectivity for wildlife and people in line with Green and Blue Infrastructure and Open Space policies.</u></b></p> <p><i>Amend paragraph 8.6 to read:</i></p> <p><b><u>8.6 The borough has a number of landscape, biodiversity and geodiversity areas of interest which contribute to local distinctiveness. These should be retained and protected and their enhancement and restoration will be encouraged.</u></b> The majority of the landscape is dominated by Wooded Farmland comprising of undulating areas of deciduous and mixed woodland interspersed with arable fields, mature hedgerows, smaller pastures and paddocks, and narrow lanes. Brentwood has 15 areas of ancient woodland <b><u>along with veteran trees and lowland fen.</u></b> The Thames Chase Community Forest Area covers the south and south-west of Brentwood. The Thames Chase Plan (2014<del>6</del>) describes the landscape as 'Land of the Fanns', comprising of marshy land/ - a low lying district with fens, forests and farming <b><u>made up of large field patterns with hedgerows, often called the Horndon Fens.</u></b> Fanns being <b><u>is</u></b> a Saxon term for low marshy land or a low-lying district. This area provides an inspirational image of a forest landscape that is being developed to Community Forest principles. <b><u>Taking into account the age, uniqueness, species diversity and rarity of these habitats, their re-creation, once destroyed, will be difficult to achieve. Therefore, proposals which impact these irreplaceable habitats will be refused unless there are wholly exceptional reasons and a suitable compensation strategy is set out.</u></b></p> <p><i>Delete paragraph 8.7.</i></p>

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			<p>Amend paragraph 8.10 to read:</p> <p>8.10 <b>The country parks of</b> Warley, Weald and Thorndon area are also on Historic England's Register of Historic Parks and Gardens of <del>s</del>Special Historic Interest in England.</p>
MM74	209 - 214	<p>Policy NE01</p> <p>Policy NE02</p> <p>Paragraph 8.14 - 8.28</p>	<p>Delete Policies NE01 and NE02 and replace with one policy to reads as follows:</p> <p><b><u>STRATEGIC</u></b> POLICY NE01: PROTECTING AND ENHANCING THE NATURAL ENVIRONMENT</p> <p><b><u>A.</u></b> <b><u>The Council will require development proposals to use natural resources prudently and protect and enhance the quality of the natural environment. All proposals should, wherever possible, incorporate measures to secure a net gain in biodiversity, protect and enhance the network of habitats, species and sites (both statutory and non-statutory) and avoid negative impacts on biodiversity and geodiversity. Compensatory measures will only be considered if it is not possible fully to mitigate any impacts.</u></b></p> <p><b><u>B.</u></b> <b><u>When determining planning applications, the council will apply the principles relevant to habitats and biodiversity as set out in National Planning Policy.</u></b></p> <p><b><u>International Designated Sites</u></b></p> <p><b><u>C.</u></b> <b><u>Where a proposed development is likely to have an adverse impact on European Designated Site (whether individually or in combination with other plans or proposals) permission will not be granted unless there is due compliance with the requirements of the Habitats Regulations.</u></b></p> <p><b><u>D.</u></b> <b><u>New residential development within the Essex RAMS and Epping Forest SAC Zones of Influence will be required to provide appropriate on-site measures for the avoidance of, and/or reduction in, recreational disturbance on European Designated Sites through the incorporation of recreational opportunities, including the provision of green space and footpaths in the proposals. Proposals will be required to follow the mitigation hierarchy by seeking to avoid creating recreational impacts first and foremost, with mitigation measures considered separately to avoidance.</u></b></p> <p><b><u>Nationally Designated Sites</u></b></p>

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			<p><u>E.</u> <u>Development proposals within or outside a SSSI, likely to have an adverse effect on a SSSI (either individually or in combination with other developments), will not be permitted unless, exceptionally, the benefits of the proposed development clearly outweigh both the adverse impacts on the features of the site that make it of national importance and any impacts on the wider network of SSSIs.</u></p>
			<p><u>Sites of Local Importance</u></p>
			<p><u>F.</u> <u>Development proposals that are likely adversely to affect locally designated sites, including their functional status within any identified ecological network, will only be permitted where the applicant can demonstrate that:</u></p>
			<p><u>a.</u> <u>the ecological coherence of the site and any local ecological network is maintained; and</u></p>
			<p><u>b.</u> <u>it can be demonstrated that the benefits of the development clearly outweigh the loss.</u></p>
			<p><i>Delete paragraphs 8.14 to 8.15</i></p>
			<p><i>Amend and re-order paragraphs 8.16 to 8.22 to read:</i></p> <p>8.18 All stages of development must be considered when assessing the impact and cumulative impact on wildlife sites both within and in proximity to the borough of Brentwood.</p> <p>8.16 The Council acknowledges the sensitive biodiversity sites just beyond the borough boundary, including Basildon Meadows SSSI, Norsey Wood SSSI and Epping Forest SSSI and Special Area of Conservation. Proposals likely to have an adverse effect on these neighbouring sites will be assessed per policy <b><u>in accordance with Strategic Policy NE01 Protecting and Enhancing the Natural Environment</u></b> above.</p> <p>8.17 Where there is a confirmed presence, or reasonable likelihood, of a legally protected species or priority species on an application site, the applicant will be required to demonstrate that adverse impacts upon the species have been avoided, and where they cannot be avoided, adequately mitigated. Mitigation must conform to the requirements of relevant legislation and</p>

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			<p>Natural England Standing Advice. Where impacts cannot be adequately mitigated, the proposal will not be permitted.</p> <p>8.19 The Council will take a precautionary approach where insufficient information is provided about avoidance, management, mitigation and compensation measures <b><u>and refuse such planning applications</u></b>. The Council will secure management, mitigation and compensation measures through planning conditions/obligations where necessary.</p> <p><del>8.20—Proposals that result in a net gain in Habitat value will in principle be supported, subject to other policies in this Plan.</del> Where Priority Habitats are likely to be adversely impacted by the proposal, the developer must demonstrate that <b><u>every effort has been made to avoid</u></b> adverse impacts, <del>will be avoided,</del> and <b><u>Mitigation and compensation measures will only be acceptable where it has been demonstrated impacts cannot be reasonably avoided in the first place.</u></b> Impacts that cannot be avoided are <b><u>to be</u></b> mitigated onsite. Where residual impacts remain, offsite compensation will be required so that there is no net loss in quantity and quality of Priority habitats<u>s</u> in the borough of Brentwood.</p> <p>8.21 The Council supports the Essex Wildlife Trust Living Landscape’s vision to ‘restore, recreate and connect wildlife habitats’. Within each Living Landscape, opportunities for the preservation, restoration and recreation of priority habitats, ecological networks and populations of priority species will be supported in order to conserve and enhance strategic wildlife corridors and habitats in Essex. Development proposals that would deliver these opportunities will in principle be supported, subject to other policies within this Plan. Development resulting in a significant adverse impact on the ecological function of these Living Landscapes will be refused.</p> <p>8.22 In addition<del>al</del> to the statutory protections and obligations for designated sites, proposals must also demonstrate how they are responding to:</p> <p><del>a. —the Essex Biodiversity Action Plan (2011);</del></p> <p>b. <b><u>a.</u></b> the Essex Wildlife Trust Living Landscapes vision; and</p> <p><del>c. <b><u>b.</u></b> the Thames Chase Plan.</del></p> <p><i>Amend paragraphs 8.23 to 8.28 to read:</i></p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p data-bbox="719 204 994 236"><b><u>Essex Coast RAMS</u></b></p> <p data-bbox="719 277 2047 408">8.23 Development in the borough has the potential to increase the recreational pressures and disturbance on existing European <del>Level</del> sensitive habitats, <b><u>such as</u></b> the Essex Estuaries Special Area of Conservation (SAC); <b><u>the</u></b> Crouch and Roach Estuaries Special Protection Areas (SPA); and <b><u>the</u></b> Epping Forest Special Area of Conservation.</p> <p data-bbox="719 427 2058 593">8.24 Recreational disturbance has been further considered in an Appropriate Assessment which <b><u>has</u></b> identified <del>s</del> the need to prepare <b><u>a</u></b> Recreational disturbance Avoidance and Mitigation Strategy (RAMS) for these locations <b><u>to deliver the mitigation necessary to avoid significant adverse effects from 'in-combination' impacts of residential development that is anticipated within the zone of influence.</u></b></p> <p data-bbox="719 612 2063 1187">8.25 Following consultation with Natural England, <b><u>a Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) has been prepared and adopted to include all coastal European sites. The strategy identifies where recreational disturbance is happening and the main recreational uses causing the disturbance. Development that is likely to have a significant effect on European sites will be required to contribute towards the implementation of the mitigation. It is considered that development in this zone of influence will be required to pay for the implementation of mitigation measures to protect the interest features of European designated sites along the Essex Coast which include</u></b> <del>a RAMS is being prepared on behalf of nine district /borough councils and Southend and Thurrock unitary authorities, to cover the Essex Estuaries <b><u>Special Area of Conservation</u></b>; <b><u>SAC</u></b> and <b><u>the</u></b> Crouch together with the <b><u>and</u></b> Roach Estuaries <b><u>Special Protection Area</u></b>; <b><u>SPA</u></b>, <b><u>and</u></b> the Colne and Blackwater Estuaries <b><u>Special Protection Areas</u></b>, <b><u>SPAs</u></b> and Ramsar sites, <del>to clarify the area of potential impacts (within the Zone of Influence) with a view to their subsequent adoption as a Supplementary Planning Document (SPD) with an associated charging schedule. This work has assessed the Zones of Influence for each of the habitat sites and where residential development is proposed in these Zones, mitigation for in combination impacts is required.</del> <b><u>The appropriate mitigation mechanisms are identified in the RAMS. The Zones of Influence affecting Brentwood are shown on the Policies Map.</u></b></del></p> <p data-bbox="719 1206 2047 1391">8.27 Any residential development <b><u>within the Zone of Influence of the Essex Coast RAMS</u></b> that is likely to affect the integrity of these European sites, <b><u>The developer</u></b> will be required to either contribute towards mitigation measures identified in the RAMS or, in exceptional circumstances, identify and implement bespoke mitigation measures <b><u>at the Essex Coastal Habitats sites</u></b> to ensure compliance with the Habitat Regulations.</p>

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			<p><b><u>Epping Forest RAMS</u></b></p> <p>8.26 A similar assessment process is being carried out for the Epping Forest Special Area of Conservation involving the local planning authorities that have been identified as having the potential for impact by their geographical proximity to Epping Forest. The detailed evidence base has now been prepared and has identified the new residential development Zones of Influence (<b><u>ZOI</u></b>) of these internationally important protected biodiversity sites.</p> <p>8.28 Prior to the adoption of a Supplementary Planning Document, or similar, <b><u>in respect of the Epping Forest SAC,</u></b> development in the Zones of Influence will be required to make an appropriate assessment of the impact of the development and identify suitable mitigation proposals, in line with Natural England advice. <b><u>Areas within Brentwood Borough fall just inside this ZOI; the Council will however, carefully consider the impacts, if any, of development that falls adjacent to this ZOI.</u></b></p>
MM75	214 - 216	Policy NE03 Paragraphs 8.33	<p><i>Delete Policy NE03 and replace with following new policy wording to read:</i></p> <p><b><u>POLICY NE02: TREES, WOODLANDS AND HEDGEROWS</u></b></p> <p><b><u>A. Development proposals that would result in the deterioration or loss of irreplaceable ancient woodland and ancient and veteran trees will not be permitted other than in wholly exceptional circumstances and only if the proposals include a suitable compensation strategy. Applicants will need to demonstrate the efficacy of the strategy by reference to the value of the habitats that will be lost or harmed and provide an appropriate implementation and maintenance programme to underpin the strategy the performance of which will be subject of a condition and/or planning obligation, as appropriate.</u></b></p> <p><b><u>B. In all other cases, proposals should, so far as possible and practicable, seek to retain existing trees, woodlands and hedgerows where they make a positive contribution to the local landscape and/or biodiversity or which have significant amenity value. Wherever possible and appropriate, landscaping schemes should take account of and incorporate these existing features in the scheme and where any loss is unavoidable, incorporate measures to compensate for their loss.</u></b></p> <p><i>Amend paragraph 8.33 to read:</i></p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p>8.33 Some specific trees or groups of trees are of particular <b>amenity</b> value, such that their removal would have a significant impact upon the local environment and its enjoyment by the public. Where they are potentially under threat, the Council will <b>seek to retain and protect them, either through planning conditions or through make Tree Preservation Orders (TPO).</b> to protect them. <del>Where trees are covered by TPOs, the policy is intended to safeguard them from damage or removal unless there are overriding reasons for the development.</del></p>
MM76	216	Policy NE04 Paragraphs 8.38 - 8.46	<p><i>Amend Policy NE04 to read:</i></p> <p>A. Development proposals which fall within the Thames Chase Community Forest Area <b>should not prejudice the implementation, aims and objectives of the Thames Chase Plan</b> <del>will be expected to make a positive contribution towards its implementation in addition to other relevant policies within the Local Plan.</del></p> <p>B. <del>Developers will be expected to work collaboratively in partnership with the Land of the Fanns Partnership to develop scheme proposals through the masterplanning process, in line with Policy SP06 Effective Delivery of Development.</del></p> <p><i>Re-order and amend paragraphs 8.38 to 8.42 to read:</i></p> <p>8.39 <b><u>The Thames Chase is a eCommunity fForest covers 40 square miles of landscape in East London and South West Essex.</u></b> <del> of 9,842 hectares located in more than 47 sites in London and Essex. Brentwood Borough Council is one of the four local authority partners along with the Forestry Commission, Essex County Council, the Woodland Trust, Essex Wildlife Trust, the London Wildlife Trust and The Royal Society for the Protection of Birds. Being <b>It is</b> one of 102 national community forests across England established nationally since in 1990 to actively regenerate the landscape, protecting, improving and expanding the woodland character of the Community Forest for the benefit of local people and wildlife., the forest covers over 500 hectares of woodland, common and recreational land within Brentwood Borough (about one quarter of the area of Thames Chase). Extended in 1999, the forest now incorporates Thorndon and Hartswood Sites of Special Scientific Interest (SSSI) and Warley Place Nature Reserve, with the area of the forest extending to the southern borough boundary and as far east as the A128. <b>Management is led by the Thames Chase Trust<sup>1</sup> in accordance with the Thames Chase Plan<sup>2</sup>.</b></del></p> <p>8.38 The Council supports the aims of the Thames Chase Plan, being:</p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p>a. to conserve, improve and expand the woodland character of the Community Forest;</p> <p>b. to sustain the natural integrity of the Community Forest's air, land and water including wildlife;</p> <p>c. to integrate climate change adaption and mitigation responses into the developing Community Forest;</p> <p>d. to use the Community Forest to improve local health and well-being, volunteering, learning and employment; and</p> <p>e. to enable effective partnership working from national to local level to maximise the impact of available resources.</p> <p><del>8.40—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.</del></p> <p>8.41 The Thames Chase Plan provides a green <b>infrastructure</b> framework, <del>in line with the London Green Grid, for supporting Countryside Stewardship: woodland</del> <b>to</b> support <b>and guide</b> applications and <b>in</b> 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 <b>policy</b>. objectives, since they would not be considered as a justification for allowing inappropriate development in the Green Belt where development that would otherwise be unacceptable.</p> <p>8.42 Thames Chase Plan maintains the original commitment to developing strategic woodland, habitats and access on a forest-wide scale. <b><u>In 2016, following an award from the Heritage Lottery Fund, a wider partnership of organisations was set up</u></b> However, there is <b><u>with</u></b> a stronger emphasis on area-based project delivery that translates forest wide ambition into tangible, quantifiable initiatives on the ground. Brentwood Borough Council is a partner in the <b><u>This</u></b> 'Land of the Fanns' Partnership <b><u>includes a number of national and local organisations, including Brentwood Borough Council, who are working towards</u></b> is and supports the Landscape Conservation Action Plan (LCAP)<sup>3</sup>. <b><u>Development proposals falling within the Thames Chase Community Forest area are strongly encouraged to consider the Thames Chase Community Forest aims and objectives outlined in these plans when devising their landscape schemes and green infrastructure proposals.</u></b></p>
			<p><i>Insert the following footnotes</i></p>



MM Ref	Page	Policy / para.	Proposed modifications
			<p>1. The Thames Chase Trust <a href="https://www.thameschase.org.uk/about-thames-chase/the-thames-chase-trust">https://www.thameschase.org.uk/about-thames-chase/the-thames-chase-trust</a>.</p> <p>2. Thames Chase Plan 2014 <a href="https://www.thameschase.org.uk/uploads/TCP_Full.pdf">https://www.thameschase.org.uk/uploads/TCP_Full.pdf</a></p> <p>3. Land of the Fanns Landscape Conservation Action Plan (LCAP) 2016 - <a href="https://www.landofthefanns.org/our-partnership/about-the-scheme/">https://www.landofthefanns.org/our-partnership/about-the-scheme/</a></p> <p><i>Delete paragraphs 8.43 to 8.46</i></p>
MM77	218	NE05 Paragraph 8.47-8.50	<p>Amend policy NE05 to read:</p> <p><b><u>STRATEGIC</u> POLICY NE05 <u>NE08</u>: AIR QUALITY</b></p> <p>A. Development is required to meet <b><u>national</u></b> or exceed the ‘air quality neutral’ standards, especially within Air Quality Management Areas (AQMAs) and where development is near to, or promotes, land uses to be used by those particularly vulnerable to poor air quality (such as children and older adults). <b><u>and identify opportunities to improve air quality or mitigate local exceedances and impacts to acceptable legal and safe levels. Development proposals must demonstrate that they will not:</u></b></p> <p><b><u>a. Compromise the achievement of compliance targets within Air Quality Management Areas (AQMAs);</u></b></p> <p><b><u>b. Create new exceedance areas;</u></b></p> <p><b><u>c. Create unacceptable risk of high levels of exposure to poor air quality, particularly where development is near to, or promotes land uses to be used by those particularly vulnerable to poor air quality (such as children and older adults).</u></b></p> <p>B. Development proposals should <b><u>be designed to</u></b> minimise exposure to existing poor air quality and make <b><u>appropriate</u></b> provisions to address local <b><u>improve local</u></b> air quality <b><u>conditions</u></b> exceedances through design solutions and measures <b><u>to the outdoor and indoor environment</u></b>. such as the use of low or zero emission transport, reduced reliance on private motor vehicles, buffer zones around schools and other community infrastructure, amongst others. <b><u>Particular attention should be given to the positioning, layout and design of proposals for new build developments and community infrastructure (indoor and outdoor) that are likely to</u></b></p>

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			<p><u>be used by large volumes of people on a daily basis, especially by vulnerable groups. Community infrastructure should, where possible incorporate appropriate buffer zones to prevent or minimise exposure to air pollution sources.</u></p>
			<p><del>C.</del> Development proposals should give equal weight to the consideration of indoor air quality, with building design solutions specifying proven ventilation systems, especially with proposals which consider energy efficient building solutions, to avoid the unintended consequences of poor indoor ventilation.</p>
			<p><del>D.</del> <u>C.</u> An <u>Air Quality Impact Assessment</u>, based on current best practice, is required as part of <u>any the</u> planning application for:</p>
			<p>a. major developments;</p>
			<p>b. employment led developments;</p>
			<p>c. developments which will require substantial earthworks or demolition;</p>
			<p>d. developments which include <u>community infrastructure including</u> leisure, education and health facilities or open space (including child play space);</p>
			<p>e. new build developments in areas <u>along busy or congested road and rail lines where residents will be exposed to poor air quality</u> of sub-standard air quality; and</p>
			<p>f. developments which propose the use of Combined Heat and Power, biomass boilers or similar solutions that might impact air quality; <u>and</u></p>
			<p>g. <u>new developments within AQMAs</u></p>
			<p><del>E.</del> Where an air quality assessment indicates that a development will cause harm to air quality or where end users could be exposed to poor air quality, development will be resisted unless mitigation measures are adopted to reduce the impact to acceptable levels.</p>
			<p><del>F.</del> New build developments which propose to provide any private, communal, publicly accessible open space or child play space in areas of sub-standard air quality are required to demonstrate that they</p>

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			<p>have considered the positioning and design of the open space to reduce exposure of future users to air pollution.</p> <p><b><u>D.</u></b> <b><u>Development proposals should have regard to their individual and cumulative impacts on air quality. Proposals that do not meet the requirements of (A) and (B) above will be resisted unless appropriate measures are implemented to ensure adverse impacts can be mitigated to an acceptable level. Mitigation should be provided onsite unless it can be demonstrated that it is inappropriate and that off-site provision will deliver equivalent or wider benefits.</u></b></p>
			<p><i>Delete paragraphs 8.47 to 8.50 and replace with the following supporting text:</i></p> <p><b><u>Air Quality in Brentwood</u></b></p> <p><b><u>Transport generated emissions are the main source of poor air quality in the borough. Air quality relates to both particulate and gaseous pollution, including fumes, odours, dust and unsafe levels of Carbon Dioxide, Nitrogen Dioxide and other pollutants in the atmosphere which can impact environmental amenity for people and wildlife. This policy aims to address existing poor air quality and ensure new development does not contribute to the worsening of air quality across the borough, but instead contributes to improving air quality through design and other mitigation measures.</u></b></p> <p><b><u>The Council will ensure that all development plays its part in securing ‘clean growth’, in line with Government’s Clean Air Strategy (2019)<sup>1</sup>. As a minimum, development must not create further deterioration of existing poor air quality or lead to new exceedances of legal air quality standards or compromise achievement of compliance in those areas currently in exceedance, as currently stipulated by the Air Quality Standards Regulations 2010<sup>1</sup>. Development proposals should also reduce the population’s exposure to poor air quality, particularly for those groups who are most vulnerable to its impacts such as children and young people and older people.</u></b></p> <p><b><u>Air Quality Management Areas (AQMA)</u></b></p> <p><b><u>Exceedances of legal air quality standards are currently as provided by the Air Quality Standards Regulations (2010). Brentwood currently has three declared Air Quality Management Areas (AQMA) where exceedances have been previously recorded:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>AQMA No. 2: M25/Brook Street Roundabout;</u></b></li> <li>• <b><u>AQMA No. 4: A12/ Warescot Road/Hurstwood Avenue/Ongar Road;</u></b></li> <li>• <b><u>AQMA No. 7: A128/A1023 Junction (Wilson’s Corner).</u></b></li> </ul>

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			<p><u>AQMAs can be found on the Council’s website. Ongoing monitoring will continue and the AQMA areas will be adjusted and reported to DEFRA accordingly. Monitoring data of air pollution in these AQMAs since 2015 has shown that the air quality standard for Nitrogen Dioxide has been met. However, as these three AQMAs remain potentially problematic, they remain in place for now. The designated AQMAs are illustrated on the policies map and declared on the DEFRA website<sup>3</sup>; these will be subject to periodic review and updating. Development should have regard to the Council’s Air Quality Action Plan<sup>4</sup>.</u></p> <p><u>Air Quality Assessments</u></p> <p><u>An appropriate and proportionate assessment of air quality must be included with any application that may adversely affect local air quality or be significantly affected by existing poor air quality levels. It is important that applicants consider the need for any assessment before any application is submitted.</u></p> <p><u>Air Quality Assessments (AQA) must follow best practice guidance and should include the following as a minimum:</u></p> <ol style="list-style-type: none"> <li>a. <u>must address the impacts arising during construction and operation/occupation of the development;</u></li> <li>b. <u>assessments should take into account the individual and wider cumulative impacts on the proposed development, consistent with national policy;</u></li> <li>c. <u>where an AQA indicates a potential negative impact on air quality, the AQA should identify implementable measures that will minimise or mitigate impacts from the development;</u></li> <li>d. <u>an AQA with full dispersion modelling is required for all proposed Biomass and CHP boilers and this must demonstrate that the impact on nearby receptors is minimal.</u></li> </ol> <p><u>Development that involves significant demolition, construction or earthworks will be required to assess the risk of impacts according to the latest best practice guidance, such as the Institute of Air Quality Management’s (IAQM) ‘Air Quality Monitoring in the Vicinity of Demolition and Construction Sites’ (2018)<sup>5</sup>. Applicants should also refer to further guidance, such as the Considerate Contractor Advice Note<sup>6</sup> on the Council webpages.</u></p> <p><u>Mitigating Poor Air Quality</u></p> <p><u>Tackling poor air quality requires a multi-dimensional approach to help achieve the objective of improving air quality across Brentwood. Therefore, this policy should be read in conjunction with all other policies that together also address poor air quality impacts, including, but not limited to: BE09: Sustainable Means Of Travel And Walkable Streets, BE10: Sustainable</u></p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p><u>Passenger Transport, BE11: Electric And Low Emission Vehicles, BE12: Mitigating The Transport Impacts Of Development; NE02 Green and Blue Infrastructure.</u></p> <p><u>While focus is often on outdoor air quality, it is important that design proposals demonstrate how ventilation in buildings can be designed to prevent or reduce the health impacts of poor indoor air quality, whilst maintaining adequate energy and thermal performance as required by Strategic Policy BE01: Carbon Reduction and Renewable Energy. This is especially important for developments adjacent to key transport infrastructure where emissions are higher. Applicants are advised to look at best practice guidance on how to achieve safe indoor air quality in new developments, such as NICE 2020 guidance ‘Indoor Air Quality at Home’7.</u></p> <p><u>Appropriate measures are often cross-cutting and involve different actions across the different aspects of the development’s design proposals. Such measures should be proportionate to the scale of development and should include: sustainable transport considerations, such as reducing vehicular traffic levels, encouraging sustainable movement patterns; sustainable building design to reduce emissions throughout the lifetime of the building, or reducing emissions from associated plant equipment; improving or greening the public realm.</u></p> <p><u>Developments comprising new or enhanced community infrastructure, such as schools, should consider how they can include appropriate safe ‘Buffer Zones’, such as low traffic zones or traffic exclusion zones, to eliminate or reduce exposure. Implementation of these would require joint working between the Council, Essex County Council as the Lead Local Education Authority and Highways Authority, and relevant schools.</u></p> <ol style="list-style-type: none"> <li><u>1. <a href="https://www.gov.uk/government/publications/clean-air-strategy-2019">https://www.gov.uk/government/publications/clean-air-strategy-2019</a></u></li> <li><u>2. <a href="https://www.legislation.gov.uk/ukxi/2010/1001/contents/made">https://www.legislation.gov.uk/ukxi/2010/1001/contents/made</a></u></li> <li><u>3. <a href="https://uk-air.defra.gov.uk/aqma/local-authorities?la_id=33">https://uk-air.defra.gov.uk/aqma/local-authorities?la_id=33</a></u></li> <li><u>4. Air Quality Action Plan (2008), or any update of this <a href="http://aqma.defra.gov.uk/action-plans/BBC%20AQAP%202008.pdf">http://aqma.defra.gov.uk/action-plans/BBC%20AQAP%202008.pdf</a></u></li> <li><u>5. <a href="https://iaqm.co.uk/guidance/">https://iaqm.co.uk/guidance/</a></u></li> <li><u>6. <a href="https://www.brentwood.gov.uk/pdf/pdf_1185.pdf">https://www.brentwood.gov.uk/pdf/pdf_1185.pdf</a></u></li> <li><u>7. <a href="https://www.nice.org.uk/guidance/ng149/chapter/Recommendations#prioritising-indoor-air-quality-in-local-strategy-or-plans">https://www.nice.org.uk/guidance/ng149/chapter/Recommendations#prioritising-indoor-air-quality-in-local-strategy-or-plans</a></u></li> </ol>

MM Ref	Page	Policy / para.	Proposed modifications
MM78	220 - 223	Policy NE06 Paragraphs 8.51 - 8.64	<p><i>Amend Policy to read:</i></p> <p><b><u>STRATEGIC POLICY NE06 NE09: FLOOD RISK</u></b></p> <p>A. Proposed <b>New</b> development will be required to avoid, where possible, <b>areas of</b> flood risk to people and property and manage any residual risk, taking account of the impacts of climate change <b>by applying the Sequential and, where necessary, the Exception Tests in accordance with national guidance and policy.</b></p> <p>a. <del>applying the sequential test, directing development away from areas at risk of flooding, including those areas associated with surface water flood risk;</del></p> <p>b. <del>if necessary, applying the exception test;</del></p> <p>c. <del>safeguarding land from development that is required for current and future flood management; and</del></p> <p>d. <del>using opportunities offered by new development to reduce the causes and impacts of flooding</del></p> <p>B. <del>In areas designated as functional flood plains, or Critical Drainage Areas development will only be permitted in accordance with national policy and guidance, and then only if:</del> <b><u>A site specific Flood Risk Assessment must assess all sources of flooding. It should demonstrate how flood risk will be managed over the development's lifetime, taking climate change into account. A site specific FRA is required, in accordance with national policy guidance, for the following types of development:</u></b></p> <p>a. <del>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.</del> <b><u>all new development greater than 1 ha in size in Flood Zone 1;</u></b></p> <p><b><u>b. all development within a Critical Drainage Area;</u></b></p> <p><b><u>c. all new development (including minor development and change of use) in flood zones 2 and 3;</u></b></p>

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			<u>d.</u> <u>new development or a change of use to a more vulnerable class which may be subject to other sources of flooding.</u>
			<u>C.</u> <u>Where proposals satisfy the Sequential and Exception Tests design proposals should ensure that:</u>
			<u>a.</u> <u>the most vulnerable land uses are located in areas within the site that are at lowest risk of flooding;</u>
			<u>b.</u> <u>development will be safe for its lifetime taking account of the vulnerability of its users,</u>
			<u>c.</u> <u>flood risk will not increase elsewhere;</u>
			<del>b.</del> <u>d.</u> development would not constrain the natural function of the flood plain, either by impeding flow or reducing storage capacity;
			<del>c.</del> <u>e.</u> development is constructed so as to remain operational even at times of flood through resistant and resilient design;
			<u>f.</u> <u>appropriate mitigation measures are incorporated to address any residual flood risk safely, including safe access and egress for all likely users of the development;</u>
			<u>g.</u> <u>where necessary incorporate flood resistant and flood resilient design measures such that, in the event of a flood, the development could be quickly brought back into use without significant refurbishment;</u>
			<u>h.</u> <u>incorporate sustainable drainage systems in line with Policy <sup>BE08-5</sup> Sustainable Drainage, unless there is clear evidence that this would be inappropriate;</u>
			<u>i.</u> <u>where possible, the development will reduce flood risk overall.</u>

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			<p><u>i.</u> <b><u>safe access and escape routes are included where appropriate, as part of an agreed Emergency Response Plan, where required.</u></b></p>
			<p><i>Delete part C-E</i></p>
			<p><u>F-D.</u> Where the site is <b><u>additionally</u></b> located within a Critical Drainage Area (CDA), <b><u>development should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage.</u></b> development may have the potential to impact on the CDA in respect of surface water flooding. As a result of this, the site will require an individually designed mitigation scheme to address this issue.</p>
			<p><i>Reorder and amendment of paragraph 8.51 – 8.64 as below.</i></p> <p><i>Amend paragraph 8.51 to read:</i></p> <p>8.51 This policy should be read in conjunction with Policy BE08-5 Sustainable Drainage, <b><u>Strategic Policy NE02 Green and Blue Infrastructure and Policy BE02 Water Efficiency and Management</u></b> Policy NE01 Protecting and Enhancing the Natural Environment and Policy, NE02 Recreational Disturbance Avoidance and Mitigation Strategy (RAMS).</p> <p><i>Delete paragraphs 8.52 to 8.54</i></p>
			<p><i>Amend paragraph 8.55 to read:</i></p> <p><b><u>FLOOD RISK DATA AND ASSESSMENTS</u></b></p> <p>8.55 <del>As a Lead Local Flood Authority, In 2020</del> Essex County Council has produced <b><u>an updated</u></b> Surface Water Management Plans for boroughs in Essex and with updates to the Critical Drainage Areas (CDAs) for the borough <b><u>identifying an area specific action plan for each CDA. This must be taken into account by development proposals falling within each CDA.</u></b> Potential development sites in areas of identified flood risk have been subject to sequential and exception tests. <b><u>Applicants should also follow the guidance and recommendations set out in Strategic Flood Risk Assessment (SFRA 2018)<sup>1</sup> which was undertaken to assess the risk of flooding in Brentwood to inform development of the Local Plan.</u></b></p>
			<p><i>Insert new paragraphs to read:</i></p>



MM Ref	Page	Policy / para.	Proposed modifications
			<p><u>In line with the NPPF and associated Government guidance, a sequential approach will be applied when deciding on the location of new development to ensure that development is directed to those areas of the Borough, and locations within sites, that are at the lowest risk of flooding. The applicant must demonstrate the appropriateness of proposed uses within the different respective flood zones having regard to the Sequential and Exception Tests. Development proposals should be informed by site specific Flood Risk Assessments submitted by applicants. Assessments are required to take into account the long-term impact of climate change. The latest standing advice on climate change allowances published by the EA should be referred and form the basis of any assessment.</u></p> <p><u>Flood zones 2 and 3, and Critical Drainage Areas (CDA) (as defined by the 2018 modelling updates) are illustrated on the Policies map, using the latest available data. Applicants should consult the Environment Agency (EA) and Essex County Council as the Lead Local Flood Authority (LLFA) to establish whether the data has since been updated. All proposals will be assessed against the latest available information.</u></p> <p>Amend <i>paragraph 8.57 to read:</i></p> <p><b><u>EXTENT OF FLOOD RISK IN BRENTWOOD</u></b></p> <p>8.57 <u>Fluvial flood risk in Brentwood is not extensive and is largely limited to areas in very close proximity to local watercourses. Risk of flooding from surface water presents a more extensive zone of risk than the fluvial flood zones. This is because the fluvial flood zones in Brentwood are relatively narrow owing to the ‘headwater’ nature of most of the watercourses. The Brentwood Strategic Flood Risk Assessment (2018) 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 from Stondon Hall Brook, and the River Roding to the north of the borough. Areas at risk of fluvial surface water flooding are mainly rural and include low lying areas south of the A127 west and east of West Horndon. The most likely mechanism for surface water runoff generation is when heavy rainfall exceeds the capacity of the local drainage network and of the ground to infiltrate water; therefore surface treatments in new development are equally important in avoiding localised flooding. Therefore, Policy BE05 Sustainable Drainage must also be taken into account alongside flood risk. The feasibility of infiltration on site will need to be determined through a site-specific drainage assessment that forms part of the Drainage Strategy. Brentwood’s Surface Water Management Plan (SWMP 2015, updated 2020) and Strategic Flood Risk Assessment (SFRA 2018) provide additional information on other sources of flood risk and potential mitigation measures.</u></p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p><i>Delete paragraphs 8.58 to 8.62</i></p> <p><i>Amend paragraph 8.63 to read:</i></p> <p><b>FLOOD MANAGEMENT AND MITIGATION</b></p> <p>8.63 Developers are encouraged to refer to the Environment Agency’s Flood Risk Standing Advice for planning applicants; <del>Early pre-application discussion</del> <b><u>engagement</u></b> with Brentwood Borough Council, Essex County Council as the Lead Local Flood Authority, and <del>the</del> <b><u>the Environment Agency and the relevant water utility company (i.e. Thames Water or Anglian)</u></b> is <b><u>strongly</u></b> advised.</p> <p><i>Delete paragraph 8.64</i></p> <p><i>Insert new paragraphs to read:</i></p> <p><b><u>It is important that development does not increase flood risk to people, properties and infrastructure. All proposals should proactively seek to minimise and mitigate risk wherever possible, especially in areas with identified risk from flooding. Applicants will be expected to consider risk from all sources of flooding using appropriate up to date information. All development proposals should also take into consideration the impacts of climate change over the lifetime or the development.</u></b></p> <p><b><u>The SFRA recommends that ‘Functional Floodplain’ status is applied to all of Flood Zone 3 extent in the Borough (as described in Section 4.4), with the exception of the areas for which the EA hold detailed modelled data (Rivers Wid and Mardyke). All areas of Flood Zone 3 should have the Flood Zone 3b planning restrictions applied, as per Table D.2 in Appendix D of the SFRA. The EA would object to any new development in functional floodplain (Flood Zone 3b). Development should be located in areas suitable to the vulnerability level of the proposed uses, in accordance with the exceptions test. For any proposed water-compatible uses within a functional floodplain, the applicant must demonstrate that development is designed and constructed to:</u></b></p> <p><b><u>a. remain operational and safe for users in times of flood;</u></b></p> <p><b><u>b. result in no net loss of floodplain storage;</u></b></p> <p><b><u>c. not impede water flows and not increase flood risk elsewhere.</u></b></p> <p><b><u>Compatible development will be assessed in accordance with national planning policy guidance for flood risk vulnerability and flood zone ‘compatibility’ tables.</u></b></p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p><u>Where the Sequential and Exception Tests are satisfied, the Council expects that proposals fully investigate opportunities to avoid, reduce, manage and mitigate flood risk through the site's layout and design. Residual risk must be fully assessed and addressed by incorporating flood resistant design (e.g. constructed to prevent water from entering the building and damaging its fabric) and resilient design measures (e.g. impact is minimised, ensuring the building's structural integrity is maintained and that drying and cleaning can be facilitated).</u></p> <p><i>Move paragraph 8.56 to after new paragraphs and amend to read:</i></p> <p>8.56—The Council will work in partnership with the Environment Agency and the Lead Local Flood Authority (Essex County Council) to manage and mitigate flood risk. All development proposals in areas at risk of flooding will need to submit a <b>site specific</b> Flood Risk Assessment (FRA) in accordance with Policy BE08 Sustainable Drainage, commensurate with the scale of the flood risk and recognising all likely sources of flooding - surface water, ground water and watercourse flood risk. <b>Sites within a Critical Drainage Area are also required to submit a Drainage Strategy in line with Policy BE05 Sustainable Drainage</b> boundaries are provided by Essex County Council and should be considered.</p>
MM79	223	Policy NE07 Paragraph 8.65 - 8.72	<p><i>Amend Policy to read:</i></p> <p>POLICY <del>NE07</del> <b>NE10</b>: CONTAMINATED LAND AND HAZARDOUS SUBSTANCES</p>
			<p><b><u>Contaminated Land</u></b></p>
			<p>A. <del>Development proposals involving the use, movement or storage of hazardous substances will only be permitted within employment areas and p-</del>Planning permission will only be granted for development on, or near to land which is suspected to be contaminated, where the Council is satisfied that:</p>
			<p>a. <del>there will be no threat to the health or safety of future users or occupiers of the site or neighbouring land;</del> <b><u>any risks, including to human health and the environment, can be adequately addressed in order to make the development safe; and</u></b></p>
			<p>b. there will be no adverse impact on the environment and quality of local groundwater or quality of surface water; <del>and</del></p>
			<p><del>c. there would be no unacceptable adverse impacts on property</del></p>

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			<p>B. <del>The Council will require applicants proposing <b>Proposed</b> development on or near known or potentially contaminated land <b>will be required to submit a Phase 1 Preliminary Risk Assessment</b> detailed site characterisation and tiered risk assessment and to identify <b>the level and type of risk and, where necessary</b>; remedial measures that need to be carried out (including remedial treatment and monitoring arrangements), provided in a detailed Remediation Scheme. Evidence of remediation should be to the satisfaction of the relevant statutory regulators.</del></p>
			<p><b><u>a. undertake a Phase 2 Intrusive Site Investigation to provide a detailed assessment of contamination and risks to all receptors;</u></b></p>
			<p><b><u>b. prepare a Remediation Statement providing details of a remediation scheme appropriate to the individual site; and</u></b></p>
			<p><b><u>c. submit a Validation Report prior to the construction of the development.</u></b></p>
			<p><b><u>Hazardous Substances and Installations</u></b></p>
			<p><del>C. Planning permission will not be permitted 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.</del></p>
			<p><b><u>C. Development proposals involving the use, movement or storage of hazardous substances will only be permitted within designated employment areas as identified on the Policies Map and only if proposals can demonstrate that appropriate safeguards are in place to ensure there is no unacceptable risk to human health, safety and the environment.</u></b></p>
			<p><b><u>D. Development of a site in the vicinity of a hazardous installation, will only be permitted where it is demonstrated that development will not constitute an unacceptable risk to human health, safety and the environment. Depending on individual site circumstances proposals may be required to be accompanied by a Preliminary Risk Assessment and Management Strategy that clearly identifies risks and sets out measures to appropriately manage and mitigate these.</u></b></p>

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			<p><i>Re-order and amend paragraph 8.65 to 8.72 as below:</i></p> <p><b><u>Contaminated Land</u></b></p> <p>8.68 <del>In the context of development management, t</del>The Essex Contaminated Land Consortium's Land Affected by Contamination - Technical Guidance for Applicants and Developers (2014), provides detailed information on how to deal with land contamination. <del>8.65</del> <b><u>In accordance with this guidance,</u></b> <del>W</del>where sites are known to be contaminated, or where contamination is subsequently discovered, the 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 remediate the contamination. <del>This</del> <b><u>The guidance also</u></b> provides guidance on how planning conditions may be used to secure suitable remediation when dealing with planning applications where contaminated land is identified.</p> <p><del>8.66</del>—The adverse impact on the environment and quality of local groundwater or surface water should consider standards outlined in the ECC SuDS Design Guide (2016).</p> <p>8.67 Where insufficient information is submitted with a planning application for a contaminated, potentially contaminated or suspected contaminated site, the Council will take a precautionary approach when making a decision.</p> <p><b><u>Hazardous Substances and Installations</u></b></p> <p>8.69 The Planning (Hazardous Substances) Act 1990 aims to prevent major accidents and limit the consequences of such accidents. In considering <del>any planning applications</del> <b><u>proposals</u></b> for development which may involve hazardous substances, the Council will 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. <del>In appropriate cases, t</del>The Council will <del>therefore</del> consult and liaise with the Health and Safety Executive <b><u>and other expert bodies, where necessary</u></b> to seek technical advice on the <b><u>potential</u></b> <del>to minimise potential risks</del> <b><u>of a proposal, and follow the required regulatory procedures as appropriate.</u></b> <del>8.74</del>—Similarly, it would be inappropriate to grant planning permission for <del>d</del>Development proposals to expand existing sites handling or processing hazardous substances <b><u>will not be granted</u></b> where this</p>

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			<p>would harm public safety. <del>Should a developer have reason to believe a development site is contaminated, they must consult the Council as early as possible before an application is submitted.</del></p> <p>8.70 Hazardous substances are defined by the Planning (Hazardous Substances) Regulations 1992. The 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. <del>The 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.</del></p> <p>8.72 <del>Certain sites and pipelines are designated as notifiable installations by virtue of the quantities of hazardous substance stored or used.</del> <b>Similarly, <u>W</u></b>where development is proposed within the consultation <b>zone</b> distance of notifiable <b>hazardous</b> installations, the Council is required to consult the Health and Safety Executive <b>and other expert bodies</b> on the suitability of that development in relation to the risks <del>that the notifiable installation might posed</del> <b>by the existing establishment</b> to the surrounding population. <b><u>Where such development could affect a sensitive natural area, Natural England must be consulted. Other regulatory procedures may apply as appropriate.</u></b></p>
MM80	225	Policy NE08 Paragraph 8.77	<p><i>Amend Policy NE08 to read:</i></p> <p>POLICY <del>NE08</del> <b>NE11</b>: FLOODLIGHTING AND ILLUMINATION</p> <p>A. Development proposals involving floodlighting or any other means of illumination (other than advertisements) will only be permitted where the scheme:</p> <p>a. is appropriate for the intended use and has been appropriately designed to <b>prevent light spillage limit</b> <del>inappropriate light direction and intensity;</del></p> <p>b. is energy efficient;</p> <p>c. provides the minimum level of light necessary to achieve its purpose;</p>

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			d. uses an appropriate light spectrum and specification that will not be harmful to nocturnal wildlife or human health;
			e. <b><u>does not impact unacceptably on</u></b> <del>minimises losses to the night sky and</del> <b><u>or</u></b> <del>does not</del> give rise to any <b><u>unacceptable</u></b> increase in sky glow; and
			f. ensures the appearance <b><u>and design</u></b> of the installation when unlit is <b><u>sympathetic to the character and design of the development of which it forms part and will when lit</u></b> <del>acceptable, provides adequate protection from glare and light spill particularly in sensitive locations, such as residential areas, sites of nature conservation interest, and have no</del> <b><u>unacceptable</u></b> adverse effect on <b><u>visual</u></b> amenity, highway safety, landscape or <b><u>the</u></b> historic character <b><u>of the area.</u></b>
			B. Applicants will need to submit a full lighting strategy, proportionate to their application, specifying details of <b><u>external</u></b> lighting, <b><u>its</u></b> <del>their</del> power and type, <b><u>the</u></b> overall level and distribution of illumination and times of operation. <b><u>Appropriate</u></b> <del>Conditions may</del> <b><u>will</u></b> be imposed to restrict lighting levels and hours of use or require measures to be taken to minimise adverse effects <b><u>where reasonably necessary.</u></b>
			<i>Amend paragraph 8.77 to read:</i> 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. The Council will require a lighting strategy to accompany all full planning applications <b><u>which include floodlighting or other forms of external illumination.</u></b>
MM81	226 - 231	Paragraphs 8.79 - 8.97 Policy NE09 Paragraphs 8.85 - 8.97	<i>Amend supporting text paragraphs 8.79 to 8.81 as introductory text to Policy NE09 to read as below; and move to Chapter 4, before paragraph 4.24.</i> Green Belt and Rural Development Green Belt Local Context 8.80 London Metropolitan Green Belt was established by the Town and Country Planning Act 1974 to control the outward spread of London into surrounding counties such as Essex, <del>to ensure the land it kept permanently open.</del> This designation has provided an important protection to the borough's

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			<p>countryside. The Council strongly supports the continued preservation of the Metropolitan Green Belt, as the rural countryside setting is central to the borough's character, which has remained largely unspoilt. 8.79 Brentwood Borough Council comprises a main urban area with villages dispersed north and south of the main town. All built-up areas are entirely within the London Metropolitan Green Belt. Brentwood is circa 15,312 ha in area, of which 13,700 ha of land is currently designated as Green Belt (over 89% of the borough). Brentwood currently makes up approximately 2.83% of the overall London Metropolitan Green Belt area. This makes <b>With</b> Brentwood a borough with <b>being</b> the sixth highest Green Belt area in England. This significantly limits land available for development within the borough and has created the sharp contrast between urban and rural areas with little or no urban fringe.</p> <p>8.81 <b>However,</b> Given Brentwood's proximity to London and <b>good connectivity</b> the road network, there is huge demand and pressure for development. The Council has had to make some difficult, but informed decisions around the alternation of the Green Belt boundary, in line with national planning policy. <b><u>Through the Green Belt review process and alongside the Sustainability Appraisal process, exceptional circumstances were established to release a number of sites to meet housing, employment and Gypsy and Traveller needs, as described in Policy MG01 Managing Growth. The Policies Map illustrates the Green Belt boundary as established by this Local Plan, with defensible boundaries around the allocation sites.</u></b></p>
			<i>Delete paragraphs 8.82 to 8.84</i>
			<p><i>Amend Policy NE09 to read:</i></p> <p><b><u>STRATEGIC</u></b> POLICY NE09 <b><u>MG02</u></b>: GREENT BELT</p>
		A.	<p>The Metropolitan Green Belt within Brentwood Borough (as defined in the Brentwood Policies Map) will be preserved from inappropriate development so that it continues to maintain its openness and serve its key functions. <b><u>Planning permission will not be granted for inappropriate development in the Green Belt other than in very special circumstances.</u></b></p>
		B.	<p>All development proposals within the Green Belt will be considered <b><u>and assessed</u></b> in accordance with the provisions of <b><u>national planning policy</u></b>. the NPPF; development within the Green Belt will only be</p>



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			permitted if it maintains the Green Belt's openness and does not conflict with the purposes of the Green Belt or harm its visual amenities. Planning applications will not be supported, and will be refused if they:
			a. are deemed to impact the five purposes of the Green Belt;
			b. do not contribute to the beneficial use of the Green Belt;
			c. are not considered appropriate development; and
			d. other material considerations apply.
			C. Consideration will be given to Gypsy and Traveller allocations within the Green Belt as long as it meets the requirements set out in Policy HP08 Regularising Suitable Existing Traveller Sites. <b><u>The Council will seek to enhance the beneficial use of the Green Belt to provide or improve access to it; to provide or enhance opportunities for outdoor sport and recreation; to retain and enhance landscapes, visual amenity and biodiversity and; to improve damaged and derelict land. Development proposals in or adjacent to the Green Belt (including those the subject of allocations in this plan) will be expected to include measures to achieve these objectives so far as it is possible and appropriate.</u></b>
			D. <b><u>For site allocations which are being released from the Green Belt, development proposals should set out ways in which the impact of removing land from the Green Belt are to be offset through compensatory improvements to the environmental quality and accessibility of the remaining Green Belt land.</u></b> Consideration will also be given to planning applications related to not inappropriate sports and recreational facilities provided they meet the following criteria:
			a. the openness of the Green Belt is not compromised;
			b. in the situation for parking facilities, where appropriate, permeable surface should be considered to avoid surface water flooding;
			c. where the relocation and/or replacement of a sport and/or recreational building is being proposed, the building footprint is to be no larger than the existing footprint; and

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			<p>d. <del>the proposal adheres to the policy requirements as set out in BE41 Open Space, Sport and Recreational Facilities.</del></p>
			<p>E. <del>Proposals related to sustainable energy technologies will be supported as long as it adheres to the requirements set out in this policy, Policy BE03 Carbon Reduction, Renewable Energy and Water Efficiency and Policy BE04 Establishing Low Carbon and Renewable Energy Infrastructure Network.</del></p>
			<p><i>Amend paragraphs 8.85 to 8.87 as supporting text after Policy NE09 to read:</i></p> <p>Purpose of the Green Belt</p> <p>8.85 The National Planning Policy Framework sets out the five main purposes of the Green Belt:</p> <ul style="list-style-type: none"> <li>i. to check the unrestricted sprawl of large built-up areas;</li> <li>ii. to prevent neighbouring towns merging into one another;</li> <li>iii. to assist in safeguarding the countryside from encroachment;</li> <li>iv. to preserve the setting and special character of historic towns; and</li> <li>v. to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.</li> </ul> <p>Encouraging the Beneficial Use of Green Belt</p> <p>8.86 The NPPF (2018 <b>2021</b>, paragraph 144 <b>145</b>) promotes the beneficial use of the Green Belt. It states that once Green Belts have been defined, local planning authorities should plan positively to enhance their beneficial use, such as looking for opportunities to provide access, to provide opportunities for outdoor sport and recreation, to retain and enhance landscapes, visual amenity and biodiversity, or to improve damaged and derelict land. In Brentwood, there are many areas of the Green Belt which also perform other key environmental and recreational functions that must also be maintained in accordance with the relevant policies. For example, there are large areas of woodlands, golf courses, playing pitches, parks, 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. There is also an extensive network of public rights of way providing public access to open</p>

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			<p>countryside. Enhancement of these features <b><u>will be supported in line with Strategic Policy MG02 Green Belt</u></b>, is welcomed to maintain the beneficial use of the Green Belt.</p> <p>8.87 Furthermore, the NPPF states that any development proposals within Community Forests in the Green Belt should be subject to the normal policies for controlling development in Green Belts. The Thames Chase Community Forest reaches across much of the south western area of the borough. The Thames Chase Community Forest offers a valuable opportunity for improving the environment by upgrading the landscape and providing for recreation and wildlife and this will be supported in line with national policy and guidance. <del>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.</del></p>
			<p><i>Delete paragraphs 8.88 to 8.92</i></p>
			<p><i>Insert new paragraph after 8.87 to read:</i></p> <p>Proposals Affecting the Green Belt</p> <p><b><u>All Proposals coming forward in non-allocated Green Belt locations will be assessed in accordance with Strategic Policy MG02 Green Belt and national policy on Green Belt. Development will be considered inappropriate and refused unless very special circumstances are demonstrated and/or where the exceptions apply, in line with paragraph 145 and 146 of the NPPF. One of the Council's objectives is to support the rural economy and sustainability of villages. Where proposals align with these exceptions, proposals will be supported.</u></b></p>
			<p><i>Delete paragraph 8.93 to 8.97</i></p>
MM82	231 - 241	Policy NE10 - NE15 Paragraph 8.98 - 8.127	<p><i>Delete Policy NE10 - NE15 and paragraph 8.98 - 8.127</i></p>

## Chapter 9

MM Ref	Page	Policy / para.	Proposed modifications
MM83	243 - 244	Paragraph 9.1 Paragraph 9.2 Paragraph 9.7 Paragraph 9.17	<p><i>Amend paragraph 9.1 to read:</i></p> <p>Site allocations listed in this chapter reflect the spatial strategy and strategic objectives. <b><u>The allocations in this chapter contain specific, sometimes additional, requirements to those set out in Chapter 5-8. All site allocations are depicted on the Policies Map of the Local Plan.</u></b></p> <p><i>Amend paragraph 9.2 to read:</i></p> <p>Each policy follows a similar format, providing the basis for how development is expected to come forward and key considerations. <b><u>While these site policies detail specific requirements for each allocation site, these requirements will apply along with all other relevant policy requirements in this Local Plan unless the site specific requirements differ.</u></b> The following sub-headings are included for each site:</p> <p>[...]</p>
			<p><i>Amend paragraph 9.7 to read:</i></p> <p>This chapter is split according to strategic sites and non-strategic <b><u>allocation</u></b> sites for both housing <b><u>residential-led</u></b> and employment development. <b><u>Residential-led allocation sites will deliver predominantly residential dwellings along with any necessary infrastructure. The Strategic Allocations also include other primary uses, such as employment and community infrastructure and are therefore referred to as Residential-Led, Mixed-use sites. In summary, the sites are:</u></b> are listed as follows:</p> <p>Strategic Housing <b><u>Residential and Mixed-Use</u></b> Allocations:</p> <ul style="list-style-type: none"> <li>• R01 Dunton Hills Garden Village Strategic Allocation</li> <li>• R02 Land at West Horndon Industrial Estate, West Horndon</li> <li>• R03 Land North of Shenfield, Shenfield</li> <li>• R04 &amp; R05 Ford Headquarters and Council Depot, Warley</li> </ul> <p>Housing <b><u>Residential-led</u></b> Allocations:</p>

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			<ul style="list-style-type: none"> <li>• R06 Land at Nags Head Lane, Brentwood</li> <li>• R07 Sow and Grow Nursery, Pilgrims Hatch</li> <li>• R08 Land at Mascalls Lane, Warley</li> <li>• R09 Land at Warley Hill, Warley</li> <li>• R10 Brentwood Railway Station Car Park, Brentwood</li> <li>• R11 Westbury Road Car Park, Brentwood</li> <li>• R12 Land at Hunter House, Brentwood</li> <li>• R13 Chatham Way Car Park, Brentwood</li> <li>• R14 William Hunter Way car park, Brentwood</li> <li>• R15 Wates Way Industrial Estate, Brentwood</li> <li>• R16 &amp; R17 Land off Doddinghurst Road, Pilgrims Hatch and Brentwood</li> <li>• <del>R18 Land off Crescent Drive, Shenfield</del></li> <li>• R19 Land at Priests Lane, Shenfield</li> <li>• <del>R20 The Eagle and Child Public House, Shenfield</del></li> <li>• R21 Land South of Ingatestone, Ingatestone</li> <li>• R22 Land Adjacent to the A12, Ingatestone</li> <li>• R23 Brizes Corner Field, Kelvedon Hatch</li> <li>• R24 Land off Stocks Lane, Kelvedon Hatch</li> <li>• R25 Land North of Woollard Way, Blackmore</li> <li>• R26 Land North of Orchard Piece, Blackmore</li> </ul>
			<p><i>Amend paragraph 9.17 to read:</i></p> <p>9.17 The policy framework is set out as one policy in <b>two parts</b> <del>three</del> interrelated <del>policies</del> domains:</p> <p>i. <b>The Strategic Allocation</b> – describing the overarching site requirements and land use parameters;</p> <p>ii. <b>The Spatial Design Masterplanning, Delivery and Legacy</b> – prescribing the physical components needed to deliver the necessary quality for a healthy, liveable and sustainable village; <del>and</del> <del>iii. The Delivery Approach and Legacy Management</del> – setting out the expectations for how the delivery of the scheme should be <del>approached</del> <b>achieved</b> to embed an ethos of co-design and participation, timely and good governance in delivery, and an embedded legacy management of the village assets.</p>
MM84	252 - 253	Policy R01(I)	<p><i>Amend Policy R01(I) to read:</i></p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p>A-<del>1.</del> In line with Policy SP02 <del>MG01</del>, land at Dunton Hills (east of the A128, south of the A127 and north of the C2C railway line, approximately 259.2 ha in size) is allocated for residential-led <u>mixed-use</u> development to deliver Dunton Hills Garden Village.</p>
			<p>B-<del>2.</del> The development will deliver a mix of uses to comprise around <del>1,650</del> 2,770 homes in the plan period (as part of an overall indicative capacity of around 4,000 homes, <u>the remainder</u> to be delivered beyond 2033) together with the necessary community, <u>retail and</u> employment <u>development and</u>, <del>utility,</del> <u>comprehensive infrastructure</u> to support a self-sustaining, thriving and healthy garden village.</p>
			<p>C. <del>Successful development of the site allocation will require:</del></p>
			<p>a-<del>3.</del> <del>to be underpinned by Garden Community principles and qualities;</del> <u>The development proposals shall accord with all other relevant policies in this Plan (including the master planning and delivery requirements of R01(ii)).</u></p>
			<p>b. <del>proposals to creatively address the key site constraints and sensitively respond to the unique qualities and opportunities afforded by the historic and environmental setting to deliver a distinctive and well designed garden village in line with the Vision and Strategic Aims and Objectives for Dunton Hills Garden Village; and</del></p>
			<p>c. <del>a holistic and comprehensive locally led masterplan and design guidance to be developed, co-designed with relevant stakeholders to frame and guide the consistent quality and delivery across the site by different contractors over the delivery period.</del></p>
			<p>D. <del>The proposed development will be required to deliver all the necessary supporting spatial components and infrastructure to address the specific site constraints, potential impacts of development and harness the site opportunities as set out by the strategic Dunton Hills aims and objectives. Permission for mixed-use development will be granted subject to the parameters and components specified below:</del></p>
			<p><u>Housing Mix</u></p>
			<p>a-<del>4.</del> <u>Development proposals shall deliver</u> delivery of at least 2,770 dwellings in the plan period providing a balanced <u>an appropriate</u> variety of housing typologies <u>types</u> and tenures <u>in accordance with the</u></p>

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			<p><b><u>Borough's identified needs and the specific needs of Dunton Hills Garden Village. They shall</u></b>  <del>and</del> includes <b><u>the</u></b> provision of:</p>
			<p><b><u>a.</u></b> self-build <b><u>and custom build</u></b> plots in <del>line</del> <b><u>accordance</u></b> with Policy HP01;</p>
			<p><b><u>b.</u></b> specialist accommodation <b><u>including three care homes of around 80 beds each, or an appropriate mix of specialist accommodation to meet identified needs,</u></b> in <del>line</del> <b><u>accordance</u></b> with Policy HP04;  <del>and</del></p>
			<p><b><u>c.</u></b> affordable housing in <del>line</del> <b><u>accordance</u></b> with Policy HP05; <b><u>and</u></b></p>
			<p><del>b-d.</del> the provision of a minimum of 5 serviced Gypsy and Traveller pitches, <b><u>the location of the pitches and the timing of their provision to be identified in the masterplan</u></b> <del>in line with Policy HP07(b).</del></p>
			<p><b><u>Employment Development</u></b></p> <p><del>c. 5.</del> <b><u>land (5.5 ha) for Development proposals shall deliver around 5.5 hectares of employment development distributed across the village that may include office, light industrial and research and development uses coming within use class E and other employment development that is complementary to, and compatible with, the residential development that is complementary to, and compatible with, the residential development.</u></b> <del>space (in line with Policy PC03) to accommodate a creative range of employment uses suitable for a vibrant village within and a predominantly residential area, including use class A1-A5 and appropriate B class uses;</del></p>
			<p><b><u>Main Town Centre Uses</u></b></p>
			<p><b><u>6.</u></b> <b><u>Development proposals shall deliver main town centre uses in the form of a district shopping centre and such additional local centres (in accordance with Policy PC04) as may be appropriate in order to optimise the self-sufficiency of the village. These centres shall also include the community and health facilities and related infrastructure necessary to support the village's residential and working community.</u></b></p>
			<p><b><u>Schools and Nurseries</u></b></p>

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			<p><u>7.</u> <b><u>Development proposals shall make provision for:</u></b></p>
			<p><del>d.</del> <u>a.</u> land (circa 7.9 hectares) for a co-located secondary school (Use Class D1); <b><u>a site for one secondary school (Class F1) (around 7.9 hectares) with capacity to co-locate one primary school and one early years and childcare nursery facility;</u></b></p>
			<p><del>e.</del> <u>b.</u> land (circa 2.1 hectares each) for two co-located primary school and early years and childcare nurseries (Use Class D1); <b><u>sites for an additional two primary schools with sufficient capacity to co-locate early years and childcare nursery facilities (around 2.1 hectares each);</u></b></p>
			<p><u>c.</u> <b><u>a site for a further primary school with capacity to co-locate early years and childcare nursery facilities (around 2.1 hectares) in the eventuality primary education provision is not co-located with the secondary school; and</u></b></p>
			<p><del>f.</del> <u>d.</u> land (circa 0.13 hectares) for two <b><u>An additional</u></b> stand-alone early years and childcare nursery <b><u>(around 0.13 hectares).</u></b> (Use Class D1);</p>
			<p><del>g.</del> <u>e.</u> community and health infrastructure proportional to the scale of development, and in line with best practice principles of healthy design;</p> <p><b><u>Green and Blue Infrastructure</u></b></p>
			<p><del>h.</del> <u>8.</u> green and blue infrastructure to be a minimum of <b><u>Not less than</u></b> 50% of the total land <b><u>allocated</u></b> area <b><u>shall comprise green and blue infrastructure which should, so far as possible, be of a multi-functional nature.</u></b></p>
			<p><del>i.</del> provision in the form of a 'District Shopping Centre' with additional Local Centre(s) in line with Policy PC08, as appropriate to the scale and phasing of the development.</p>
			<p><b><u>Mobility Hub</u></b></p>
			<p><del>j.</del> <u>9.</u> the provision of new and enhanced transport infrastructure to mitigate the impacts of development and to support sustainable modes of transport to travel to ensure connectivity to key destinations, increase transport choice, support changes in travel behaviour, and to minimise the impact of traffic on the local</p>



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			<p>and wider network, in line with Policy BE16 and as detailed in R01(ii) G-J; <b><u>Development proposals shall make provision for a mobility hub that should relate well to the district centre.</u></b></p>
			<p>k. <del>strategically designed and appropriately phased infrastructure, employing the most up to date technologies to ensure a smart, sustainable and a resilient basis for drainage and flood management in line with Policy BE08; water management including potable/ non-potable and opportunities for grey water harvesting in line with BE03; efficient and cost saving energy networks in line with Policy BE04; superfast broadband in line with Policy BE10.</del></p>
MM85	254 - 267	Policy R01 (II) Policy R01 (III) Paragraph 9.24 Paragraph 9.32 Paragraph 9.44 Paragraph 9.45 Paragraph 9.72 Paragraph 9.76	<p><i>Delete Policy R01(III).</i></p> <p><i>Replace policy R01 (II) with the following:</i></p> <p><b><u>A. MASTER PLANNING, DESIGN AND LAYOUT</u></b></p> <p><b><u>1. All development proposals in relation to the site shall be in accordance with an approved masterplan. The masterplan shall relate to the whole of the allocated site and be produced in consultation with local communities and all relevant stakeholders and shall include a statement that sets out how community and stakeholder involvement has influenced the design and layout of the submitted scheme and its intended delivery. The masterplan shall be submitted to the Council for its approval as part of the initial application for planning permission.</u></b></p> <p><b><u>2. The Masterplan shall:</u></b></p> <p>a. <b><u>be locally led with the community and relevant stakeholders, in accordance with the Statement of Community Involvement;</u></b></p> <p>b. <b><u>show the intended overall design and layout of the development and the proposed distribution and location of uses across the allocated site which shall accord with, be based upon and promote, garden community principles;</u></b></p> <p>c. <b><u>demonstrate how heritage assets and their settings will be sympathetically and appropriately integrated into the development taking into account the requirements of para.3 (j) and (k) below;</u></b></p>

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			<ul style="list-style-type: none"> <li>d. <u>identify the proposed transport links, including access to the site and main internal highway links, and principal walking, cycling and bridle links (including links to the surrounding network);</u></li> <li>e. <u>show all structural landscaping and the treatments to be provided (including boundary treatments and measures to ensure visual separation from Basildon);</u></li> <li>f. <u>incorporate a green and blue infrastructure (GBI) plan which is informed by a comprehensive wildlife and habitat survey and heritage and landscape character assessments;</u></li> <li>g. <u>show all intended links to the surrounding footpath and cycleway network and indicate potential footpath and cycleway links towards Basildon from the east of the allocated site;</u></li> <li>h. <u>show how development will safeguard, maintain and, where possible, enhance key views in and across the allocated site;</u></li> <li>i. <u>provide for convenient pedestrian and cycle links through the allocated site towards West Horndon Station;</u></li> <li>j. <u>show how the development will incorporate the full range of sustainable transport measures, including dedicated bus services and the location and nature of a mobility hub;</u></li> <li>k. <u>identify the locations and forms of the district and local centres, including the community and healthcare facilities to be provided within them; and</u></li> <li>l. <u>include a phasing and implementation plan which should secure the phasing of development across the whole of the allocated site to ensure that the development will be carried out in a manner that co-ordinates the implementation and timely delivery of such on and off-site infrastructure as shall be necessary to support each phase of the development and to ensure that:</u> <ul style="list-style-type: none"> <li>i. <u>its impacts are satisfactorily and appropriately mitigated;</u></li> <li>ii. <u>there are adequate supporting facilities (including access to adequate green and blue infrastructure, leisure and sporting facilities, shops, health, community and educational</u></li> </ul> </li> </ul>

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			<p><u>facilities) that will allow the early establishment of a self-sufficient and cohesive community; and</u></p> <p>iii. <u>occupiers have an appropriate range of sustainable travel options at their disposal, including access to bus services and the cycle and pedestrian link to West Horndon Station.</u></p>
			<p><b><u>3. Development proposals should:</u></b></p> <p>a. <u>ensure that detailed design and layout take into account the guidance contained in an adopted Garden Village Design Supplementary Planning Document;</u></p> <p>b. <u>ensure that the distinct spatial, landscape and heritage qualities of the site and its surroundings are maintained or enhanced;</u></p> <p>c. <u>ensure that the design of neighbourhoods is such that they are harmoniously integrated to form an overall Dunton Hills Garden Village identity and distinctiveness;</u></p> <p>d. <u>combine to provide an appropriate range of densities across the site to ensure a compact and highly networked, walkable and fine-grained environment with a highly connected street-based layout that encourages walking and cycling;</u></p> <p>e. <u>provide, or relate appropriately to, well-located multi-functional green infrastructure to promote safe, and attractive environments for leisure, informal and adventure play areas, recreational and sporting activity with appropriate levels of surveillance;</u></p> <p>f. <u>promote coherent signposted internal footpath and cycleway routes that provide, where appropriate, links to the surrounding network with sympathetic transitions between the rural and urban environment;</u></p> <p>g. <u>provide or contribute to a highly connected and biodiverse ecological network that incorporates existing habitats of value and natural features and, wherever possible and appropriate, the enhancement of existing, or the creation of new, habitats; and</u></p> <p>h. <u>provide an appropriate level of formal sports pitches and facilities to meet the evolving needs of the community;</u></p>

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			<ul style="list-style-type: none"> <li>i. <u>ensure the public right of way (PRoW) network is retained and enhanced;</u></li> <li>j. <u>take into account the findings of the Council’s Heritage Impact Assessment for Dunton Hills Garden Village and the applicant’s own heritage impact assessment and demonstrate what measures have been taken to sustain the significance of any affected designated and non-designated heritage asset and its setting, whether on or off-site and, wherever possible and appropriate, include other measures to provide enhancements to their settings; and</u></li> <li>k. <u>take into account the results of a programme of archaeological evaluation based upon a geophysical survey of the development area.</u></li> </ul>
			<b><u>B. DELIVERY AND LEGACY</u></b>
			<b><u>1. The development shall be delivered in accordance with the phasing and implementation plan</u></b>
			<b><u>2. A mobility hub shall be delivered prior to the first occupation of the development with provision for its enhancement and expansion during later phases to be secured through a planning obligation.</u></b>
			<b><u>3. Where directly related to Dunton Hills Garden Village applicants will be required to make necessary, appropriate and reasonable financial contributions via planning obligations towards:</u></b> <ul style="list-style-type: none"> <li>a. <u>off-site highway infrastructure improvements as may be necessary and reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes) unless, in the case of the A127/128 junction, the applicant enters into a s.278 Agreement for its timely construction, if more appropriate;</u></li> <li>b. <u>necessary bus services to nearby school facilities prior to the delivery of on-site school facilities which services shall be secured before first residential occupation of the development;</u></li> <li>c. <u>phased improvements to West Horndon Station in accordance with policy BE08 to increase its capacity and utility in line with anticipated demand generated by each phase the development;</u></li> </ul>

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			<p>d. <u>off-setting improvements to the Hartswood Golf Course.</u></p>
			<p><u>4. Appropriate restrictions on the occupation of the development will be imposed subject to the carrying out and completion of necessary highway works to secure safe and convenient access to the site, including any necessary improvements to the A128 corridor.</u></p>
			<p><u>5. Proposals shall include a supporting statement which addresses the long-term governance and stewardship arrangements (including the management, maintenance and renewal) of the green and blue infrastructure, the public realm, community and other relevant public facilities. Planning obligations will be sought to secure the long term funding, maintenance and stewardship of the assets where necessary.</u></p>
			<p><u>6. Proposals shall include a supporting statement that includes initiatives to ensure that new jobs created are offered to local people, as far as may be reasonably possible.</u></p>
			<p><i>Amend para 9.24 to read:</i></p> <p><b><u>The Council will adopt the Dunton Hills Garden Village Design Supplementary Planning Document to give guidance to subsequent applications.</u></b> The sections that follow elaborate on the spatial vision and policy requirements <b><u>which should be incorporated into the masterplan and any subsequent applications.</u></b> <del>This</del> <b><u>The</u></b> vision for Dunton Hills Garden Village was defined following two Design Review workshops with Design Council CABE in 2016, as well as a broad analysis of site constraints and opportunities.</p>
			<p><i>Amend paragraph 9.32 to read:</i></p> <p>Delivering great, affordable homes will be key to making the village distinctive and desirable. At least <b><u>1,650</u></b> <del>2,770</del> homes are planned within the Plan period, with an indicative capacity of around 4,000 <b><u>(with the remainder</u></b> to be delivered after 2033, subject to further feasibility and assessment of impact). Homes, like the public realm, should be well designed and provide a range of choice (dwelling sizes, tenure) to encourage a balanced community from all stages of life to form.</p>
			<p><i>Insert new paragraph after paragraph 9.35 to read:</i></p>

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			<p><u>In accordance with the Golf Course Needs Assessment and the Golf Feasibility Assessment, the loss of entry level golf at Dunton Hills Garden Village should be mitigated by an appropriate financial contribution being secured through a planning obligation that would be used towards enhancements to the Borough Council’s Hartwood Golf Course.</u></p>
			<p><i>Amend paragraph 9.44 to read:</i></p> <p>The creative interweaving of productive landscapes within the GBI network will be favourably considered. The agricultural heritage of the site also provides a distinctive cultural context to inspire green infrastructure with a focus on food production and foraging as alternatives to grassed verges; while grass verges are well-loved in garden communities, alternatives or additional elements, such as sensory street verges through the use of, for example, culinary herbs or linear orchards could also add another dimension to the much-loved and expected tree-lined and green verge-lined residential avenues. <u>Allotments and open space should be provided in accordance with Policy NE05 and NE06</u> <del>Some allotments should be created for any residential properties which may not have a garden.</del></p>
			<p><i>Add new para after title Designated &amp; Non-designated heritage assets, before para 9.45, to read:</i></p> <p><u>The site contains and is surrounded by the following listed buildings, designated heritage assets and non-designated heritage assets as set out in the Heritage Impact Assessment:</u></p> <ul style="list-style-type: none"> <li>• <u>Dunton Hills (Grade II listed building) on-site;</u></li> <li>• <u>Dunton Hall (Grade II listed building) off-site;</u></li> <li>• <u>Church of St Mary (Grade II listed building) off-site;</u></li> <li>• <u>Church of All Saints (Grade II* listed building) off-site;</u></li> <li>• <u>Nightingale Hall (non-designated) on-site;</u></li> <li>• <u>Nightingales Lane (non-designated) on-site;</u></li> <li>• <u>Windmill – site of (non-designated) on-site;</u></li> <li>• <u>Cottages at entrance to golf course (non-designated) on-site.</u></li> </ul> <p><u>Development proposals will be considered by reference to the requirements of Policy BE16 and the specific requirements of R01(ii).</u></p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p><i>Amend paragraph 9.72 to read:</i></p> <p>Strategic Objective DH02b (all through learning) will deliver an exemplar all through school with a design that fosters a learning environment for all <b>education facilities that meet the needs of all</b> types of learners and through life, from nursery through to adult learning opportunities.</p>
			<p><i>Amend paragraph 9.76 to read:</i></p> <p>Equally however, the village centre(s) themselves should provide opportunities for localised employment, to ensure a thriving local economy ensues. The spaces should be designed to flexibly accommodate A1-A5 use classes as well as appropriate B4 <b>Class E and other employment development</b> and other community spaces <b>that are complementary to, and compatible with, the residential development</b>, thinking particularly about the entrepreneurial potential of the area.</p>
MM86	269 - 271	Policy R02 Paragraph 9.90 Paragraph 9.95	<p><i>Amend Policy to read:</i></p> <p>Land at West Horndon Industrial Estate, as shown in Appendix 2, is allocated for residential <b>led mixed use</b> development. Development proposals should consider the following:</p> <p>A.1. Amount and Type of Development</p> <p><b><u>Development should provide:</u></b></p> <p>a. provision for around 580 new homes of mixed size and type, including affordable housing;</p> <p>b. provision for a residential care home (<b>around 60 bed residential care home or an appropriate mix of specialist accommodation to meet identified needs, in accordance with policy HP04.</b> scheme as part of the overall allocation);</p> <p>c. provision for 5% self-build and custom build housing across the entire allocation area; and</p>

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			d. provision of <u>around</u> 2ha of land for employment purposes <u>which may include light industrial, offices, research and development (within class E) or other sui generis employment uses which are compatible with the residential development.</u> and
			e. <u>retail, commercial and leisure floorspace sufficient to meet the needs of the new community;</u>
		B. <u>2.</u> Development Principles	
			<b><u>Proposals should:</u></b>
			a. <u>be accompanied by a</u> comprehensive masterplan and phasing strategy to be prepared and considered as planning application <u>inform detailed proposals as they</u> comes forward;
			b. <u>provide</u> vehicular access via Station Road and Childerditch Lane;
			d. <u>create</u> <del>creating</del> a new village centre, connected by sustainable links to West Horndon station, and which comprises retail and supporting community facilities;  <u>provide</u> new and enhanced links with West Horndon station and the wider area; and
			e. provide well-connected internal road layouts which allow for good accessibility;
			f. <u>provide</u> <del>provision for</del> new multi-functional green infrastructure, including public open space <u>in</u> g. <u>accordance with Policies NE02 and NE05;</u>
			provide for appropriate landscaping and buffers along sensitive boundary adjoining the railway line; <u>and</u>  h. <u>any future development should sustain and where possible enhance the significance of the Scheduled former parish church and churchyard of St Nicholas, the Grade II* listed Registered Park and Garden of Thorndon Hall, and the Thorndon Park Conservation Area and their settings.</u>



MM Ref	Page	Policy / para.	Proposed modifications
			<p><del>C.</del> <b>3.</b> Infrastructure Requirements</p> <p>a. provision <b>of</b> <del>for</del> improved bus service;</p> <p>b. provision <b>of</b> <del>for</del> health facilities; and</p> <p>c. <b>as</b> the site is located within a Critical Drainage Area. <del>This development may have the potential to impact on the Critical Drainage Area in respect of surface water flooding. As a result of this, the site is likely to require an individually designed mitigation scheme to address this issue</del> <b><u>should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage.</u></b></p>
			<p><b>4. <u>Infrastructure Contributions</u></b></p> <p><b><u>Applicants will also be required to make necessary financial contributions via planning obligations towards:</u></b></p> <p><b><u>a. off-site highway infrastructure improvements as may be reasonably required by National Highways (M25, J28 and J29) and Essex County Council (A127/B186) in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);</u></b></p> <p><b><u>necessary bus services to secondary school facilities prior to the delivery of secondary school at Dunton Hills Garden Village, which services shall be secured before first residential occupation of the development;</u></b></p> <p><b><u>phased improvements to West Horndon Station in accordance with policy BE08 to increase its capacity and utility in line with anticipated demand generated by each phase the development.</u></b></p>
			<p><i>Amend second sentence of paragraph 9.90 to read:</i></p> <p>The site will provide for around 580 homes, anticipated to be delivered between 2021/22 and <del>2030/31</del> <b><u>2026/27 and 2032/33.</u></b></p>
			<p><i>Delete paragraph 9.94</i></p>

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			<p><i>New paragraph to be inserted after paragraph 9.95 to read:</i></p> <p><b><u>Development of this site will need to sustain and, where opportunities arise, enhance the Scheduled former parish church and churchyard of St Nicholas, the Grade II* listed Registered Park and Garden of Thorndon Hall, and Thorndon Park Conservation Area and their settings.</u></b></p>
MM87	271 - 273	Policy R03 Paragraph 9.98 Paragraph 9.100 Paragraph 9.104 Paragraph 9.105	<p><i>Amend Policy R03 to read:</i></p> <p>Land north of Shenfield, <del>as shown in Appendix 2,</del> known as Officer's Meadow and surrounding land is allocated for residential <b><u>led mixed-use</u></b> development. <del>Development proposals should consider the following:</del></p> <p><b><u>A.1.</u></b> Amount and Type of Development</p> <p><b><u>Development should provide:</u></b></p> <p>a. <del>provision for around 825 new homes of mixed size and type, including affordable housing</del></p> <p>b. <del>provision of land (circa</del> <b><u>around 2.1 hectares</u></b>) <b><u>of land</u></b> for a co-located primary school and early years and childcare nursery (Use Class D1);</p> <p><del>provision for a residential care home (around 60 bed</del> <b><u>residential care</u></b> home <b><u>or an appropriate mix of specialist accommodation to meet identified needs, in accordance with policy HP04.</u></b> <del>scheme as part of the overall allocation);</del></p> <p>c. <del>provision for 5% self-build and custom build housing across the entire allocation area; and</del></p> <p>d. <del>provision of</del> <b><u>around</u></b> 2ha of land for employment purposes <b><u>which may include light industrial, offices, research and development (within class E) or other sui generis employment uses which are compatible with the residential development.</u></b></p> <p><b><u>B.2.</u></b> Development Principles</p> <p><b><u>Proposals should:</u></b></p>

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			<p>a. <del>be accompanied by a</del> comprehensive masterplan and phasing strategy to <del>be prepared and considered as planning applications</del> <b><u>inform detailed proposals as they</u></b> come forward;</p> <p>b. <del>site is identified as a key gateway location and development should</del> <b><u>be of a design quality and layout that reflect reflects</u></b> this in terms of design quality particularly <b><u>its key gateway location, particularly</u></b> on land near to Junction 12, A12;</p>
			c. <b><u>provide</u></b> vehicular access via Chelmsford Road (A1023) and Alexander Lane;
			d. <b><u>allow if possible</u></b> <del>potential</del> for <del>the</del> diversion of Alexander Lane <b><u>to creating create</u></b> a quiet lane for pedestrians and cyclists, with the provision for new and improved route through the development site linking to Chelmsford Road;
			e. <del>enhancing sustainable links</del> <b><u>enhance walking, cycling and public transport services</u></b> with Shenfield station and local services and facilities in the wider area, <b><u>including Brentwood Town Centre</u></b> ;
			f. provide well-connected internal road layouts which allow for good accessibility;
			g. <del>provision</del> <b><u>provide</u></b> new multi-functional green infrastructure including public open <b><u>space in accordance with Policies NE02 and NE05</u></b> ;
			h. maintain and enhance Public Rights <del>s</del> of Way within the site and to the wider area; <del>and</del>
			i. protect and where appropriate enhance the Local Wildlife Site (Arnold's Wood);
			j. provide for appropriate landscaping and buffers along sensitive boundaries adjoining the A12 and railway line;
			k. <b><u>maintain the same amount of existing playing field provision on site or, where this cannot be achieved, provide replacement playing fields (including supporting ancillary facilities) of equivalent or better provision in terms of quantity and quality in a suitable location prior to commencement of development on the playing field. Any replacement playing field provision</u></b>

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			<p><u>should not prejudice Shenfield High School or the community from meeting their playing pitch needs; and</u></p>
			<p><u>l. be designed to ensure a coherent functional relationship with the existing development, which should be well integrated into the layout of the overall masterplan.</u></p>
			<p><del>C. 3.</del> Infrastructure Requirements</p>
			<p><u>Proposals should:</u></p>
			<p>a. provide pedestrian and cycle crossing points across Chelmsford Road (A1023) where appropriate; <b>and</b></p>
			<p>b. <del>provision for</del> <u>provide an</u> improved bus service.; <b>and</b></p>
			<p>c. <u>as</u> the site is located within a Critical Drainage Area. <del>This development may have the potential to impact on the Critical Drainage Area in respect of surface water flooding. As a result of this, the site is likely to require an individually designed mitigation scheme to address this issue</del> <b><u>should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage.</u></b></p>
			<p><u>4. Infrastructure Contributions</u></p>
			<p><u>a. Applicants will also be required to make necessary financial contributions via planning obligations towards:</u></p> <p><u>off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);</u></p>
			<p><u>b. 'quietway' cycle routes connecting transfer hubs to schools in Brentwood Town Centre.</u></p>
			<p><i>Insert an additional paragraph before paragraph 9.98 to read:</i></p> <p><b><u>This policy does not apply to the existing properties that existed prior to the adoption of the Plan.</u></b></p>

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			<p><i>Amend paragraph 9.100 as follows:</i></p> <p>Given the scale of development, a wide range of new community services and facilities including a new co-located primary school and early years and childcare nursery, open space and play facilities are required. These services and facilities should be of an appropriate scale to serve the new communities and located where they will be easily accessible by walking, cycling and public transport to the majority of residents in the development.</p>
			<p><i>Delete paragraph 9.104</i></p>
			<p><i>Amend paragraph 9.105 to read</i></p> <p>The development will be required to provide appropriate habitat mitigation and creation, and appropriate buffers to the Local Wildlife Site (Arnold's Wood). <del>As the site is located within a Critical Drainage Area early consultation with the Lead Local Flood Authority (Essex County Council) will be required to determine appropriate mitigation which should be incorporated into the overall design of the scheme.</del> <b><u>The site falls within the Shenfield CDA and is at potential risk of flooding from surface water as show on the EAs Risk of Flooding From Surface Water Maps. Any development within this area should be directed away from areas of existing flooding and where possible should try to have a positive impact on existing areas of flood risk downstream of the development. Early Engagement with the LLFA in this area is critical to ensure that existing and potential flood risk is properly managed.</u></b></p>
MM88	274 - 275	Policy R04 and R05 Paragraph 9.106 Paragraph 9.110	<p><i>Amend the Policy R04 and R05 to read:</i></p> <p>Policy R04 and R05: Ford Headquarters and Council Depot</p> <p>The Ford Headquarters and Council Depot, Warley, <del>as shown in Appendix 2,</del> is allocated for residential-<b><u>led, mixed-use development</u></b>. Development proposals should consider the following:</p>
			<p><b><u>A.1.</u></b> Amount and Type of Development</p>
			<p><b><u>Development should provide:</u></b></p>

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			a. <del>provision for around 473</del> <b>133</b> new homes of mixed size and type, including affordable housing;
			b. <del>provision for a residential care home (around 60 bed</del> <b>residential care home or an appropriate mix of specialist accommodation to meet identified needs, in accordance with policy HP04.</b> <del>scheme as part of the overall allocation);</del>
			c. <del>provision for 5% self-build and custom build</del> <b>housing</b> across the entire allocation area; and
			d. <del>provision of</del> <b>around</b> 2ha of land for employment purposes <b>which may include light industrial, offices, research and development (within class E) or other sui generis employment uses which are compatible with the residential development.</b>
			<del>B.2.</del> <b>2.</b> Development Principles
			<b><u>Proposals should:</u></b>
			a. <b><u>be accompanied by a</u></b> comprehensive masterplan and phasing strategy to <del>be prepared and considered as planning applications</del> <b><u>inform detailed proposals as they</u></b> come forward;
			b. <b><u>provide</u></b> vehicular access via Eagle Way and The Drive;
			c. provide well-connected internal road layouts which allows for good accessibility;
			d. integrate existing community facilities within new development <del>provision for new multi-functional green infrastructure including public open space;</del>
			e. <b><u>provide for new multi-functional green infrastructure including public open space in accordance with Policies NE02 and NE05;</u></b>
			f. <del>consideration of historic context for the area;</del> <b><u>any future development should sustain and where possible enhance the significance of the Grade II listed Blenheim House and the Chapel of the Royal Anglian and Essex Regiments and their settings;</u></b>

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			<p><del>g.</del> preserve the setting of two listed buildings on adjoining land to the west; and</p> <p><del>h.</del> <b>g.</b> protect and where appropriate enhance the Local Wildlife Sites (Barrack Wood/Donkey Lane Plantation); <b><u>and</u></b></p> <p><del>i.</del> <b>h.</b> <b><u>provide an improved bus service.</u></b></p>
			<p><del>C.</del> <b>3.</b> Infrastructure Requirements <b><u>Drainage</u></b></p> <p><del>a.</del> Provision for improved bus service; and</p> <p><del>b.</del> <b><u>As</u></b> the site is located within a Critical Drainage Area. This development may have the potential to impact on the Critical Drainage Area in respect of surface water flooding. As a result of this, the site is likely to require an individually designed mitigation scheme to address this issue <b><u>should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage.</u></b></p>
			<p><b><u>4.</u></b> <b><u>Infrastructure Contributions</u></b></p> <p><b><u>a.</u></b> <b><u>Applicants will also be required to make necessary financial contributions via planning obligations towards:</u></b></p> <p><b><u>off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);</u></b></p> <p><b><u>b.</u></b> <b><u>'quietway' cycle routes connecting transfer hubs to schools in Brentwood Town Centre.</u></b></p>
			<p><i>Amend second sentence of paragraph 9.106 to read:</i></p> <p>The site will provide for around 473 <b><u>133</u></b> homes, anticipated to be delivered between <del>2024/25 and 2032/33</del> <b><u>2022/23 and 2024/25.</u></b></p> <p><i>Delete paragraph 9.109</i></p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p><i>Amend paragraph 9.110 of supporting text to read:</i></p> <p><b><u>Development of this site will need to sustain and, where opportunities arise, enhance the Grade II listed Blenheim House and the Chapel of the Royal Anglian and Essex Regiments and their settings. This development should be of high quality design.</u></b> The historic context of the site including previous use by the Essex Regiment and current use by Ford Motor Company provides an opportunity to promote local history</p>
MM89	276 - 277	Policy R06 Paragraph 9.113 Paragraph 9.115	<p><i>Amend Policy R06 to read:</i></p> <p>Land off Nags Head Lane, Brentwood, <del>as shown in Appendix 2,</del> is allocated for housing development around 125 new homes. <del>Development proposals should consider the following:</del></p> <p><del>A.</del></p> <p><del>Amount and Type of Development</del></p> <p><del>a.</del></p> <p><del>provision for around 125 new homes of mixed size and type.</del></p> <p><del>B.1.</del> Development Principles</p> <p><b><u>Proposals should:</u></b></p> <p>a. <b><u>provide</u></b> vehicular access via Nags Head Lane</p> <p>b. <del>provision</del> <b><u>provide</u></b> for <b><u>good</u></b> pedestrian and cycle connections <b><u>to routes identified within the Brentwood Cycle Action Plan or other relevant evidence;</u></b></p> <p>c. <del>provision</del> <b><u>provide</u></b> for public open space <b><u>in accordance with policies NE02 and NE05;</u></b> and</p> <p>d. <del>provide for</del> sensitive landscaping along the north and eastern boundaries adjoining existing commercial development and residential dwellings; <b><u>and</u></b></p>



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			<p><u>e.</u> <b><u>any future development at R06 should sustain and where possible enhance the significance of The Grade II listed Nags Head public house and its setting.</u></b></p>
			<p><del>C. 2.</del> <b><u>Infrastructure Requirements-Drainage</u></b></p>
			<p>a- <del>As the site is located within a Critical Drainage Area. This development may have the potential to impact on the Critical Drainage Area in respect of surface water flooding. As a result of this, the site is likely to require an individually designed mitigation scheme to address this issue</del> <b><u>should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage.</u></b></p>
			<p><u>3.</u> <b><u>Infrastructure Contributions</u></b></p> <p><b><u>Applicants will also be required to make necessary financial contributions via planning obligations towards:</u></b></p>
			<p><u>a.</u> <b><u>off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);</u></b></p>
			<p><u>b.</u> <b><u>'quietway' cycle routes connecting transfer hubs to schools in Brentwood Town Centre.</u></b></p> <p><i>Amend third sentence of paragraph 9.113 to read:</i></p> <p>The site will provide for around 125 homes, anticipated to be delivered between <del>2021/22 and 2025/26</del> <b><u>2022/23 and 2025/26.</u></b></p>
			<p><i>Delete paragraph 9.115</i></p> <p><i>Additional supporting text to be inserted after paragraph 9.115 to read:</i></p> <p><b><u>Development of this site will need to sustain and, where opportunities arise, enhance the Grade II listed Nags Head public house and its setting. This development should be of high quality design.</u></b></p>

MM Ref	Page	Policy / para.	Proposed modifications
MM90	277 - 278	Policy R07 Paragraph 9.117 Paragraph 9.120	<p><i>Amend Policy R07 to read:</i></p> <p>Sow and Grow Nursery, Pilgrims Hatch, <del>as shown in Appendix 2,</del> is allocated for housing development. around 38 new homes. Development proposals should consider the following:</p> <p>A. <del>Amount and Type of Development</del></p> <p>a. <del>provision for around 38 new homes of mixed size and type, including affordable housing.</del></p> <p><del>B.1.</del> <b>Development Principles</b></p> <p><b><u>Proposals should:</u></b></p> <p>a. <b><u>provide</u></b> vehicular access via Ongar Road;</p> <p>b. <del>provision</del> <b><u>provide for good</u></b> pedestrian and cycle connections <b><u>to routes identified within the Brentwood Cycle Action Plan or other relevant evidence;</u></b></p> <p>c. <del>preserve the setting of the Historic Park and Garden site (South Weald Park) to west of the site</del> <b><u>any future development should sustain and where possible enhance the significance of the Grade II listed Registered Park and Garden of South Weald Park and its setting;</u></b> and</p> <p>d. provide for sensitive landscaping along the south western boundary adjoining the allotments.</p> <p><del>C.2.</del> <b><u>Infrastructure Requirements-Drainage</u></b></p> <p>a. <b><u>As</u></b> the site is located within a Critical Drainage Area. This development may have the potential to impact on the Critical Drainage Area in respect of surface water flooding. As a result of this, the site is likely to require an individually designed mitigation scheme to address this issue <b><u>should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage.</u></b></p> <p><b><u>3. Infrastructure Contributions</u></b></p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p><b><u>Applicants will also be required to make necessary financial contributions via planning obligations towards:</u></b></p> <p><b><u>a. off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);</u></b></p> <p><b><u>b. 'quietway' cycle routes connecting transfer hubs to schools in Brentwood Town Centre.</u></b></p> <p><i>Amend fourth sentence of paragraph 9.117 to read:</i></p> <p>The site will provide for around 37 homes, anticipated to be delivered <del>between 2020/21 and 2021/22</del> <b><u>in 2022/23.</u></b></p> <p><i>Delete paragraph 9.119</i></p> <p><i>Amend paragraph 9.120 of supporting text to read:</i></p> <p><b><u>Development of this site will need to sustain and, where opportunities arise, enhance the Grade II listed Registered Park and Garden of South Weald Park and its setting. This development should be of high quality design and</u></b> <del>The development</del> <b><u>will be required to provide</u></b> appropriate landscaping and buffers to protect the amenity of the adjoining allotments and <b><u>setting of the</u></b> <del>nearby</del> Historic Park and Garden at South Weald Park</p>
MM91	278 - 279	Policy R08 Paragraph 9.122	<p><i>Amend Policy R08 to read:</i></p> <p>Land at Mascalls Lane, Warley, <del>as shown in Appendix 2,</del> is allocated for housing development. for around 9 new homes. <del>Development proposals should consider the following:</del></p> <p><del>A. Amount and Type of Development</del></p> <p><del>a. provision for around 9 new homes of mixed size and type.</del></p> <p><b><u>B.1.</u></b> Development Principles</p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p><b><u>Proposals should:</u></b></p> <p>a. <b><u>provide</u></b> vehicular access via Mascalls Lane; and</p> <p>b. provide for <b><u>appropriate landscaping along</u></b> sensitive landscaping along the north, east and western boundaries adjoining existing residential dwellings.</p> <p><del>C. 2. Infrastructure Requirements</del> <b><u>Drainage</u></b></p> <p>a. <b><u>As</u></b> the site is located within a Critical Drainage Area. This development may have the potential to impact on the Critical Drainage Area in respect of surface water flooding. As a result of this, the site is likely to require an individually designed mitigation scheme to address this issue <b><u>should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage.</u></b></p> <p><i>Amend third sentence of paragraph 9.122 to read:</i></p> <p>The site will provide for around 9 homes anticipated to be delivered in 2020/24 <b><u>2022/23</u></b>.</p> <p><i>Delete paragraph 9.124</i></p>
MM92	279 - 280	Policy R09 Paragraph 9.126 Paragraph 9.129	<p><i>Amend Policy R09 to read:</i></p> <p>Land off Warley Hill, Warley, <del>as shown in Appendix 2,</del> is allocated for housing development. around 43 new homes. <del>Development proposals should consider the following:</del></p> <p><del>A. Amount and Type of Development</del></p> <p>a. <del>provision for around 43 new homes of mixed size and type, including affordable housing.</del></p> <p><del>B. 1. Development Principles</del></p> <p><b><u>Proposals should:</u></b></p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p>a. <b>provide</b> vehicular access via Pastoral Way;</p> <p>b. <del>preserve the setting of nearby listed buildings</del> <b><u>any future development should sustain and where possible enhance the significance of the Grade II listed Warley Hospital, Tower at Warley Hospital and Lodge to Warley Hospital and their settings; and</u></b></p> <p>c. provide for sensitive landscaping throughout the site and consider the need for the retention of some existing trees on site where appropriate.</p>
			<p><del>C. 2.</del> <b><u>Infrastructure Requirements-Drainage</u></b></p>
			<p>a. <del>As the site is located within a Critical Drainage Area. This development may have the potential to impact on the Critical Drainage Area in respect of surface water flooding. As a result of this, the site is likely to require an individually designed mitigation scheme to address this issue</del> <b><u>should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage.</u></b></p>
			<p><del>3.</del> <b><u>Infrastructure Contributions</u></b></p> <p><b><u>Applicants will also be required to make necessary financial contributions via planning obligations towards:</u></b></p>
			<p>a. <b><u>off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);</u></b></p>
			<p>b. <b><u>'quietway' cycle routes connecting transfer hubs to schools in Brentwood Town Centre.</u></b></p>
			<p><i>Amend third sentence of paragraph 9.126 to read:</i></p> <p>The site will provide for around 43 homes, anticipated to be delivered between <del>2023/24 and 2024/25</del> <b><u>2022/23 and 2023/24.</u></b></p>
			<p><i>Delete paragraph 9.128</i></p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p><i>Amend paragraph 9.129 of supporting text to read:</i></p> <p>The site forms part of the former Warley Hospital estate with nearby Grade II Listed Buildings situated to the north (Tower House and Lodge at Warley Hospital). <del>The setting of these will need appropriate consideration in forming the design and layout of the site.</del> <b><u>Development of this site will need to sustain and, where opportunities arise, enhance the Grade II listed Warley Hospital, Tower at Warley Hospital and Lodge to Warley Hospital and their settings. This development should be of high quality design.</u></b></p>
MM93	280 - 282	Policy R10 Paragraph 9.131	<p><i>Amend Policy R10 to read:</i></p> <p>Brentwood Railway Station car park, <del>as shown in Appendix 2,</del> is allocated for housing development. around 400 <b><u>200</u></b> new homes. <del>Development proposals should consider the following:</del></p> <p>A. Amount and Type of Development</p> <p>a. <del>provision for around 100 new homes of mixed size and type, including affordable housing.</del></p> <p><del>B.1.</del> <b><u>1.</u></b> Development Principles</p> <p><b><u>Proposals should:</u></b></p> <p>a. <b><u>provide</u></b> vehicular access via St. James Road;</p> <p>b. <del>provision</del> <b><u>provide for good</u></b> pedestrian and cycle connection <b><u>to routes identified within the Brentwood Cycle Action Plan or other relevant evidence;</u></b></p> <p>c. <del>provision</del> <b><u>provide for</u></b> public open space <b><u>as required by Policy NE05; and</u></b></p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p>d. <del>development proposals should consider wider Town Centre parking needs in collaboration with other development sites where there is existing parking on site, in order to ensure that the current level of Town Centre public parking spaces is maintained</del> <b><u>parking on site is sufficient to meet existing and future rail traveller needs.</u></b></p>
			<p><del>C. 2.</del> <b><u>Infrastructure Requirements-Drainage</u></b></p>
			<p>a. <del>As the site is located within a Critical Drainage Area. This development may have the potential to impact on the Critical Drainage Area in respect of surface water flooding. As a result of this, the site is likely to require an individually designed mitigation scheme to address this issue</del> <b><u>should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage.</u></b></p>
			<p><b><u>3. Infrastructure Contributions</u></b></p>
			<p><b><u>Applicants will also be required to make necessary financial contributions via planning obligations towards:</u></b></p>
			<p>a. <b><u>off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);</u></b></p>
			<p>b. <b><u>'quietway' cycle routes connecting transfer hubs to schools in Brentwood Town Centre.</u></b></p>
			<p><i>Amend third sentence of paragraph 9.131 to read:</i></p> <p>The site will provide for around 400 <b><u>200</u></b> homes, anticipated to be delivered between 2029/30 and 2032/33.</p> <p><i>Delete paragraph 9.133</i></p>

MM Ref	Page	Policy / para.	Proposed modifications
MM94	282 - 283	Policy R11  Paragraph 9.137  Paragraph 9.140	<p><i>Amend Policy R11 to read:</i></p> <p>Land off Westbury Road, Brentwood, <del>as shown in Appendix 2,</del> is allocated for housing development, around 45 new homes. Development proposals should consider the following:</p>
			<p>A. Amount and Type of Development</p> <p>a. <del>provision for around 45 new homes of mixed size and type, including affordable housing.</del></p>
			<p><del>B.1.</del> Development Principles</p>
			<p><b><u>Proposals should:</u></b></p>
			<p>a. <b><u>provide</u></b> vehicular access via Westbury Road;</p>
			<p>b. <del>site is identified as a key opportunity area within the Town Centre Design Plan and development should reflect this in terms of design quality;</del> <b><u>be designed to a high standard to meet the objectives of the Town Centre Design Plan as part of a key opportunity area;</u></b></p>
			<p>c. <del>provision</del> <b><u>provide</u></b> for <b><u>good</u></b> pedestrian and cycle connections <b><u>to routes identified within the Brentwood Cycle Action Plan or other relevant evidence;</u></b></p>
			<p>d. <del>preserve and where appropriate enhance the character and appearance of the Conservation Area which adjoins the site;</del> <b><u>any future development at R11 should sustain and where possible enhance the significance of the Brentwood Town Centre Conservation Area and the Grade II listed building at 120 High Street and their settings;</u></b></p>



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			e. preserve the setting of nearby listed buildings
			f. <b><u>e.</u></b> <b><u>be accompanied by a</u></b> heritage assessment taking account of archaeological potential for the historic core of Brentwood; and
			g. <b><u>f.</u></b> development proposals should consider wider Town Centre parking needs in collaboration with other development sites where there is existing parking on site, in order to ensure that the current level of Town Centre public parking spaces is maintained. <b><u>the retention of public parking spaces to be reconfigured and integrated with the new development, provided that the number of spaces to be included is sufficient to meet overall town centre public parking needs in combination with other public parking provision within the town centre.</u></b>
			G. <b><u>2.</u></b> Infrastructure Requirements <b><u>Drainage</u></b>
			a. <b><u>As</u></b> the site is located within a Critical Drainage Area. This development may have the potential to impact on the Critical Drainage Area in respect of surface water flooding. As a result of this, the site is likely to require an individually designed mitigation scheme to address this issue <b><u>should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage.</u></b>
			<b><u>3.</u></b> <b><u>Infrastructure Contributions</u></b>
			<b><u>Applicants will also be required to make necessary financial contributions via planning obligations towards:</u></b>
			<b><u>a.</u></b> <b><u>off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);</u></b>
			<b><u>b.</u></b> <b><u>'quietway' cycle routes connecting transfer hubs to schools in Brentwood Town Centre.</u></b>

MM Ref	Page	Policy / para.	Proposed modifications
			<p><i>Amend third sentence of paragraph 9.137 to read:</i></p> <p>The site will provide for around 45 homes, anticipated to be delivered <del>between 2020/21 and 2021/22</del> <b><u>in 2023/24.</u></b></p> <p><i>Delete paragraph 9.139</i></p> <p><i>Amend paragraph 9.140 of supporting text to read:</i></p> <p>The site is situated in an important central location in within Brentwood Town Centre. <b><u>Development of this site will need to sustain and, where opportunities arise, enhance the Grade II listed building at 120 High Street, and the Brentwood Town Centre Conservation Area and their settings.</u></b>  <del>Appropriate consideration therefore needs to be given to preservation and where appropriate enhancing the nearby Conservation Area and setting of Listed Buildings.</del></p>
MM95	283 - 284	Policy R12 Paragraph 9.142 Paragraph 9.144	<p><i>Amend Policy R12 to read:</i></p> <p>Land at Hunter House, <del>as shown in Appendix 2,</del> is allocated for housing development around 48 new homes. <del>Development proposals should consider the following:</del></p>
			<p>A. <del>Amount and Type of Development</del></p> <p>a. <del>provision for around 48 new homes of mixed size and type, including affordable housing</del></p> <p><b><u>B.1.</u></b> Development Principles</p>
			<p><b><u>Proposals should:</u></b></p>

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			a. <b><u>provide</u></b> vehicular access via Western Road;
			b. <del>provision</del> <b><u>provide</u></b> for <b><u>good</u></b> pedestrian and cycle connections <b><u>to routes identified within the Brentwood Cycle Action Plan or other relevant evidence;</u></b>
			<b><u>c.</u></b> <b><u>any future development at R12 should sustain and where possible enhance the significance of the Brentwood Town Centre Conservation Area and its setting; and</u></b>
			<del>e.</del> <b><u>d.</u></b> <b><u>be accompanied by a</u></b> heritage assessment taking account of archaeological potential for the historic core of Brentwood.
			<del>C. 2.</del> <b><u>Infrastructure Requirements-Drainage</u></b>
			a. <del>As</del> the site is located within a Critical Drainage Area. This development may have the potential to impact on the Critical Drainage Area in respect of surface water flooding. As a result of this, the site is likely to require an individually designed mitigation scheme to address this issue <b><u>should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage.</u></b>
			<b><u>3.</u></b> <b><u>Infrastructure Contributions</u></b>  <b><u>Applicants will also be required to make necessary financial contributions via planning obligations towards:</u></b>
			<b><u>a.</u></b> <b><u>off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);</u></b>
			<b><u>b.</u></b> <b><u>'quietway' cycle routes connecting transfer hubs to schools in Brentwood Town Centre.</u></b>

MM Ref	Page	Policy / para.	Proposed modifications
			<p><i>Amend third sentence of paragraph 9.142 to read:</i></p> <p>The site will provide for around 48 homes, anticipated to be delivered between 2024/25 <b><u>2025/26</u></b> and 2026/27.</p> <p><i>Delete paragraph 9.144</i></p> <p><i>Additional supporting text to be inserted after paragraph 9.144 to read:</i></p> <p><b><u>Development of this site will need to sustain and, where opportunities arise, enhance the Brentwood Town Centre Conservation Area and its setting. This development should be of high quality design.</u></b></p>
MM96	285 - 286	Policy R13 Paragraph 9.146 Paragraph 9.148	<p><del>A.</del> <i>Amend Policy R13 to read:</i></p> <p><del>a.</del> Chatham Way car park, Brentwood, as shown in Appendix 2, is allocated for housing development around 31 new homes. <del>Development proposals should consider the following:</del></p> <p><del>Amount and Type of Development</del></p> <p><del>provision for around 31 new homes of mixed size and type, including affordable housing.</del></p> <p><b><u>B.1.</u></b> Development Principles</p> <p><b><u>Proposals should:</u></b></p> <p>a. <b><u>provide</u></b> vehicular access via Chatham Way;</p> <p>b. <del>provision</del> <b><u>provide</u></b> for <b><u>good</u></b> pedestrian and cycle connections;</p>

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			<p>c. <del>possible retention</del> <u>retain of as much</u> public car parking <u>as possible</u> along with Westbury Road and William Hunter Way Housing sites;</p>
			<p>d. <del>preserve and where appropriate enhance the character and appearance of the Conservation Area which the site is situated within</del> <u>any future development should sustain and where possible enhance the Brentwood Town Centre Conservation Area and its setting;</u></p>
			<p>e. <u>be accompanied by a</u> heritage assessment taking account of archaeological potential for the historic core of Brentwood.; and</p>
			<p>f. <del>development proposals should consider wider Town Centre parking needs in collaboration with other development sites where there is existing parking on site, in order to ensure that the current level of Town Centre public parking spaces is maintained.</del> <u>the retention of public parking spaces to be reconfigured and integrated with the new development, provided that the number of spaces to be included is sufficient to meet overall town centre public parking needs in combination with other public parking provision within the town centre.</u></p>
			<p><del>C. 2.</del> <u>Infrastructure Requirements-Drainage</u></p>
			<p>a. <u>As</u> the site is located within a Critical Drainage Area. <del>This development may have the potential to impact on the Critical Drainage Area in respect of surface water flooding. As a result of this, the site is likely to require an individually designed mitigation scheme to address this issue</del> <u>should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage.</u></p>
			<p><u>3. Infrastructure Contributions</u></p>
			<p><u>Applicants will also be required to make necessary financial contributions via planning obligations towards:</u></p>

MM Ref	Page	Policy / para.	Proposed modifications	
			a.	<u>off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);</u>
			b.	<p><u>'quietway' cycle routes connecting transfer hubs to schools in Brentwood Town Centre.</u></p> <p><i>Amend third sentence of paragraph 9.146 to read:</i></p> <p>The site will provide for around 31 homes, anticipated to be delivered <del>between 2020/21 and 2021/22</del> <u>in 2026/27.</u></p> <p><i>Delete paragraph 9.148</i></p> <p><i>Additional supporting text to be inserted after paragraph 9.148 to read:</i></p> <p><u>Development of this site will need to sustain and, where opportunities arise, enhance the Brentwood Town Centre Conservation Area and its setting. This development should be of high quality design.</u></p>
MM97	286 - 287	Policy R14 Paragraph 9.150 Paragraph 9.152	<del>A.</del> <u>1.</u>	<p><i>Amend Policy R14 to read:</i></p> <p>William Hunter Way car park, Brentwood, <del>as shown in Appendix 2,</del> is allocated for housing and retail <u>residential-led mixed use</u> development. Development proposals should consider the following:</p> <p>Amount and Type of Development</p> <p><u>Development should provide:</u></p>
			a.	<del>provision for around 300 new homes of mixed size and type, including affordable housing; and</del>

MM Ref	Page	Policy / para.	Proposed modifications
			<p>b. <del>provision for retail use,</del> <b><u>commercial and leisure floorspace sufficient to meet the needs of the new community;</u></b></p>
		<p>B. <del>2.</del></p>	<p>Development Principles</p> <p><b><u>Proposals should:</u></b></p> <p>a. <b><u>provide</u></b> vehicular access via William Hunter Way;</p> <p>b. <del>site is identified as a key opportunity area within the Town Centre Design Plan and development should reflect this in terms of design quality;</del> <b><u>be designed to a high standard to meet the objectives of the Town Centre Design Plan as part of a key opportunity area;</u></b></p> <p>c. <b><u>be the subject of a</u></b> comprehensive masterplan to <del>be developed</del> <b><u>to inform detailed proposals as they come forward, to include with</u></b> full consideration of the sensitive site edges;</p> <p>d. <del>provision</del> <b><u>provide</u></b> for <b><u>good</u></b> pedestrian and cycle connections <b><u>to routes identified in the Brentwood Cycle Action Plan or other relevant evidence;</u></b></p> <p>e. <del>preserve and where appropriate enhance the character and appearance of the Conservation Area which adjoins the site</del> <b><u>any future development should sustain and where possible enhance the Brentwood Town Centre Conservation Area and its setting;</u></b></p> <p>f. <b><u>be accompanied by a</u></b> heritage assessment taking account of archaeological potential for the historic core of Brentwood.; and</p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p data-bbox="618 209 2033 432">g development proposals should consider wider Town Centre parking needs in collaboration with other development sites where there is existing parking on site, in order to ensure that the current level of Town Centre public parking spaces is maintained <b><u>the retention of public parking spaces to be reconfigured and integrated with the new development, provided that the number of spaces to be included is sufficient to meet overall town centre public parking needs in combination with other public parking provision within the town centre.</u></b></p> <p data-bbox="618 472 1223 504">C. <b><u>3.</u></b> Infrastructure Requirements <b><u>Drainage</u></b></p> <p data-bbox="618 544 2069 687">a. <b><u>As</u></b> the site is located within a Critical Drainage Area. This development may have the potential to impact on the Critical Drainage Area in respect of surface water flooding. As a result of this, the site is likely to require an individually designed mitigation scheme to address this issue <b><u>should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage.</u></b></p> <p data-bbox="618 703 1115 759"><b><u>4.</u></b> <b><u>Infrastructure Contributions</u></b></p> <p data-bbox="618 791 1935 871">a. <b><u>Applicants will also be required to make necessary financial contributions via planning obligations towards:</u></b></p> <p data-bbox="618 911 2051 1023">b. <b><u>off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);</u></b></p> <p data-bbox="723 1062 1951 1094"><b><u>‘quietway’ cycle routes connecting transfer hubs to schools in Brentwood Town Centre.</u></b></p> <p data-bbox="723 1134 1375 1166"><i>Amend third sentence of paragraph 9.150 to read:</i></p> <p data-bbox="723 1206 2040 1270">The site will provide for around 300 homes, anticipated to be delivered <del>between 2022/23 and 2028/29</del> <b><u>in 2026/27.</u></b></p> <p data-bbox="723 1334 1032 1366"><i>Delete paragraph 9.152</i></p>



MM Ref	Page	Policy / para.	Proposed modifications
			<p><i>Additional supporting text to be inserted after paragraph 9.152 to read:</i></p> <p><b><u>Development of this site will need to sustain and, where opportunities arise, enhance the Brentwood Town Centre Conservation Area and its setting. This development should be of high quality design.</u></b></p>
MM98	288 - 289	Policy R15 Paragraph 9.154 Paragraph 9.158	<p><i>Amend Policy R15 to read:</i></p> <p>Wates Way Industrial Estate, Brentwood, as shown in Appendix 2, is allocated for housing and retail <b><u>residential-led mixed use</u></b> development. Development proposals should consider the following:</p> <p>A. <b><u>1.</u></b> Amount and Type of Development</p> <p><b><u>Development should provide:</u></b></p> <p>a. <del>provision for around 80</del> <b><u>46</u></b> new homes of mixed size and type, including affordable housing; and</p> <p>b. <del>provision for retail use,</del> <b><u>commercial and leisure floorspace sufficient to meet the needs of the new community;</u></b></p> <p>B. <b><u>2.</u></b> Development Principles</p> <p><b><u>Proposals should:</u></b></p> <p>a. <b><u>provide</u></b> vehicular access via Ongar Road;</p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p>b. provision <del>provide for</del> public open space <u>as required by policy NE05</u>;</p> <p>c. provision <del>provide for</del> <u>good</u> pedestrian and cycle connections <u>to routes identified in the Brentwood Cycle Action Plan or other relevant evidence</u>; and</p> <p>d. <del>consideration of historic context for the area.</del></p>
			<p><del>C. 3.</del> <u>Infrastructure Requirements-Drainage</u></p> <p>a. <u>As</u> the site is located within a Critical Drainage Area. This development may have the potential to impact on the Critical Drainage Area in respect of surface water flooding. As a result of this, the site is likely to require an individually designed mitigation scheme to address this issue <u>should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage.</u></p>
			<p><del>4.</del> <u>Infrastructure Contributions</u></p> <p><u>Applicants will also be required to make necessary financial contributions via planning obligations towards:</u></p> <p>a. <u>off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);</u></p> <p>b. <u>'quietway' cycle routes connecting transfer hubs to schools in Brentwood Town Centre.</u></p> <p><i>Amend third sentence of paragraph 9.154 to read:</i></p> <p>The site will provide for around <del>80</del> <u>46</u> homes, anticipated to be delivered between 2022/23 and <del>2025/26</del> <u>2023/24</u>.</p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p><i>Delete paragraph 9.156</i></p> <p><i>Delete paragraph 9.158</i></p>
MM99	289 - 290	<p>Policy R16 and R17</p> <p>Paragraph 9.160</p>	<p><i>Amend Policy R16 and R17 to read:</i></p> <p>Policy R16 <del>&amp; R17</del>: Land off Doddinghurst Road</p> <p>Land off Doddinghurst Road, Pilgrims Hatch and Brentwood <del>as shown in Appendix 2</del>, is allocated for around 200 new homes. <del>residential development. Development proposals should consider the following:</del></p> <p>A. <del>Amount and Type of Development</del></p> <p>a. <del>provision for around 200 new homes of mixed size and type, including affordable housing.</del></p> <p><del>B.1.</del> <u>1.</u> Development Principles</p> <p><b><u>Proposals should:</u></b></p> <p>a. <b><u>provide</u></b> vehicular access via Doddinghurst Road;</p> <p>b. <del>provision</del> <b><u>provide for</u></b> public open space <b><u>as required by policy NE05;</u></b></p> <p>c. <del>provision</del> <b><u>provide for good</u></b> pedestrian and cycle connections <b><u>to routes identified in the Brentwood Cycle Action Plan or other relevant evidence; and</u></b></p> <p>d. provide for appropriate landscaping and buffers along sensitive boundary adjoining the A12; <b><u>and</u></b></p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p><u>e.</u> provide improved bus service.</p>
			<p><del>C. 2.</del> <u>Infrastructure Requirements</u> <u>Drainage</u></p>
			<p><del>a.</del> provide improved bus service;</p> <p><u>As</u> the site is located within a Critical Drainage Area. This development may have the potential to impact on the Critical Drainage Area in respect of surface water flooding. As a result of this, the site is likely to require an individually designed mitigation scheme to address this issue <u>should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage.</u></p>
			<p><u>3.</u> <u>Infrastructure Contributions</u></p>
			<p><u>Applicants will also be required to make necessary financial contributions via planning obligations towards:</u></p>
			<p><u>a.</u> <u>off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);</u></p>
			<p><u>b.</u> <u>'quietway' cycle routes connecting transfer hubs to schools in Brentwood Town Centre.</u></p>
			<p><i>Amend fourth sentence of paragraph 9.160 to read:</i></p> <p>The site will provide for around 200 homes, anticipated to be delivered between <del>2023/24 and 2026/27</del> <u>2022/23 and 2025/26.</u></p> <p><i>Delete paragraph 9.162</i></p>

MM Ref	Page	Policy / para.	Proposed modifications
MM100	290 - 291	Policy R18 Paragraphs 9.165 – 9.170	<i>Delete Policy R18 and paragraphs 9.165 to 9.170</i>
MM101	292-293	Policy R19 Paragraph 9.171 Paragraph 9.175	<p><i>Amend Policy R19 to read:</i></p> <p>Land at Priests Lane, Shenfield, <del>as shown in Appendix 2,</del> is allocated for <b><u>around 75 new homes residential development.</u></b> Development proposals should consider the following:</p> <p>A. Amount and Type of Development</p> <p>a. <del>provision for around 45 new homes of mixed size and type, including affordable housing; and</del></p> <p>b. <del>potential for the provision of a care home (around 40 bed scheme as part of the overall allocation).</del></p> <p><del>B.</del> <b><u>1.</u></b> Development Principles</p> <p><b><u>Proposals should:</u></b></p> <p>a. <b><u>provide</u></b> vehicular access points via Priests Lane;</p> <p>b. <del>provision</del> <b><u>provide for</u></b> public open space <b><u>as required by policy NE05 or a financial contribution towards other open space improvements within the borough;</u></b></p> <p>c. <del>provision</del> <b><u>provide for good</u></b> pedestrian and cycle connections <b><u>to routes identified in the Brentwood Cycle Action Plan or other relevant evidence.</u></b>; and</p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p>d. <del>provision</del> <u>provide land</u> for Endeavour School expansion; <b>and</b></p> <p>e. <u>provide replacement playing field provision in the form of an appropriate financial contribution being made towards new or enhanced playing field projects within the Borough.</u></p>
			<p><del>C. 2.</del> <u>Infrastructure Requirements-Drainage</u></p>
			<p>a. <del>As the site is located within a Critical Drainage Area.This development may have the potential to impact on the Critical Drainage Area in respect of surface water flooding. As a result of this, the site is likely to require an individually designed mitigation scheme to address this issue</del> <u>should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage.</u></p>
			<p><del>3.</del> <u>Infrastructure Contributions</u></p> <p><u>Applicants will also be required to make necessary financial contributions via planning obligations towards:</u></p>
			<p>a. <u>off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);</u></p>
			<p>b. <u>'quietway' cycle routes connecting transfer hubs to schools in Brentwood Town Centre.</u></p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p><i>Amend paragraph 9.171 to read:</i></p> <p>This site is located to the south of Shenfield on land off Priests Lane. The site adjoins the railway line on the south eastern boundary and residential dwellings on the north, east and southern boundaries. The site will provide for around <del>45</del> <b>75</b> homes, anticipated to be delivered between <del>2021/22 and 2022/23</del> <b><u>2022/23 and 2023/24</u></b>. It will provide a mix of size and type of homes including affordable <del>and older persons housing</del> in accordance with the Council's policy requirements.</p>
			<p><i>Delete paragraph 9.174</i></p> <p><i>Amend paragraph 9.175 to read:</i></p> <p>The Endeavour School (a Special Educational Needs school), which adjoins the site to the south, is seeking to expand to accommodate a 6<sup>th</sup> form. <b><u>Essex County Council welcomes this proposal and intends to commission some of the places for local children with an Education Health and Care Plan. The 6<sup>th</sup> form provision will enable local children to continue their education within their community and reduce travel time to specialist establishments elsewhere.</u></b> The school does not currently have the available land to expand. Land adjoining the school within the development site should be utilised to accommodate the expansion.</p> <p><i>Add new paragraph to follow para 9.175 to read:</i></p> <p><b><u>The development of the site will result in the loss of land last used as Brentwood Ursuline School's detached playing fields and was also used by local football clubs. The Councils' Playing Pitch Strategy identifies deficiencies in playing pitch provision and recommends that the loss of this site be mitigated through the development of replacement facilities elsewhere in the Borough. Development of this site will therefore be expected to mitigate the loss of the playing fields through an appropriate financial contribution being secured towards the delivery of off-site playing field</u></b></p>

MM Ref	Page	Policy / para.	Proposed modifications
MM102	293	Policy R20 Paragraphs 9.177 - 9.180	Delete Policy R20 and paragraphs 9.177 to 9.180
MM103	294 - 295	Policy R21 Paragraph 9.181 Paragraph 9.184	<p>Amend Policy R21 to read:</p> <p>Land south of Ingatestone, comprising former garden centre and A12 works site, as shown in Appendix 2, is allocated for around 161 new homes. <del>housing development. Development proposals should consider the following:</del></p> <p>A. Amount and Type of Development</p> <p>a. <del>provision for around 161 new homes of mixed size and type.</del></p> <p><del>B.</del> <u>1.</u> Development Principles</p> <p><b><u>Proposals should:</u></b></p> <p>a. <b><u>provide</u></b> vehicular access via Roman Road;</p> <p>b. <del>provision</del> <b><u>provide for</u></b> public open space <b><u>as required by policy NE05;</u></b></p> <p>c. <del>provision</del> <b><u>provide for good</u></b> pedestrian and cycle connections <b><u>to routes identified in the Brentwood Cycle Action Plan or other relevant evidence;</u></b></p>



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			<p>d. provide for appropriate landscaping and buffers along sensitive boundary adjoining the A12 and railway line; and <del>heritage assessment taking account of archaeological potential for the proximity to Roman Road</del></p>
			<p><b><u>e.</u></b> <b><u>be accompanied by a heritage assessment taking account of archaeological potential for the proximity to Roman Road.</u></b></p> <p><b><u>C. 2.</u></b> <del>Infrastructure Requirements</del> <b><u>Drainage</u></b></p>
			<p>a. <del>As</del> the site is located within a Critical Drainage Area. This development may have the potential to impact on the Critical Drainage Area in respect of surface water flooding. As a result of this, the site is likely to require an individually designed mitigation scheme to address this issue <b><u>should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage.</u></b></p>
			<p><b><u>3.</u></b> <b><u>Infrastructure Contributions</u></b></p> <p><b><u>Applicants will also be required to make necessary financial contributions via planning obligations towards:</u></b></p>
			<p><b><u>a.</u></b> <b><u>off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);</u></b></p>
			<p><i>Amend third sentence of paragraph 9.181 to read:</i></p> <p>The site will provide for around 161 homes, anticipated to be delivered between <del>2021/22 and 2023/24</del> <b><u>2022/23 and 2024/25.</u></b></p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p><i>Delete paragraph 9.184</i></p> <p><i>Additional supporting text to be inserted after paragraph 9.184 to read:</i></p> <p><b><u>The site lies within close proximity to a Roman Road so there is potential for archaeological remains to be present. A heritage assessment should be undertaken in accordance with Policy BE16 Conservation and Enhancement of Historic Environment.</u></b></p>
MM104	295 - 296	Policy R22 Paragraph 9.186 Paragraph 9.189	<p><i>Amend Policy R22 to read:</i></p> <p>Land adjacent to the A12, Ingatestone, <del>as shown in Appendix 2,</del> is allocated for around 57 new homes. <del>housing development. Development proposals should consider the following:</del></p> <p>A. <del>Amount and Type of Development</del></p> <p>a. <del>provision for around 57 new homes of mixed size and type.</del></p> <p><del>B.1.</del> <b>1.</b> Development Principles</p> <p><b><u>Proposals should:</u></b></p> <p>a. <b><u>provide</u></b> vehicular access via Roman Road;</p> <p>b. <del>provision</del> <b><u>provide for</u></b> public open space <b><u>as required by policy NE05;</u></b> <del>and</del></p> <p>c. provide for appropriate landscaping and buffers along sensitive boundary adjoining the A12; <b><u>and</u></b></p>

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			<p><u>d.</u> <b><u>be accompanied by a heritage assessment taking account of archaeological potential for the proximity to Roman Road.</u></b></p>
			<p><del>C. 2.</del> <b><u>Infrastructure Requirements-Drainage</u></b></p>
			<p><del>a.</del> <b><u>As the site is located within a Critical Drainage Area.This development may have the potential to impact on the Critical Drainage Area in respect of surface water flooding. As a result of this, the site is likely to require an individually designed mitigation scheme to address this issue should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage.</u></b></p> <p><b><u>3.</u></b></p> <p><b><u>Infrastructure Contributions</u></b></p>
			<p><b><u>Applicants will also be required to make necessary financial contributions via planning obligations towards:</u></b></p> <p><b><u>a.</u></b> <b><u>off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);</u></b></p>
			<p><i>Amend third sentence of paragraph 9.186 to read:</i></p> <p>The site will provide for around 57 homes, anticipated to be delivered between 2021/22 <b><u>2022/23</u></b> and 2023/24.</p>
			<p><i>Delete paragraph 9.189</i></p> <p><i>Additional supporting text to be inserted after paragraph 9.189 to read:</i></p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p><u>The site lies within close proximity to a Roman Road so there is potential for archaeological remains to be present. A heritage assessment should be undertaken in accordance with Policy BE16 Conservation and Enhancement of Historic Environment.</u></p>
MM105	297	Policy R23 Paragraph 9.191	<p><i>Amend Policy R23 to read:</i></p> <p>Brizes Corner Field, Kelvedon Hatch, as shown in Appendix 2, is allocated for around 23 new homes. <del>housing development. Development proposals should consider the following:</del></p>
			<p>A. <del>Amount and Type of Development</del></p>
			<p>a. <del>provision for around 23 new homes of mixed size and type.</del></p>
			<p><del>B. 1.</del> <u>1.</u> Development Principles</p>
			<p><u>Proposals should:</u></p>
			<p>a. <u>provide</u> vehicular access via Blackmore Road; and</p>
			<p>b. <u>provide</u> <del>provision for</del> public open space <u>as required by policy NE05.</u></p>
			<p><u>2.</u> <u>Infrastructure Contributions</u></p>
			<p><u>Applicants will also be required to make necessary financial contributions via planning obligations towards:</u></p>
			<p>a. <u>off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);</u></p>

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			<p><i>Amend third sentence of paragraph 9.191 to read:</i></p> <p>The site will provide for around 23 homes, anticipated to be delivered between 2021/22 and <del>2022/23</del> <b><u>2022/23 and 2023/24.</u></b></p> <p><i>Delete paragraph 9.193</i></p>
MM106	298	Policy R24 Paragraph 9.194	<p><i>Amend Policy R24 to read:</i></p> <p>Land off Stocks Lane, Kelvedon Hatch, <del>as shown in Appendix 2,</del> is allocated for around <del>30</del> <b><u>40</u></b> new homes. <del>Housing development. Development proposals should consider the following:</del></p> <p>A. <del>Amount and Type of Development</del></p> <p>a. <del>provision for around 30 new homes of mixed size and type.</del></p> <p><del>B.</del> <b><u>1.</u></b> Development Principles</p> <p><b><u>Proposals should:</u></b></p> <p>a. <b><u>provide</u></b> vehicular access via Blackmore Road; and</p> <p>b. <b><u>provide</u></b> provision for public open space <b><u>as required by policy NE05.</u></b></p> <p><b><u>2.</u></b> <b><u>Infrastructure Contributions</u></b></p> <p><b><u>Applicants will also be required to make necessary financial contributions via planning obligations towards:</u></b></p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p><b><u>a.</u></b> <b><u>off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);</u></b></p> <p><i>Amend third sentence of paragraph 9.194 to read:</i></p> <p>The site will provide for around 30 <b><u>40</u></b> homes, anticipated to be delivered between <del>2021/22 and 2022/23</del> <b><u>2022/23 and 2023/24.</u></b></p> <p><i>Delete paragraph 9.196</i></p>
MM107	299 - 300	Policy R25 Paragraph 9.197 Paragraph 9.199 Paragraph 9.200	<p><i>Amend Policy R25 to read:</i></p> <p>Land north of <b><u>Woollard Way</u></b>, Blackmore, <del>as shown in Appendix 2,</del> is allocated for around 30 <b><u>40</u></b> new homes. <del>housing development. Development proposals should consider the following:</del></p> <p>A.</p> <p><del>Amount and Type of Development</del></p> <p>a.</p> <p><del>provision for around 30 new homes of mixed size and type;</del></p> <p>b.</p> <p><del>a minimum of 25% of the proposed dwellings to be reserved for people with a strong and demonstrable local connection or those over 50 years of age. These dwellings should comprise affordable housing. A person with a strong local connection should meet one of the following criteria:</del></p> <p>i.</p> <p><del>existing local residents requiring separate accommodation; or</del></p>

MM Ref	Page	Policy / para.	Proposed modifications
			<ul style="list-style-type: none"> <li><del>— ii. close relatives of existing local residents who have a demonstrable need to either support or be supported by them; or</del></li> </ul>
			<ul style="list-style-type: none"> <li><del>— iii. people whose work provides an important and necessary local service.</del></li> </ul> <p>In the context of this policy “local” means a parish or ward, or in exceptional circumstances, adjacent parishes or wards.</p>
			<del>B.1.</del> Development Principles
			<ul style="list-style-type: none"> <li>a. <b><u>Proposals should:</u></b> <b><u>provide</u></b> vehicular access via Redrose Lane <b><u>or Nine Ashes Road;</u></b></li> </ul>
			<ul style="list-style-type: none"> <li>b. <del>provision</del> <b><u>provide</u></b> for <b><u>good</u></b> pedestrian and cycle connections <b><u>to routes identified in the Brentwood Cycle Action Plan or other relevant evidence;</u></b></li> </ul>
			<ul style="list-style-type: none"> <li>c. <del>provision</del> <b><u>provide</u></b> for public open space <b><u>as required by policy NE05;</u></b> and</li> </ul>
			<ul style="list-style-type: none"> <li>d. <b><u>be accompanied by a</u></b> heritage assessment taking account of archaeological potential for the historic settlement of Blackmore.</li> </ul>
			<b><u>2.</u></b> <b><u>Infrastructure Contributions</u></b>
			<b><u>Applicants will also be required to make necessary financial contributions via planning obligations towards:</u></b>

MM Ref	Page	Policy / para.	Proposed modifications
			<p><b><u>a. off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);</u></b></p> <p><i>Amend paragraph 9.197 to read:</i></p> <p>The site is located to the north of Blackmore on land off Redrose Lane and Woollard Way. Residential properties adjoin the site on the southern boundary. The site will provide for around <del>30</del> <b>40</b> homes anticipated to be delivered between <del>2023/24 and 2024/25</del> <b>2022/23 and 2023/24</b>. It will provide a mix of size and type of homes including affordable in accordance with the Council's policy requirements.</p>
			<p><i>Delete paragraph 9.198</i></p> <p><i>Amend paragraph 9.199 to read:</i></p> <p>The development will consider an appropriate main vehicular access via Redrose Lane <b><u>or Nine Ashes Road.</u></b></p>
			<p><i>Delete paragraph 9.200</i></p> <p><i>Additional supporting text to be inserted after paragraph 9.200 to read:</i></p> <p><b><u>The site lies within close proximity to the historic settlement of Blackmore so there is potential for archaeological remains to be present. A heritage assessment should be undertaken in accordance with Policy BE16 Conservation and Enhancement of Historic Environment.</u></b></p>
MM108	300 - 301	Policy R26	<p><i>Amend Policy R26 to read:</i></p>



MM Ref	Page	Policy / para.	Proposed modifications
		Paragraphs 9.201 Paragraphs 9.203 Paragraphs 9.204	Land north of Orchard Piece, Blackmore, <del>as shown in Appendix 2,</del> is allocated for around 20 <b>30</b> new homes. <del>housing development. Development proposals should consider the following:</del>
			A. <del>Amount and Type of Development</del>
			a. <del>provision for around 20 new homes of mixed size and type;</del>
			b. <del>a minimum of 25% of the proposed dwellings to be reserved for people with a strong and demonstrable local connection or those over 50 years of age. These dwellings should comprise affordable housing. A person with a strong local connection should meet one of the following criteria:</del>
			<del>existing local residents requiring separate accommodation; or</del>
			<del>close relatives of existing local residents who have a demonstrable need to either support or be supported by them; or</del>
			<del>people whose work provides an important and necessary local service.</del>
			<del>In the context of this policy “local” means a parish or ward, or in exceptional circumstances, adjacent parishes or wards.</del>
			<del>B.1. Development Principles</del>
			<del><b><u>Proposals should:</u></b></del>
			a. <del><b><u>provide</u></b> vehicular access via Redrose Lane, <b><u>Orchard Piece or Fingrith Hall Lane;</u></b></del>

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			b. provision <b>provide</b> for <b>good</b> pedestrian and cycle connections <b><u>to routes identified in the Brentwood Cycle Action Plan or other relevant evidence;</u></b>
			c. provision <b>provide</b> for public open space <b><u>as required in policy NE05;</u></b> and
			d. <b><u>be accompanied by a</u></b> heritage assessment taking account of archaeological potential for the historic settlement of Blackmore.
			<b><u>2. Infrastructure Contributions</u></b>
			<b><u>Applicants will also be required to make necessary financial contributions via planning obligations towards:</u></b>
			a. <b><u>off-site highway infrastructure improvements as may be reasonably required by National Highways and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);</u></b>
			<i>Amend paragraph 9.201 to read:</i>  The site is located to the north of Blackmore on land off Redrose Lane and <b><u>Orchard Piece</u></b> <del>Wollard Way</del> . Residential properties adjoin the site on the southern boundary. The site will provide for around <del>20</del> <b><u>30</u></b> homes anticipated to be delivered between <del>2021/22 and 2022/23</del> <b><u>2022/23 and 2023/24</u></b> . It will provide a mix of size and type of homes including affordable in accordance with the Council's policy requirements.
			<i>Amend paragraph 9.203 to read:</i>

MM Ref	Page	Policy / para.	Proposed modifications
			<p>The development will <del>take its</del> <b><u>consider an appropriate</u></b> main vehicular access from <del>via</del> Redrose Lane, <b><u>Orchard Piece or Fingrith Hall Lane</u></b>. It will be expected to adequately mitigate its likely impacts on the performance of the local and strategic road network.</p> <p><i>Delete paragraph 9.204</i></p> <p><i>Additional supporting text to be inserted after paragraph 9.204 to read:</i></p> <p><b><u>The site lies within close proximity to the historic settlement of Blackmore so there is potential for archaeological remains to be present. A heritage assessment should be undertaken in accordance with Policy BE16 Conservation and Enhancement of Historic Environment.</u></b></p>
MM109	302 - 303	Policy E11 Paragraph 9.206	<p><i>Amend Policy E11 to read:</i></p> <p>Land south east of M25 Junction 29, <del>as shown in Appendix 2,</del> is allocated <b><u>for</u></b> to provide high quality employment development and significant number of jobs. Development proposals should consider the following: at least <b><u>around</u></b> 25.85 ha of land for employment use <b><u>development (principally for offices, light industrial and research and development, B2 and B8 and other sui generis employment uses).</u></b> <b><u>Other ancillary supporting development within classes C1, E and F1 or other sui generis ancillary supporting development may be permitted as a means of supporting these principal employment uses.</u></b></p> <p>A. <del>Amount and Type of Development</del></p> <p>a. <del>at least 25.85 ha of land for employment use (principally use classes B1, B2, B8 and any associated employment generating sui generis uses) taking account of market needs along with ancillary and supporting uses.</del></p> <p>B <del>Supporting On-site Development</del></p>

MM Ref	Page	Policy / para.	Proposed modifications
			<ul style="list-style-type: none"> <li>a. ancillary uses, for example:-               <ul style="list-style-type: none"> <li>— i. use class C1 hotel;-</li> <li>— ii. use classes A1 to A4 including small shops and eateries; and/or</li> <li>— iii. use class D1 including day nurseries, creches and health services.</li> </ul> </li> </ul>
			<del>C.1.</del> Development Principles
			<ul style="list-style-type: none"> <li>a. <b><u>Proposals should:</u></b>                 landscaping and earthworks within the gross site area and in particular in the southern part of the allocated area, will enable the formation of a developable site and <b><u>be accompanied by a high quality landscaping scheme (including a scheme of maintenance) for the site as a whole with the objective also to</u></b> provide improved visual amenity between the site and surrounding land. Landscaping provided is to be retained thereafter <b><u>adjoining Green Belt</u></b>;</li> </ul>
			<ul style="list-style-type: none"> <li>b. site is identified as a key gateway location and development should reflect this in terms of design quality <b><u>be of a high quality in terms of its design and layout to reflect its status as a key gateway site</u></b>;</li> </ul>
			<ul style="list-style-type: none"> <li>c. protect and where appropriate <b><u>possible</u></b> enhance the adjoining Local Wildlife Site (Hobbs Hole); and</li> </ul>
			<ul style="list-style-type: none"> <li>d. preserve and where appropriate <b><u>possible</u></b> enhance <b><u>the</u></b> Public Right of Way through <b><u>the</u></b> site;</li> </ul>
			<del>D.2.</del> Infrastructure Requirements

MM Ref	Page	Policy / para.	Proposed modifications
			<b><u>Proposals should provide:</u></b>
			a. <del>land (circa 0.13 hectares each) for two stand-alone early years and childcare nurseries (Use Class D1)</del>
			b. a. <del>highway works including potential access points</del> <b><u>access</u></b> via M25 Junction 29 and <b><u>or</u></b> Warley Street (B186) and associated slip roads;
			c. b. well-connected internal road layouts which allows good accessibility for bus services;
			d. c. <del>provision for</del> new public transport <b><u>or Demand Responsive Travel</u></b> links with the surrounding area;
			e. d. <del>provision for</del> <b><u>good</u></b> walking and cycling connections within the site and to the surrounding area; <b><u>and</u></b>
			<b><u>4. Infrastructure Contributions</u></b>
			<b><u>Applicants will also be required to make necessary financial contributions via planning obligations towards:</u></b>
			<b><u>a. off-site highway infrastructure improvements as may be reasonably required by National Highways (M25, J28 and J29) and Essex County Council (A127 and B186) in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes) unless, in the case of the Junction 29 mitigation and A127/B186 works, the applicant enters into a s.278 Agreement for its timely construction, if more appropriate;</u></b>
			<b><u>b. phased improvements to West Horndon Station in accordance with policy BE08 to increase its capacity and utility in line with anticipated demand generated by each of phase the development.</u></b>

MM Ref	Page	Policy / para.	Proposed modifications
			<p><i>Amend paragraph 9.206 as follows:</i></p> <p>The site is located on land to the south of the A127 and east of the M25. Warley Street runs along the eastern boundary. Existing residential properties are situated to the east. The site will provide for at least 25.85 ha of land for employment use (principally use classes B1, B2, B8 and any associated employment generating sui generis uses). This employment allocation will make a considerable contribution towards the overall employment needs for the Borough. <b><u>It is envisaged that due to the location of the site next to one of the Borough’s key gateway, development on site should create a positive impression through high quality design and layout.</u></b></p> <p><i>Delete paragraph 9.210</i></p>
MM110	304 – 305	Policy E12 Paragraph 9.211 Paragraph 9.214	<p><i>Amend Policy E12 to read:</i></p> <p>Land at Childerditch Industrial Estate, as shown in Appendix 2, is allocated for <del>around 20.64</del> <b><u>20.54</u></b> ha <del>of land</del> for employment use. development proposals should consider the following: <b><u>which may comprise offices, light industrial, research and development (within Class E), B2, B8 or sui generis employment uses. Other ancillary supporting development may be permitted as a means of supporting these principal employment uses.</u></b></p> <p>A. Amount and Type of Development</p> <p>a. <del>20.64 ha of employment land (principally use classes B1, B2, B8 and any associated employment generating sui generis uses), including elements of landscaping to improve visual amenity.</del></p> <p><del>B.1.</del> <b><u>1.</u></b> Development Principles</p> <p><b><u>Proposals for development (including the redevelopment of existing developed areas) should:</u></b></p>

MM Ref	Page	Policy / para.	Proposed modifications
			<u>a.</u> <u>include appropriate landscaping treatment to improve visual amenity on site, and safeguard and where possible and appropriate, enhance the visual amenity of the adjoining green belt;</u>
			<del>a.-b.</del> <u>provide</u> access <u>to the site</u> via <u>the</u> eastbound A127;
			<del>b.-c.</del> <u>make</u> provision for improved walking and cycling links within <u>the site and to</u> the surrounding area;
			<del>c.-d.</del> consideration for improvements to A127 junction; and <u>provide new public transport or Demand Responsive Travel links with the surrounding area; and</u>
			<del>d.</del> provides opportunity to expand an existing employment site and improve site layout.
			<u>e.</u> <u>any future development should sustain and where possible enhance the significance of the Grade II* listed Registered Park and Garden of Thorndon Hall, and the Thorndon Park Conservation Area and their settings.</u>
			<u>2.</u> <u>Infrastructure Contributions</u>
			<u>Applicants will also be required to make necessary financial contributions via planning obligations towards:</u>
			<u>a.</u> <u>off-site highway infrastructure improvements as may be necessary and reasonably required by National Highways (M25, J28 and J29) and Essex County Council (A127 and B186) in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);</u>

MM Ref	Page	Policy / para.	Proposed modifications
			<p><b><u>b.</u></b> <b><u>phased improvements to West Horndon Station in accordance with policy BE08 to increase its capacity and utility in line with anticipated demand generated by each of phase the development.</u></b></p>
			<p><i>Amend paragraph 9.211 to read:</i></p> <p>The site is located on land to the north of the A127 on land off Childerditch Hall Drive. A number of residential dwellings lie to the west of the site. The site will provide for <del>20.64</del> <b>20.54</b> ha of land for employment use (principally use classes B1, B2, B8 and any associated employment generating sui generis uses).</p>
			<p><i>Delete paragraph 9.214</i></p> <p><i>Add a new paragraph following paragraph 9.214 to read:</i></p> <p><b><u>Development of this site will need to sustain and, where opportunities arise, enhance the Grade II* listed Registered Park and Garden of Thorndon Hall, and the Thorndon Park Conservation Area and their settings. This development should be of high quality design.</u></b></p>
			<p><i>Add a new paragraph following paragraph 9.214 to read:</i></p> <p><b><u>The proposed development area is at potential risk of flooding from surface water as shown on the Environment Agency Risk of Flooding from Surface Water Maps. Any development within this area should be directed away from areas of existing flooding and, where possible, should try to have a positive impact on existing areas of flood risk downstream of the development. It should however be ensured that any development within this area complies with flood risk mitigation measures outlined in the Essex SuDS guide.</u></b></p>



MM Ref	Page	Policy / para.	Proposed modifications
MM111	305 - 306	Policy E10 Paragraph 9.219	<p><i>Amend Policy E10 to read:</i></p> <p>Land <b>at Codham Hall Farm</b>, north east of M25 Junction 29 as shown in Appendix 2, is allocated for <b>around 9.6ha of land</b> for employment use. <del>Development</del> <b><u>which may comprise offices, light industrial, research and development (within Class E), B2, B8 or sui generis employment uses. Other ancillary supporting development may be permitted as a means of supporting these principal employment uses.</u></b> <del>Development proposals should consider the following:</del></p>
			A. Amount and Type of Development
			a. 9.6 ha of employment land (principally use classes B1, B2, B8 and any associated employment generating sui generis uses); and
			b. 8.0 ha of land to provide for landscaping, amenity, access and ancillary uses to support the sustainability of the site.
			<del>B.</del> <b><u>1.</u></b> Development Principles
			<b><u>Proposals for development (including the redevelopment of existing developed areas) should:</u></b>
			a. <b><u>provide</u></b> access via M25 Junction 29 <b><u>and Warley Street (B186)</u></b> ;
			b. protect and where <b><u>appropriate possible</u></b> enhance the adjoining Local Wildlife Site (Codham Hall Wood);
			c. preserve and where <b><u>appropriate possible</u></b> enhance the Public Right of Way through <b><u>the</u></b> site; and

MM Ref	Page	Policy / para.	Proposed modifications
			<p>d. <del>provision of provide improved</del> <b>good</b> walking and cycling connections within the site and to the <del>wider surrounding</del> area.</p>
			<p>e. <b><u>be accompanied by an appropriate landscaping treatment scheme for the site as a whole to improve visual amenity on site, and safeguard and where possible and appropriate, enhance the visual amenity of the adjoining green belt.</u></b></p>
			<p><b><u>2. Infrastructure Contributions</u></b></p>
			<p><b><u>Applicants will also be required to make necessary financial contributions via planning obligations towards:</u></b></p>
			<p>a. <b><u>necessary off-site highway infrastructure improvements as may be reasonably required by National Highways (M25, J28 and J29) and Essex County Council (A127 and B186) in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes) unless, in the case of the A127/B186 works, the applicant enters into a s.278 Agreement for its timely construction, if more appropriate;</u></b></p>
			<p>b. <b><u>phased improvements to West Horndon Station in accordance with policy BE08 to increase its capacity and utility in line with anticipated demand generated by each of phase the development.</u></b></p>
			<p><i>Delete paragraph 9.219</i></p> <p><i>Add new paragraph following paragraph 9.219 to read:</i></p> <p><b><u>The proposed development area is at potential risk of flooding from surface water as shown on the Environment Agency Risk of Flooding from Surface Water Maps. Any development within this area should be directed away from areas of existing flooding and, where possible, should try to have a positive impact on existing areas of flood risk downstream of the development. It</u></b></p>

MM Ref	Page	Policy / para.	Proposed modifications
			<u>should however be ensured that any development within this area complies with flood risk mitigation measures outlined in the Essex SuDS guide.</u>
MM112	306 - 307	Policy E13 Paragraph 9.224	<p><i>Amend Policy E13 to read:</i></p> <p>Land at East Horndon Hall is allocated for <b>around</b> 5.5 ha <b>of land</b> for employment use. <del>D</del>development proposals should consider the following: <b><u>which may comprise offices, light industrial, research and development (within Class E), B2, B8 or sui generis employment uses. Other ancillary supporting development may be permitted as a means of supporting these principal employment uses.</u></b></p> <p>A. Amount and Type of Development</p> <p>a. 5.5 ha of employment land (principally use classes B1, B2, B8 and any associated employment generating sui generis uses), including elements of landscaping to improve visual amenity.</p> <p><del>B.1.</del> <b><u>1.</u></b> Development Principles</p> <p><b><u>Proposals should:</u></b></p> <p>a. improved sustainable links to Dunton Hills Garden Village and West Horndon station;</p> <p><del>b. a.</del> <b><u>provide</u></b> access via Old Tilbury Road;</p> <p><del>c. b.</del> <b><u>provide</u></b> for improved <b><u>good</u></b> walking and cycling connections within the site and to the wider <b><u>surrounding</u></b> area;</p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p>d. <u>c.</u> <u>preserve the setting of nearby listed buildings, East Horndon Hall and All Saints Church; any future development should sustain and where possible enhance the significance of East Horndon Hall and All Saints Church and their settings.</u></p>
			<p><u>2.</u> <u>Infrastructure Contributions</u></p> <p><u>Applicants will also be required to make necessary financial contributions via planning obligations towards:</u></p>
			<p><u>a.</u> <u>necessary off-site highway infrastructure improvements as may be reasonably required by National Highways (M25, J28 and J29) and Essex County Council (A127 and B186) in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);</u></p>
			<p><u>b.</u> <u>phased improvements to West Horndon Station in accordance with policy BE08 to increase its capacity and utility in line with anticipated demand generated by each of phase the development.</u></p> <p><i>Delete paragraph 9.224</i></p> <p><i>Additional supporting text to be inserted after paragraph 9.224 to read:</i></p> <p><u>Development of this site will need to sustain and, where opportunities arise, enhance the Grade II listed East Horndon Hall and All Saints Church and their settings. This development should be of high quality design.</u></p>
			<p><i>Add a new paragraph following paragraph 9.224 to read:</i></p> <p><u>The proposed development area is at potential risk of flooding from surface water as shown on the Environment Agency surface water flooding maps. Any development within this area should</u></p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p><u>be directed away from areas of existing flooding and, where possible, should have a positive impact on existing areas of flood risk downstream of the development. It should be ensured that any development within this area complies with flood risk mitigation measures outlined in the Essex SuDS guide.</u></p>
MM113	307	Policy E08  Paragraph 9.227  Paragraph 9.229	<p><i>Amend Policy E08 to read:</i></p> <p>Land adjacent to A12 and slip road, Ingatestone is allocated for <b>around</b> 2.06 ha of <b>land for employment use. Development proposals should consider the following: <u>which may comprise offices, light industrial, and research and development (within Class E), B2, B8 or sui generis employment uses. Other ancillary supporting development may be permitted as a means of supporting these principal employment uses.</u></b></p>
			<p>A. Amount and Type of Development</p>
			<p>a. 2.06 ha of employment land (principally use classes B1, B2, B8 and any associated employment generating sui generis uses).</p>
			<p><del>B.1.</del> Development Principles</p>
			<p><b><u>Proposals should:</u></b></p>
			<p>a. <b><u>provide</u></b> access via Roman Road (B1002) with potential highway improvements;</p>
			<p>b. <del>provision</del> <b><u>provide</u></b> for improved <b><u>good</u></b> walking and cycling connections within the site and the surrounding area; and</p>
			<p>c. <del>full traffic assessment and Travel Plan to accompany an application.</del></p>

MM Ref	Page	Policy / para.	Proposed modifications
			<p><b><u>2.</u></b> <b><u>Drainage</u></b></p> <p><b><u>As the site is located within a Critical Drainage Area development should minimise and mitigate surface water runoff in line with Policy BE05 Sustainable Drainage.</u></b></p>
			<p><b><u>3.</u></b> <b><u>Infrastructure Contributions</u></b></p> <p><b><u>Applicants will also be required to make necessary financial contributions via planning obligations towards:</u></b></p>
			<p><b><u>a.</u></b> <b><u>necessary off-site highway infrastructure improvements as may be reasonably required by National Highways (M25, J28 and J29) and Essex County Council in accordance with policies MG05 and BE08 (the planning obligation will determine the level and timing of payments for these purposes);</u></b></p>
			<p><i>Amend paragraph 9.227 to read:</i></p> <p><b><u>The development should achieve safe and suitable access(es), for all highway users, including pedestrians and cyclists. This will need to be undertaken in consultation with Essex County Council as the Highway Authority, and National Highways who control the A12 and its slip roads.</u></b> The development will take its main vehicular access from Roman Road (B1002). It will be expected to adequately mitigate its likely impacts on the performance of the local and strategic road network.</p>
			<p><i>Delete paragraph 9.229</i></p> <p><i>Add a new paragraph following paragraph 9.229 to read:</i></p> <p><b><u>The site falls within the Moutnessing CDA. Any development within this area should where possible try to have a positive impact on existing areas of flood risk downstream of the</u></b></p>

MM Ref	Page	Policy / para.	Proposed modifications
			<u>development. Early engagement with the LLFA in this area is critical to ensure that existing and potential flood risk is properly managed.</u>

## Appendices

MM Ref	Page	Policy / para.	Proposed modifications
MM114	309 -312	Appendix 1	<i>Replace Appendix 1 with updated Housing Trajectory table, as set out in Annexe 1</i>
MM115	313 – 347 and 369-370	Appendix 2 and Appendix 5	<i>Delete Appendix 2 and Appendix 5</i>
MM116		New Appendix	<i>Insert a new Appendix, as shown in Annexe 2, which lists the strategic and non-strategic policies and explains how the policies relate to the strategic objectives</i>
MM117	349 - 366	Appendix 3 Table 1	<i>Replace with table in Annexe 3</i>
MM118	367 - 368	Appendix 4	<i>Delete Appendix 4</i>
MM119		New Appendix	<i>Insert new Appendix 2, as shown in Annexe 4, which lists the plans and policies to be superseded</i>



# Annexe 1 – MM114 Appendix 1 – Housing Trajectory

				Plan Period																	
	New Homes	HELAA Ref.	Policy Ref	Year 1 2016/17	Year 2 2017/18	Year 3 2018/19	Year 4 2019/20	Year 5 2020/21	Year 6 2021/22	Year 7 2022/23	Year 8 2023/24	Year 9 2024/25	Year 10 2025/26	Year 11 2026/27	Year 12 2027/28	Year 13 2028/29	Year 14 2029/30	Year 15 2030/31	Year 16 2031/32	Year 17 2032/33	
Completions (2016/17 - 2020/21)	977			150	213	246	200	168													
Extant permissions (as at 1st April 2021) and minus non-implementation discount (10% of permission supply)	1036								155	261	230	210	180								
Windfall	434													62	62	62	62	62	62	62	62
<b>Local Plan Allocations</b>																					
<b>Brownfield Land within Brentwood Urban Area / Settlement Boundary</b>																					
Ford Headquarters and Council Depot, Warley - northern and southern site	133	081 / 117A / 117B	R04							25	50	58									
Brentwood Railway Station Car Park	200	002	R10														100	100			
Westbury Road Car Park, Westbury Road, Brentwood	45	039	R11								45										
Land at Hunter House, Western Road, Brentwood	48	041	R12										24	24							
Chatham Way / Crown Street Car Park Brentwood	31	040	R13											31							
William Hunter Way	300	102	R14											300							

				Plan Period																	
	New Homes	HELAA Ref.	Policy Ref	Year 1 2016/17	Year 2 2017/18	Year 3 2018/19	Year 4 2019/20	Year 5 2020/21	Year 6 2021/22	Year 7 2022/23	Year 8 2023/24	Year 9 2024/25	Year 10 2025/26	Year 11 2026/27	Year 12 2027/28	Year 13 2028/29	Year 14 2029/30	Year 15 2030/31	Year 16 2031/32	Year 17 2032/33	
Wates Way Industrial Estate, Ongar Road, Brentwood	46	003	R15							23	23										
<b>Brownfield Land within Brentwood Urban Area / Settlement Boundary Total</b>	<b>803</b>									<b>48</b>	<b>118</b>	<b>58</b>	<b>24</b>	<b>355</b>			<b>100</b>	<b>100</b>			
<b>Greenfield Land within Brentwood Urban Area / Settlement Boundary</b>																					
Land at Priests Lane, Brentwood	75	044 / 178	R19							30	45										
<b>Greenfield Land within Brentwood Urban Area / Settlement Boundary Total</b>	<b>75</b>									<b>30</b>	<b>45</b>										
<b>Brownfield Land within settlement boundary – Other Locations</b>																					
West Horndon Industrial Estates	580	020 / 021 / 152	R02											80	75	95	100	100	65	65	
<b>Brownfield Land within settlement boundary – Other Locations</b>	<b>580</b>													<b>80</b>	<b>75</b>	<b>95</b>	<b>100</b>	<b>100</b>	<b>65</b>	<b>65</b>	
<b>Green Belt Land – Edge of Brentwood Urban Area</b>																					
Land north of Shenfield	825	034 / 158 / 235 / 087 / 263 / 276	R03								50	100	125	125	125	125	100	75			
Land East of Nags Head Lane, Brentwood	125	032	R06							25	25	50	25								
Sow and Grow Nursery, Ongar Road, Pilgrims Hatch	38	010	R07							38											
Land Adjacent to Carmel, Mascalls Lane, Warley	9	027	R08							9											
Land west of Warley Hill, Pastoral Way, Warley	43	083	R09							20	23										

				Plan Period																	
	New Homes	HELAA Ref.	Policy Ref	Year 1 2016/17	Year 2 2017/18	Year 3 2018/19	Year 4 2019/20	Year 5 2020/21	Year 6 2021/22	Year 7 2022/23	Year 8 2023/24	Year 9 2024/25	Year 10 2025/26	Year 11 2026/27	Year 12 2027/28	Year 13 2028/29	Year 14 2029/30	Year 15 2030/31	Year 16 2031/32	Year 17 2032/33	
Land off Doddinghurst Road, either side of A12	200	023A / 23B	R16							50	50	50	50								
<b>Green Belt Land – Edge of Brentwood Urban Area Total</b>	<b>1,240</b>									<b>142</b>	<b>148</b>	<b>200</b>	<b>200</b>	<b>125</b>	<b>125</b>	<b>125</b>	<b>100</b>	<b>75</b>			
<b>Green Belt Land – Edge of Ingatestone</b>																					
Land south of Ingatestone, Ingatestone	161	128 / 106	R21							50	60	51									
Land Adjacent to Ingatestone By-pass	57	079A	R22							17	40										
<b>Green Belt Land – Edge of Ingatestone Total</b>	<b>218</b>									<b>67</b>	<b>100</b>	<b>51</b>									
<b>Green Belt Land – Larger Villages</b>																					
Brizes Corner Field, Blackmore Road, Kelvedon Hatch	23	194	R23							12	11										
Land off Stocks Lane, Kelvedon Hatch	40	075B	R24							20	20										
Land north of Woollard Way, Blackmore	40	077	R25							20	20										
Land south of Redrose Lane, north of Orchard Piece, Blackmore	30	076	R26							10	20										
<b>Green Belt Land – Larger Villages Total</b>	<b>133</b>									<b>62</b>	<b>71</b>										
<b>Strategic Allocation – Dunton Hills Garden Village</b>																					
Dunton Hills Garden Village	1,650	200	R01											150	250	250	250	250	250	250	
<b>Strategic Allocation – Dunton Hills Garden Village Total</b>	<b>1,650</b>													<b>150</b>	<b>250</b>	<b>250</b>	<b>250</b>	<b>250</b>	<b>250</b>	<b>250</b>	

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				Plan Period																
	New Homes	HELAA Ref.	Policy Ref	Year 1 2016/17	Year 2 2017/18	Year 3 2018/19	Year 4 2019/20	Year 5 2020/21	Year 6 2021/22	Year 7 2022/23	Year 8 2023/24	Year 9 2024/25	Year 10 2025/26	Year 11 2026/27	Year 12 2027/28	Year 13 2028/29	Year 14 2029/30	Year 15 2030/31	Year 16 2031/32	Year 17 2032/33
Allocation Total	4,699									349	482	309	224	710	450	470	550	525	315	315
Total Housing Provision	7,146			150	213	246	200	168	155	610	712	519	404	772	512	532	612	587	377	377
Housing requirement by year	7,752			300	300	300	300	300	300	300	300	400	400	400	400	400	400	984	984	984
Performance against requirement within individual year				-150	-87	-54	-100	-132	-145	310	412	119	4	372	112	132	212	-397	-607	-607
Housing provision cumulative total				150	363	609	809	977	1,132	1,742	2,454	2,973	3,377	4,149	4,661	5,193	5,805	6,392	6,769	7,146
Housing requirement cumulative total				300	600	900	1,200	1,500	1,800	2,100	2,400	2,800	3,200	3,600	4,000	4,400	4,800	5,784	6,768	7,752
Cumulative total deficit/surplus				-150	-237	-291	-391	-523	-668	-358	54	173	177	549	661	793	1005	608	1	-606

5 year supply calculations		
Five year supply calculation at adoption (2021/22) Includes 20% buffer from Housing Delivery Test and accounts for deficit (446) from start of plan period to year before adoption (2016/17 to 2020/21) which has been annualised over the remainder of the plan period (12 years) (2021/22 to 2032/33) (Liverpool approach)	Total supply 2021/22 to 2025/26	2,400
	Local Plan annual housing requirement (2021/22 to 2025/26)	1,700
	Deficit (2016/17 to 2020/21) ÷ 12 years x 5 years	-218
	Housing Delivery Test 20% buffer (Local Plan annual requirement + deficit)	384
	Total five year requirement (with undersupply + 20% buffer)	2,302
	Annual five year requirement (Total requirement ÷ 5 years (rounded))	460
	Five year supply (years) = Total supply ÷ Annual five year requirement	5.21

## Annexe 2 – MM116 Appendix 2: Strategic and non-strategic policies and their relationship to Strategic Objectives

Strategic Objective	Strategic Policies	Non-Strategic Policies
SO1: Managing Growth Sustainably	<p><b>Delivering Sustainable Patterns of Growth</b></p> <p>Strategic Policy MG01: Managing Growth</p> <p>Strategic Policy MG02: Green Belt</p>	<p><b>Cross-cutting Development Management</b></p> <p>Policy MG03: Settlement Hierarchy</p> <p>Policy MG04: Health Impact Assessments (HIAs)</p> <p>Policy MG05: Developer Contributions</p> <p>Policy MG06: Local Plan Review and Update</p>
SO2: Deliver a Healthy and Resilient Built Environment:	<p><b>Sustainable Design of Buildings and Infrastructure</b></p> <p>Strategic Policy BE01 Carbon Reduction, and Renewable Energy</p> <p><b>Communications Infrastructure</b></p> <p>Strategic Policy BE06: Communications Infrastructure</p> <p><b>Transport Infrastructure</b></p> <p>Strategic Policy BE08: Strategic Transport Infrastructure</p>	<p><b>Sustainable Design of Buildings and Infrastructure</b></p> <p>Policy BE02: Water Efficiency and Management</p> <p>Policy BE03: Establishing Low Carbon and Renewable Energy Infrastructure Network</p> <p>Policy BE04: Managing Heat Risk</p> <p>Policy BE05: Sustainable Drainage</p> <p><b>Communications Infrastructure</b></p> <p>Policy BE07: Connecting New Developments to Digital Infrastructure</p> <p><b>Transport Infrastructure</b></p>

Strategic Objective	Strategic Policies	Non-Strategic Policies
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">Page 630</p>	<p>Strategic Policy BE09: Sustainable Means of Travel and Walkable Streets</p> <p><b>Design &amp; Place-making (Buildings and Public Realm)</b></p> <p>Strategic Policy BE14: Creating Successful Places</p> <p><b>Heritage</b></p> <p>Strategic Policy BE16: Conservation and Enhancement of Historic Environment</p>	<p>Policy BE10: Sustainable Passenger Transport</p> <p>Policy BE11: Electric and Low Emission Vehicle</p> <p>Policy BE12: Mitigating the Transport Impacts of Development</p> <p>Policy BE13: Parking Standards</p> <p><b>Design &amp; Place-making (Buildings and Public Realm)</b></p> <p>Policy BE15: Planning for Inclusive Communities</p> <p><b>Heritage</b></p> <p>Policy BE17: Archaeological Remains</p>
	<p><b>Variety and Quality of Homes</b></p> <p>Strategic Policy HP01: Housing Mix</p>	<p><b>Variety and Quality of Homes</b></p> <p>Policy HP02: Protecting the Existing Housing Stock</p> <p>Policy HP03: Residential Density</p> <p>Policy HP04: Specialist Accommodation</p> <p>Policy HP05: Affordable Housing</p> <p>Policy HP06: Standards for New Housing</p> <p><b>Gypsy and Traveller Provision</b></p> <p>Policy HP07: Regularising Suitable Existing Traveller Sites</p> <p>Policy HP08: Safeguarding Permitted Sites</p>

Strategic Objective	Strategic Policies	Non-Strategic Policies
		<p>POLICY HP09: Sub-Division of Pitches or Plots</p> <p>POLICY HP10: Proposals for Gypsies, Travellers and Travelling Showpeople on Windfall sites</p>
<p>SO3: Deliver Sustainable Communities with Diverse Economic &amp; Social-cultural Opportunities for All</p>	<p><b>Economy and Jobs</b></p> <p>Strategic Policy PC01: Safeguarding Employment Land</p> <p><b>Retail</b></p> <p>Strategic Policy PC03: Retail and Commercial Leisure Growth</p> <p>Strategic Policy PC04: Retail Hierarchy of Designated Centres</p> <p><b>Community Infrastructure</b></p> <p>Strategic Policy PC10: Protecting and Enhancing Community Facilities</p>	<p><b>Economy and Jobs</b></p> <p>Policy PC02: Supporting the Rural Economy</p> <p><b>Retail</b></p> <p>Policy PC05: Brentwood Town Centre</p> <p>Policy PC06: Mixed Use Development in Designated Centres</p> <p>Policy PC07: Primary Shopping Areas</p> <p>Policy PC08: Non-centre Uses</p> <p>Policy PC09: Night-Time Economy</p> <p><b>Community Infrastructure</b></p> <p>Policy PC11: Education Facilities</p>
<p>SO4: Deliver Beautiful, Biodiverse, Clean and a Functional</p>	<p><b>Green Infrastructure and Biodiversity</b></p> <p>Strategic Policy NE01: Protecting and Enhancing the Natural Environment</p> <p>Strategic Policy NE02: Green and Blue Infrastructure</p>	<p><b>Green Infrastructure and Biodiversity</b></p> <p>Policy NE03: Trees, Woodlands, Hedgerows</p> <p>Policy NE04: Thames Chase Community Forest</p> <p>Policy NE05: Open Space and Recreation Provision</p>

Strategic Objective	Strategic Policies	Non-Strategic Policies
Natural Environment	<p data-bbox="474 248 853 280">Clean and Safe Environment</p> <p data-bbox="474 320 909 352">Strategic Policy NE08: Air Quality</p> <p data-bbox="474 392 916 424">Strategic Policy NE09: Flood Risk</p>	<p data-bbox="1218 248 2029 280">Policy NE06: Allotments and Community Food Growing Space</p> <p data-bbox="1218 320 1760 352">Policy NE07: Protecting Land-for Gardens</p> <p data-bbox="1218 392 1592 424">Clean and Safe Environment</p> <p data-bbox="1218 464 2018 496">Policy NE10: Contaminated Land and Hazardous Substances</p> <p data-bbox="1218 536 1771 568">Policy NE11: Floodlighting and Illumination</p>



## Annexe 3 – MM117 Appendix 3 – Monitoring Framework

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
Chapter 4: Managing Growth						
<b>MG01</b>	Managing Growth	7,752 new homes over the Plan period as a running total	Planning permissions	Achieve 7,752 new residential dwellings (net) over the Plan period 2016-2033.  <u>Target to also include the number of housing expected to be developed on an annual basis from the Housing Trajectory.</u>	<u>80% or less of the running total of the Housing Trajectory is achieved over a three-year period.</u>	<u>Review the housing trajectory and assess reasons why developments are not coming forward as expected.</u>  <u>If the five-year housing supply is not being achieved, then consider whether the policy requirements need to be reviewed as part of a full or focused review and, if necessary, consider undertaking a call for sites to include additional sites to help improve delivery of new homes.</u>
		<u>13 new gypsy and traveller pitches to be delivered over the plan period</u>		<u>13 new pitches to be delivered at the following sites (as identified in HP08):</u>  <u>Oaktree Farm (7 pitches)</u> <u>Hunters Green (1 pitch)</u> <u>DHGV (5 pitches)</u>	<u>Failure to meet 13 new pitches over the Local Plan period.</u>	<u>Refresh the HELAA and/or SHLAA to identify new gypsy and traveller pitches to meet the borough's needs.</u>  <u>Consider whether the policy requirements need to be reviewed as part of a full or focused review.</u>
		<u>46.64 ha of employment land over the Plan period</u>		<u>A minimum of 33.76 ha (or 2.81 ha per year) (net) of employment land provision over the</u>	<u>80% or less over a five year period of the minimum employment land need (2.81 ha per year)</u>	<u>Assess the reasons why employment land provision is not being achieved.</u>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
				<u>remaining Plan period 2021-2033</u>  <u>(Based on the identified needs range of 33.76 - 45.96 ha)</u>		<u>Consider a refresh the HELAA to identify additional employment sites to meet job growth.</u>  <u>Consider whether the policy requirements need to be reviewed as part of a full or focused review.</u>
		<u>1,604 sqm (net) of comparison retail floorspace</u>  <u>4,438 sqm (net) of convenience floorspace</u>		<u>1,604 sqm (or approximately 94sqm per year) (net) of comparison retail floorspace over the Plan period</u>  <u>4,438 sqm (or approximately 261 sqm per year) (net) of convenience floorspace over the Plan period</u>	<u>80% or less over a three year period of the average annual net comparison retail floorspace</u>  <u>80% of less over a three year period of the average annual net convenience floorspace</u>	<u>Assess the reasons why net comparison retail floorspace and/or net convenience floorspace is not being achieved.</u>  <u>Consider a refresh of the Retail Needs Assessment.</u>  <u>Consider whether the policy requirements need to be reviewed as part of a full or focused review.</u>
<b>MG05</b>	Developers Contribution	<u>Strategic Transport Infrastructure requirements as identified in the individual site allocation policies and the most up to date IDP Part B.</u>	Planning permission	<u>Appropriate level of funding collected based on the requirements set out in the most up to date IDP Part B for providing the required strategic transport infrastructure.</u>	<u>Failure to deliver a project that then results in a delay to the delivery of development sites allocated in the plan</u>	<u>Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.</u>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
Chapter 5: Resilient Built Environment						
<b>BE08</b>	Strategic Transport Infrastructure	<b><u>Strategic Transport Infrastructure requirements as identified in the individual site allocation policies and the most up to date IDP Part B.</u></b>	Planning permission	<b><u>Appropriate level of funding collected based on the requirements set out in the most up to date IDP Part B for providing the required strategic transport infrastructure.</u></b>	<b><u>Failure to deliver a project that then results in a delay to the delivery of development sites allocated in the plan</u></b>	<b><u>Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.</u></b>
<b>BE09</b>	Sustainable Means of Travel and Walkable Streets	<b><u>Develops provide an appropriate level of sustainable transport infrastructure as required by the policy</u></b>	Planning permission	<b><u>Developments provide access to appropriate sustainable travel infrastructure including:</u></b> <ul style="list-style-type: none"> <li>• <b><u>Walking;</u></b></li> <li>• <b><u>Cycling; and</u></b></li> <li>• <b><u>Access to public transport</u></b></li> </ul> <b><u>No net loss of existing pedestrian and cycle paths</u></b>  <b><u>Where appropriate access to car pools, car sharing,</u></b>	<b><u>Developments do not provide appropriate walking and cycle paths and access to public transport.</u></b>  <b><u>A loss to the existing pedestrian and cycle paths as a result of development.</u></b>	<b><u>Assess why pedestrian and/or cycle paths are not included within developments or why there is a net loss of pedestrian / cycle paths. Consider whether the policy should be reviewed.</u></b>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
				<u>community buses and cycle schemes</u>		
<b><u>BE11</u></b>	Electric and Low-Emission Vehicles	<b><u>Provide sufficient occupier and visitor access to electric vehicle charging points</u></b>	Planning Permission	<b><u>All development include electric charging points wherever possible</u></b>	<b><u>80% of all new developments do not provide access to electric vehicle charging points in line with the most up to date Government guidance and/or Council strategy, whichever is greater.</u></b>	<b><u>Assess why electric vehicle charging points are not being included in developments. Consider whether the policy should be reviewed to set minimum standards for electric vehicle charging points to ensure uptake.</u></b>
<b><u>BE13</u></b>	Parking Standards	<b><u>Provide the required amount of parking as determined by the most up to date Essex Parking Standards</u></b>	Planning Permission	<b><u>All developments adhere to the Essex Parking Standards as required by the most up to date parking standards Design and Good Practice document.</u></b>	<b><u>Not all developments provide the minimum level of parking spaces as required by the most up to date Essex Parking Standards guidance</u></b>	<b><u>Assess why not all developments meet the most up to date Essex Parking Standards Design and Good Practice requirements. Consider if a further review of the policy is required.</u></b>
		<b><u>No net loss of parking spaces for the Brentwood Town Centre development sites:</u></b> <b><u>R11: 97</u></b> <b><u>R12: 48</u></b> <b><u>R13: 122</u></b> <b><u>R14: 371</u></b>	Planning Permission	<b><u>No net loss of Town Centre car parking places.</u></b>	<b><u>R10, R11, R12, R13, and R14 total parking places are less than 80% of the original available parking spaces.</u></b>	<b><u>Assess why there was a net loss of parking within Brentwood Town Centre. Consider if a further review of the policy is required.</u></b>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		<b><u>Total current parking spaces totaling: 638</u></b>				
<b><u>BE16</u></b>	Conservation and Enhancement of Historic Environment	<b><u>National Heritage Risk Register</u></b>	Planning permission	<p><b><u>Sites R01, R02, R06, R22, E12, and E13 to provide a Heritage Statements as required by the site specific policy requirements.</u></b></p> <p><b><u>Reduction in the number of heritage assets on the Historic England's 'At Risk' register. Reduction in the number of heritage assets considered to be 'at risk' on the local list of heritage assets once established.</u></b></p>	<p><b><u>Heritage Statements are not provided for all development sites required to do so as stated within the individual site policies.</u></b></p> <p><b><u>Identification of a heritage asset newly listed on the 'at risk' register. Periodic increase in the number of heritage assets on the 'at risk' register in the borough. Identification of a locally listed heritage asset that could be at risk through periodic review.</u></b></p>	<b><u>Consider how the Council can contribute to measures to improve the condition of the 'at risk' heritage assets. Consider whether the policy is contributing to the neglect of the heritage assets, and if so, consider whether the policy should be reviewed.</u></b>
Chapter 6: Housing Provision						
HP01	Housing Mix	<b><u>Proposals of 10 or more to meet M4(2) or M4(3) Building Regulations</u></b>	Planning permission	<b><u>All developments of 10 or more dwellings meet the minimum requirement of M4(2) Building Regulation standards</u></b>	<b><u>5% of M4(3) Building Regulation standards for 80% of developments of 60 or more are not met.</u></b>	<b><u>Assess reasons why M4(3) Building Regulations are not being met. If this requirement is not being met due to viability reassess viability. Consider whether the policy requirements need to</u></b>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		<u>Developments of 60 or more to meet 5% M4(3) Building Regulation</u>				<u>be reviewed as part of a full or focused review.</u>
		<u>Developments of 100 or more to provide 5% Self and Custom Build</u>		<u>All developments of 100 or more provide 5% Self and Custom Build homes.</u>	<u>5% Self and Custom Build dwelling are not met for 80% of development of 100 or more are not met</u>	<u>Assess reasons why 5% Self and Custom Build requirement is not being met. Consider whether the policy requirements need to be reviewed as part of a full or focused review.</u>
HP04	Specialist Accommodation	<u>Appropriate level of Specialist Accommodation is provided as indicated in the Council's 'Specialist Accommodation Report'</u>	Planning Permission	<u>Appropriate level and type of Specialist Accommodation is provided as indicated in the Council's most up to date Specialist Accommodation Report and other relevant evidence base.</u>	<u>80% of the required Specialist Accommodation is provided over the plan period.</u>	<u>Assess why the Specialist Accommodation requirements are not being met. If there are viability concerns, update the Viability Assessment and review the policy requirements.</u>
HP05	Affordable Housing	<u>All developments of 10 or more to provide 35% affordable housing</u>	Planning Permission	<u>All developments of 10 or more to provide 35% affordable housing as required by the policy</u>	<u>80% of all developments of 10 or more dwellings to provide 35% affordable housing</u>	<u>Assess why the affordable housing requirements are not being met. If concerns around viability, update the Viability Assessment and review the policy requirements.</u>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		<u>Tenure split to be 86% Affordable / Social Rent and 14% of other forms of affordable housing.</u>		<u>Appropriate tenure split as required by the policy.</u>	<u>80% of all developments 10 or more to provide 86% affordable / social rent and 14% of other forms of affordable housing</u>	<u>Assess why the tenure split is not being achieved. If concerns around viability, update the viability assessment. If the needs of the borough have changed, then consider updating the housing evidence and updating the policy to reflect the new housing tenure split.</u>
<b>HP08</b>	Safeguarding Permitted Sites	<u>Gypsy and Traveller pitches listed in criteria B of the policy are granted permanent planning permission</u>	Planning Permission	<u>All Gypsy and Traveller sites and associated pitches are granted planning permission over the plan period.</u>	<u>80% or less of the Gypsy and Traveller sites identified in the policy are granted planning permission</u>	<u>Consider undertaking a Gypsy and Traveller Accommodation Needs Assessment to determine if the needs within the borough have changed. Consider reviewing the policy.</u>
<b>HP10</b>	Proposals for Gypsies, Travellers, and Travelling Showpeople on Windfall Sites	<u>New Gypsy and Traveller sites come forward during the plan period on windfall site.</u>	Planning Permission	<u>All gypsy and traveller windfall sites come forward in line with the policy requirements. Those that are granted permission on greenbelt sites have clearly demonstrated very special circumstances.</u>	<u>Gypsy and Traveller sites are granted permission on appeal.</u>	<u>Assess the justifications for gypsy and traveller sites being granted on appeal. Consider updating the Gypsy and Traveller Accommodation Needs Assessment and reviewing policies HP07: Provision for Gypsy and Traveller through to HP10: Proposals for Gypsies, Travellers, and Travelling Showpeople on Windfall Sites. Amend these policies where needed.</u>
Chapter 7: Prosperous Communities						

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
<b>PC03</b>	Retail and Commercial Growth	<p><b><u>Retail floorspace requirements met in line with policy MG01.</u></b></p> <p><b><u>Retail floorspace to be provided as part of the following mix-use developments</u></b></p> <p><b><u>Dunton Hills Gadren Village (R01)</u></b></p> <p><b><u>Land at West Horndon Industrial Estate (R02)</u></b></p> <p><b><u>William Hunter Way Car Park (R14)</u></b></p> <p><b><u>Wates Way Industrial Estate (R15)</u></b></p>	Planning Permission	<b><u>Appropriate level of retail floorspace provided as indicated within policy MG01 and site policies R01, R02, R14, and R15</u></b>	<b><u>80% or less of the policy required retail floorspace is achieved in accordance with the site specific policies.</u></b>	<p><b><u>Assess the reasons why retail floorspace is not being achieved.</u></b></p> <p><b><u>Consider a refresh of the Retail Needs Assessment.</u></b></p> <p><b><u>Consider whether the policy requirements need to be reviewed as part of a full or focused review.</u></b></p>
<b>PC10</b>	Protecting and Enhancing Community <b>Facilities</b> Assets	<b><u>Maintaining the existing level of Community Facilities.</u></b>	Planning Permission	<b><u>No net loss of existing community facilities, include those registered as Assets of Community Value (ACV).</u></b>	<b><u>The loss of a community facility to an alternative use.</u></b>	<b><u>Assess why the community facility was loss (i.e. there was no longer a need for the facility). Consider updating the Council's Built Facilities Strategy. Consider reviewing the policy.</u></b>



Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
Chapter 8: Natural Environment						
NE01	Protecting and Enhancing the Natural Environment Heritage	<b><u>Biodiversity net gains</u></b>	Planning permission	<b><u>Achieve biodiversity net gains</u></b>	<b><u>New developments are unable to achieve biodiversity net gains.</u></b>	<b><u>Assess why biodiversity net gains are not able to be achieved on site(s). Consider a review of how the policy has been applied, and whether the policy should be reviewed.</u></b>
		<b><u>Sites within the RAMS Zone of Influence make appropriate contribution toward mitigation.</u></b>		<b><u>Sites within the RAMS Zone of Influence make appropriate contribution towards mitigation as required by the policy and the most up to date evidence.</u></b>	<b><u>New developments not making appropriate contributions towards mitigations as required by the RAMS Strategy</u></b>	<b><u>Assess reasons why RAMS contributions were not made as required by the RAMS Strategy and the policy. Consider if changes to the policy wording are required.</u></b>
		<b><u>No impacts on SSSI's or Sites of Local Importance</u></b>		<b><u>No impacts from developments, either individually or in combination, on SSSI's or Sites of Local Importance</u></b>	<b><u>Unacceptable environmental impacts on SSSI's and/or Sites of Local Importance as a result of an individual development or a combination of developments.</u></b>	<b><u>Assess reasons why unacceptable environmental impacts on SSSI's and/or Sites of Local Importance have occurred. Consider reviewing the policy wording.</u></b>
<b><u>NE02</u></b>	Green and Blue Infrastructure	<b><u>Maximise opportunities for improving Green and Blue Infrastructure (GBI)</u></b>	Planning Permission	<b><u>Existing Green and Blue Infrastructure are protected and enhanced where possible</u></b>	<b><u>Adverse impact to green and blue infrastructure as a result of development.</u> <b><u>Lack of appropriate specification and maintenance plans for the</u></b></b>	<b><u>Assess the reasons why appropriate protect and/or enhancement to Green and Blue Infrastructure was not achieved. Consider reviewing the policy wording.</u></b>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
					<u>proposed green and blue Infrastructure through the life of the development.</u>	
		<u>Development adjacent to water course or water body, do not have any adverse on the function or quality of the Blue Infrastructure.</u>		<u>No adverse impacts on water quality as a result of those developments located near water courses and/or water bodies.</u>	<u>Adverse impact on water courses and/or water bodies as a result of development.</u>	<u>Assess reasons why adverse impacts to water courses and water bodies. Consider reviewing the policy wording.</u>
<b>NE08</b>	Air Quality	<u>Developments do not create an unacceptable risk to Air Quality.</u> <u>All development types listed within the policy, criteria C are required to submit an Air Quality Assessment as part of the planning application process.</u>	Planning Permission	<u>All developments required by the policy submit an Air Quality Assessment which clearly demonstrates no risk to air quality.</u>	<u>Planning permission is granted to developments where:</u> <ul style="list-style-type: none"> <li><u>An Air Quality Assessment has not submitted; and/or</u></li> <li><u>An unacceptable impact on air quality is identify</u></li> </ul>	<u>Assess reason why planning permission was granted to a development which did not meet the requirements of the policy. Consider whether a review of the policy wording is required.</u>
Chapter 9: Site Allocations						

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
*Not all aspects of the site allocations will be monitored. Focus is solely on housing, employment, infrastructure and environment and heritage as it related to the policies listed above.						
R01	Dunton Hills Garden Village	<p><b><u>Housing:</u></b></p> <ul style="list-style-type: none"> <li><b><u>Delivery of 1,650 new homes, providing 35% affordable housing</u></b></li> <li><b><u>5% self and Custom build homes</u></b></li> <li><b><u>Delivery of three care homes of around 80 bed spaces each</u></b></li> <li><b><u>Minimum of 5 new Gypsy and Traveller pitches</u></b></li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li><b><u>1,950 new dwellings</u></b></li> <li><b><u>577 affordable housing</u></b></li> <li><b><u>Approximately 82 self and custom build homes</u></b></li> <li><b><u>Three, 80-bed care homes</u></b></li> <li><b><u>Five gypsy and traveller pitches</u></b></li> </ul>	<ul style="list-style-type: none"> <li><b><u>Deliver the full identified housing of 1,650 new dwelling over the plan period</u></b></li> <li><b><u>Deliver the full 35% affordable housing requirement (approximately 577)</u></b></li> <li><b><u>Deliver 5% Self and Custom Build homes (approximately 82 dwellings)</u></b></li> <li><b><u>Three, 80 bed care homes</u></b></li> <li><b><u>5 Gypsy and Traveller pitches to be provided within the first five years of development coming forward</u></b></li> </ul>	<p><b><u>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</u></b></p> <p><b><u>Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs.</u></b></p>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		<p><b><u>Employment:</u></b>  <b><u>5.5 ha of employment land of E use class</u></b></p>		<p><b><u>A minimum of 5.5 ha employment land provision over the remaining Plan period 2021-2033</u></b></p>	<p><b><u>Less than 90% of employment land is provided as identified within the policy.</u></b></p>	<p><b><u>Assess the reasons why employment land provision is not being achieved.</u></b></p> <p><b><u>Consider a refresh the HELAA to identify additional employment sites to meet job growth.</u></b></p>
		<p><b><u>Infrastructure:</u></b>  <b><u>Delivery of at least one secondary school with sufficient capacity to co-locate early years and childcare nursery facilities</u></b></p>		<p><b><u>At least one secondary school and co-located early years and childcare nursery facilities</u></b></p>	<p><b><u>Secondary school and early years and childcare nursery not provided</u></b></p>	<p><b><u>Assess why the Secondary school, early years, and/or childcare facilities have not been provided.</u></b></p> <p><b><u>Consider whether a review of the viability assessment is needed.</u></b></p> <p><b><u>Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.</u></b></p>
		<p><b><u>Environment and Heritage:</u></b></p> <ul style="list-style-type: none"> <li><b><u>Minimum of 50% of the site is green and blue infrastructure</u></b></li> </ul>		<ul style="list-style-type: none"> <li><b><u>50% of the site is green and blue infrastructure</u></b></li> <li><b><u>Heritage Statement included with application</u></b></li> </ul>	<ul style="list-style-type: none"> <li><b><u>A minimum of 50% of the site is not green and blue infrastructure as required by the policy</u></b></li> <li><b><u>Heritage Statement not included in application</u></b></li> </ul>	<ul style="list-style-type: none"> <li><b><u>Assess why 50% of the site was not green and blue infrastructure as required by the policy.</u></b></li> <li><b><u>Consider how the Council can contribute to measures to improve the condition of the 'at risk' heritage assets. Consider whether policy BE16 Conservation and Enhancement of Historic</u></b></li> </ul>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		<ul style="list-style-type: none"> <li><u>National Heritage Risk Register</u></li> </ul>				<u>Environment is contributing to the neglect of the heritage assets, and if so, consider whether the policy should be reviewed.</u>
R02	Land at West Horndon Industrial Estate	<p><b>Housing:</b></p> <ul style="list-style-type: none"> <li><u>Deliver 580 new dwelling</u></li> <li><u>35% affordable housing</u></li> <li><u>5% Self and Custom Build homes</u></li> <li><u>60-bed residential care home or appropriate specialist accommodation</u></li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li><u>Provide the full 580 new dwelling</u></li> <li><u>Provide 35% affordable housing (approximately 203 dwellings)</u></li> <li><u>Provide 5% Self and Custom Build homes (approximately 29 new dwellings)</u></li> <li><u>One 60-bed care home or other appropriate specialist accommodation to meet the needs of the borough</u></li> </ul>	<ul style="list-style-type: none"> <li><u>Less than 90% of the full identified housing requirement is met</u></li> <li><u>Less than 90% of the affordable housing requirement is met</u></li> <li><u>Less than 90% of the Self and Custom Build requirement is met</u></li> <li><u>60-bed care home or other appropriate specialist accommodation is not met.</u></li> </ul>	<p><u>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</u></p> <p><u>Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs.</u></p>
		<p><b>Employment:</b></p> <p><u>Around 2 ha of employment land with an appropriate mix</u></p>		<u>A minimum of 2 ha employment land provision over the remaining Plan period 2021-2033</u>	<u>Less than 90% of employment needs are provided</u>	<u>Assess the reasons why employment land provision is not being achieved.</u>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		<u>of retail, commercial, and leisure floorspace</u>				<u>Consider a refresh the HELAA to identify additional employment sites to meet job growth.</u>
		<u>Environment and Heritage:</u> <u>Preparation of a Heritage Statement</u>		<u>Heritage Statement including in application</u>	<u>No Heritage Statement included in application</u>	<u>Consider how the Council can contribute to measures to improve the condition of the 'at risk' heritage assets. Consider whether policy BE16 Conservation and Enhancement of Historic Environment is contributing to the neglect of the heritage assets, and if so, consider whether the policy should be reviewed.</u>
R03	Land North of Shenfield	<u>Housing:</u> <ul style="list-style-type: none"> <li>• <u>Provide 825 new homes</u></li> <li>• <u>35% affordable housing</u></li> <li>• <u>5% self and custom builds</u></li> <li>• <u>60 bed residential care home</u></li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>• <u>825 new dwelling</u></li> <li>• <u>288 affordable dwellings</u></li> <li>• <u>41 self and custom build dwellings</u></li> <li>• <u>60 bed residential care home</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Less than 825 new dwelling are provided</u></li> <li>• <u>90% of less of the affordable housing is provided</u></li> <li>• <u>Less than 90% self and custom build homes are provided</u></li> <li>• <u>Care home or appropriate mix of specialist accommodation to be meets not provided.</u></li> </ul>	<p><u>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</u></p> <p><u>Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs.</u></p>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		<p><u>Employment:</u></p> <p><u>2ha of employment land</u></p>		<p><u>2ha of employment land</u></p>	<p><u>Less than 90% of the required employment land is provided</u></p>	<p><u>Assess the reasons why employment land provision is not being achieved.</u></p> <p><u>Consider a refresh the HELAA to identify additional employment sites to meet job growth.</u></p>
		<p><u>Infrastructure:</u></p> <ul style="list-style-type: none"> <li>• <u>Provide vehicle access off Chelmsford Road and Alexander Lane</u></li> <li>• <u>Provide multi-function green infrastructure, including maintaining the provision of the existing playing</u></li> </ul>		<ul style="list-style-type: none"> <li>• <u>Vehicle access off Chelmsford Road and Alexander Lane</u></li> <li>• <u>Existing Green and Blue Infrastructure are protected and enhanced where possible. No loss of the existing playing field currently on site</u></li> <li>• <u>Provide primary school, early years and childcare nursey</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>A minimum of two vehicle access points into the site are provided agreed with ECC</u></li> <li>• <u>Adverse impact to green and blue infrastructure as a result of development. Lack of appropriate specification and maintenance plans for the proposed green and blue Infrastructure through the life of the development.</u></li> <li>• <u>Required educational facilities not provided.</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.</u></li> <li>• <u>Assess the reasons why appropriate protect and/or enhancement to Green and Blue Infrastructure was not achieved. Consider reviewing the policy wording for policy BE16 Green and Blue Infrastructure.</u></li> <li>• <u>Assess the reasons why the policy required educational facilities were not provided.</u></li> </ul>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		<p><u>field on site.</u></p> <ul style="list-style-type: none"> <li>• <u>2.1 ha of land for primary school and early years and childcare nursey.</u></li> </ul>				
R04	Ford Headquarters and Council Depot	<p><b><u>Housing:</u></b></p> <ul style="list-style-type: none"> <li>• <u>Provide 133 new homes</u></li> <li>• <u>35% affordable housing</u></li> <li>• <u>5% Self and Custom Build</u></li> <li>• <u>60-bed residential care home or appropriate mix of specialist accommodation</u></li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>• <u>133 new dwelling</u></li> <li>• <u>46 affordable dwellings</u></li> <li>• <u>6 self and custom build dwellings</u></li> <li>• <u>60-bed residential care home or other appropriate specialist accommodation</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Less than 133 new dwelling are provided</u></li> <li>• <u>90% of less of the affordable housing is provided</u></li> <li>• <u>Less than 90% self and custom build homes are provided</u></li> <li>• <u>Care home or other appropriate specialist accommodation is not provided.</u></li> </ul>	<p><b><u>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</u></b></p> <p><b><u>Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs.</u></b></p>



Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		<p><u>Employment:</u></p> <p><u>2ha of employment land</u></p>		<p><u>2ha of employment land</u></p>	<p><u>Less than 90% of the employment land is provided</u></p>	<p><u>Assess the reasons why employment land provision is not being achieved.</u></p> <p><u>Consider a refresh the HELAA to identify additional employment sites to meet job growth.</u></p>
		<p><u>Infrastructure:</u></p> <ul style="list-style-type: none"> <li>• <u>Provide Vehicle access off Eagle Way and The Drive</u></li> <li>• <u>Provide multi-functional green infrastructure</u></li> <li>• <u>Provide appropriate financial contribution towards infrastructure improvements as set out in the</u></li> </ul>		<ul style="list-style-type: none"> <li>• <u>Vehicle access off Eagle Way and The Drive</u></li> <li>• <u>multi-functional green infrastructure</u></li> <li>• <u>Appropriate financial contribution towards other infrastructure improvements</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>A minimum of two vehicle access points into the site are provided agreed with ECC</u></li> <li>• <u>Adverse impact to green and blue infrastructure as a result of development. Lack of appropriate specification and maintenance plans for the proposed green and blue Infrastructure through the life of the development.</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.</u></li> <li>• <u>Assess the reasons why appropriate protect and/or enhancement to Green and Blue Infrastructure was not achieved. Consider reviewing the policy wording for policy NE02: Green and Blue Infrastructure</u></li> </ul>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		<u>Council's IDP</u>				
		<u>Heritage:</u> <u>Grade II listed Blenheim House and the Chapel of Royal Anglian and Essex Regiments</u>		<u>No negative impact on the Grade II listed Blenheim House and the Chapel of Royal Anglian and Essex Regiments</u>	<u>Negative impacts occur on the listed building within the area as a direct result of development.</u>	<u>Consider how the Council can contribute to measures to improve the condition of the 'at risk' heritage assets. Consider whether policy BE16 Conservation and Enhancement of Historic Environment is contributing to the neglect of the heritage assets, and if so, consider whether the policy should be reviewed.</u>
R06	Land off Nags Head Lane	<u>Housing:</u> <ul style="list-style-type: none"> <li>• <u>125 new dwelling</u></li> <li>• <u>35% affordable housing</u></li> <li>• <u>5% Self and Custom Build</u></li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>• <u>125 new dwellings</u></li> <li>• <u>43 affordable dwellings</u></li> <li>• <u>6 Self and Custom Build dwellings</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Less than 125 new dwelling are provided</u></li> <li>• <u>90% of less of the affordable housing is provided</u></li> <li>• <u>Less than 90% self and custom build homes are provided</u></li> </ul>	<p><u>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</u></p> <p><u>Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs.</u></p>
		<u>Infrastructure:</u> <u>Provision for public open space</u>		<u>Provide multi-functional green infrastructure</u>	<u>Adverse impact to green and blue infrastructure as a result of development. Lack of appropriate specification and maintenance plans for the</u>	<u>Assess the reasons why appropriate protect and/or enhancement to Green and Blue Infrastructure was not achieved. Consider reviewing the policy wording for policy NE02 Green and Blue Infrastructure</u>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
					<u>proposed green and blue Infrastructure through the life of the development.</u>	
		<u>Environment and Heritage:</u>  <u>National Risk Register</u>		<u>Heritage Statement submitted with application</u>	<u>No Heritage Statement is submitted with the application</u>	<u>Consider how the Council can contribute to measures to improve the condition of the 'at risk' heritage assets. Consider whether policy BE16 Conservation and Enhancement of Historic Environment is contributing to the neglect of the heritage assets, and if so, consider whether the policy should be reviewed.</u>
R07	Sow and Grow Nursery	<u>Housing:</u> <ul style="list-style-type: none"> <li><u>38 new homes</u></li> <li><u>35% affordable housing</u></li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li><u>38 new dwellings</u></li> <li><u>13 affordable dwellings</u></li> </ul>	<ul style="list-style-type: none"> <li><u>Less than 38 new dwellings</u></li> <li><u>90% or less affordable housing</u></li> </ul>	<u>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</u>  <u>Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs.</u>
		<u>Infrastructure:</u> <u>Appropriate developers contribution as set out in the Council's IDP towards highway infrastructure</u>		<u>Appropriate developers contribution as set out in the Council's IDP towards highway infrastructure</u>	<u>Insufficient developers contribution made as required by policy</u>	<u>Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.</u>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		<b><u>Environment and Heritage:</u></b> <b><u>National Risk Register</u></b>		<b><u>No adverse impacts of Grade II listed Park and Garden of South Weald Park</u></b>	<b><u>Adverse impacts on the Grade II listed Park and Garden of South Weald as a result of the development.</u></b>	<b><u>Consider how the Council can contribute to measures to improve the condition of the 'at risk' heritage assets. Consider whether policy BE16: Conservation and Enhancement of Historic Environment is contributing to the neglect of the heritage assets, and if so, consider whether the policy should be reviewed.</u></b>
R08	Land at Mascalls Lane	<b><u>Housing:</u></b> <b><u>9 new dwellings</u></b>	Planning Permission	<b><u>9 new dwellings</u></b>	<b><u>Less than 9 new dwelling</u></b>	<b><u>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</u></b>
		<b><u>Infrastructure:</u></b> <b><u>Appropriate financial contribution as determined by the Council's IDP</u></b>		<b><u>Appropriate financial contribution</u></b>	<b><u>No financial contribution</u></b>	<b><u>Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.</u></b>
R09	Land of Warley Hill	<b><u>Housing:</u></b> <ul style="list-style-type: none"> <li>• <b><u>43 new dwellings</u></b></li> <li>• <b><u>35% affordable housing</u></b></li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>• <b><u>43 new dwellings</u></b></li> <li>• <b><u>15 affordable dwelling</u></b></li> </ul>	<ul style="list-style-type: none"> <li>• <b><u>Less than 43 new dwellings</u></b></li> <li>• <b><u>Less than 90% affordable housing</u></b></li> </ul>	<b><u>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</u></b>  <b><u>Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs.</u></b>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		<u>Environment and Heritage:</u> <u>National Risk Register</u>		<u>No negative impacts of the Grade II listed Warley Hospital, Tower at Warley Hospital and Lodge to Warley Hospital</u>	<u>Adverse impacts on the Grade II listed buildings as a result of the development.</u>	<u>Consider how the Council can contribute to measures to improve the condition of the 'at risk' heritage assets. Consider whether policy BE16: Conservation and Enhancement of Historic Environment is contributing to the neglect of the heritage assets, and if so, consider whether the policy should be reviewed.</u>
R10	Brentwood Railway Station	<u>Housing:</u> <ul style="list-style-type: none"> <li>• <u>200 new dwellings</u></li> <li>• <u>35% affordable housing</u></li> <li>• <u>5% Self and Custom Build dwellings</u></li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>• <u>200 new dwellings</u></li> <li>• <u>70 affordable dwelling</u></li> <li>• <u>10 self and custom build dwellings</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Less than 200 new dwellings</u></li> <li>• <u>90% or less affordable housing</u></li> <li>• <u>90% or less self and custom builds</u></li> </ul>	<p><u>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</u></p> <p><u>Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs.</u></p>
		<u>Infrastructure:</u> <ul style="list-style-type: none"> <li>• <u>Adequate parking for future rail traveler needs</u></li> <li>• <u>Developers contribution as</u></li> </ul>		<ul style="list-style-type: none"> <li>• <u>Adequate parking for future rail traveller needs</u></li> <li>• <u>Appropriate developers contribution</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Insufficient parking provided</u></li> <li>• <u>Insufficient developers contribution made as required by policy</u></li> </ul>	<u>Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.</u>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		<u>required by the Council's IDP</u>				
R11	Westbury Road Car Park	<p><b>Housing:</b></p> <ul style="list-style-type: none"> <li>• <u>45 new dwelling</u></li> <li>• <u>35% affordable housing</u></li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>• <u>45 new dwellings</u></li> <li>• <u>15 affordable dwellings</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Less than 45 dwellings</u></li> <li>• <u>90% or less affordable housing</u></li> </ul>	<p><u>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</u></p> <p><u>Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs.</u></p>
		<p><b>Infrastructure:</b></p> <ul style="list-style-type: none"> <li>• <u>Developers contribution to Highway improvements as required by the IDP</u></li> <li>• <u>No net loss of Town Centre parking – 638 parking spots</u></li> </ul>		<ul style="list-style-type: none"> <li>• <u>Sufficient developers contribution</u></li> <li>• <u>638 car parking places for the Town Centre allocate sites</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Insufficient developers contribution</u></li> <li>• <u>Loss of Town Centre parking as a result of development</u></li> </ul>	<p><u>Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.</u></p>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		<u>Environment and Heritage:</u> <u>National Risk Register</u>		<u>Heritage Statement</u>	<u>No Heritage Statement</u>	<u>Consider how the Council can contribute to measures to improve the condition of the 'at risk' heritage assets. Consider whether policy BE16 Conservation and Enhancement of Historic Environment is contributing to the neglect of the heritage assets, and if so, consider whether the policy should be reviewed.</u>
R12	Land at Hunter House	<u>Housing:</u> <ul style="list-style-type: none"> <li>• <u>48 new dwelling</u></li> <li>• <u>35% affordable dwellings</u></li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>• <u>48 new dwellings</u></li> <li>• <u>16 affordable dwellings</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Less than 48 dwellings</u></li> <li>• <u>90% or less affordable housing</u></li> </ul>	<p><u>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</u></p> <p><u>Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs</u></p>
		<u>Infrastructure:</u> <ul style="list-style-type: none"> <li>• <u>Developers contribution to Highway improvements as required by the IDP</u></li> <li>• <u>No net loss of Town Centre parking –</u></li> </ul>		<ul style="list-style-type: none"> <li>• <u>Sufficient developers contribution</u></li> <li>• <u>638 car parking places for the Town Centre allocate sites</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Insufficient developers contribution</u></li> <li>• <u>Loss of Town Centre parking as a result of development</u></li> </ul>	<u>Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.</u>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		<b><u>638 parking spots</u></b>				
		<b><u>Environment and Heritage:</u></b> <b><u>National Risk Register</u></b>		<b><u>Heritage Statement</u></b>	<b><u>No Heritage Statement</u></b>	<b><u>Consider how the Council can contribute to measures to improve the condition of the 'at risk' heritage assets. Consider whether policy BE16 Conservation and Enhancement of Historic Environment is contributing to the neglect of the heritage assets, and if so, consider whether the policy should be reviewed.</u></b>
R13	Chatham Way Car Park	<b><u>Housing:</u></b> <ul style="list-style-type: none"> <li>• <b><u>31 new dwellings</u></b></li> <li>• <b><u>35% affordable housing</u></b></li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>• <b><u>31 new dwellings</u></b></li> <li>• <b><u>10 affordable housing</u></b></li> </ul>	<ul style="list-style-type: none"> <li>• <b><u>Less than 31 dwellings</u></b></li> <li>• <b><u>90% or less affordable housing</u></b></li> </ul>	<p><b><u>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</u></b></p> <p><b><u>Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs</u></b></p>
		<b><u>Infrastructure:</u></b> <ul style="list-style-type: none"> <li>• <b><u>Developers contribution to Highway improvements as required by the IDP</u></b></li> </ul>		<ul style="list-style-type: none"> <li>• <b><u>Sufficient developers contribution</u></b></li> <li>• <b><u>638 car parking places for the Town Centre allocate sites</u></b></li> </ul>	<ul style="list-style-type: none"> <li>• <b><u>Insufficient developers contribution</u></b></li> <li>• <b><u>Loss of Town Centre parking as a result of development</u></b></li> </ul>	<b><u>Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.</u></b>



Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		<ul style="list-style-type: none"> <li><u>No net loss of Town Centre parking – 638 parking spots</u></li> </ul>				
		<p><u>Environment and Heritage:</u></p> <p><u>National Risk Register</u></p>		<u>Heritage Statement</u>	<u>No Heritage Statement</u>	<u>Consider how the Council can contribute to measures to improve the condition of the ‘at risk’ heritage assets. Consider whether policy BE16: Conservation and Enhancement of Historic Environment is contributing to the neglect of the heritage assets, and if so, consider whether the policy should be reviewed.</u>
R14	William Hunter Way Car Park	<p><u>Housing:</u></p> <ul style="list-style-type: none"> <li><u>300 new dwellings</u></li> <li><u>35% affordable housing</u></li> <li><u>5% Self and Custom Build dwelling</u></li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li><u>300 new dwellings</u></li> <li><u>105 affordable housing</u></li> <li><u>15 self and custom build</u></li> </ul>	<ul style="list-style-type: none"> <li><u>Less than 300 dwellings</u></li> <li><u>90% or less affordable housing</u></li> <li><u>90% or less self and custom build</u></li> </ul>	<p><u>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</u></p> <p><u>Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs</u></p>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		<p><b><u>Infrastructure:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>Developers contribution to Highway improvements as required by the IDP</u></b></li> <li>• <b><u>No net loss of Town Centre parking – 638 parking spots</u></b></li> </ul>		<ul style="list-style-type: none"> <li>• <b><u>Sufficient developers contribution</u></b></li> <li>• <b><u>638 car parking places for the Town Centre allocate sites</u></b></li> </ul>	<ul style="list-style-type: none"> <li>• <b><u>Insufficient developers contribution</u></b></li> <li>• <b><u>Loss of Town Centre parking as a result of development</u></b></li> </ul>	<p><b><u>Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.</u></b></p>
		<p><b><u>Environment and Heritage:</u></b></p> <p><b><u>National Risk Register</u></b></p>		<p><b><u>Heritage Statement</u></b></p>	<p><b><u>No Heritage Statement</u></b></p>	<p><b><u>Consider how the Council can contribute to measures to improve the condition of the ‘at risk’ heritage assets. Consider whether policy BE16: Conservation and Enhancement of Historic Environment is contributing to the neglect of the heritage assets, and if so, consider whether the policy should be reviewed.</u></b></p>
R15	Wates Way Industrial Estate	<p><b><u>Housing:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>46 new dwellings</u></b></li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>• <b><u>46 new dwellings</u></b></li> </ul>	<ul style="list-style-type: none"> <li>• <b><u>Less than 80 dwellings</u></b></li> </ul>	<p><b><u>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</u></b></p>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
						<u>Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs</u>
		<u>Infrastructure:</u> <u>Developers contribution to Highway improvements as required by the IDP</u>		<u>Sufficient developers contribution</u>	<u>Insufficient developers contribution</u>	<u>Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.</u>
R16	Land off Doddinghurst Road	<u>Housing:</u> <ul style="list-style-type: none"> <li>• <u>200 new dwellings</u></li> <li>• <u>35% affordable</u></li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>• <u>200 new dwellings</u></li> <li>• <u>70 affordable</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Less than 200 dwellings</u></li> <li>• <u>90% or less affordable housing</u></li> </ul>	<u>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</u>  <u>Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs</u>
		<u>Infrastructure:</u> <u>Developers contribution to Highway improvements as required by the IDP</u>		<u>Sufficient developers contribution</u>	<u>Insufficient developers contribution</u>	<u>Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.</u>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
R19	Land at Priests Lane	<p><b><u>Housing:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>75 new dwellings</u></b></li> <li>• <b><u>35% affordable</u></b></li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>• <b><u>75 new dwellings</u></b></li> <li>• <b><u>26 affordable</u></b></li> </ul>	<ul style="list-style-type: none"> <li>• <b><u>Less than 75 dwellings</u></b></li> <li>• <b><u>90% or less affordable</u></b></li> </ul>	<p><b><u>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</u></b></p> <p><b><u>Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs</u></b></p>
		<p><b><u>Infrastructure:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>Replacement playing field</u></b></li> <li>• <b><u>Developers contribution to Highway improvements as required by the IDP</u></b></li> </ul>		<ul style="list-style-type: none"> <li>• <b><u>Replacement playing field</u></b></li> <li>• <b><u>Sufficient developers contribution</u></b></li> </ul>	<p><b><u>Insufficient developers contribution</u></b></p>	<p><b><u>Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.</u></b></p>
R21	Land South of Ingatestone	<p><b><u>Housing:</u></b></p> <ul style="list-style-type: none"> <li>• <b><u>161 new dwellings</u></b></li> <li>• <b><u>35% affordable</u></b></li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>• <b><u>161 new dwellings</u></b></li> <li>• <b><u>56 affordable dwellings</u></b></li> </ul>	<ul style="list-style-type: none"> <li>• <b><u>Less than 161 dwellings</u></b></li> <li>• <b><u>90% or less affordable</u></b></li> </ul>	<p><b><u>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</u></b></p> <p><b><u>Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs</u></b></p>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		<u>Infrastructure:</u> <u>Developers contribution to Highway improvements as required by the IDP</u>		<u>Sufficient developers contribution</u>	<u>Insufficient developers contribution</u>	<u>Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.</u>
		<u>Environment and Heritage:</u> <u>National Rik Register</u>		<u>Heritage Statement submitted with application</u>	<u>No Heritage Statement submitted with application</u>	<u>Consider how the Council can contribute to measures to improve the condition of the 'at risk' heritage assets. Consider whether policy BE16 Conservation and Enhancement of Historic Environment is contributing to the neglect of the heritage assets, and if so, consider whether the policy should be reviewed.</u>
R22	Land adjacent to the A12, Ingatestone	<u>Housing:</u> <ul style="list-style-type: none"> <li>• <u>57 new dwellings</u></li> <li>• <u>35% affordable dwellings</u></li> </ul>		<ul style="list-style-type: none"> <li>• <u>57 new dwellings</u></li> <li>• <u>20 affordable</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Less than 57 dwellings</u></li> <li>• <u>90% or less affordable</u></li> </ul>	<u>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</u>  <u>Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs</u>
		<u>Infrastructure:</u> <u>Developers contribution to Highway</u>		<u>Sufficient developers contribution</u>	<u>Insufficient developers contribution</u>	<u>Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary</u>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		<u>improvements as required by the IDP</u>				<u>review alternative ways of meeting the infrastructure needs.</u>
		<u>Environment and Heritage:</u> <u>National Rik Register</u>		<u>Heritage Statement submitted with application</u>	<u>No Heritage Statement submitted with application</u>	<u>Consider how the Council can contribute to measures to improve the condition of the 'at risk' heritage assets. Consider whether policy BE16 Conservation and Enhancement of Historic Environment is contributing to the neglect of the heritage assets, and if so, consider whether the policy should be reviewed.</u>
R23	Brizes Corner Field	<u>Housing:</u> <ul style="list-style-type: none"> <li>• <u>23 new dwellings</u></li> <li>• <u>35% affordable</u></li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>• <u>23 new dwellings</u></li> <li>• <u>8 affordable</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Less than 23 new dwellings</u></li> <li>• <u>90% or less affordable</u></li> </ul>	<u>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</u>  <u>Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs</u>
		<u>Infrastructure:</u> <u>Developers contribution to Highway improvements as required by the IDP</u>		<u>Sufficient developers contribution</u>	<u>Insufficient developers contribution</u>	<u>Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.</u>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
R24	Land off Stocks Lane	<b>Housing:</b> <ul style="list-style-type: none"> <li>• <u>40 new dwellings</u></li> <li>• <u>35% affordable</u></li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>• <u>40 new dwellings</u></li> <li>• <u>14 affordable</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Less than 40 dwellings</u></li> <li>• <u>90% or less affordable</u></li> </ul>	<p><b><u>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</u></b></p> <p><b><u>Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs</u></b></p>
		<b>Infrastructure:</b> <b><u>Developers contribution to Highway improvements as required by the IDP</u></b>		<b><u>Sufficient developers contribution</u></b>	<b><u>Insufficient developers contribution</u></b>	<p><b><u>Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.</u></b></p>
R25	Land North of Wollard Way	<b>Housing:</b> <ul style="list-style-type: none"> <li>• <u>40 new dwellings</u></li> <li>• <u>35% affordable</u></li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>• <u>40 new dwellings</u></li> <li>• <u>14 affordable</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Less than 40 dwellings</u></li> <li>• <u>90% or less affordable</u></li> </ul>	<p><b><u>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</u></b></p> <p><b><u>Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs</u></b></p>
		<b>Infrastructure:</b> <b><u>Developers contribution to Highway</u></b>		<b><u>Sufficient developers contribution</u></b>	<b><u>Insufficient developers contribution</u></b>	<p><b><u>Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary</u></b></p>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		<u>improvements as required by the IDP</u>				<u>review alternative ways of meeting the infrastructure needs.</u>
R26	Land North of Orchard Piece	<b>Housing:</b> <ul style="list-style-type: none"> <li>• <u>30 new dwellings</u></li> <li>• <u>35% affordable</u></li> </ul>	Planning Permission	<ul style="list-style-type: none"> <li>• <u>30 new dwellings</u></li> <li>• <u>10 affordable</u></li> </ul>	<ul style="list-style-type: none"> <li>• <u>Less than 30 dwellings</u></li> <li>• <u>90% or less affordable</u></li> </ul>	<u>Assess why the housing requirements are not being met. If there are viability concerns, update the Viability Assessment.</u>  <u>Consider whether a call for site should be undertaken and additional sites allocated to ensure the borough can meet its identified housing needs</u>
		<b>Infrastructure:</b> <u>Developers contribution to Highway improvements as required by the IDP</u>		<u>Sufficient developers contribution</u>	<u>Insufficient developers contribution</u>	<u>Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.</u>
E11	Brentwood Enterprise Park	<b>Employment:</b> <u>25.85 ha of employment</u>	Planning Permission	<u>25.85 employment – B2, B8, and sui generis</u>	<u>90% or less employment</u>	<u>Assess the reasons why employment land provision is not being achieved.</u>  <u>Consider a refresh the HELAA to identify additional employment sites to meet job growth.</u>



Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		<b><u>Infrastructure:</u></b> <b><u>Developers contribution to Highway improvements and early years child care as required by the IDP</u></b>		<b><u>Sufficient developers contribution</u></b>	<b><u>Insufficient developers contribution</u></b>	<b><u>Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.</u></b>
E12	Childerditch Industrial Estate	<b><u>Employment:</u></b> <b><u>20.64 ha of employment land</u></b>	Planning Permission	<b><u>24.64 employment – Class E, B2, B8, and sui generis</u></b>	<b><u>90% or less employment</u></b>	<b><u>Assess the reasons why employment land provision is not being achieved.</u></b>  <b><u>Consider a refresh the HELAA to identify additional employment sites to meet job growth.</u></b>
		<b><u>Infrastructure:</u></b> <b><u>Developers contribution to Highway improvements and early years child care as required by the IDP</u></b>		<b><u>Sufficient developers contribution</u></b>	<b><u>Insufficient developers contribution</u></b>	<b><u>Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.</u></b>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		<u>Environment and Heritage:</u> <u>National Risk Register</u>		<u>Heritage Statement submitted with application</u>	<u>No Heritage Statement is submitted with application</u>	<u>Consider how the Council can contribute to measures to improve the condition of the 'at risk' heritage assets. Consider whether policy BE16: Conservation and Enhancement of Historic Environment is contributing to the neglect of the heritage assets, and if so, consider whether the policy should be reviewed.</u>
E10	Codham Hall Farm	<u>Employment:</u> <u>9.6 ha of employment</u>	Planning Permission	<u>9.6 ha employment – Class E, B2, B8 or sui generis uses</u>	<u>90% or less employment</u>	<u>Assess the reasons why employment land provision is not being achieved.</u>  <u>Consider a refresh the HELAA to identify additional employment sites to meet job growth.</u>
		<u>Infrastructure:</u> <u>Developers contribution to Highway improvements and early years child care as required by the IDP</u>		<u>Sufficient developers contribution</u>	<u>Insufficient developers contribution</u>	<u>Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.</u>
E13	East Hordon Hall	<u>Employment:</u> <u>9.6 ha employment</u>	Planning Permission	<u>9.6 ha employment – Class E, B2, B8, or sui generis</u>	<u>90% or less employment</u>	<u>Assess the reasons why employment land provision is not being achieved.</u>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
						<u>Consider a refresh the HELAA to identify additional employment sites to meet job growth.</u>
		<u>Infrastructure: Developers contribution to Highway improvements and early years child care as required by the IDP</u>		<u>Sufficient developers contribution</u>	<u>Insufficient developers contribution</u>	<u>Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.</u>
		<u>Environment and Heritage: National Risk Register</u>		<u>Heritage Statement submitted with application</u>	<u>No Heritage Statement submitted with application</u>	<u>Consider how the Council can contribute to measures to improve the condition of the 'at risk' heritage assets. Consider whether policy BE16: Conservation and Enhancement of Historic Environment is contributing to the neglect of the heritage assets, and if so, consider whether the policy should be reviewed.</u>
E08	Land Adjacent to A12 and Slip Road, Ingatestone	<u>Employment: 2.06 ha employment</u>	Planning Permission	<u>2.06 ha employment – Class E, B2, B8, or sui generis</u>	<u>90% or less employment</u>	<u>Assess the reasons why employment land provision is not being achieved.</u>  <u>Consider a refresh the HELAA to identify additional employment sites to meet job growth.</u>

Plan Policy	Policy Name	Indicator	Delivery Mechanism	Target	Trigger for action	Action
		<u>Infrastructure: Developers contribution to Highway improvements and early years child care as required by the IDP</u>		<u>Sufficient developers contribution</u>	<u>Insufficient developers contribution</u>	<u>Work with lead organisations and developers to unblock delivery of infrastructure projects. If necessary review alternative ways of meeting the infrastructure needs.</u>

## Annexe 4 – MM119 Appendix 2 Schedule of Plans and Policies which will be superseded by the new Plan

In accordance with Regulation 8 (5) of the Town and Country Planning (Local Planning) (England) Regulations 2012, the following Development Plan Documents and Policies will be superseded by the Local Plan:

**Table 1: Schedule of Superseded Documents**

<b>Superseded Development Plan Document</b>	<b>Date Adopted</b>
Brentwood Replacement Local Plan 2005	August 2005

**Table 2: Schedule of Superseded Policies**

<b>Superseded Replacement Local Plan 2005 Policies</b>
CP1 General Development Criteria
CP2 New Development and Sustainable Development Choices
CP3 Transport Assessments
CP4 The Provision of Infrastructure and Community Facilities
H3 Community Uses in Residential Development
H4 Mixed Use Development
H5 Changes of Use of Upper Floors
H6 Small Unit Accommodation
H7 Single Storey Dwellings
H8 Conversions
H9 Affordable Housing on Larger Sites

## Superseded Replacement Local Plan 2005 Policies

H10 Affordable Rural Housing

H11 Supported Accommodation

H12 Residential Homes

H14 Housing Density

H15 Hutton Mount

H16 Lifetime Homes

H17 Dormer Windows

E1 Areas Allocated for General Employment

E2 Areas Allocated for Office Purposes

E4 Sites for Additional Employment Land

E5 Land Adjacent to Council Depot, Warley

E6 Childerditch Industrial Park, Warley

E8 Employment Development Criteria

S1 New Major Retail Developments

S3 Petrol Filling Retail Developments

S4 Non-Retail Uses within Local Shopping Centres and Parades

T1 Travel Plans

T2 New Development and Highway Considerations

T3 Traffic Management

T5 Parking - General

<b>Superseded Replacement Local Plan 2005 Policies</b>
T6 Public Car Parking Strategy
T7 Off Street Public Car Parking
T8 On-Street Parking
T9 Commuter Car Parking
T10 Access for Persons with Disabilities
T11 Bus Services
T12 Rail Services
T13 Taxis
T14 Cycling
T15 Pedestrian Facilities
GB1 New Development
GB2 Development Criteria
GB3 Settlements Excluded from the Green Belt
GB4 Established Areas of Development
GB5 Extensions to Dwellings
GB6 Replacement Dwellings
GB7 Garages, Swimming Pools/Enclosures and Outbuildings
GB8 Extensions to Gardens
GB9 Havering Grove
GB10 Subdivision of Dwellings

## Superseded Replacement Local Plan 2005 Policies

GB11 Temporary Siting of Mobile Homes

GB12 Permanent Dwellings for Agricultural Dwellings

GB13 Removal of Agricultural Occupancy Conditions

GB14 Agricultural Buildings

GB15 Re-Use and Adaptation of Rural Buildings for Small-Scale Employment, Tourism, Leisure, and Community Uses

GB16 Residential Conversions

GB17 Conversion or Change of Use of Listed Buildings

GB18 Existing Inappropriate Development Sites

GB19 Farm Shops and Retailing

GB22 Outdoor Facilities

GB23 Ancillary Buildings

GB25 Riding Schools and Livery Stables

GB26 Other Stables

GB27 Access to Countryside

LT1 Strategic Public Open Spaces

LT2 Development of Existing Urban Open Spaces

LT3 Areas Deficient in Open Space

LT4 Provision of Open Space in New Development

LT5 Displacement of Open Land Uses



<b>Superseded Replacement Local Plan 2005 Policies</b>
LT6 The Brentwood Centre
LT8 Use of Redundant Institutional, Recreational and Community Buildings
LT9 Highwood Hospital Site
LT10 Changes of Use or New Buildings for Institutional Purposes
LT11 Retention of Existing Local Community Facilities
LT15 Hotel Accommodation in the Urban Area
LT16 Bed & Breakfast and Self-catering Accommodation
LT19 Accessibility to Premises to which the Public are Admitted and to Employment Generating Developments
C3 County Wildlife Sites, Local Nature Reserves and Other Habitats and Natural Features of Local Value
C4 Management of Woodlands
C5 Retention and Provision of Landscaping and Natural Features in Development
C6 Tree Preservation Orders and Works to Preserved Trees
C7 Development Affecting Preserved Trees, Ancient Woodland and Trees in Conservation Areas
C8 Special Landscape Areas
C9 Ancient Landscapes and Historic Parks and Gardens
C10 Protected Lanes
C11 Thames Chase Community Forest
C12 Landscape Improvements
C14 Development Affecting Conservation Areas

## Superseded Replacement Local Plan 2005 Policies

C15 Listed Buildings – Demolitions, Alterations or Extensions

C16 Development within the Vicinity of a Listed Building

C17 Change of use of a Listed Building

C18 Ancient Monuments

C19 Secured by Design

C20 Shop Fronts

C21 Illuminated Advertisements

C22 Signs within Conservation Areas or on Listed Buildings

C23 Externally Illuminated Hanging Signs

C24 Non-Illuminated Advertisements

C25 Floodlighting and Other Forms of Illumination

IR2 Telecommunications

IR3 Protecting the Best and Most Versatile Agricultural Land

IR4 Recycling Facilities

IR5 Energy and Water Conservation and the Use of Renewable Sources of Energy in New Development

IR6 Renewable Energy Schemes

PC1 Land Contaminated by " Hazardous Substances

PC4 Noise

PC5 Traffic Noise

<b>Superseded Replacement Local Plan 2005 Policies</b>
PC6 Transport Pollution
PC7 Areas of Poor Air Quality
TC1 Vacant and Redevelopment Sites within Residentially Allocated Areas
TC2 Residential Replacement
TC3 Mixed Use Development
TC4 Use of Upper Floors
TC5 Type of Accommodation
TC6 Small Scale Shops
TC7 Non-Retail uses
TC8 Professional/Financial Services
TC9 The Telephone Exchange
TC10 Site of the William Hunter Way Car Park
TC11 Traffic in the High Street
TC12 Landscaping in the Town Centre
TC13 Pedestrian Areas
TC14 Advertisements and Shop Fronts
TC15 Shop Fronts Facing William Hunter Way
TC16 Non-Illuminated Advertisements Fronting William Hunter Way
TC19 Medical/Health Uses
APP1 Extracts from the adopted Essex Design Guide for Residential and Mixed Use Areas

**Superseded Replacement Local Plan 2005 Policies**

APP2 Vehicle Parking Standards

APP3 Advertisements and Shop Front Guidance: Additional Advice to Applicants

APP4 Access for Disabled Persons

APP5 Miscellaneous Residential Design Guidance



Brentwood Borough Council

# Schedule of Additional Modifications

Brentwood Local Plan Examination

March 2022

This document contains the Additional Modifications to the Brentwood Local Plan 2016-2033 as submitted for Examination on 14 February 2020.

These are changes which do not materially affect the Policies of the Local Plan and do not fall within the scope of the Plan Examination. The Council is therefore accountable for these changes.

The proposed Additional Modifications will be made upon adoption of the Local Plan by the Council.

The modifications in the table are expressed either in the conventional form of ~~striketrough~~ for deletions and **underlined bold** text for additions, or by specifying the modification in words in *italics*.

Where the text is re-ordered due to restructuring, it will be highlighted in **green** with ~~striketrough~~ for deletions and **underlined bold** for additions.

The page numbers and paragraph numbering below refer to the submission local plan, and do not take account of the deletion or addition of text.

## General

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
AM1	N/A	Front and back covers	<i>Update front and back covers</i>	To reflect final document title and publication date
AM2	1 - 8	Contents, Policy Index and List of Figures	<i>Update Contents, Policy Index and List of Figures</i>	To reflect the modifications to the Local Plan
AM3	N/A	Page header	<i>Update page header throughout the Local Plan</i>	To reflect final document title and publication date
AM4	N/A	Footnote numbering	<i>Update footnote numbering</i>	So that they follow a sequential order throughout the whole document

## Chapter 1

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
AM5	9-10	Figure 1.1	<i>Update figure 1.1 to reflect revised policy structure</i>	To reflect modifications to Policy references, names and structure
AM6	11	Paragraph 1.1	<i>Amend first sentence to read: <del>This Pre-Submission Local Plan (Publication Draft, Regulation 19)</del> <b>Local Plan</b> presents Brentwood Borough Council's vision for how the borough will develop over the next 17 years, from 2016 to 2033.</i>	Removal of references to Pre-Submission version of the Local Plan
AM7	11	Paragraph 1.3, 1.6 – 1.10 and Figure 1.2	<i>Delete paragraphs 1.3, 1.6 – 1.10 and Figure 1.2</i>	To remove text that is out of date.
AM8	14	Paragraph 1.12	<i>Amend second sentence of paragraph 1.12 to read: Maintaining effective cooperation is also reinforced by the NPPF (<del>2018</del> <b>2021</b>, paragraphs 24-27), which calls for one or more 'Statements of Common Ground' to be prepared and maintained on cross-boundary matters being addressed and progress in cooperating to address these. <del>These are to be made publicly available.</del></i>	To reflect updated NPPF and to remove text that is out of date.
AM9	14	Paragraph 1.14 and 1.16 – 1.18	<i>Delete paragraph 1.14 and 1.16 – 1.18</i>	To remove text that is out of date
AM10	15	Paragraph 1.19 – 1.20	<i>Amend paragraphs 1.19 – 1.20 to read: <del>As stated above, a</del> <b>A</b> Sustainability Appraisal (SA) has been carried out at key stages in the plan-making process, in line with the Environmental Assessment of Plans and</i>	Removal of references to Pre-Submission version of the Local Plan and out of date text

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
			<p>Programmes Regulations 2004. The Sustainability Appraisal recommendations at each stage have informed the production of this <del>Pre-Submission</del> Local Plan.</p> <p>The SA <del>has</del> considered potential impacts of the Plan on economic, social and environmental considerations and how they can be mitigated. It <del>has</del> also considered several reasonable alternatives to ensure Brentwood's growth strategy is sound. <del>The Sustainability Appraisal is available for public consultation alongside the Pre-Submission Local Plan.</del></p>	
AM11	15	Paragraph 1.21 and 1.22	<p><i>Amend paragraph 1.21 to 1.22 to read:</i></p> <p>1.21 In accordance with regulation <del>64</del> <b>63</b> of the Conservation of Habitats and Species Regulations <del>2010</del> <b>2017</b>, a Habitats Regulation Assessment (HRA) screening has been undertaken to determine whether the <del>Pre-Submission</del> <b>Local</b> Plan is likely, either alone or in combination with other plans and projects, to have a significant adverse impact on internationally important habitat sites.</p> <p>1.22 To assess the in-combination impacts of new development, a need to prepare a Recreational disturbance Avoidance and Mitigation Strategy (RAMS) has been identified for the <b><u>internationally important designated wildlife sites on the Essex Estuaries and Coastal Sites Coast.</u></b> A RAMS <del>is being</del> <b>has been</b> prepared <b><u>(January 2019)</u></b> to <del>cover</del> <b><u>deliver strategic mitigation to avoid impacts on</u></b> these sites <b><u>from residential development within the evidenced Zone of Influence,</u></b> with a view to subsequent adoption <b><u>as of</u></b> a Supplementary Planning Document (SPD) by the Council <b><u>to secure per dwelling developer contributions.</u></b> Residential development that is likely to <b><u>adversely</u></b> affect the integrity of <b><u>Habitats</u></b> (European) Sites, is required to either contribute towards mitigation measures identified in the RAMS or, in exceptional circumstances, identify and <b><u>deliver</u></b> bespoke mitigation measures <b><u>(in perpetuity)</u></b> to ensure compliance with the Habitat Regulations. <b><u>Mitigation is needed because these impacts, in combination with other plans and projects, cannot be ruled out and a strategic approach is advised by Natural England.</u></b></p>	Factual changes



AM Ref	Page	Policy / para.	Additional Modifications	Reasons
AM12	15	Paragraph 1.24	<i>Update reference to NPPF from 2018 to 2021.</i>	To reflect updated NPPF
AM13	16	Paragraph 1.27	<p><i>Amend paragraph 1.27 to read:</i></p> <p>There are currently no active quarry sites in Brentwood. However, there are unworked sand and gravel deposits which are subject to a Minerals Safeguarding policy within the Essex Minerals Local Plan 2014. The safeguarding policy requires that Essex County Council, as minerals planning authority, be consulted on development proposals covering five hectares or more within the sand and gravel Minerals Safeguarding Area. <b><u>The aim of minerals safeguarding is to ensure that mineral resources are not needlessly sterilised by non-mineral development by ensuring their prior extraction, where this is viable, before the non-mineral development is implemented.</u></b></p>	To provide further information, as agreed with Esex County Council via Statement of Common Ground.
AM14	17	Paragraph 1.32	<p><i>Amend first sentence to read:</i></p> <p>The Essex and Southend-on-Sea Replacement Waste Local Plan does not propose any new waste development in Brentwood.</p>	To reflect correct document title
AM15	17	Paragraph 1.34	<p><i>Amend paragraph 1.34 to read:</i></p> <p>The Plan also designates Waste Consultation Areas at a distance of 250m around permitted and allocated waste management facilities, <b><u>extending to 400m in the case of Waste Recycling Centres.</u></b> Essex County Council must be consulted on all non-waste related development within these areas to ensure that the proposed development would not adversely impact on their existing or future operation. <del>The Brentwood Policies Map identifies existing waste sites within the Council's area.</del></p>	To provide further clarity, as agreed with Essex County Council via Statement of Common Ground and reflect that reference will need to be made to the Essex and Southend-on-Sea Waste Local Plan for details on permitted and allocated waste

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
				management facilities.

## Chapter 2

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
AM16	27	Paragraph 2.29	<p><i>Amend paragraph 2.29 to read:</i></p> <p>Office employment areas are mainly located within the Brentwood Town Centre, Brentwood station area and Warley Business Park. <del>Major employers include BT, Canon, Countryside Properties, Ford and LV Insurance.</del></p>	To remove text that is out of date.
AM17	29	Paragraph 2.47	<p><i>Amend paragraph 2.47 to read:</i></p> <p>Brentwood residents have to travel outside the borough to access main hospital facilities including accident and emergency. However, the borough benefits from a small NHS community hospital in Brentwood and other private medical facilities. GP surgeries are generally at capacity. NHS England has identified <del>an additional</del> <b><u>the</u></b> need for GPs <b><u>additional workforce</u></b> subject to the location of future development <b><u>to increase capacity to accommodate future development. Further details can be found in the most up-to-date strategy documents from NHS England include The Five Year Forward View and the NHS Long Term Plan, the emerging STP Estates Strategy and the Essex Health Places Advice Note for planners, developers and designers.</u></b></p>	To provide clarity in respect of the NHS' long terms plans for healthcare facilities, in line with Mid & South Essex STP's advice.
AM18	30	Paragraph 2.51	<p><i>Amend paragraph 2.51 to read:</i></p> <p>Primary schools in the borough are generally at capacity, particularly within the Brentwood Urban Area, and some have limited physical space to expand.</p>	To provide further clarity in respect of education planning, in line with Essex

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
			<p><u>In terms of Early Years and Childcare, in general Brentwood has a diverse range of provision to a high quality, however data suggests a large majority of areas are reaching maximum capacity and with the introduction of the Extended Funding Entitlement in 2017, childcare choices are limited and new provision will be needed with the additional developments planned.</u></p> <p>Secondary schools are generally performing with spare capacity. <u>All secondary schools within Brentwood have 6th form provision, learner’s wishing to study vocational subjects travel to South Essex College (Thurrock/Basildon), Chelmsford College, with a further cohort travelling into Havering.</u></p> <p><u>In respect of Special Education Needs (SEN), it is not possible to provide for every need within each District. Each special school is regarded as a regional centre of excellence for their type of need and children attend from a wider geographical area. In Brentwood, Endeavour School is a special school for children aged 5 years to 16 years with moderate learning difficulties and complex needs and is the only special school in Brentwood. ECC commissions places for local children with an Education Health and Care Plan at this school. ECC has developed specially resourced provision for children with speech and language difficulties within West Horndon Primary School in the Borough.</u></p>	County Council’s advice.

### Chapter 3

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
			No proposed Additional Modifications to Chapter 3	

## Chapter 4

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
AM19	53	Paragraph 4.23 Paragraph 4.25 Paragraph 4.26 – 4.27 Figure 4.3	<i>Delete paragraph 4.23 and 4.25</i> <i>Update references to NPPF from 2018 to 2021</i> <i>Update use class references in figure 4.3 to align with the modified policy</i>	To reflect updated NPPF and provide clarity on use class references
AM20	61	Paragraph 4.48	<i>Amend paragraph 4.48 to read:</i>  The NPPF (2018 <b>2021</b> ) states that the preparation and review of all policies should be underpinned by relevant and up-to-date evidence, and that this evidence is adequate and proportionate, taking into account relevant market signals. <del>The Local Plan has been created having considered evidence and representations received from consultations on previous drafts.</del> The NPPF (2018 <b>2021</b> , paragraph 33) also states that reviews should be completed no later than five years from the adoption date of the plan, especially to take into account changing circumstances affecting the area, or any relevant changes in national policy.	To reflect updated NPPF and to remove text that is out of date.

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## Chapter 5

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
AM21	63 - 81	Paragraph 5.2 – 5.3 Paragraph 5.6 Paragraphs 5.13 - 5.14	<i>Update NPPF reference from 2018 to 2021 for both paragraphs 5.2 and 5.3 and for paragraph 5.2 update NPPF reference from paragraph 91 to 92.</i>  <i>Amend paragraph 5.6 to replace ‘whilst healthy planning’ with ‘and promotes healthy communities’</i>	To reflect updated NPPF  To correct grammatical error and provide clarity

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
		<p>Paragraph 5.20 Figure 5.1 Paragraph 5.41 Paragraph 5.44 Paragraph 5.45 Paragraph 5.52 Paragraph 5.63</p>	<p><i>Amend footnote 5 of paragraph 5.13 to read:</i> Environment Agency (2017) Flood Risk Assessments: Climate Change Allowances. Available at: <a href="http://bit.ly/2w5Zo4o">http://bit.ly/2w5Zo4o</a>. <b><u>United Kingdom Climate Projections 2018 (UKCP18) has started to consider revised risk associated with sea level change.</u></b></p> <p><i>Amend paragraph 5.14 to read:</i> The Climate Change Act (2008) legislates for an 80% reduction in greenhouse gas emissions against 1990 levels by 2050. <b><u>In June 2019, parliament passed the Climate Change Act 2008 (2050 Target Amendment) Order 2019 committing the UK to reduce net emissions of greenhouse gases to zero by 2050.</u></b> This requires everyone to be engaged, from national and local government to businesses, households and communities.</p>	<p>Factual changes</p>
			<p><i>Amend paragraph 5.20 to update NPPF reference from 2018 to 2021.</i></p>	<p>To reflect updated NPPF</p>
			<p><i>Amend Carbon Reduction section of Figure 5.1 to remove references to energy hierarchy</i></p>	<p>To provide clarity.</p>
			<p><i>Amend paragraph 5.41 to read:</i> Incorporating renewable energy generation and energy efficiency measures into new development will be essential in order to achieve carbon reduction targets. <del>The government has set a target to deliver 15% of the UK's energy consumption from renewable sources by 2020 yet in 2016, only 8.9% of our energy was met by renewable generation.</del></p>	<p>To remove text that is out of date.</p>
			<p><i>Amend paragraph 5.44, 5.45 and 5.52 to read:</i> 5.44 It is acknowledged that standalone technologies such as large-scale wind turbines and photovoltaic (PV) arrays could be significant sources of energy. The resource assessment in the Brentwood Renewable Energy Study (2014) demonstrated that the borough's renewable energy target will not be possible without</p>	<p>To reflect updated NPPF and correct grammatical errors</p>

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
			<p>deploying large commercial scale renewable technologies. However, stand-alone renewable energy schemes would occur within and could impact on the Green Belt and would also be constrained by proximity to suitable connection to the national electricity grid. Therefore, whilst the Council would encourage opportunities for stand-alone renewable energy schemes within Brentwood, this will need careful consideration and be assessed on a case-by-case basis. Selection of the most appropriate locations would depend on balancing technical factors (such as proximity to substations) with minimising the impact of those developments through careful siting and mitigation measures. The Council would also support community-led initiatives for renewable and low carbon energy, including developments outside areas identified in local plans or other strategic policies that are being taken forward through neighbourhood planning, in line with the NPPF (2018, paragraph 152).</p> <p>5.45 Decentralised energy broadly refers to energy that is generated off the main grid, including micro-renewables, heating and cooling. It can refer to energy from waste plants, combined heat and power, district heating and cooling, as well as geothermal, biomass or solar energy. Schemes can serve a single building or a whole community, even being built out across entire cities. Decentralised energy is a rapidly-deployable and efficient way to meet demand, whilst improving energy security and sustainability at the same time. Other benefits of decentralised energy include:</p> <ul style="list-style-type: none"> <li>i. increased conversion efficiency (capture and use of heat generated, reduced transmission losses);</li> <li>ii. increased use of renewable, carbon-neutral and low-carbon sources of fuel;</li> <li>iii. more flexibility for generation to match local demand patterns for electricity and heat;</li> <li>iv. greater energy security for businesses that control their own generation;</li> <li>v. greater awareness of energy issues through community-based energy systems, driving a change in social attitudes and more efficient use of our energy resources.</li> </ul>	

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
			<i>Amend paragraph 5.63 to update NPPF reference from 2018 to 2021 and from paragraph 149 to 153</i>	To reflect updated NPPF
AM22	92	Paragraph 5.87	<i>Amend bracketed (i) to read: (Policy <del>BE11</del> <b>BE08</b> Strategic Transport Infrastructure, Policy <del>BE12</del> Car-limited development, Policy <del>BE13</del> <b>BE09</b> Sustainable Means of Travel and Walkable Street, Policy <del>BE14</del> <b>BE10</b> Sustainable Passenger Transport, Policy <del>BE17</del> <b>BE13</b> Parking Standards)</i>	To reflect proposed amendments to policies.
AM23	94	Paragraph 5.92	<i>Amend paragraphs 5.92 and 5.96 part b, to update date for Crossrail being fully operational from December 2019 to May 2023.</i>	Factual changes
AM24	97 - 99	Paragraph 5.101 Paragraph 5.104 Paragraph 5.107	<i>Update Transport Assessment reference from 2018 to 2021</i>	To reflect updated Transport Assessment published January 2021

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## Chapter 6

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
AM25	123	Paragraph 6.2	<i>Amend first sentence to read:  The amount and distribution of housing to be delivered in the borough over the Plan period is established through Policy <del>SP02</del> <b>MG01</b> Managing Growth.</i>	To reflect modifications to Policy references

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
AM26	109	Paragraph 6.11	<p><i>Amend first sentence to read:</i></p> <p>To assist in the delivery of a choice of accommodation, the provision of self and custom housebuilding plots is required to be made available on <del>strategic</del> residential schemes of <del>500</del> <b>100</b> dwellings or more.</p>	Incidental change resulting from the main modifications
AM27	109	Paragraph 6.13	<p><i>Amend first sentence to read:</i></p> <p>The Council will also seek the provision of Specialist Accommodation on <del>strategic</del> residential schemes of 100 dwellings or more,</p>	Incidental change resulting from the main modifications
AM28	113	Paragraph 6.24	<p><i>Amend paragraph 6.24 to read:</i></p> <p>The Council's SHMA Part 2 provides a detailed assessment of the housing required to meet existing and future needs across the borough. The SHMA indicates that if occupation patterns of <del>S</del>specialist <del>R</del>residential <del>A</del>accommodation for older people remain at current levels, there will be a requirement for 494 additional specialist units to 2033. Essex County Council's (<b>ECC</b>) Independent Living Programme is encouraging the provision of <del>S</del>specialist <del>R</del>residential <del>A</del>accommodation in Essex as a means to provide housing for people over the age of 55 whose current home no longer meets their needs. Brentwood has an ageing population which has clear implications for the future delivery of housing over the Local Plan period. <del>Essex County Council (ECC)</del> is the provider of <b>adult</b> social <b>care</b> services in Brentwood. <del>ECC's</del> <b>their</b> approach to Independent Living (Extra Care) encourages the provision of specialist accommodation in Essex as a means by which older people can continue to live healthy and active lives within existing communities. This approach to meeting the specialist accommodation needs of older people is intended to reduce the demand for residential/nursing home care across the County. Independent Living schemes are part of a wider accommodation pathway to enable older people to remain as independent as possible with the right housing and support to meet their needs. The Council will work with <b>ECC</b> <del>Essex County Council</del> to secure provision of suitable sites.</p>	Grammatical changes and typographical correction



AM Ref	Page	Policy / para.	Additional Modifications	Reasons
AM29	138	Paragraph 6.51	<p><i>Amend paragraph 6.51 to read:</i></p> <p>This policy should be read in conjunction with Policy HP16 Building Design, Policy HP18 Designing Landscape and the Public Realm, and Policy BE19 Access to Nature. Applicants should also refer to best practice and guidance on achieving quality design for all new residential development, as set out in the Essex Design Guide.</p>	To reflect modifications to Policy references
AM30	158	Footnote 7	<p><i>Amend footnote 7 to read:</i></p> <p><del><a href="https://historicengland.org.uk/advice/technical-advice/information-management/hers/">https://historicengland.org.uk/advice/technical-advice/information-management/hers/</a></del>  <a href="http://www.heritagegateway.org.uk/gateway/">http://www.heritagegateway.org.uk/gateway/</a></p>	Updated weblink
AM31	139	Paragraph 6.61	<p><i>Amend reference to Policy HP11 to HP10.</i></p>	To reflect modifications to Policy references
AM32	141	Paragraph 6.66 Paragraphs 6.68 – 6.70	<p><i>Delete paragraphs 6.66 and 6.68-6.70</i></p>	Incidental change resulting from the main modifications
AM33	143	Policy HP09	<p><i>Amend Policy number to read:</i></p> <p>POLICY <del>HP09</del> <b>HP08</b>: SAFEGUARDING PERMITTED SITES</p>	To reflect modifications to Policy references
AM34	162	Paragraph 6.134	<p><i>Amend paragraph to read:</i></p> <p>Where there is evidence of deliberate neglect of, or damage to a heritage asset, the deteriorated state of the heritage asset will not be taken into account in any decision</p>	To correct grammatical error
AM35	166	Figure 6.5	<p><i>Amend Figure 6.5 to delete entries for Back Lane and Sandpit Lane and insert entry for Chivers Road, Stondon Massey, BRWLANE14</i></p>	Factual changes to reflect assessments carried out by Essex

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
				County Council in 2016, 2018 and 2020.
AM36	166	Paragraph 6.150	<p><i>Amend paragraph 6.150 to read:</i></p> <p>Recent assessment of the Protected Lanes and updates in Brentwood has confirmed that these features remain and in the majority of instances, the designation for protection is recommended for retention. <del>One lane has been identified as at risk, partly due to damage as a result of its increased use as a cut through in the recent past when the Ongar Road suffered a major collapse, that is Sandpit Lane. The Council will be taking a watching brief on this lane, aware that some damage has already taken place. Brentwood Borough is therefore retaining the designation of all of the Protected Lanes with a review proposed for the next edition of the Local Plan</del> <b><u>Two lanes, Back Lane and Sandpit Lane were identified by Essex County Council as no longer meeting the required criteria and have been removed whilst Chivers Road has been added as a Protected Lane.</u></b></p>	Factual change to reflect assessments carried out by Essex County Council in 2016, 2018 and 2020.
AM37	166	Footnote 13	<p><i>Add in new footnote</i></p> <p>Protected Lane Assessment, Chivers Road, Additional Lane (2020), Essex County Council</p>	Factual change to reflect assessments carried out by Essex County Council in 2020
AM38	168	Paragraph 6.158	<p><i>Amend reference in paragraph 6.158 from Policy HP19 to BE16.</i></p>	To reflect modifications to Policy references

## Chapter 7

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
AM39	170	Figure 7.1	Delete Figure 7.1	As it duplicates Figure 2.4
AM40	177	Figure 7.5	Amend final row of Figure 7.5 to read: ... <del>33.76 ha to 45.96 ha</del> <b><u>38.41 to 50.61 ha</u></b>	Incidental amendment to reflect modifications to updated employment land requirement figures.
AM41	179	Paragraph 7.22	Amend Policy reference Policy PC03 to PC01	To reflect modifications to Policy references
AM42	185	Paragraph 7.46	Update reference of NPPF from 2018 to 2021	To reflect updated NPPF
AM43	188	Footnote 9	Amend Policy reference from PC11 to PC07	To reflect modifications to Policy references
AM44	194	Paragraph 7.65	Amend final sentence to read:  Developers should also refer to Policy <del>BE17</del> <b><u>BE13</u></b> Parking Standards and Policy <del>BE16</del> <b><u>BE12</u></b> Mitigating the Transport Impacts of Development.	To reflect modifications to Policy references
AM45	195	Paragraph 7.69	Delete paragraph 7.69	To remove text that is out of date.

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
AM46	196	Paragraph 7.70	<p><i>Amend first sentence of paragraph 7.70 to read:</i></p> <p>The NPPF recognizes <b>recognises</b> that diversification is key to long-term vitality and viability of town centre, to 'respond to rapid changes in the retail and leisure industries</p>	To correct grammatical error
AM47	205	Paragraph 7.99	<p><i>Amend second sentence of paragraph 7.99 to read:</i></p> <p>Development should seek to ensure that children and young people can walk or cycle to school safely on designated safe routes through new developments in line with Policy <del>BE13</del> <b>BE09</b> Sustainable Means of Travel and Walkable Streets, and Policy <del>BE14</del> <b>BE10</b> Sustainable Passenger Transport.</p>	To reflect modifications to Policy references

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## Chapter 8

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
AM48	215	Paragraph 8.32	<p><i>Amend first sentence of paragraph 8.32 to read:</i></p> <p>Trees, woodlands, hedges and hedgerows, wherever appropriate, should be incorporated <u>d</u> within a landscape scheme.</p>	To correct grammatical error
AM49	222	Paragraph 8.56	<p><i>Amend Policy reference from BE08 to BE05</i></p>	To reflect modifications to Policy references
AM50	209	Paragraphs 8.11 to 8.12.	<p><i>Amend paragraph 8.11 to read:</i></p> <p>The borough contains three Sites of Special Scientific Interest (SSSI): Curtis Mill Green, Thorndon Park and The Coppice, <b>in</b> Kelvedon Hatch. Hutton Country Park is also a statutory Local Nature Reserve, <b>The 2012 Local Wildlife Site Review identified</b> while there are additionally 147 Local Wildlife Sites (LWS), identified for</p>	Factual update and to correct grammatical error

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
			<p>their value as semi-natural habitats and for their role in environmental education and public engagement with wildlife. In the Mill Green area, lies the Forest of Writtle, which is a designated Ancient Landscape. All these sites are important landscapes recognised for their special cultural, horticultural, historic and landscape qualities.</p> <p><i>Amend paragraph 8.12 to read:</i></p> <p>Other natural features of conservation interest include commons, small copses, trees, tree belts, woodlands, ponds and watercourses and hedgerows. Recreational impacts already pose a challenge to conserving these sites. Ancient hedged landscape of narrow lanes links historic farmsteads and hamlets in the Brentwood <del>C</del>countryside.</p>	

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
AM51	All	Site allocation policy references	Re-number site policy references from R04 onwards.	To ensure the sequencing of site policy references is consistent following deletion of R18 and R20 and combining of R04 & R05 and R16 & R17.
AM52	244	Paragraph 9.3	<p><i>Amend paragraph 9.3 to read:</i></p> <p>Where reference is made to the type and size <del>and</del> <u>of</u> new homes, the local character should also be considered.</p>	To correct grammatical error

Schedule of Additional Modifications

AM53	244	Paragraph 9.5	<p><i>Amend paragraph 9.5 to read:</i></p> <p>The trajectory is not fixed, it gives an indication to how <del>we think things will</del> <b>development is expected to</b> come forward within a phased approach and taking account of the ability to build in infrastructure</p>	To correct grammatical error
AM54	243-244	Paragraph 9.2 c.	<p><i>Amend Policy reference from SP04 to MG05</i></p>	To reflect modifications to Policy references
AM55	245	Paragraph 9.8	<p><i>Amend NPPF reference from 2018 to 2021.</i></p>	To reflect updated NPPF
AM56	260	Paragraph 9.27	<p><i>Amend final sentence of paragraph 9.27 to read:</i></p> <p><del>We want</del> Dunton Hills <del>to</del> <b>should</b> become a community which sees itself as a 'conservation area of the future', not a dormitory 'non-place' that has become the norm for such developments in the recent past.</p>	To correct grammatical error

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## Appendices

AM Ref	Page	Policy / para.	Additional Modifications	Reasons
AM57	N/A	Appendices	<p><i>Amend sequencing of Appendices as follows:</i></p> <p>Appendix 1: Local Development Plan Housing Trajectory</p> <p>Appendix 2: Strategic and non-strategic policies and their relationship to the Strategic Objectives</p> <p>Appendix 3: Monitoring Framework</p> <p>Appendix 4: Schedule of Plans and Policies which will be superseded by the new Plan</p> <p>Appendix 5: Glossary</p>	For presentation purposes.

AM58	379	Appendix 6 Footnote 6 Footnote 7	<p><i>Insert the following definition of “Mineral Consultation Area” to Appendix 6 of the Plan:</i></p> <p><b><u>Mineral Consultation Area: a geographical area based on a Mineral Safeguarding Area, where the district or borough council should consult the Mineral Planning Authority for any proposals for non-minerals development.</u></b></p>	To reflect definition in the NPPF 2021
			<p><i>Update the link to Public Health England’s guidance at footnote 6.</i></p>	To provide clarity
			<p><i>Delete footnote 7.</i></p>	To remove link to a document that is out of date.

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# BRENTWOOD LOCAL PLAN

## Proposed Changes to Policies Maps

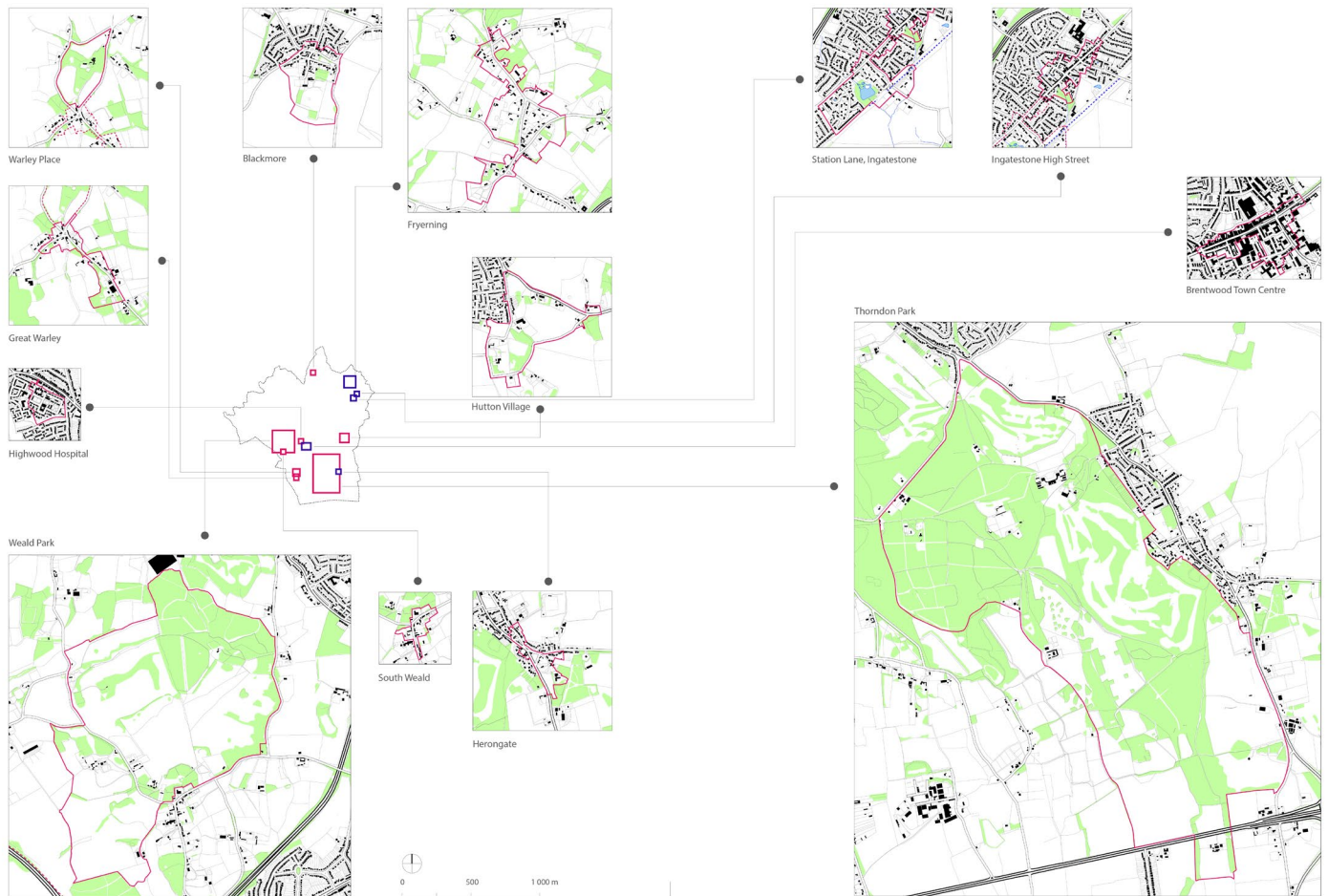
February 2020





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# Amended Conservation Areas



## CONSERVATION AREAS IN BRENTWOOD BOROUGH

-  Conservation Areas with boundary amendments since the 2005 Replacement Local Plan
-  Conservation Areas without boundary amendments

See also Brentwood's Conservation Area Appraisals. Available at: <https://www.brentwood.gov.uk/index.php?cid=31>

Since adoption of the Replacement Local Plan in 2005, changes have been made to several Conservation Area boundaries. These changes have been approved by the Council following consultation on the proposed amendments.

Changes have been made to the boundaries of:

- Brentwood Town Centre Conservation Area;
- Ingatestone Station Lane Conservation Area and Ingatestone High Street Conservation Area;
- Great Warley Conservation Area;
- Herongate Conservation Area; and
- Fryerning Conservation Area



Brentwood Town Centre Conservation Area (Policy HP21)

- 2005 boundary
- Amended boundary



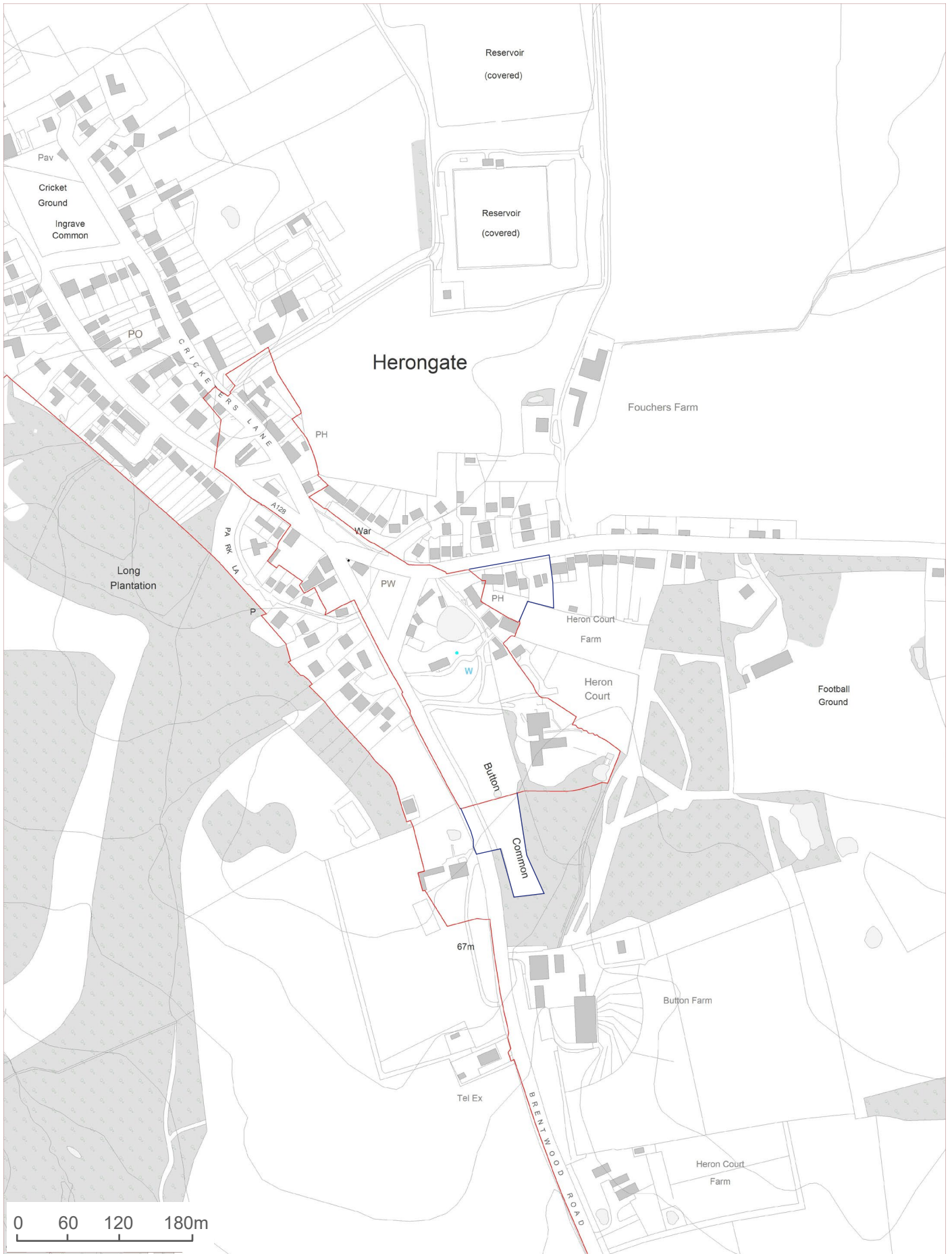
Ingatestone Station Lane and Ingatestone High Street Conservation Areas (Policy HP21)

- 2005 boundary
- Amended boundary



Great Warley Conservation Area (Policy HP21)

- 2005 boundary
- Amended boundary



Herongate Conservation Area (Policy HP21)

- 2005 boundary
- Amended boundary

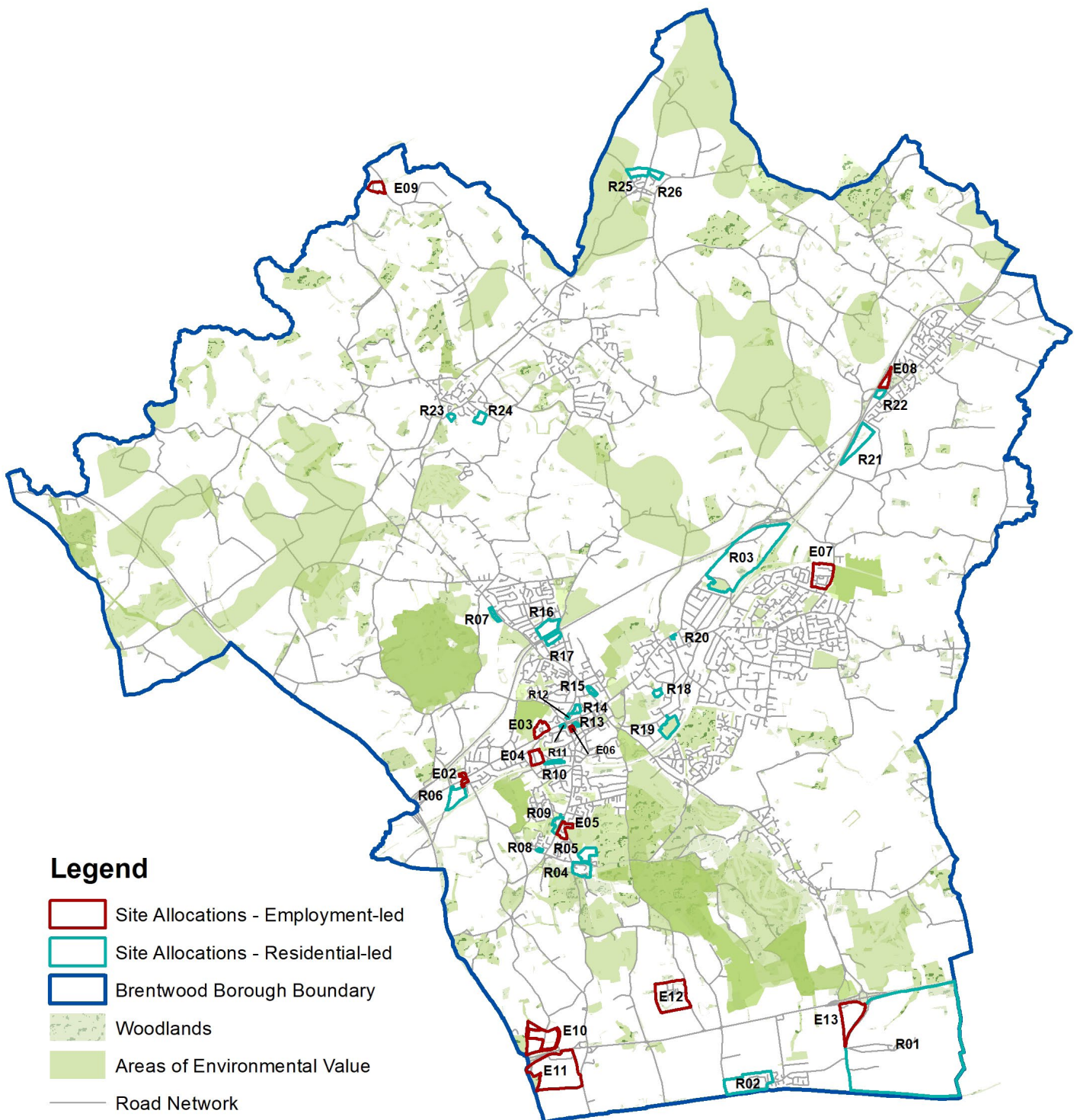


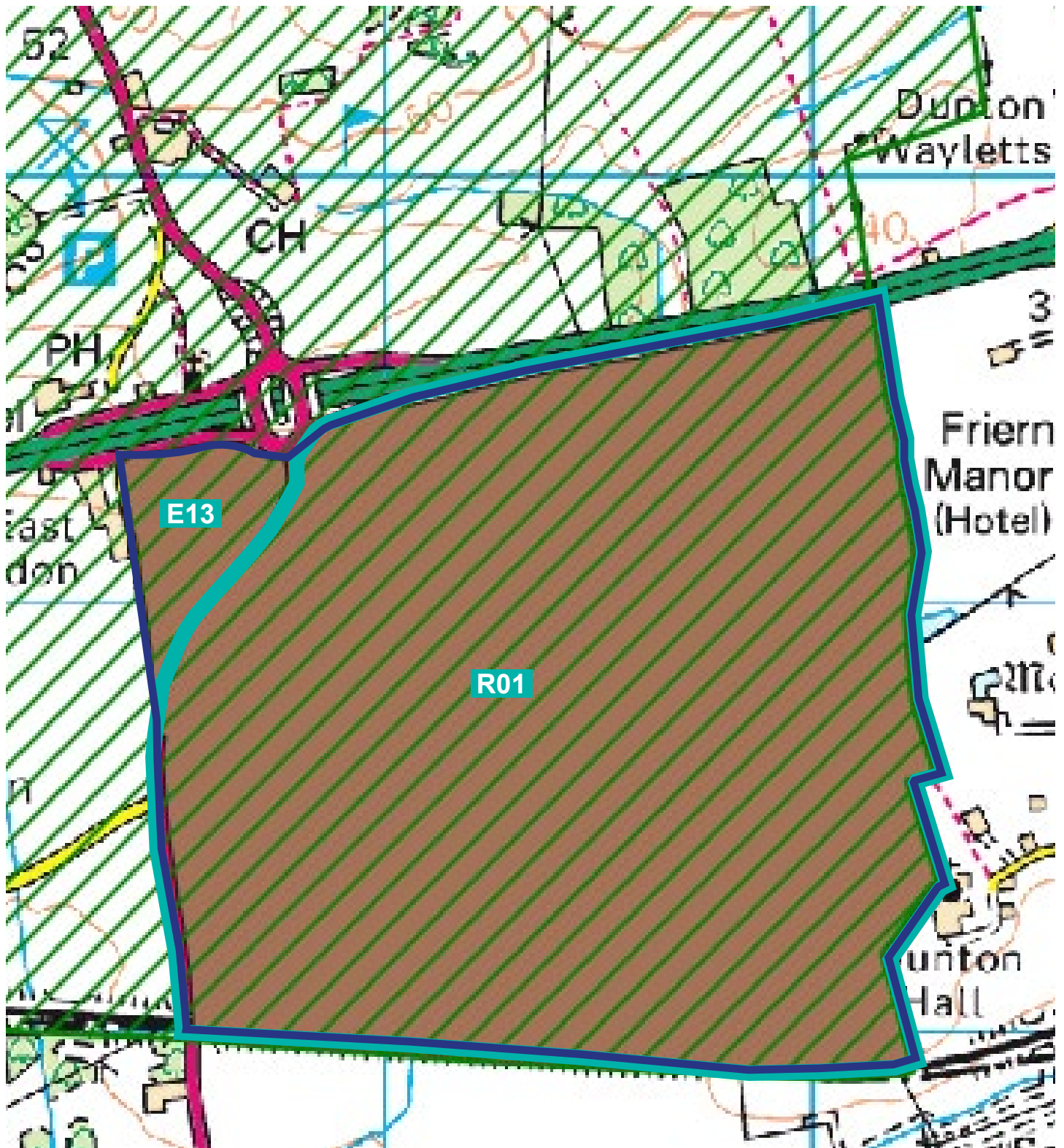
Fryering Conservation Area (Policy HP21)

- 2005 boundary
- Amended boundary



# New Development Allocations

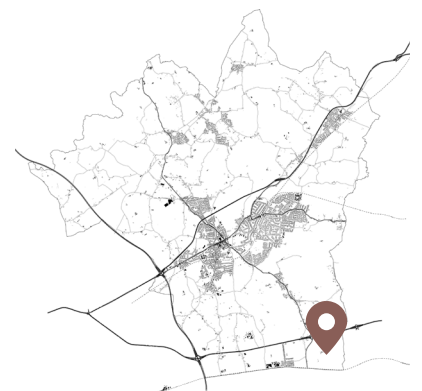


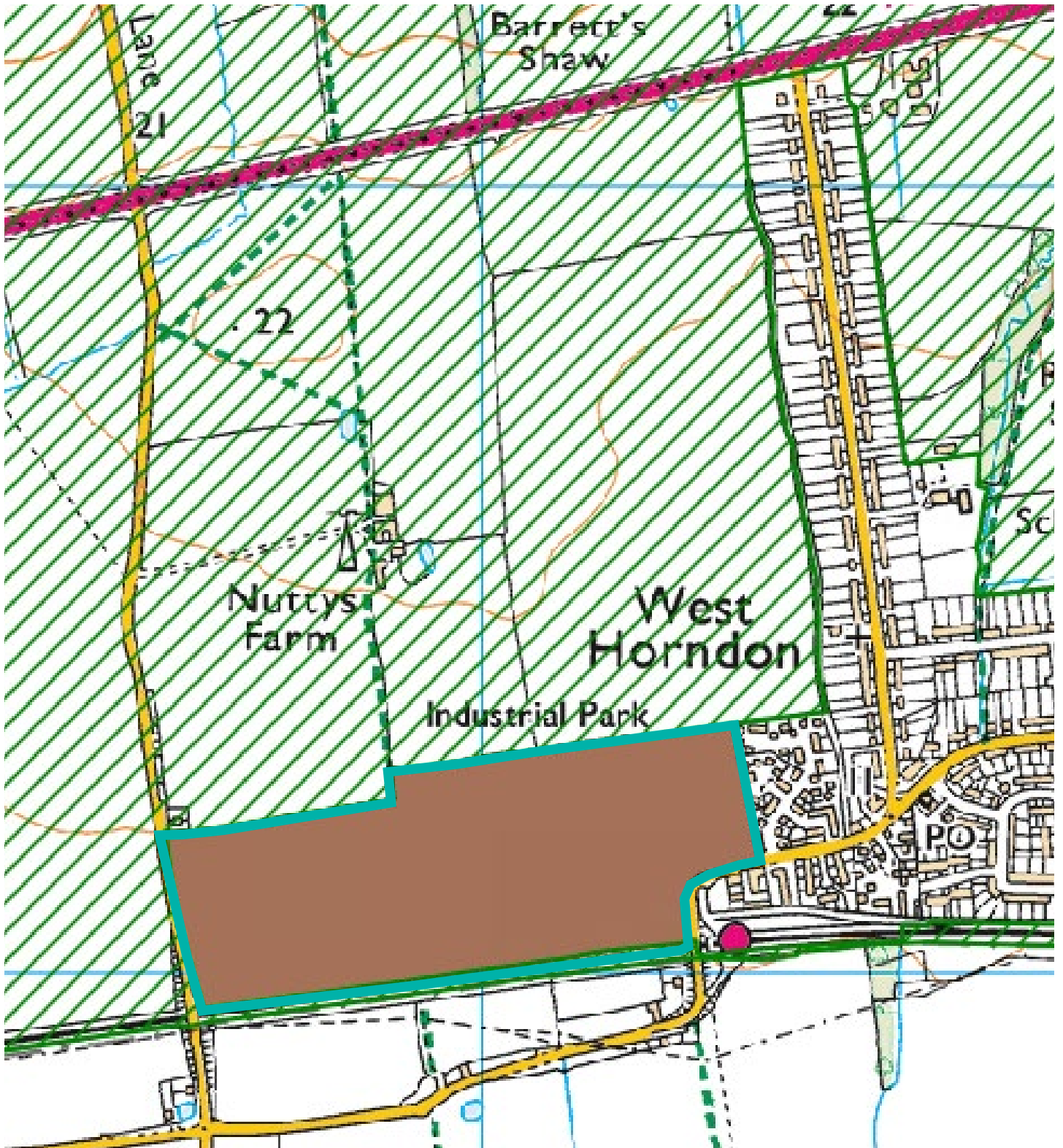


R01 – Strategic Allocation – Dunton Hills Garden Village



- Site area
- Site boundary
- Green Belt boundary
- Amended Green Belt boundary

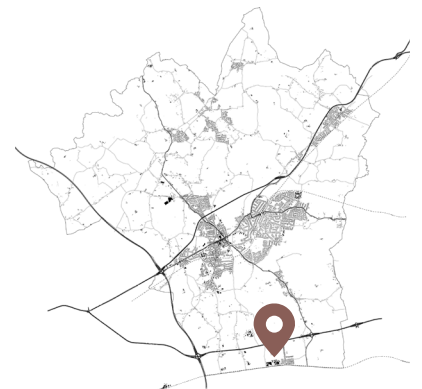


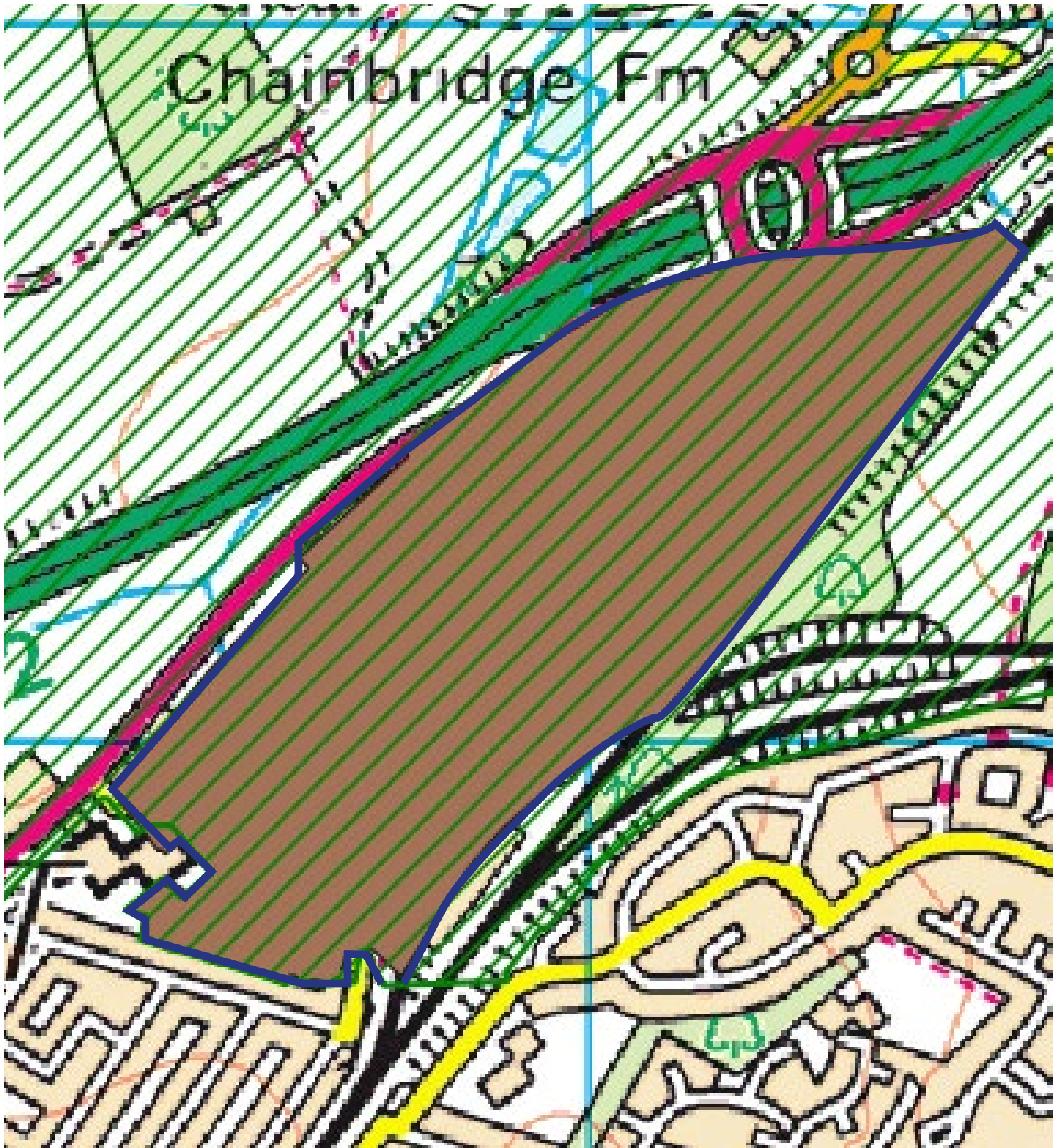


R02 – Strategic Allocation – West Horndon Industrial Estate

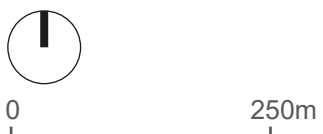


- Site area
- Site boundary
- Green Belt boundary
- Amended Green Belt boundary

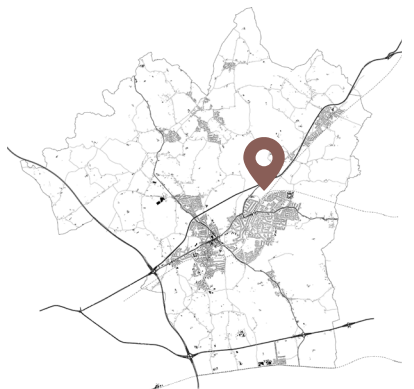


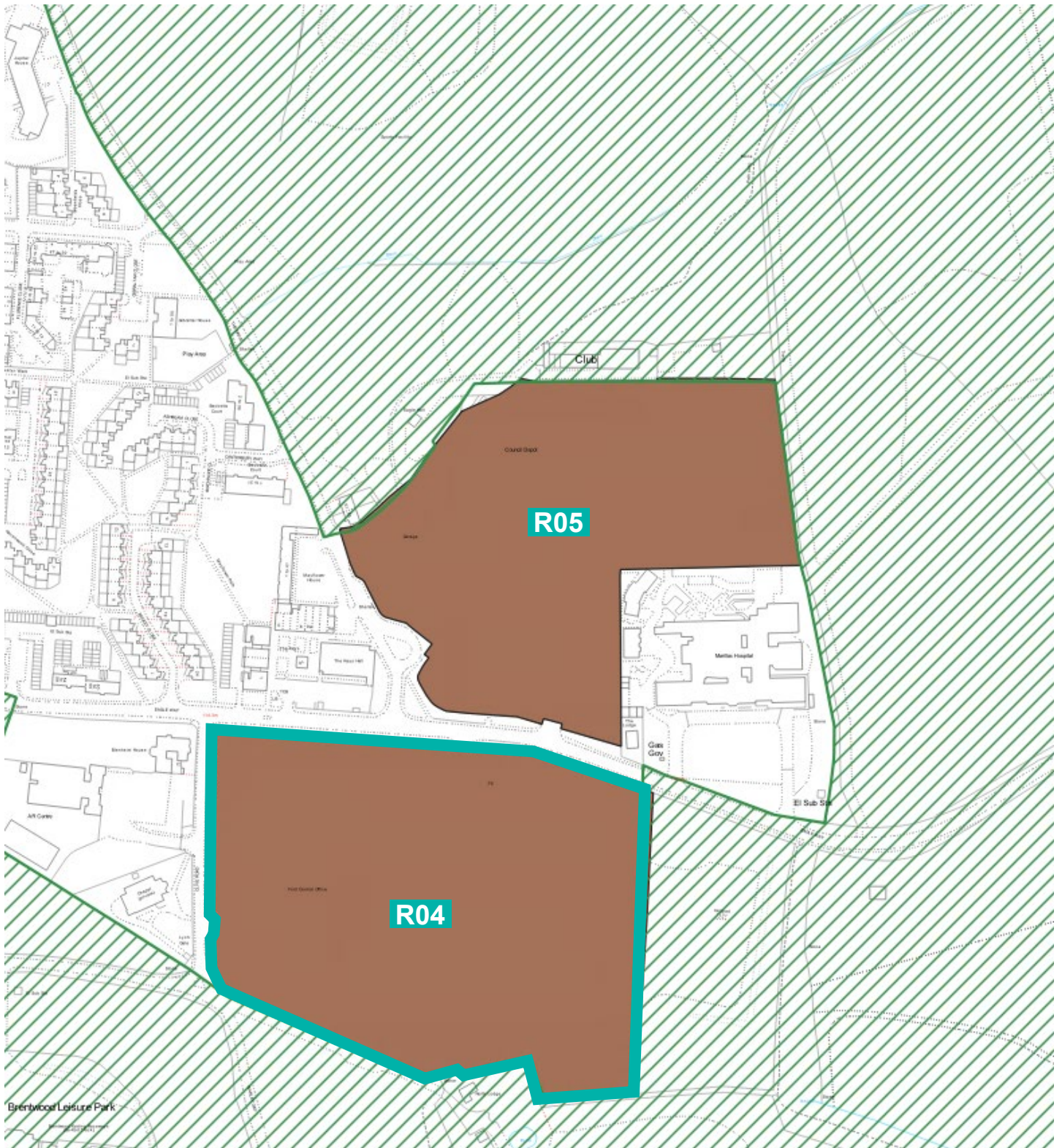


R03 - Strategic Housing Allocation – Land north of Shenfield



- Site area
- Site boundary
- Green Belt boundary
- Amended Green Belt boundary



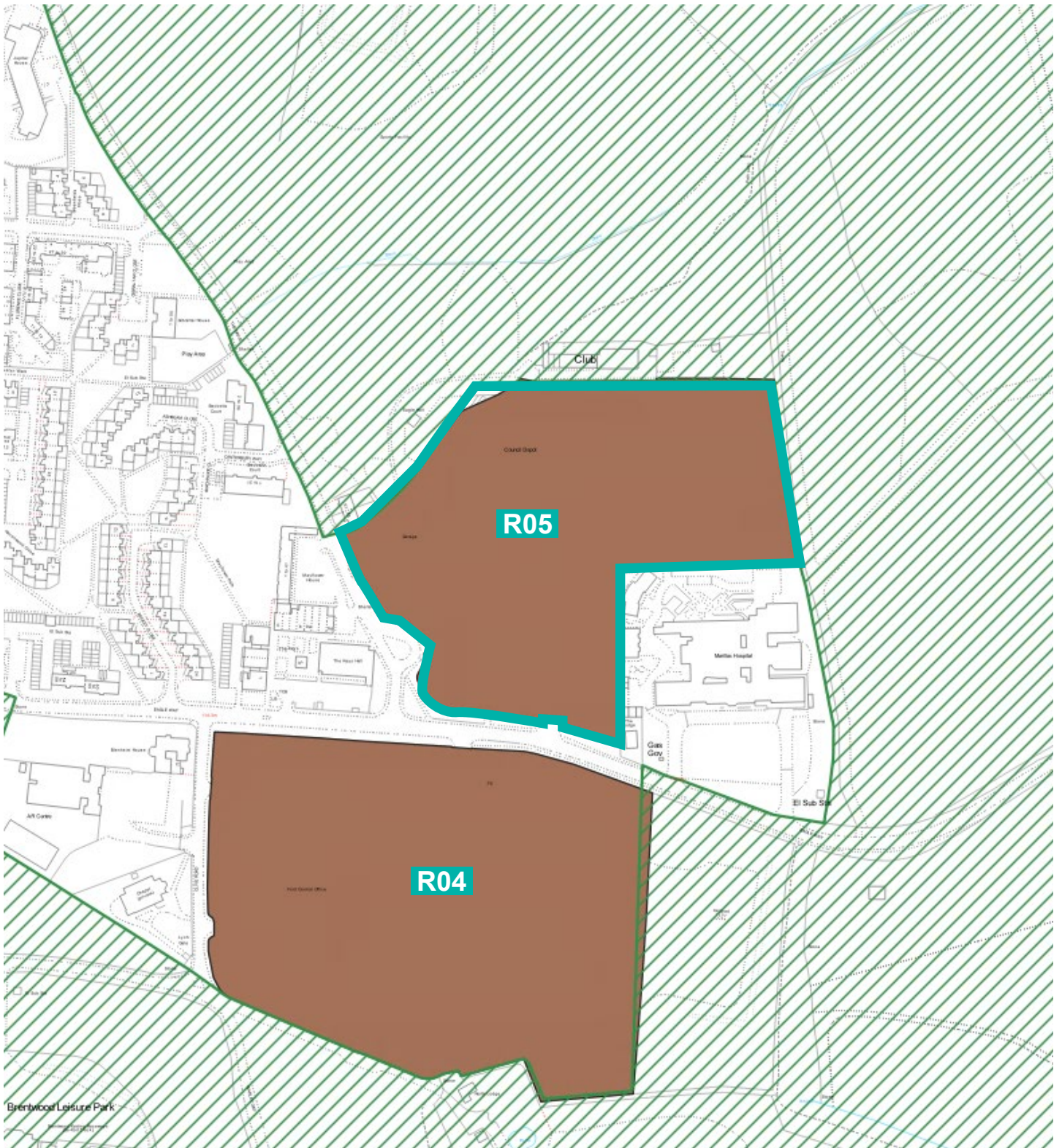


R04 – Ford Headquarters and Council Depot, Warley - Southern Site



- Site area
- Site boundary
- Green Belt boundary
- Amended Green Belt boundary



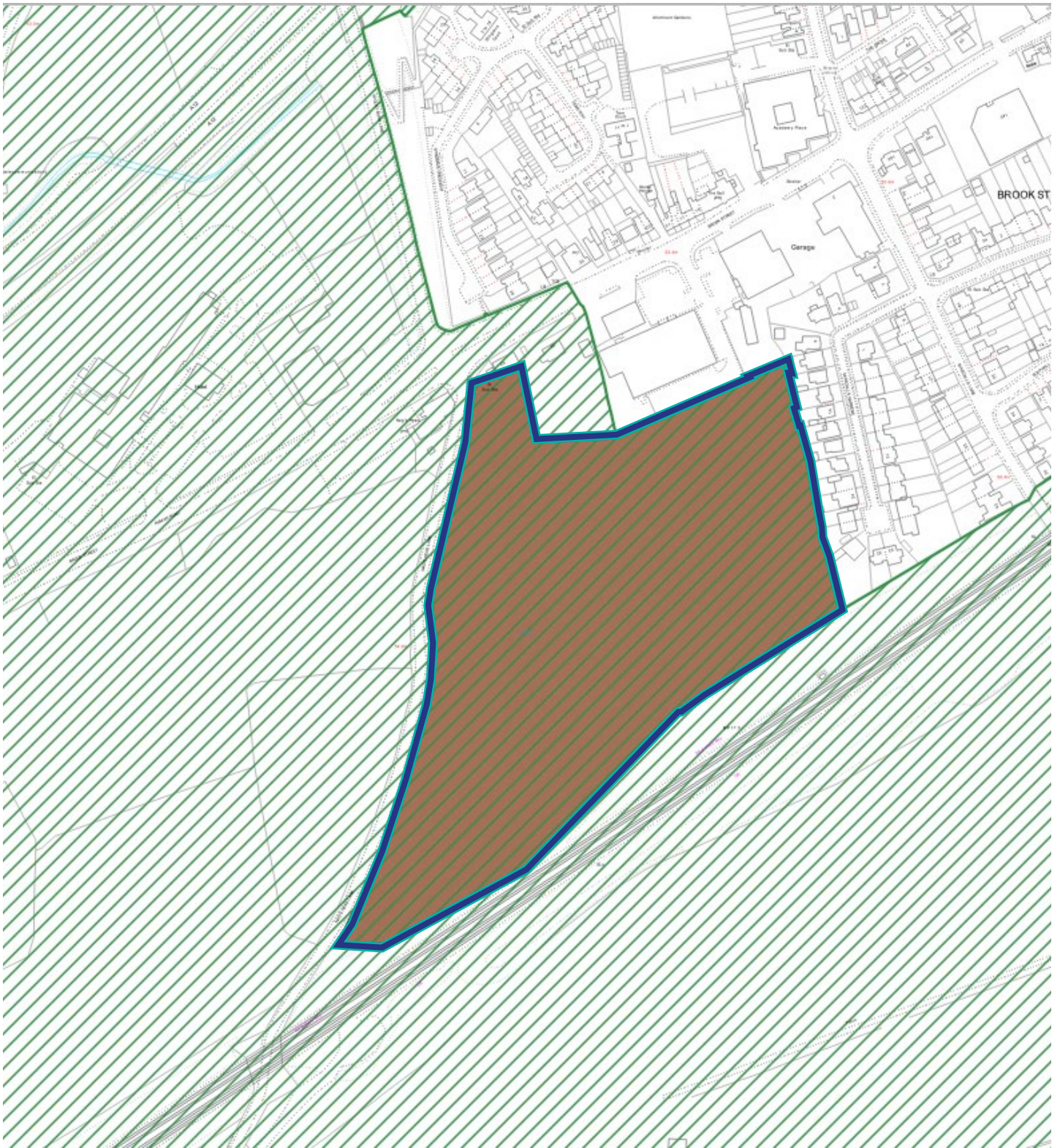


R05 – Ford Headquarters and Council Depot, Warley - Northern Site



- Site area
- Site boundary
- Green Belt boundary
- Amended Green Belt boundary

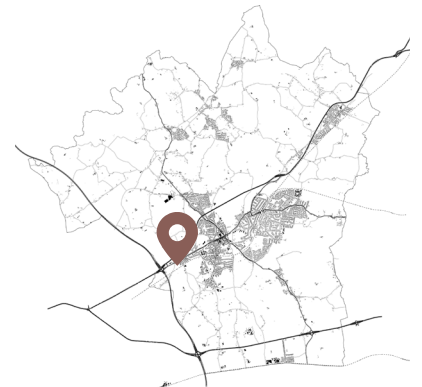




R06 – Land off Nags Head Lane, Brentwood







- Site area
- Site boundary
- Green Belt boundary
- Amended Green Belt boundary

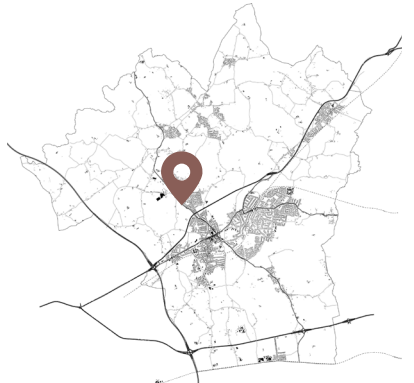




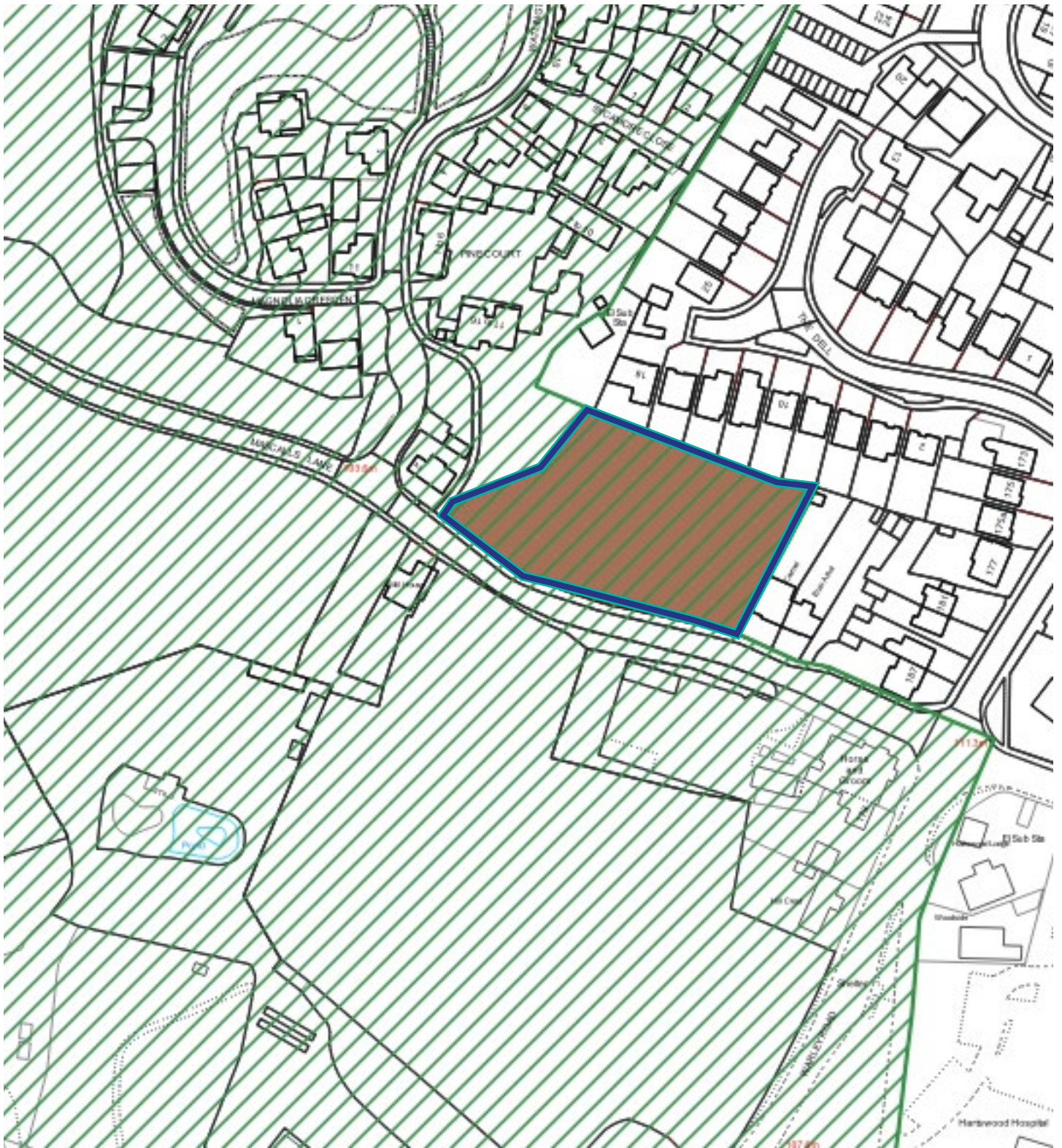
R07 – Sow and Grow Nursery, Pilgrims Hatch



-  Site area
-  Site boundary
-  Green Belt boundary
-  Amended Green Belt boundary





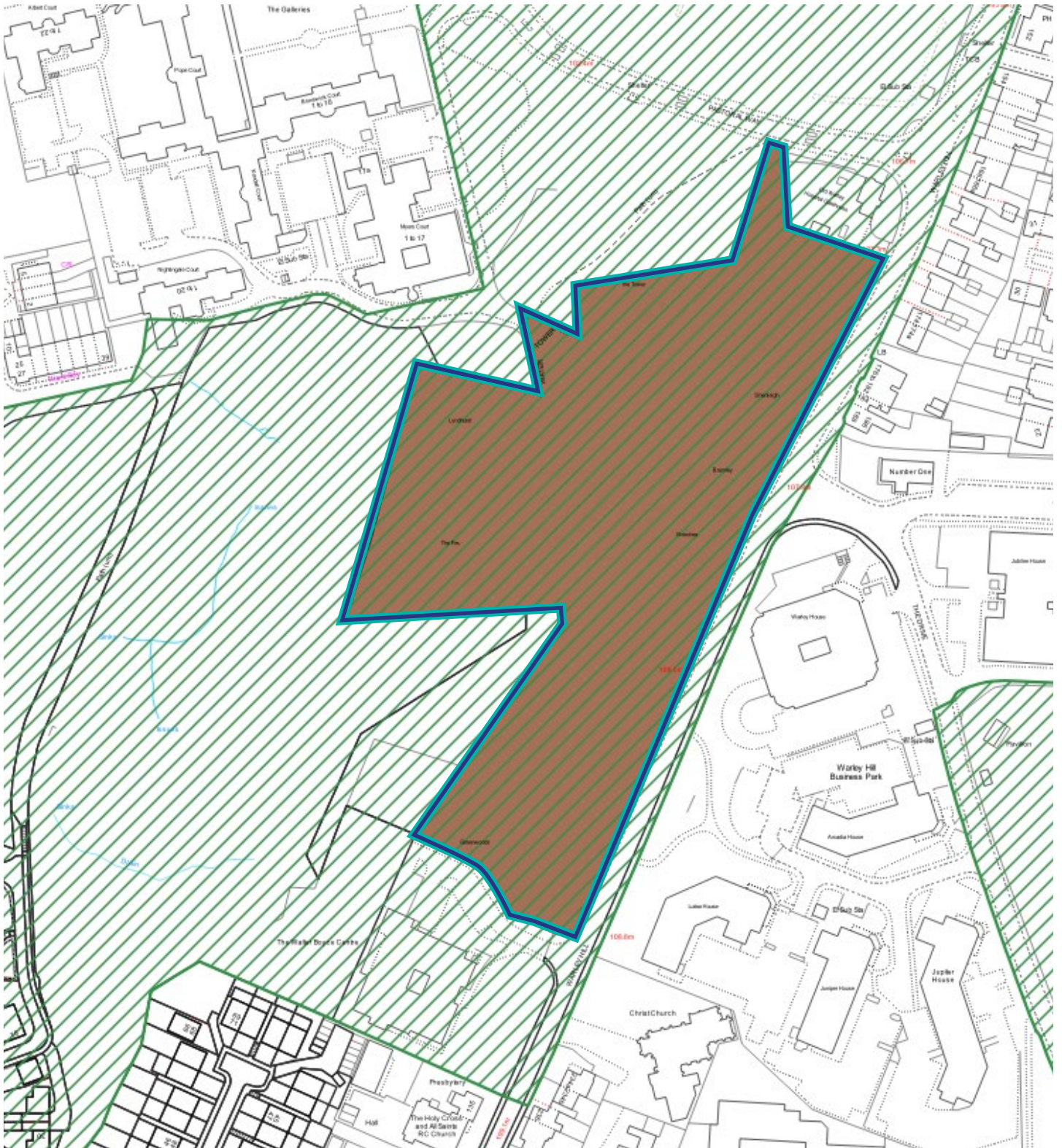


R08 – Land at Mascalls Lane, Warley



- Site area
- Site boundary
- Green Belt boundary
- Amended Green Belt boundary





R09 – Land off Warley Hill, Warley



- Site area
- Site boundary
- Green Belt boundary
- Amended Green Belt boundary

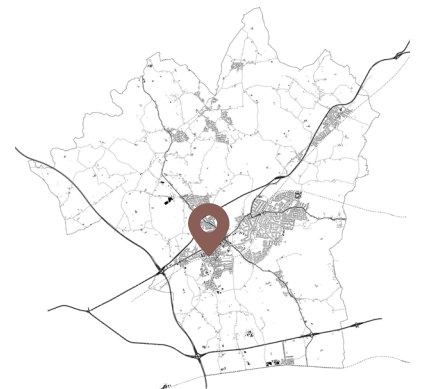


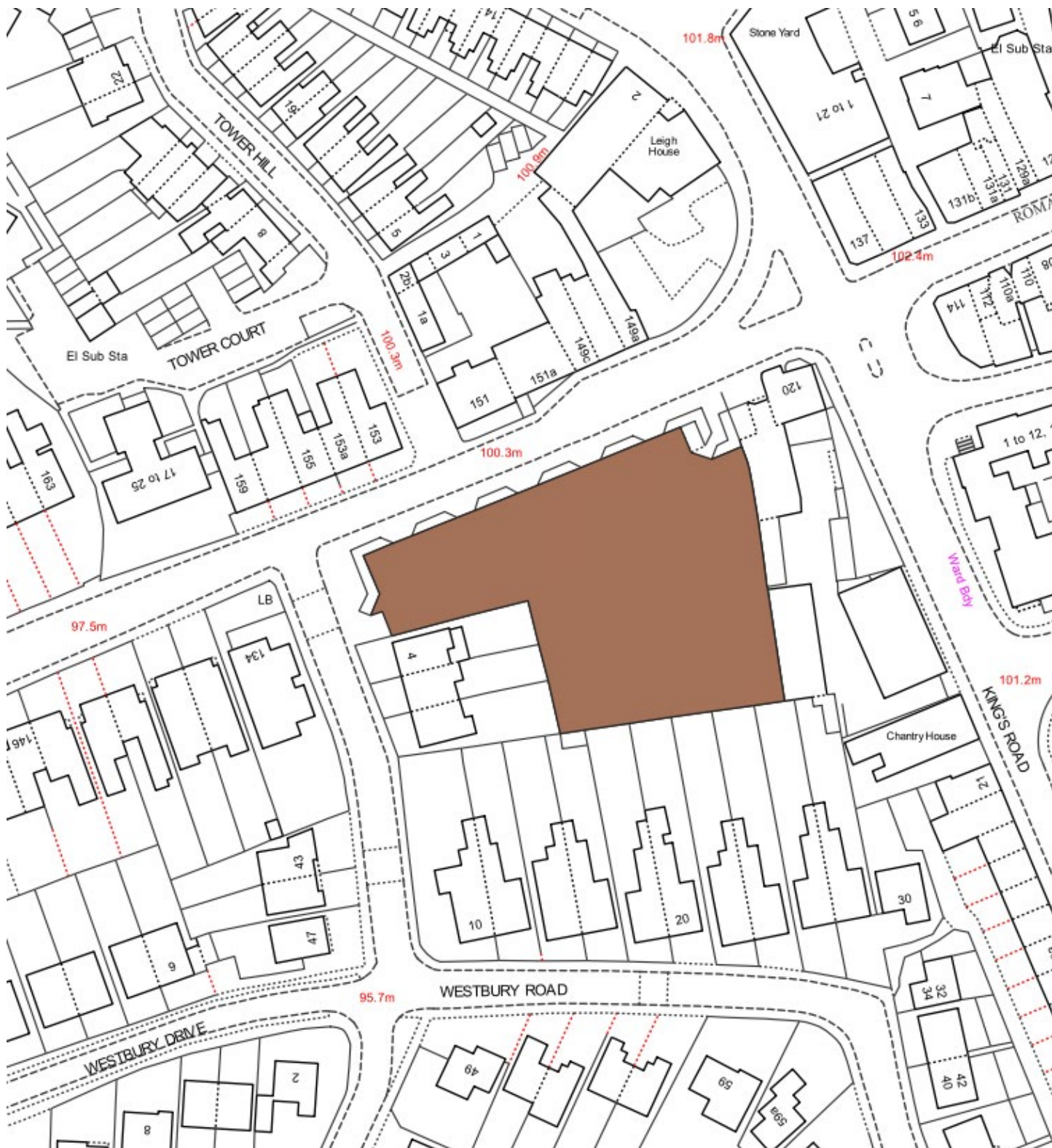


R10 – Brentwood railway station car park



- Site area
- Site boundary
- Green Belt boundary
- Amended Green Belt boundary

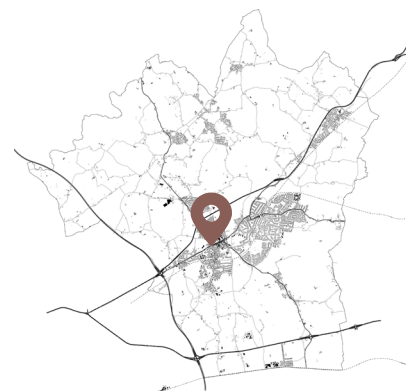




R11 – Westbury Road car park, Brentwood



- Site area
- Site boundary
- Green Belt boundary
- Amended Green Belt boundary

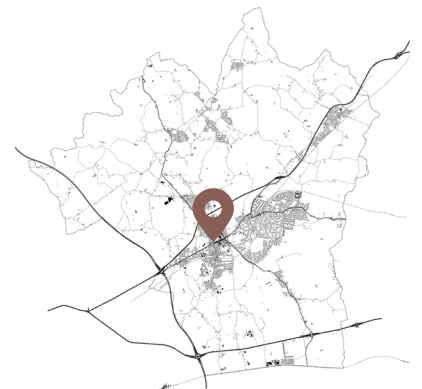


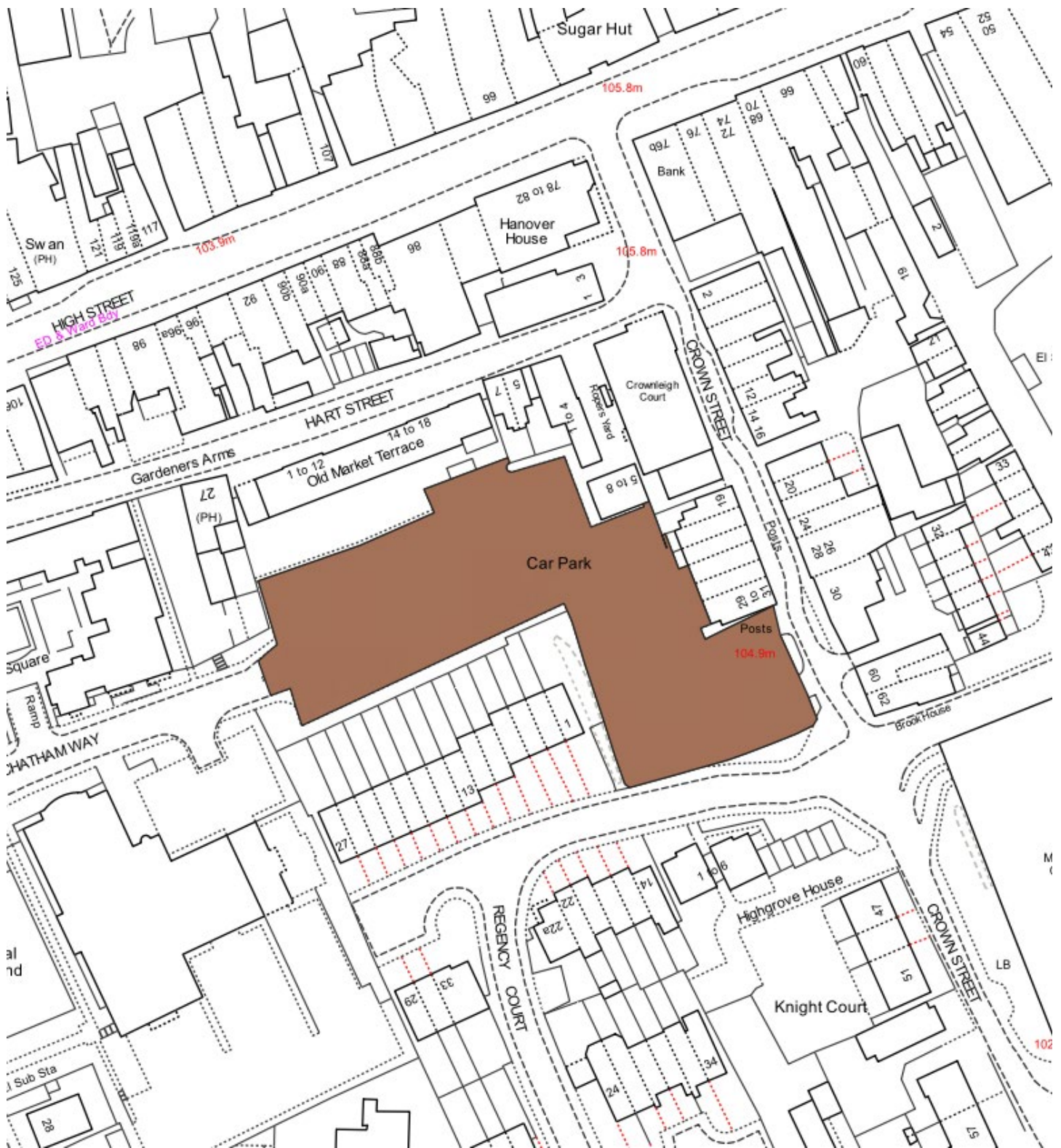


R12 – Land at Hunter House, Brentwood



- Site area
- Site boundary
- Green Belt boundary
- Amended Green Belt boundary

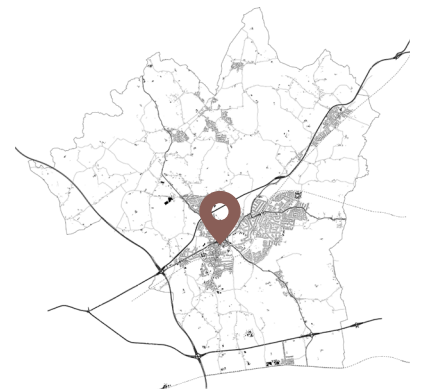


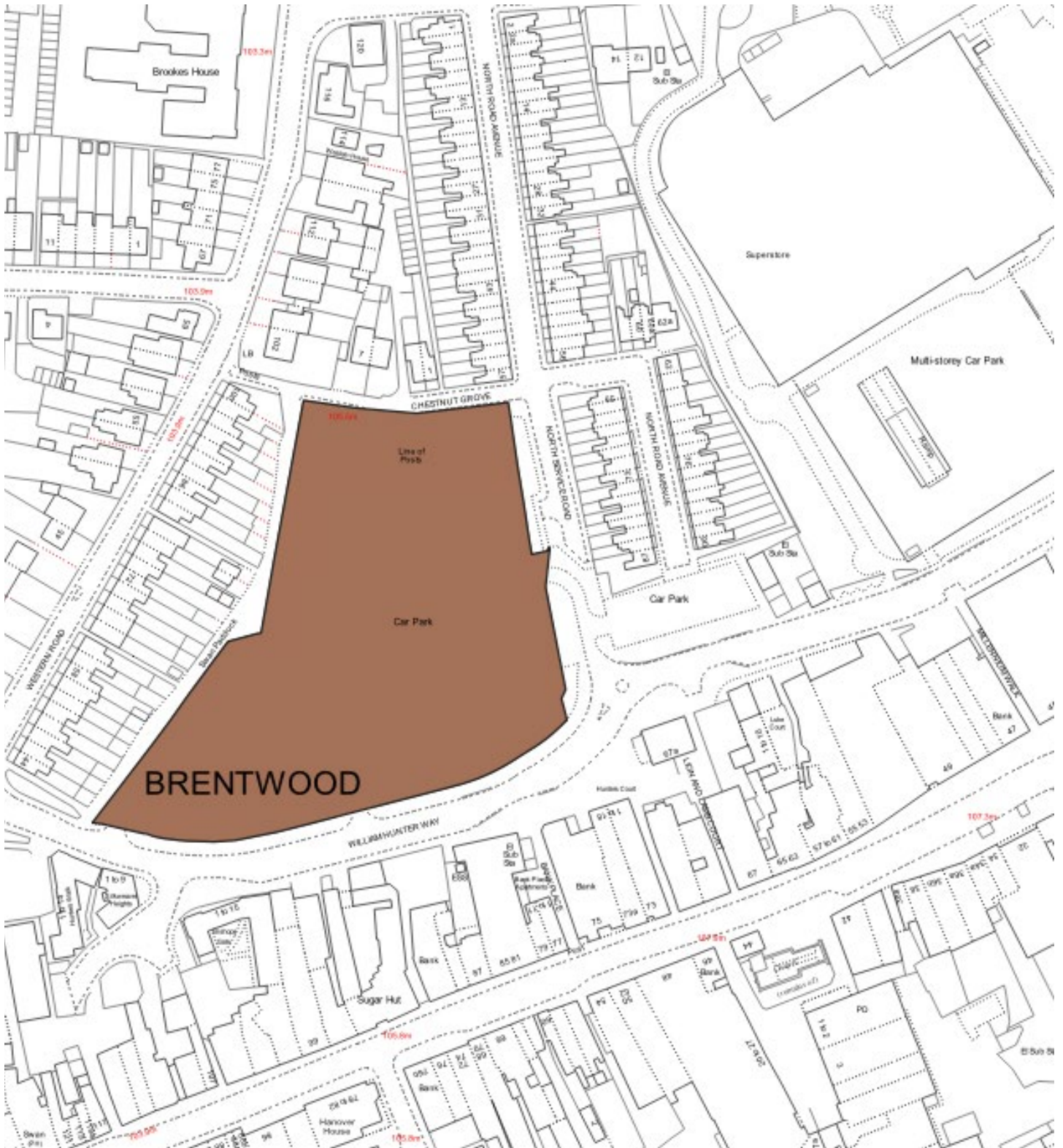


R13 – Chatham Way car park, Brentwood



- Site area
- Site boundary
- Green Belt boundary
- Amended Green Belt boundary

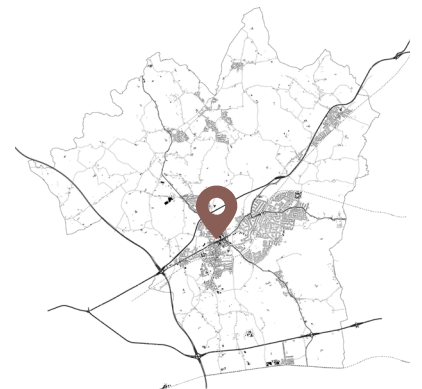




R14 –William Hunter Way car park, Brentwood



- Site area
- Site boundary
- Green Belt boundary
- Amended Green Belt boundary

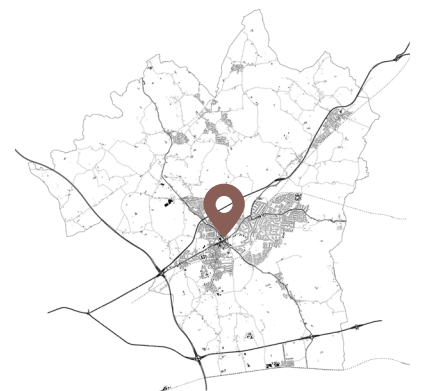




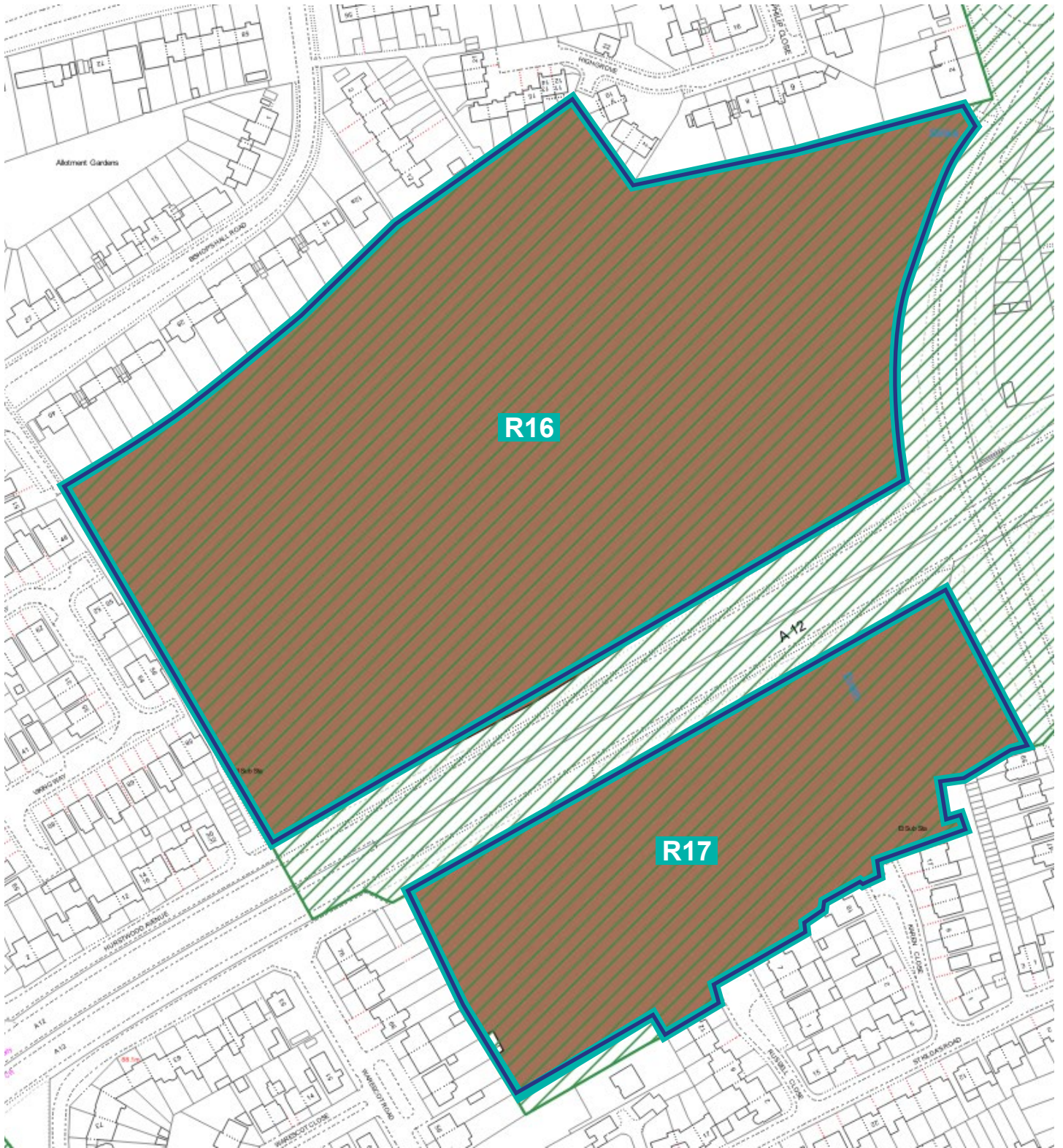
R15 - Wates Way Industrial Estate, Brentwood



- Site area
- Site boundary
- Green Belt boundary
- Amended Green Belt boundary



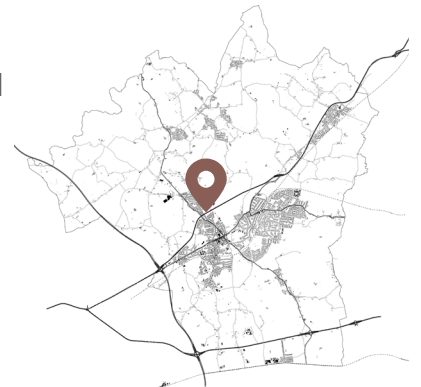


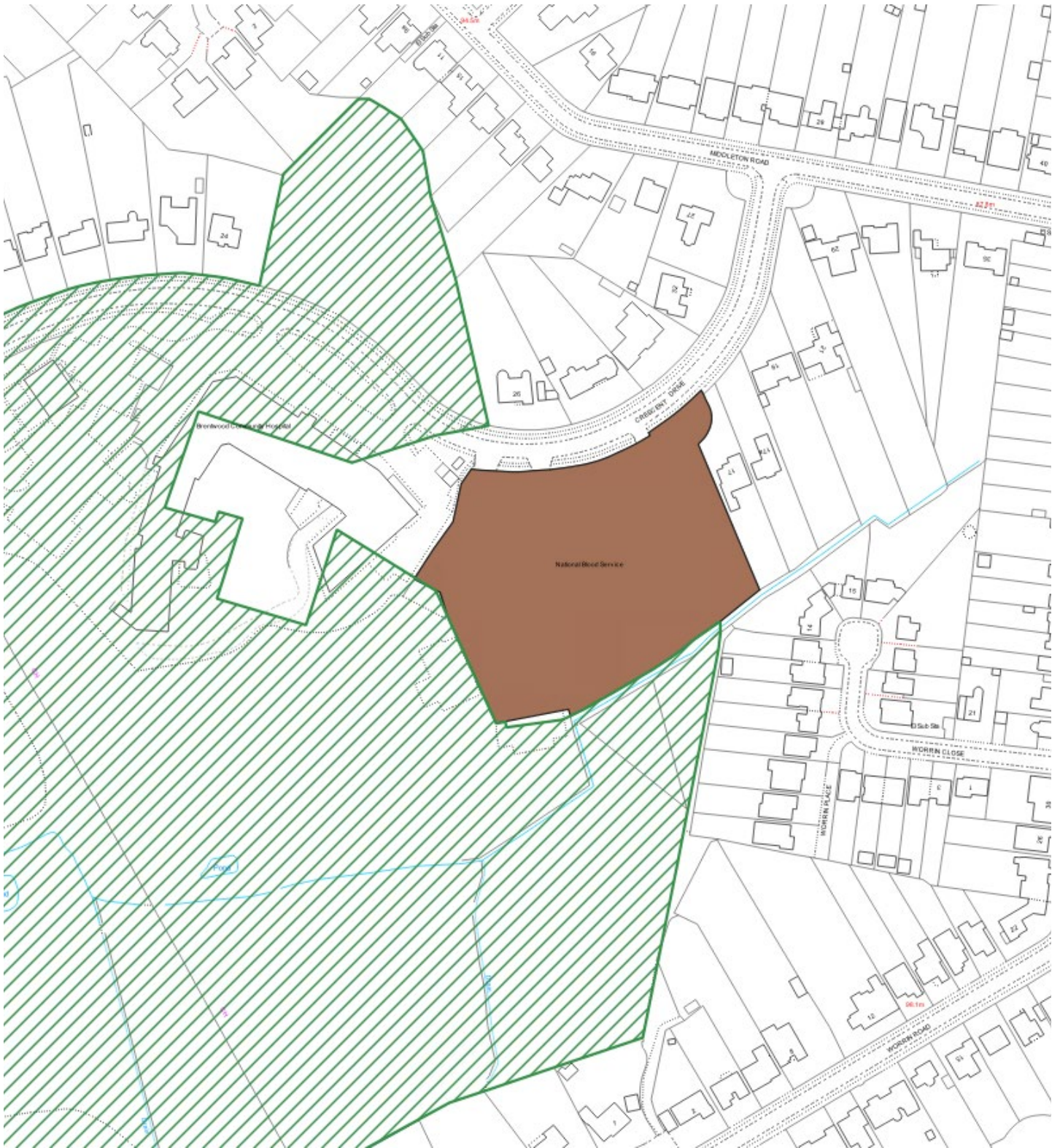


R16 & R17 - Land off Doddinghurst Road, Pilgrims Hatch and Brentwood



- Site area
- Site boundary
- Green Belt boundary
- Amended Green Belt boundary

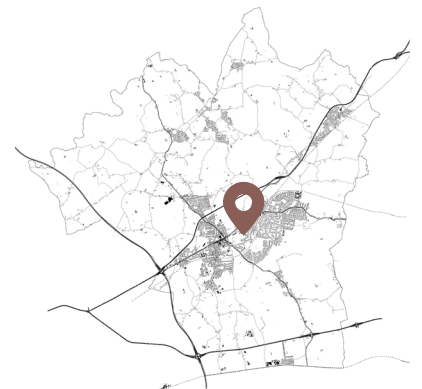


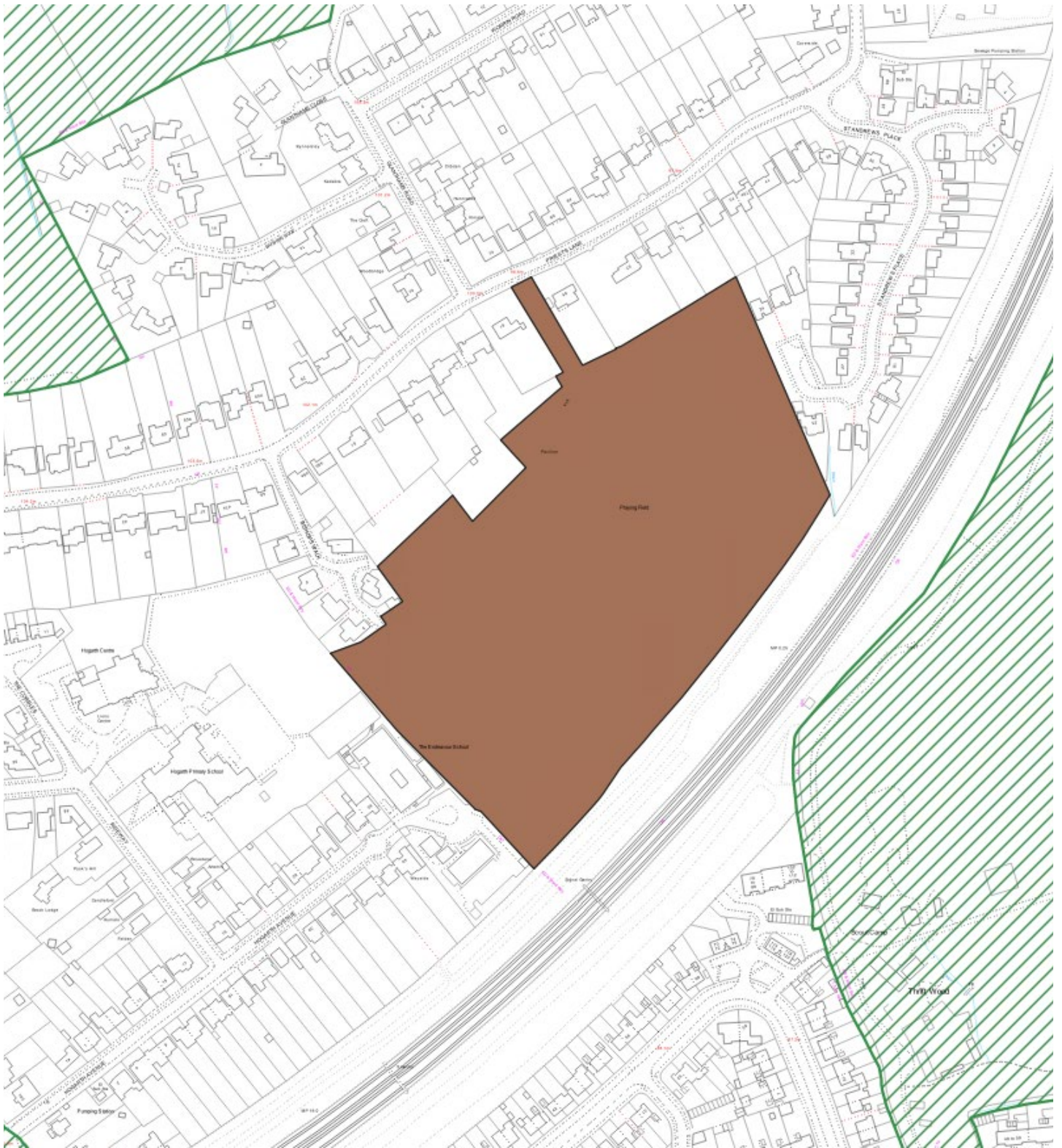


R18 - Land off Crescent Drive, Shenfield



- Site area
- Site boundary
- Green Belt boundary
- Amended Green Belt boundary





R19 - Land at Priests Lane, Shenfield



- Site area
- Site boundary
- Green Belt boundary
- Amended Green Belt boundary

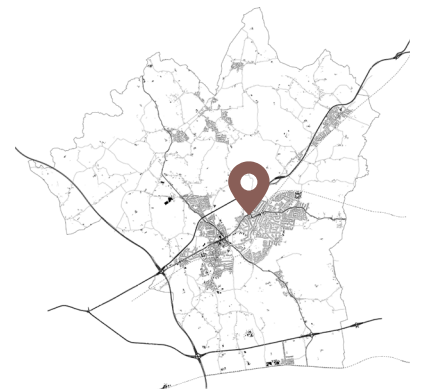




R20 - The Eagle and Child Public House, Shenfield



- Site area
- Site boundary
- Green Belt boundary
- Amended Green Belt boundary

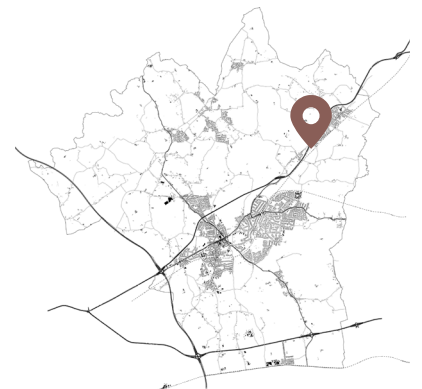


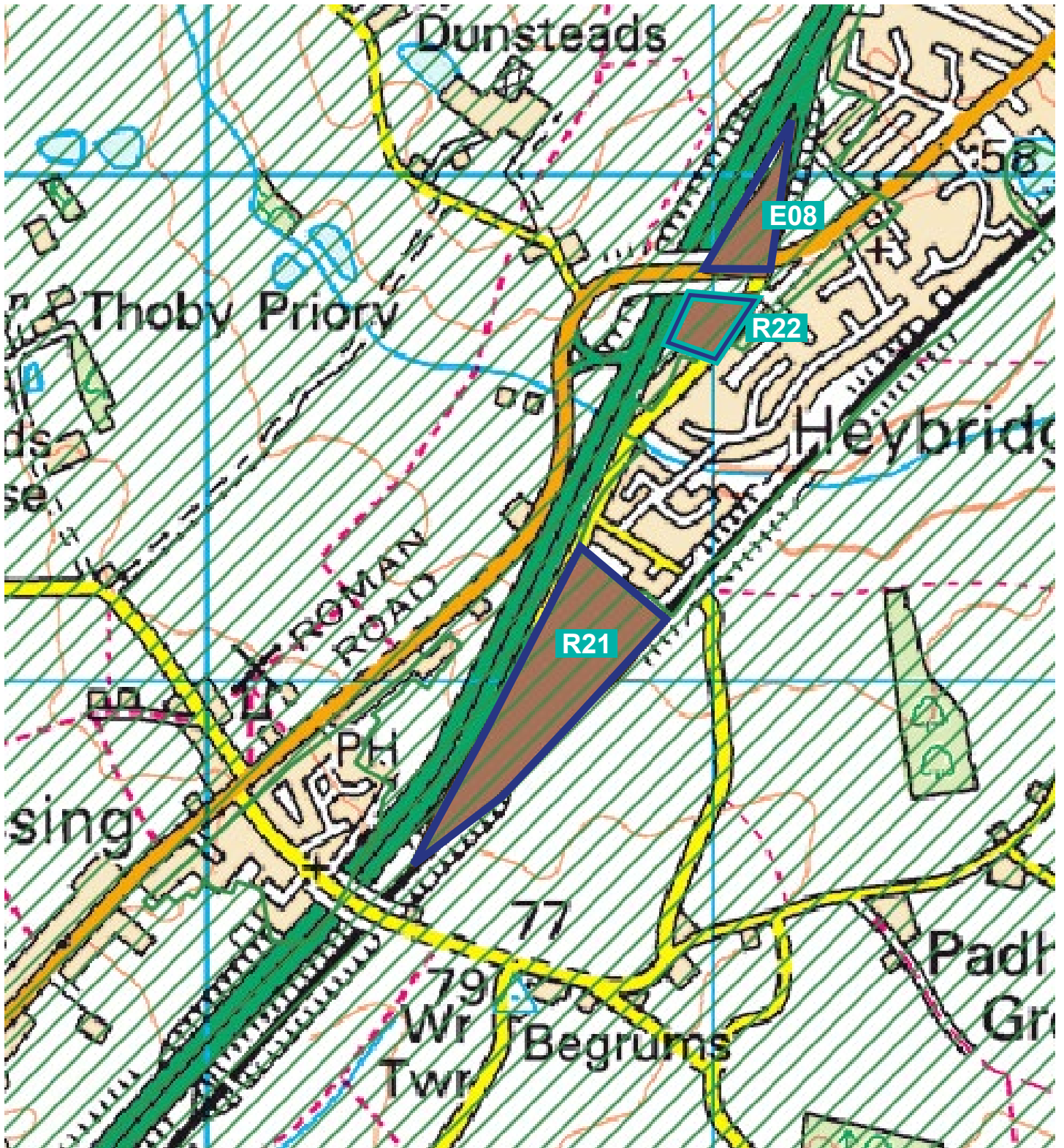


R21 - Land south of Ingatestone



- Site area
- Site boundary
- Green Belt boundary
- Amended Green Belt boundary

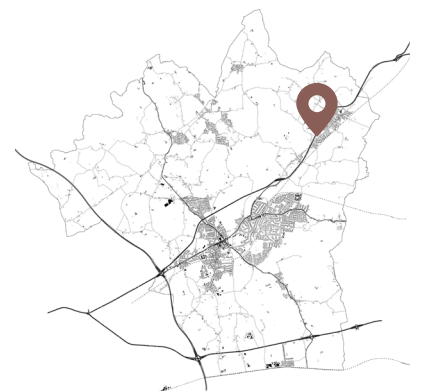


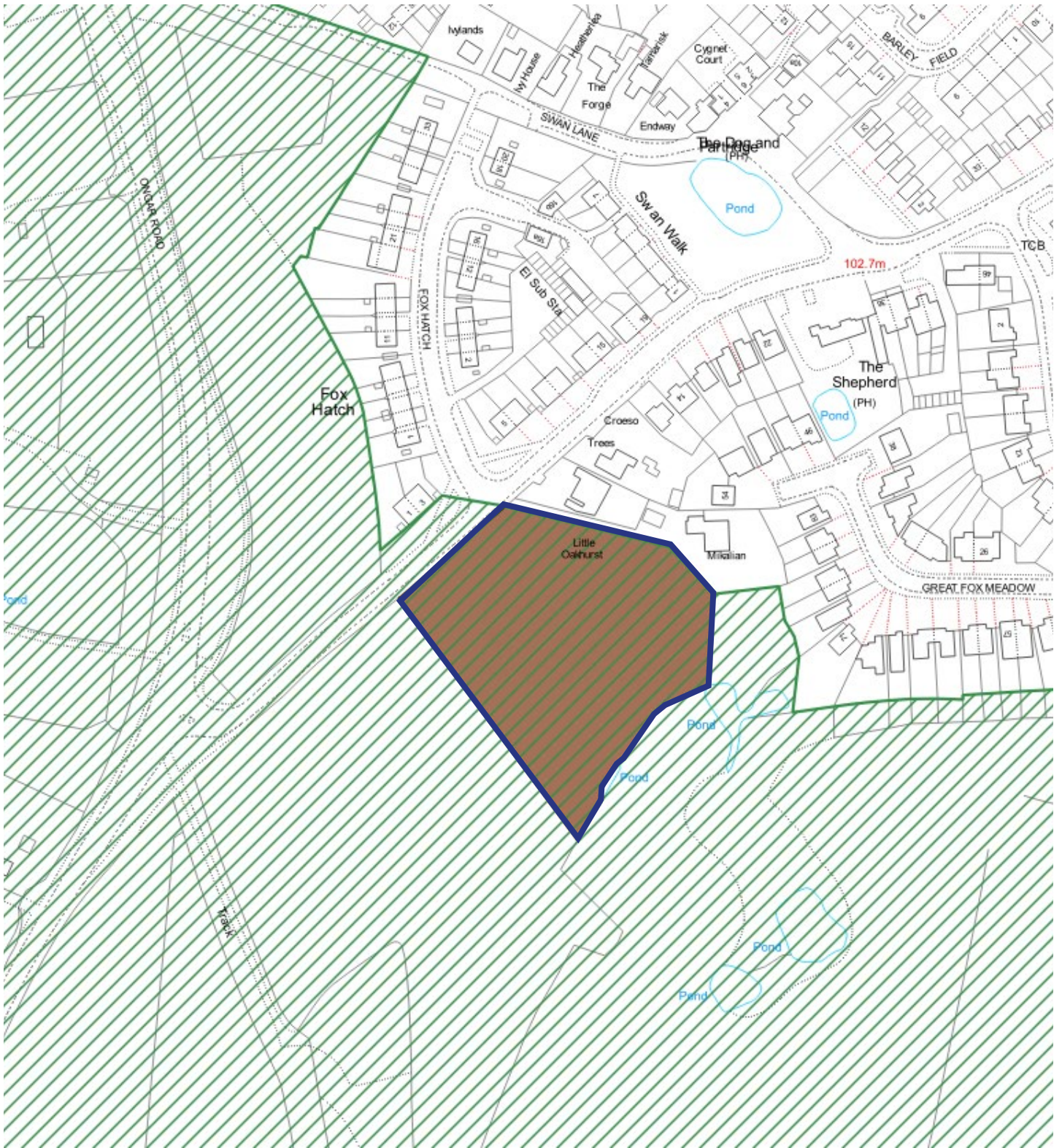


R22 - Land adjacent to the A12, Ingatestone







- Site area
- Site boundary
- Green Belt boundary
- Amended Green Belt boundary

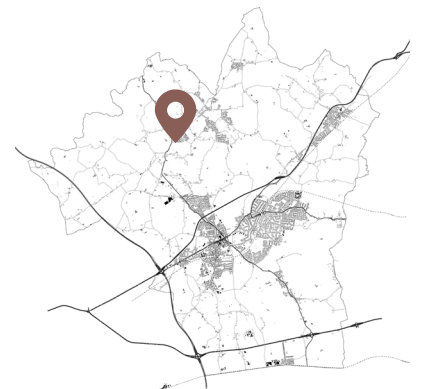


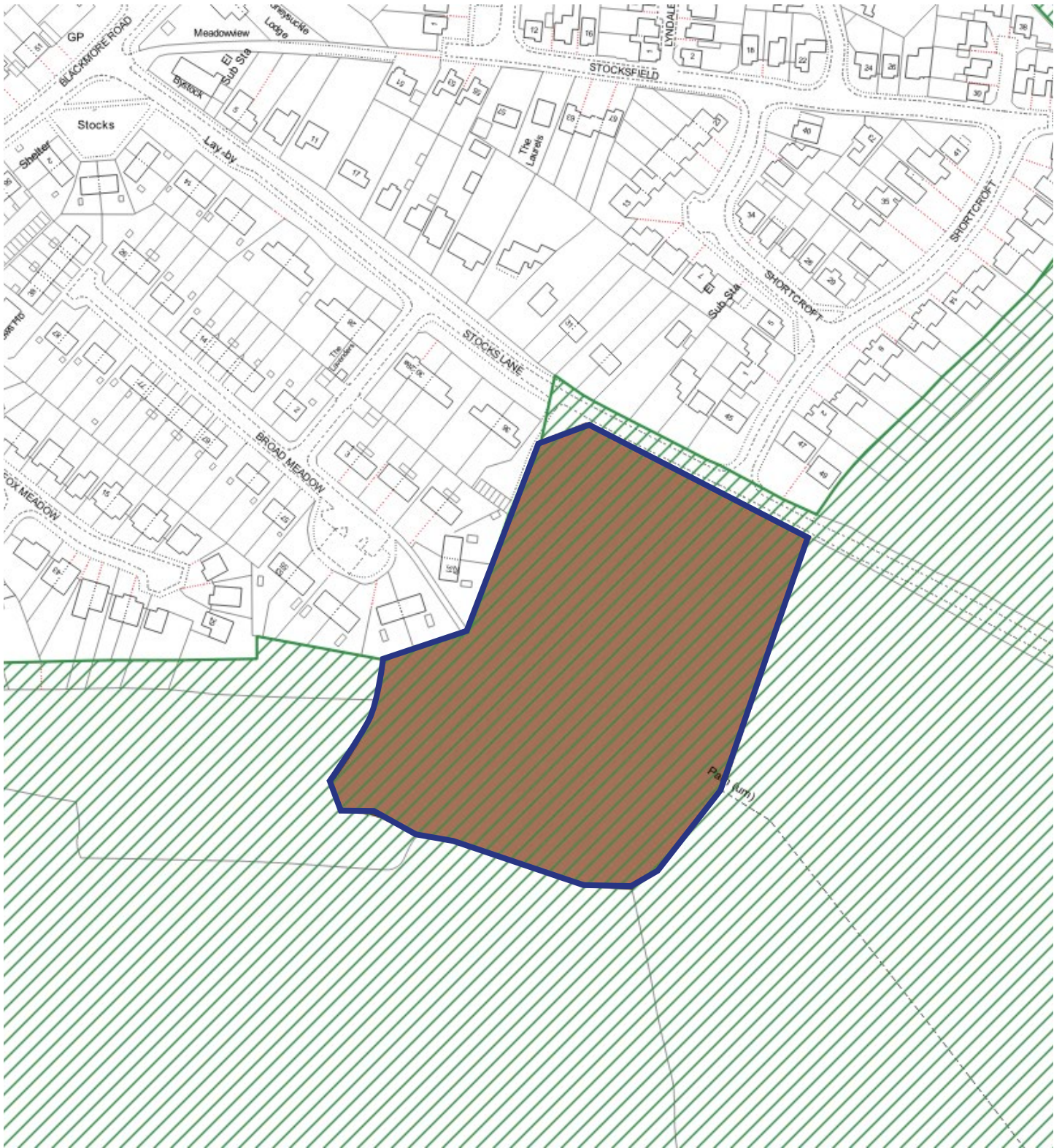


R23 - Brizes Corner Field, Kelvedon Hatch



-  Site area
-  Site boundary
-  Green Belt boundary
-  Amended Green Belt boundary

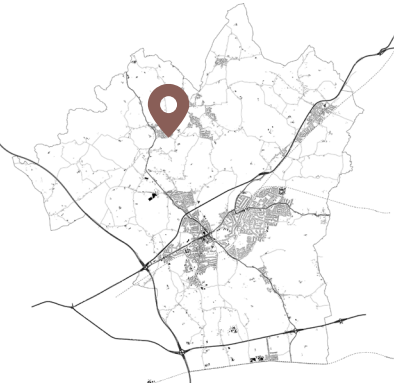




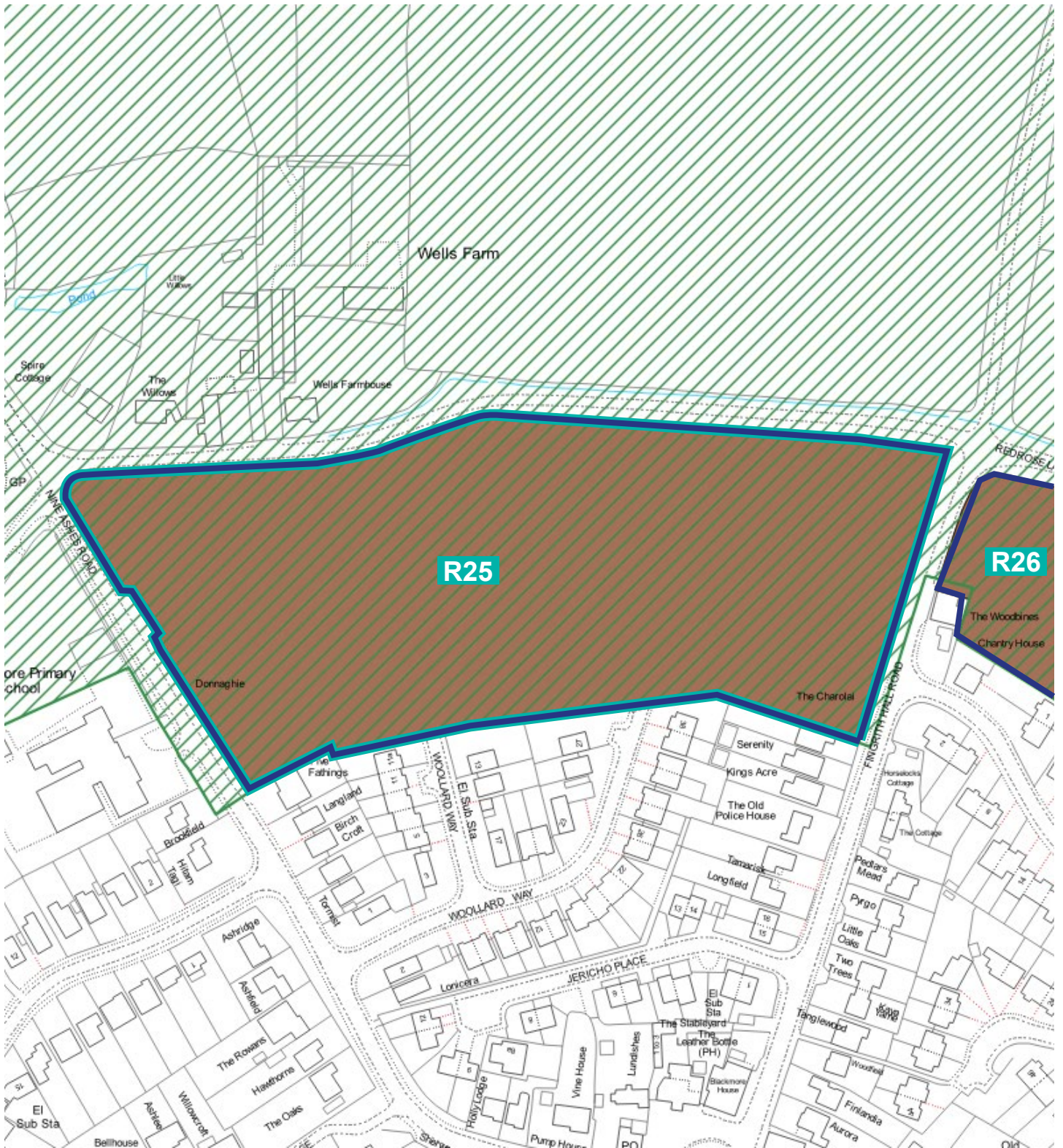
R24 - Land off Stocks Lane, Kelvedon Hatch



- Site area
- Site boundary
- Green Belt boundary
- Amended Green Belt boundary



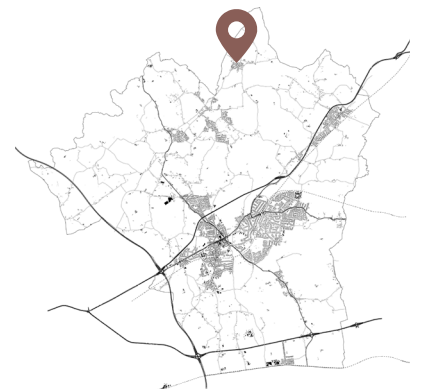


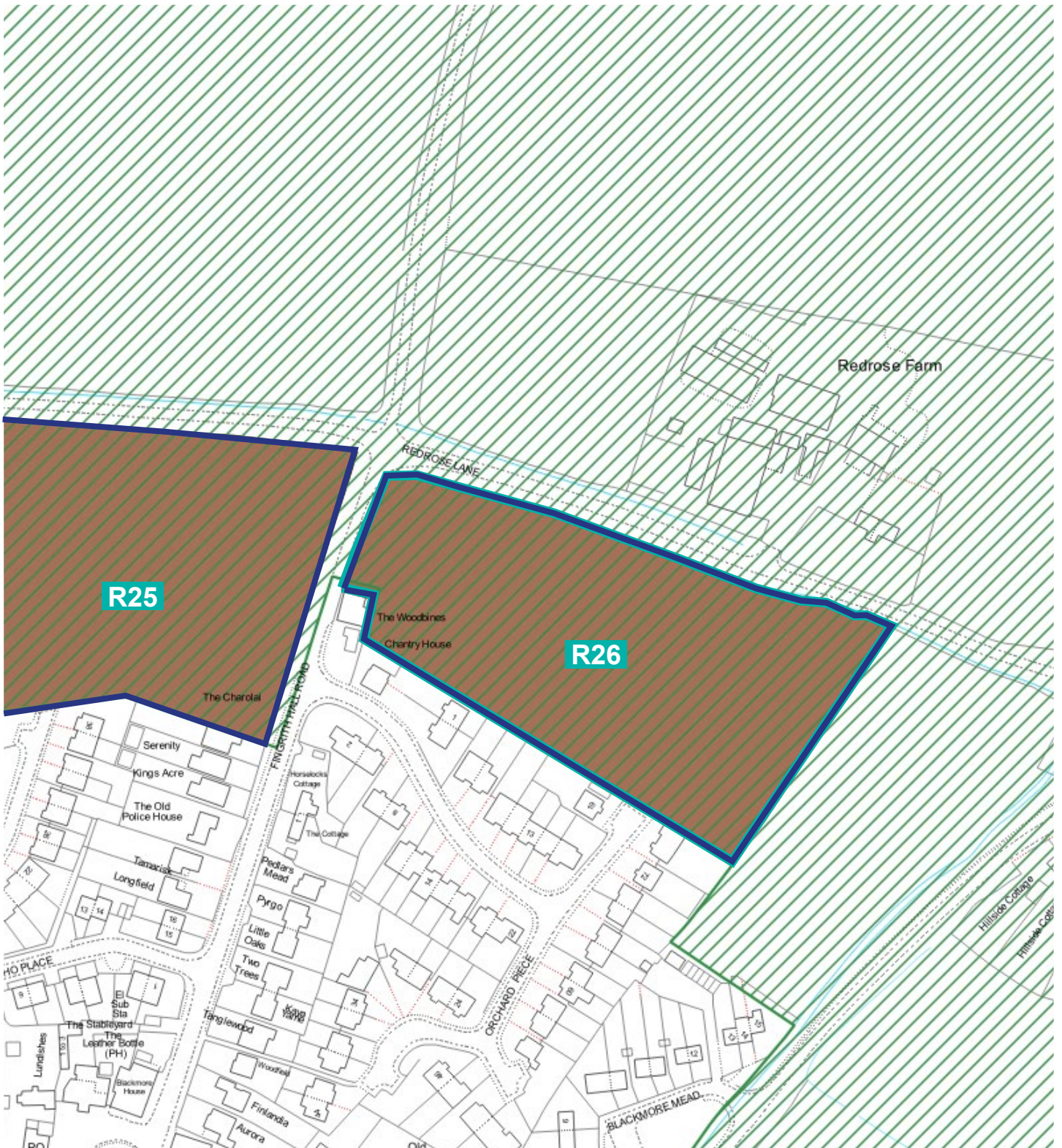


R25 - Land north of Woollard Way, Blackmore



- Site area
- Site boundary
- Green Belt boundary
- Amended Green Belt boundary

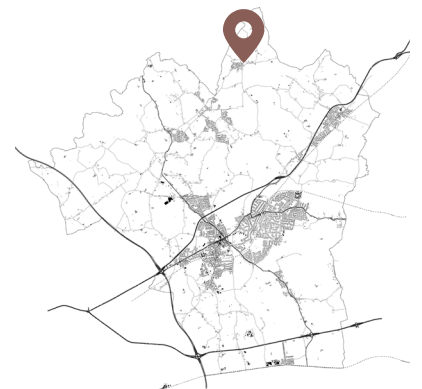




R26 - Land north of Orchard Piece, Blackmore



- Site area
- Site boundary
- Green Belt boundary
- Amended Green Belt boundary





E08 - Land adjacent to Ingatestone by-pass (part bounded by Roman Road)



- Site area
- Site boundary
- Green Belt boundary
- Amended Green Belt boundary





E10 - Land at Codham Hall



 Improved landscaped area

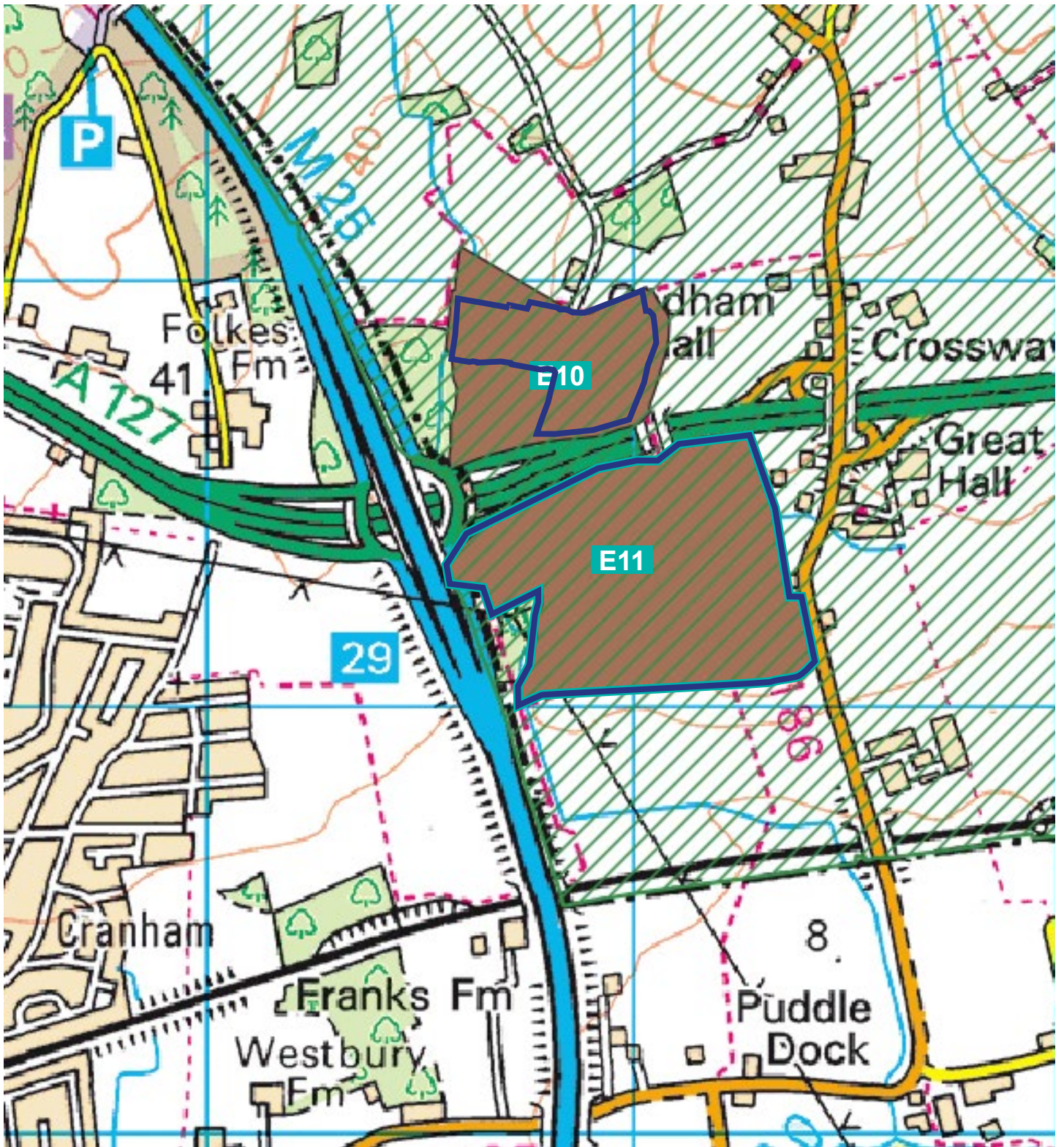
 Site area

 Site boundary

 Green Belt boundary

 Amended Green Belt boundary



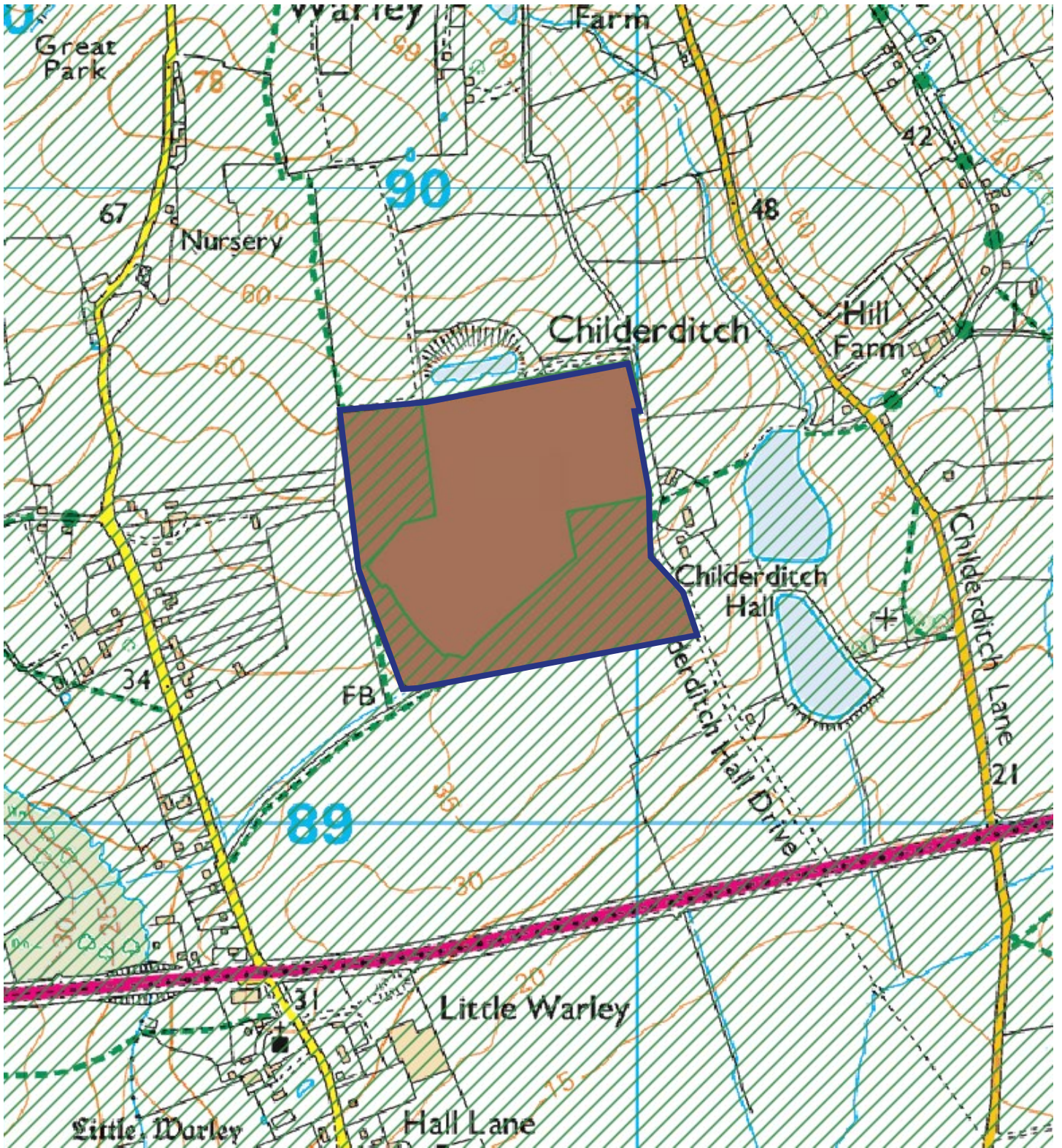


E11 - Brentwood Enterprise Park



- Site area
- Site boundary
- Green Belt boundary
- Amended Green Belt boundary



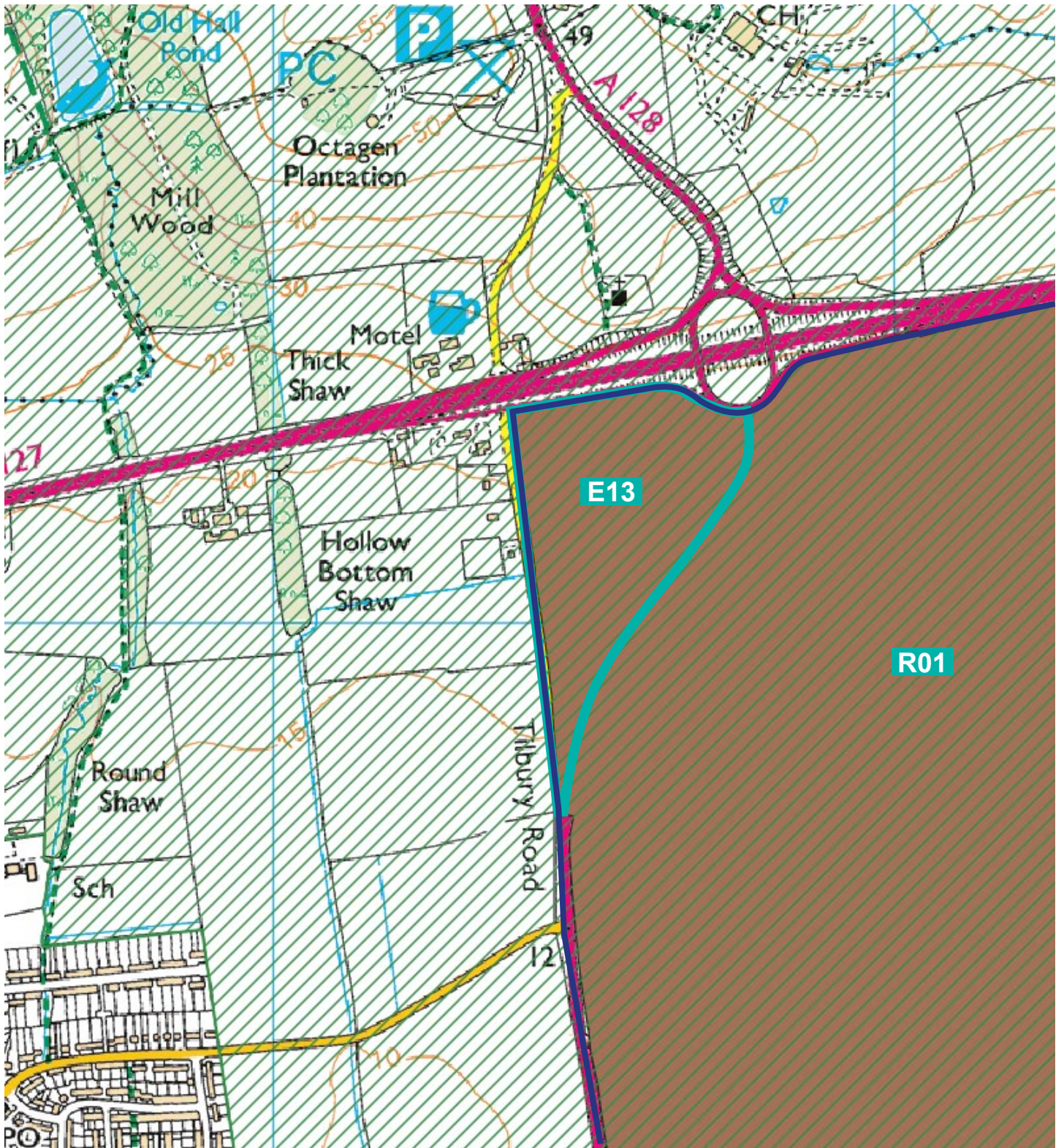


E12 - Childerditch Industrial Estate



- Site area
- Site boundary
- Green Belt boundary
- Amended Green Belt boundary





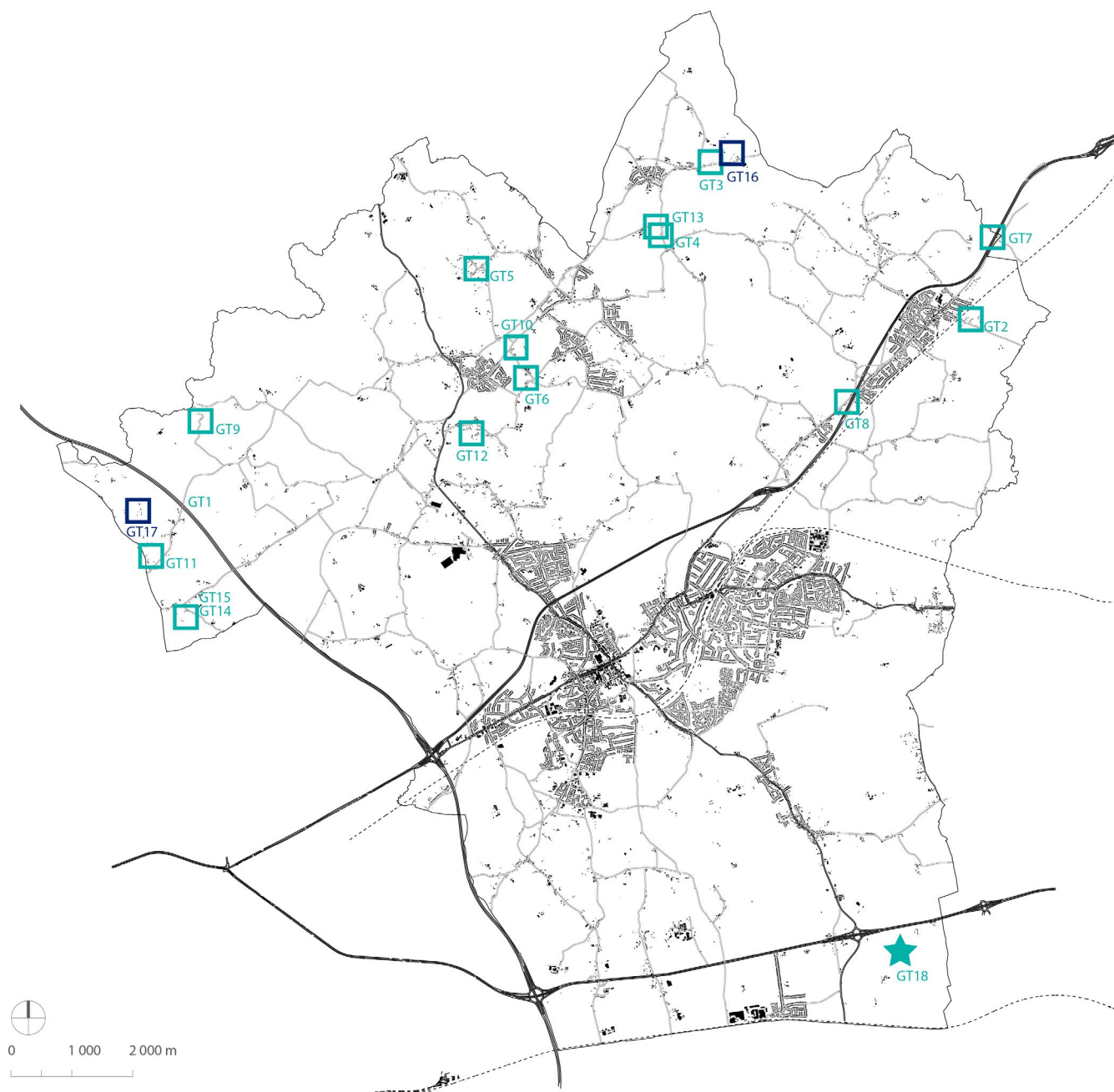
E13 - Land at East Horndon Hall



- Site area
- Site boundary
- Green Belt boundary
- Amended Green Belt boundary



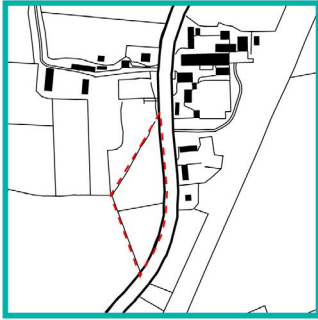
# Gypsy and Travellers Sites



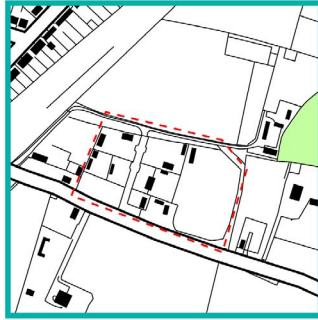
GYPSEY AND TRAVELLERS SITES LOCATION IN BRENTWOOD BOROUGH

- Safeguarded site(Policy HP09)
- Regularised site (Policy HP08)
- ★ New Gypsy & Traveller site (Policy HP07)
- ⋯ Approximate site boundary

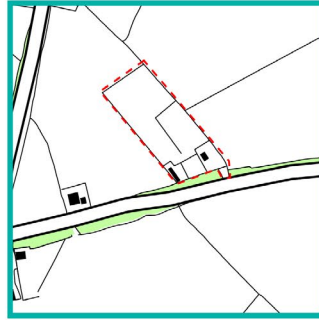




GT1 | Clementines Farm, Muthering Lane, Navestock  
1 Pitch



GT2 | Deep Dell Park (Willow Farm), Ingatestone  
6 pitches



GT3 | Lilliputs, Blackmore  
2 pitches



GT4 | Meadow View, Blackmore  
2-3 pitches



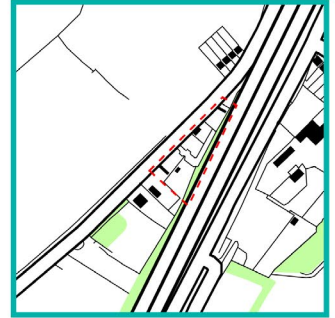
GT5 | Pond End, Kelvedon Hatch  
1-2 pitches



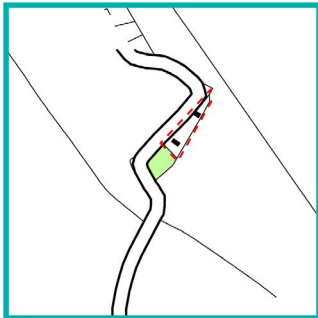
GT6 | Ponderosa Place, Kelvedon Hatch  
1 pitch



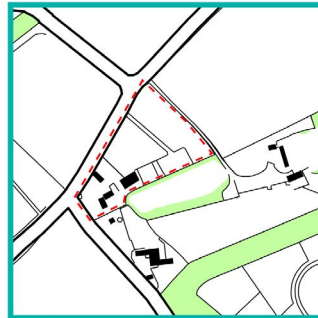
GT7 | Poplars Farm - Ingatestone  
2-3 pitches



GT8 | Roman Triangle, Mountnessing  
5 pitches



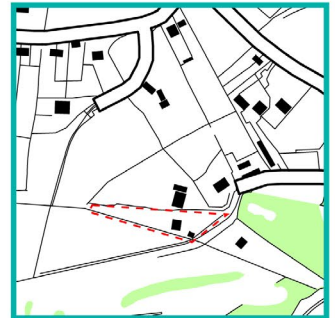
GT9 | Rye Etch, Navestock  
3 pitches



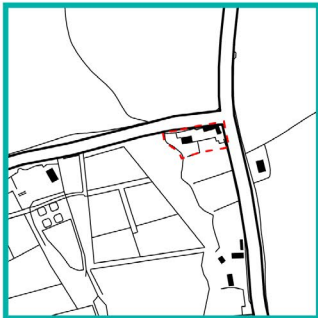
GT10 | The Willows, Kelvedon Hatch  
3 pitches



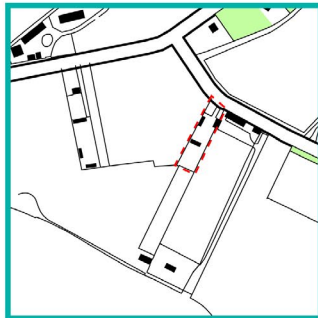
GT11 | Tree Tops, Navestock  
3 pitches



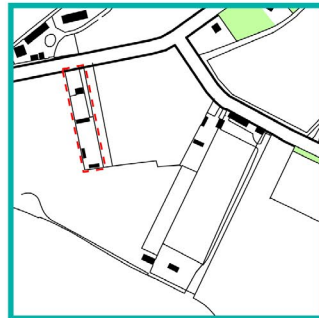
GT12 | Warren Lane, Doddinghurst  
1 pitch



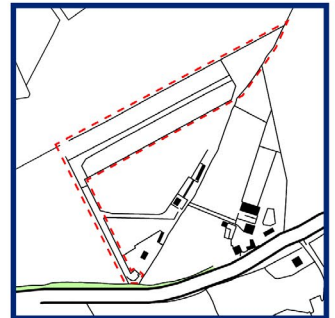
GT13 | Wenlock Meadow, Blackmore  
1 pitch



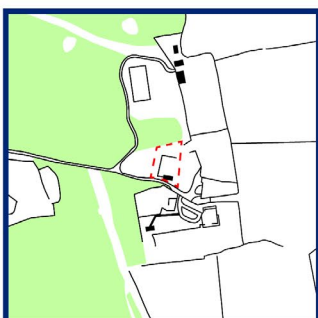
GT14 | Hope Farm, Navestock  
6 pitches



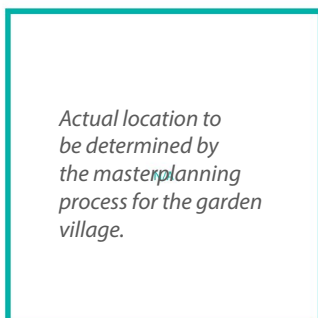
GT15 | Orchard View, Navestock  
4 pitches



GT16 | Oaktree Farm (Greenacres), Chelmsford Road  
7 Pitches



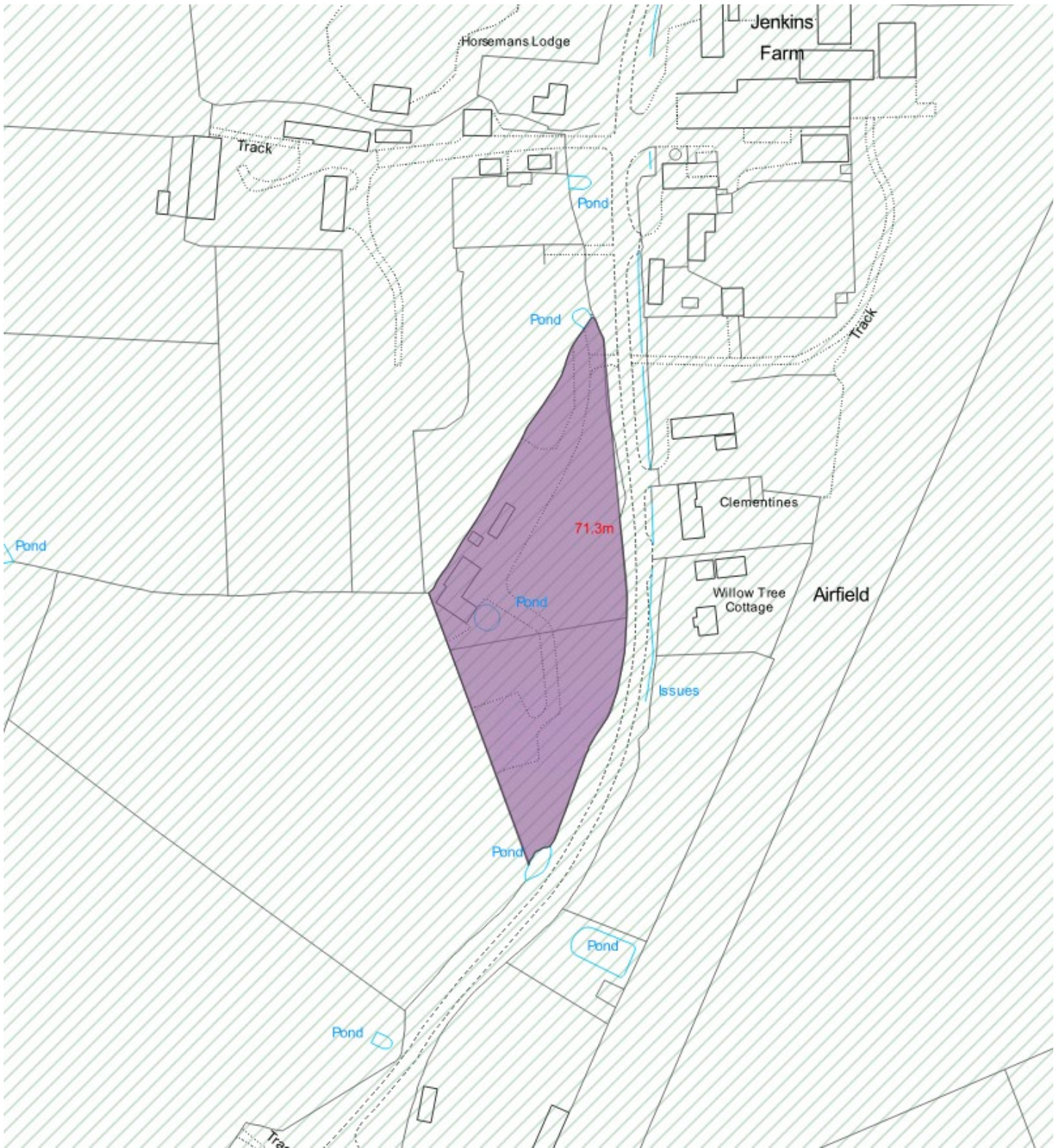
GT17 | Hunters Green, Albyns Lane, Navestock  
1 Pitch



GT18 | Dunton Hills Garden Village Allocation  
5 Pitches

- Safeguarded site
- Regularised site
- ★ New Gypsy & Traveller site
- Approximate site boundary

0 250 m



GT1 - Clementines Farm, Murthing Lane, Navestock



- Site area
- Green Belt boundary



GT2 - Deep Dell Park (Willow Farm), Ingatestone



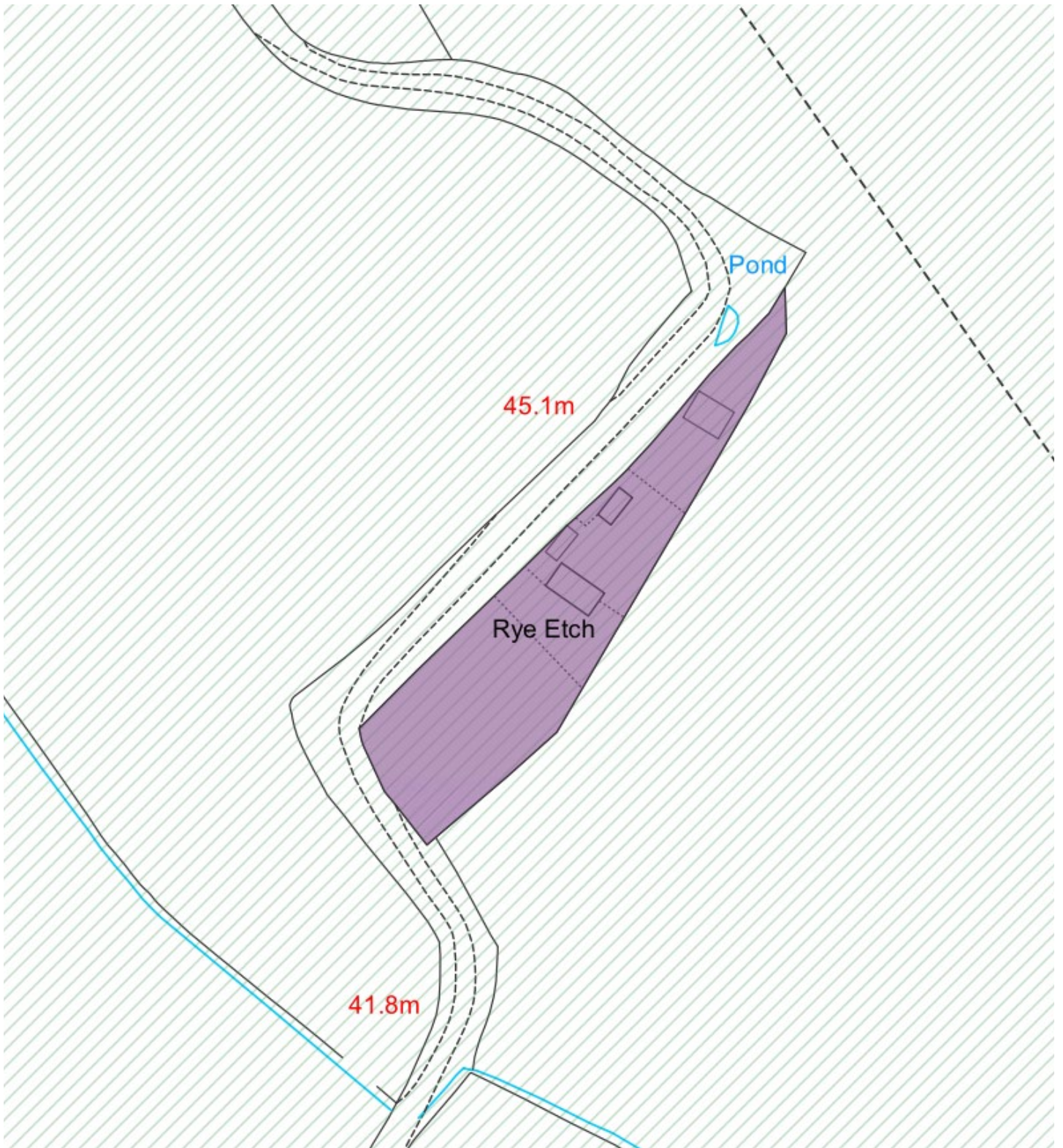
- Site area
- Green Belt boundary



GT8 - Roman Triangle, Mountnessing



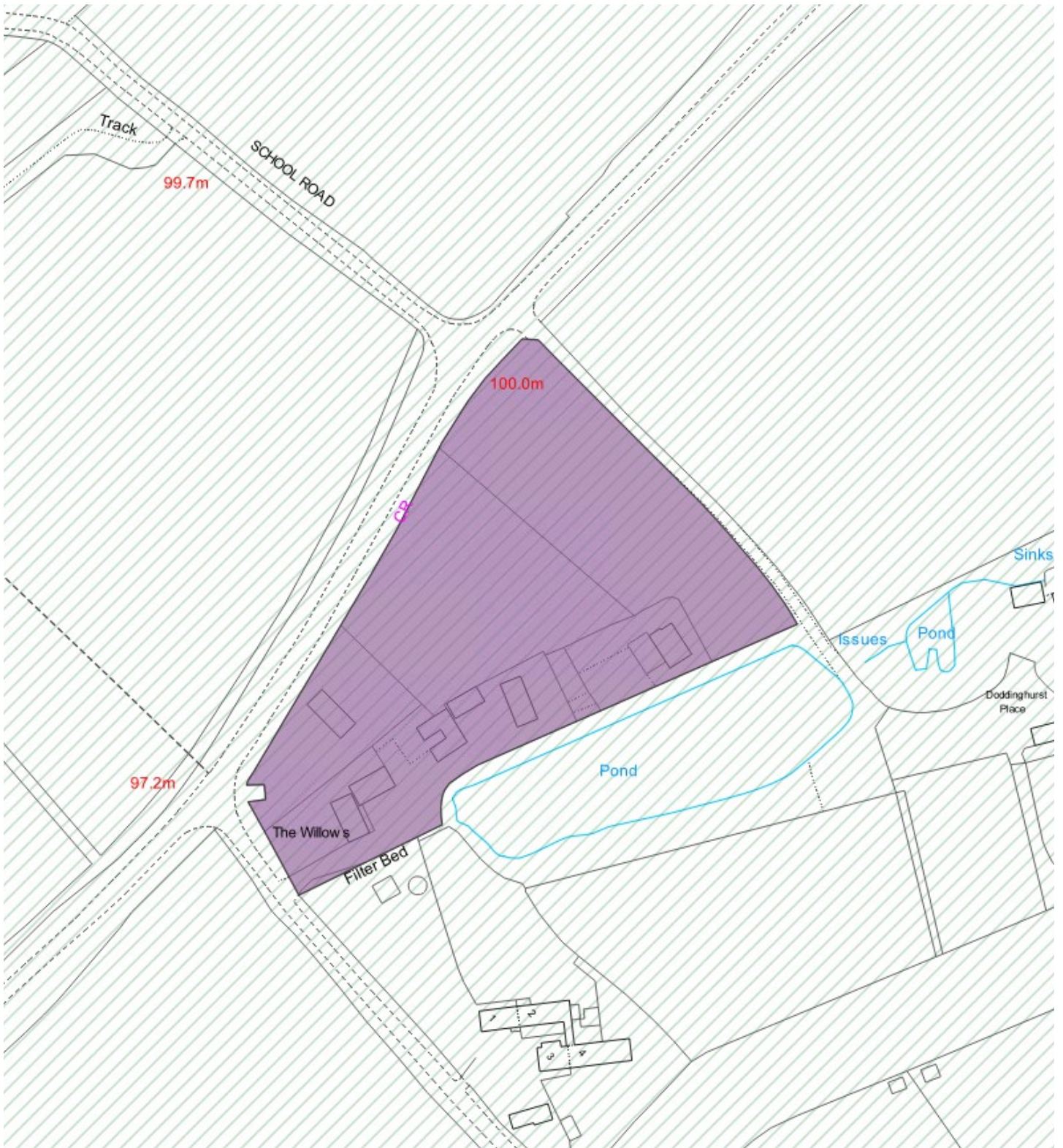
- Site area
- Green Belt boundary



GT9 - Rye Etch, Navestock



- Site area
- Green Belt boundary



GT10 - The Willows', Kelvedon Hatch



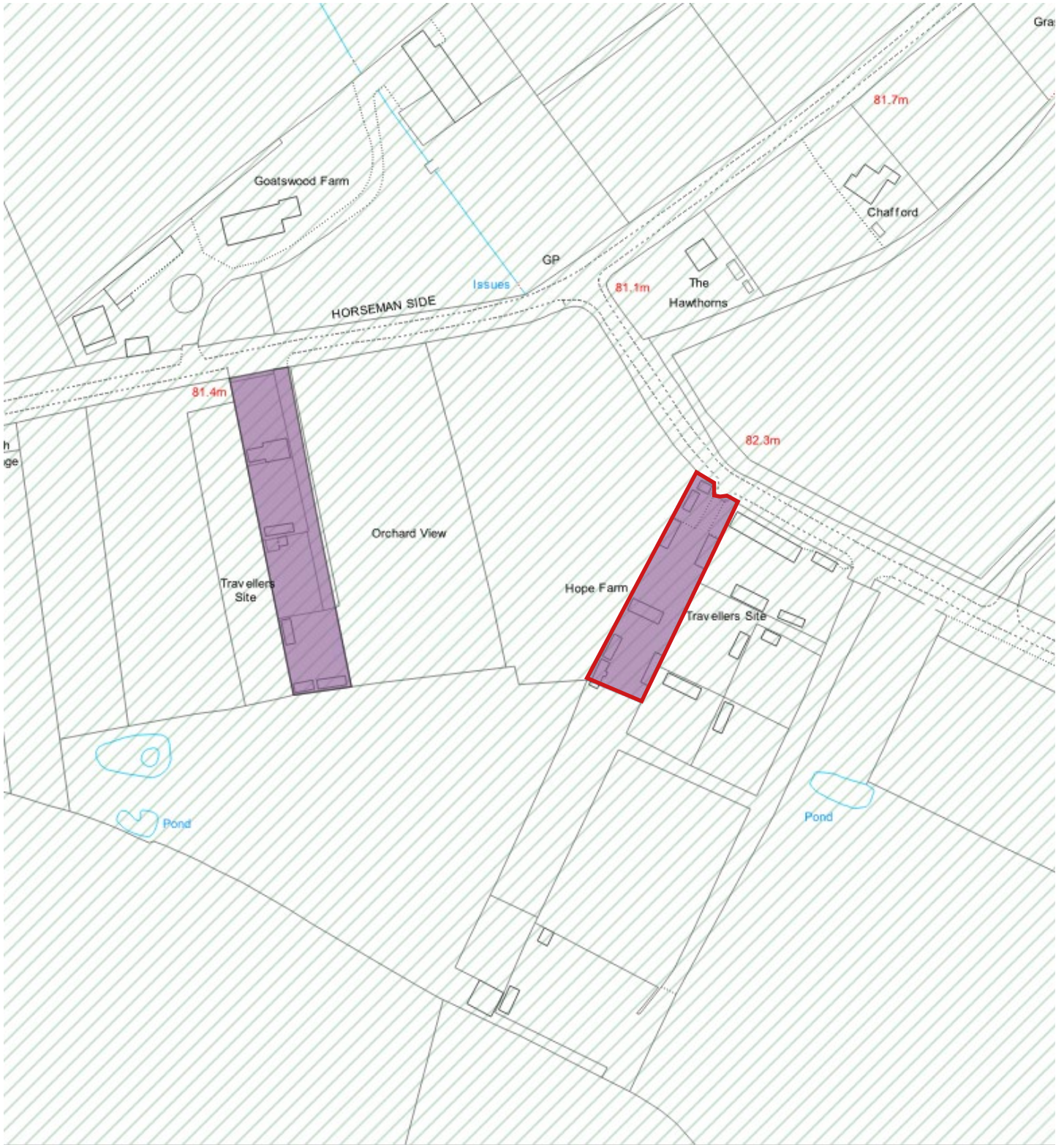
- Site area
- Green Belt boundary



GT11 - Tree Tops, Navestock



- Site area
- Green Belt boundary



GT14 - Hope Farm, Navestock



- Site area
- Green Belt boundary
- Site boundary





GT15 - Orchard View, Navestock



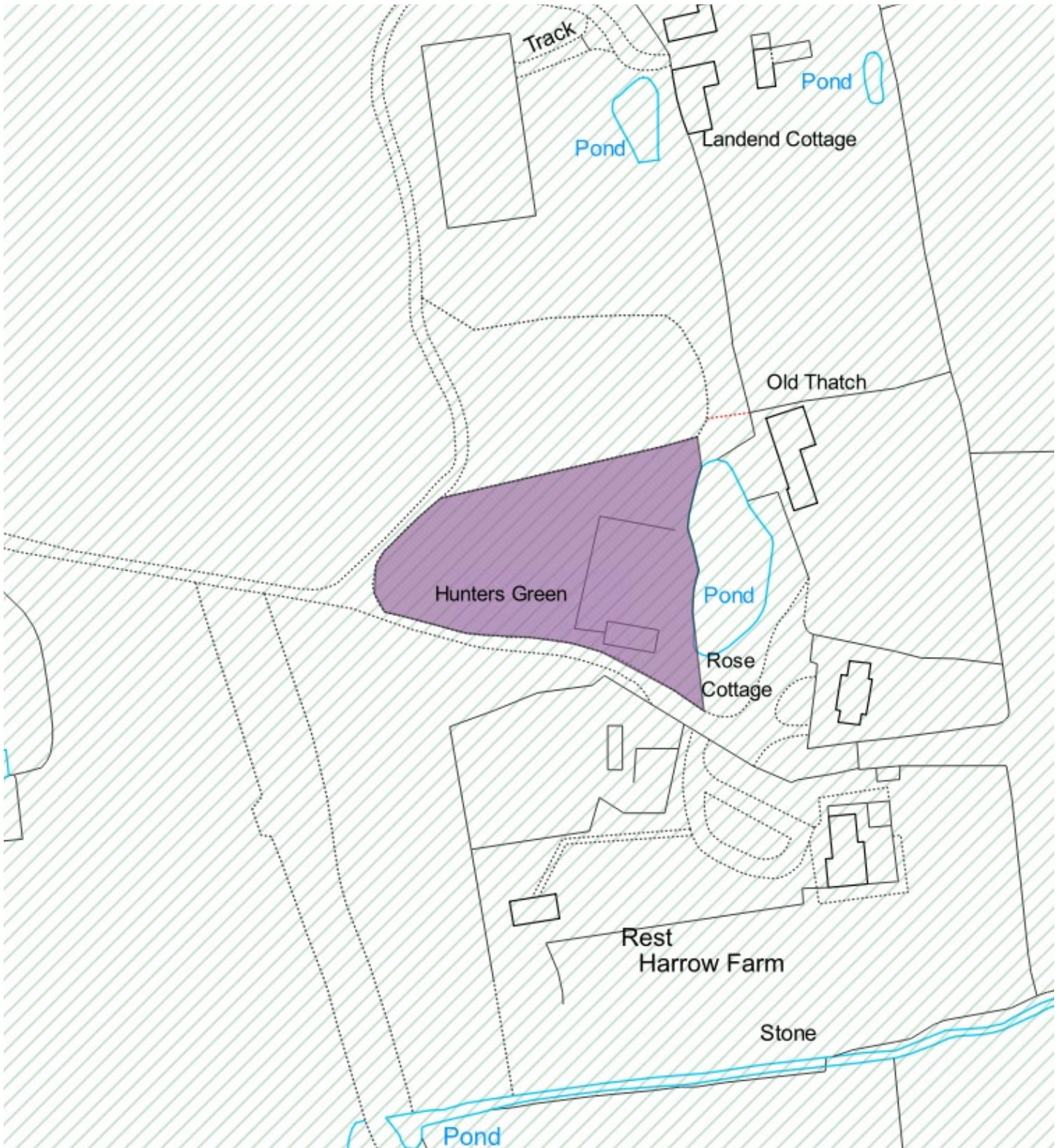
- Site area
- Green Belt boundary
- Site boundary



GT16 - Oaktree Farm (Greenacres), Chelmsford Road





- Site area
- Green Belt boundary

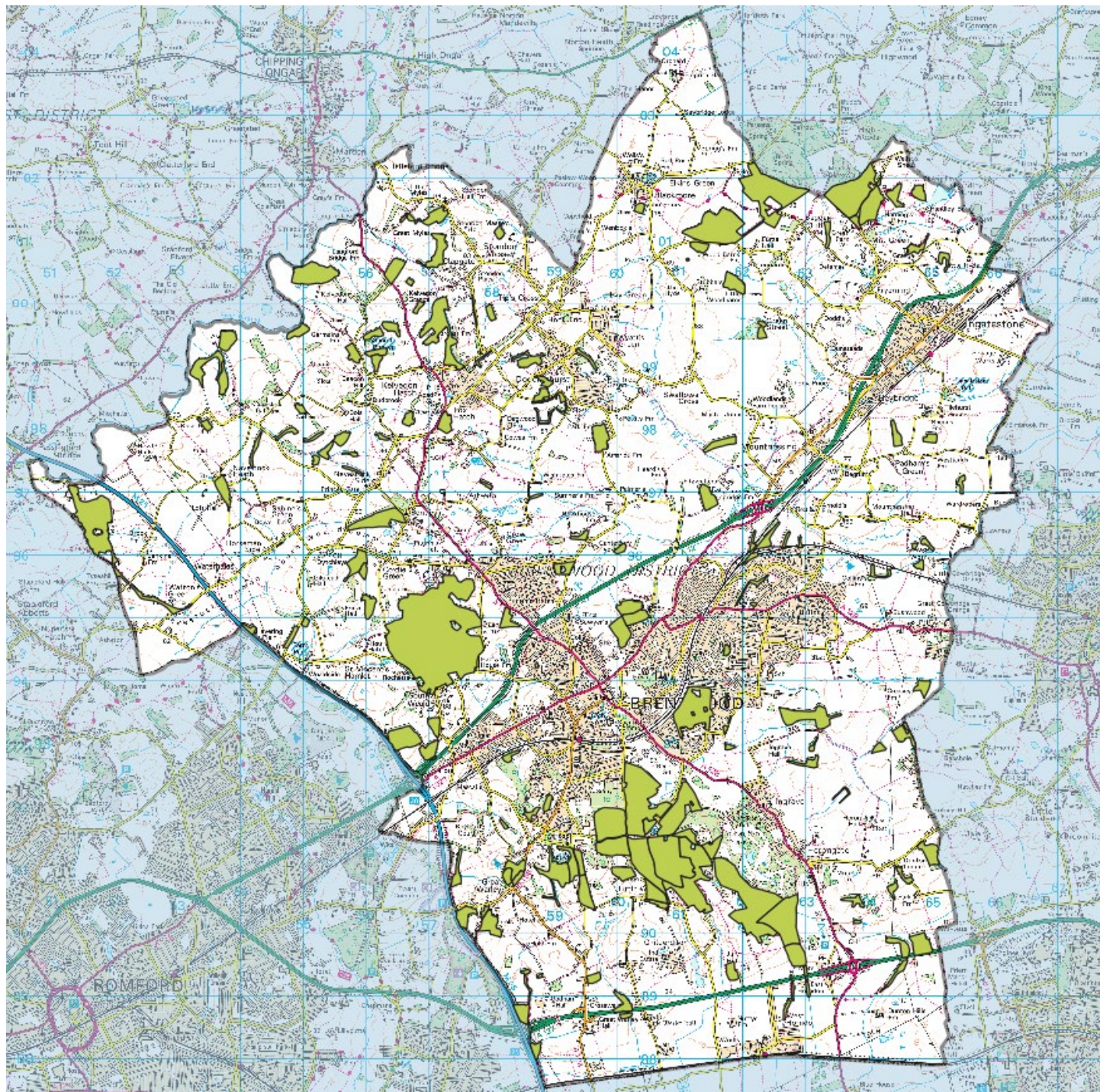


GT17 - Hunters Green, Albyns Lane, Navestock



-  Site area
-  Green Belt boundary

# Local Wildlife Site Changes



LOCAL WILDLIFE SITES IN BRENTWOOD BOROUGH IN 2005



Local Wildlife Sites



LOCAL WILDLIFE SITES IN BRENTWOOD BOROUGH FOLLOWING 2012 REVIEW



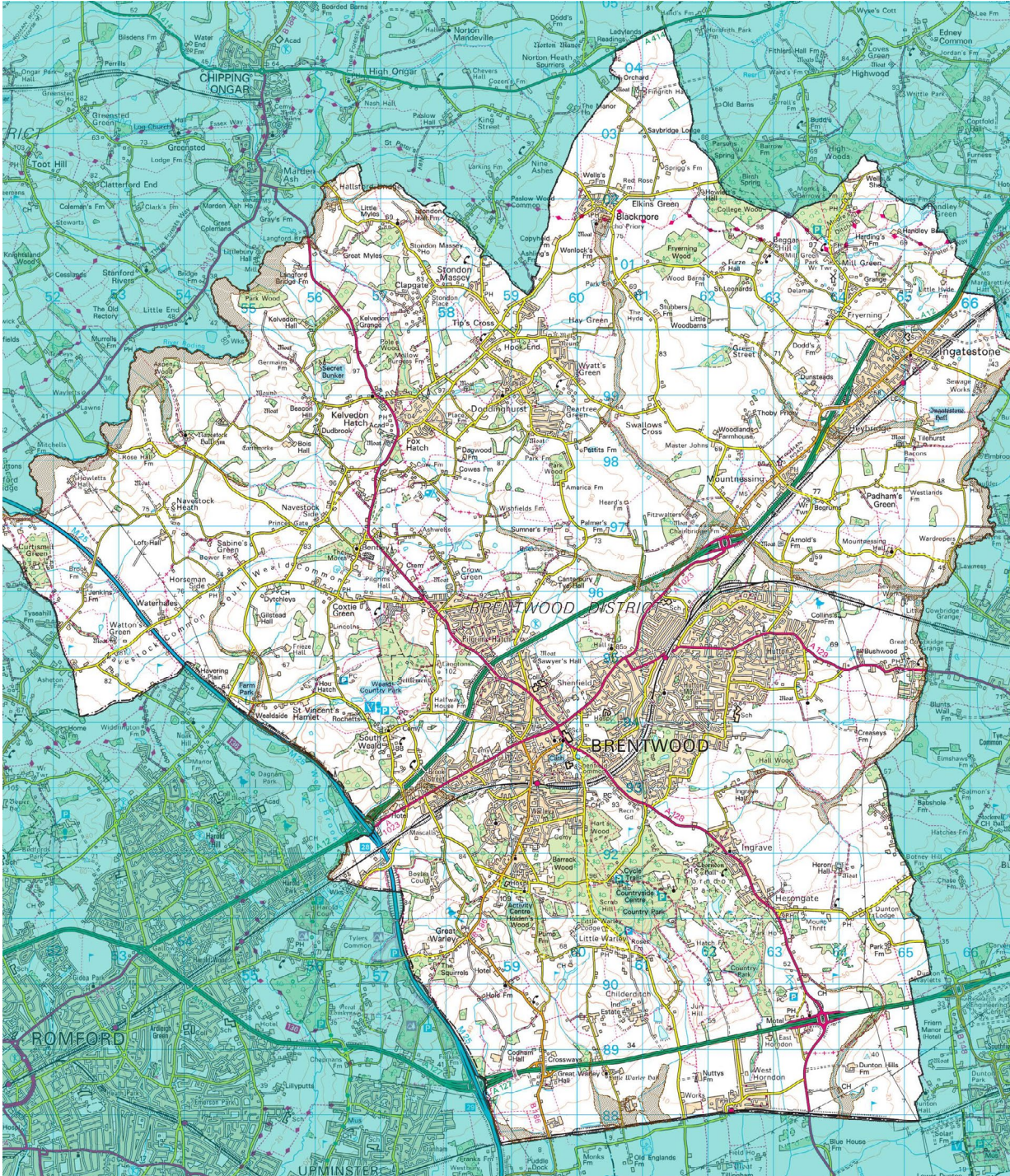
Local Wildlife Sites following the Local Wildlife Site Review 2012

Local Wildlife Site changes are detailed in the Local Wildlife Site Review 2012, available at:

<http://www.brentwood.gov.uk/pdf/17072013120644u.pdf> Page 749


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2020 Ordnance Survey 100018309

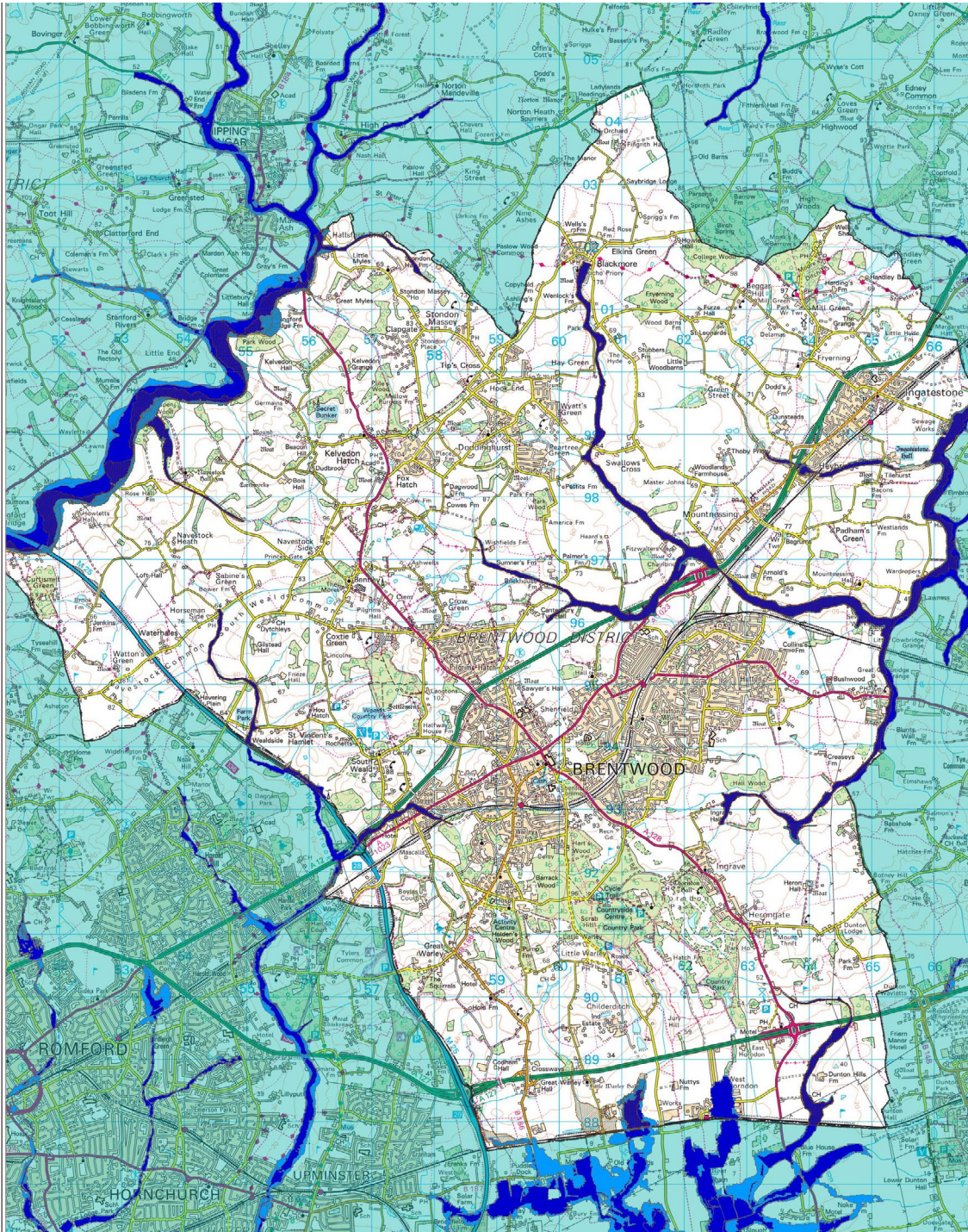
# Functional Flood Plain Changes



FUNCTIONAL FLOOD PLAIN IN BRENTWOOD BOROUGH IN 2005






 2005 Flood zone

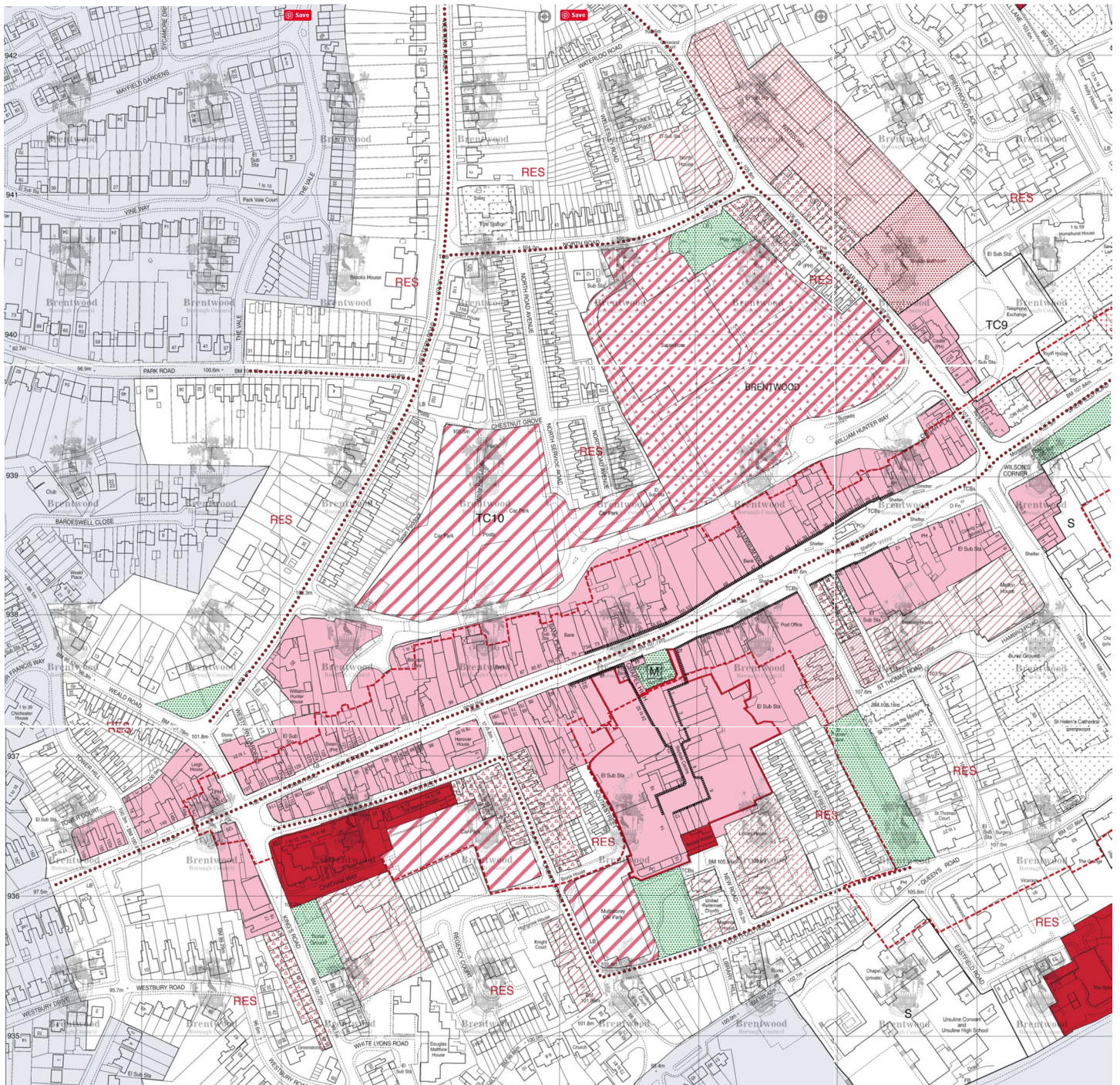


FUNCTIONAL FLOOD PLAIN CHANGES IN BRENTWOOD BOROUGH



-  Flood zone 3
-  Flood zone 2
-  2005 Flood zone

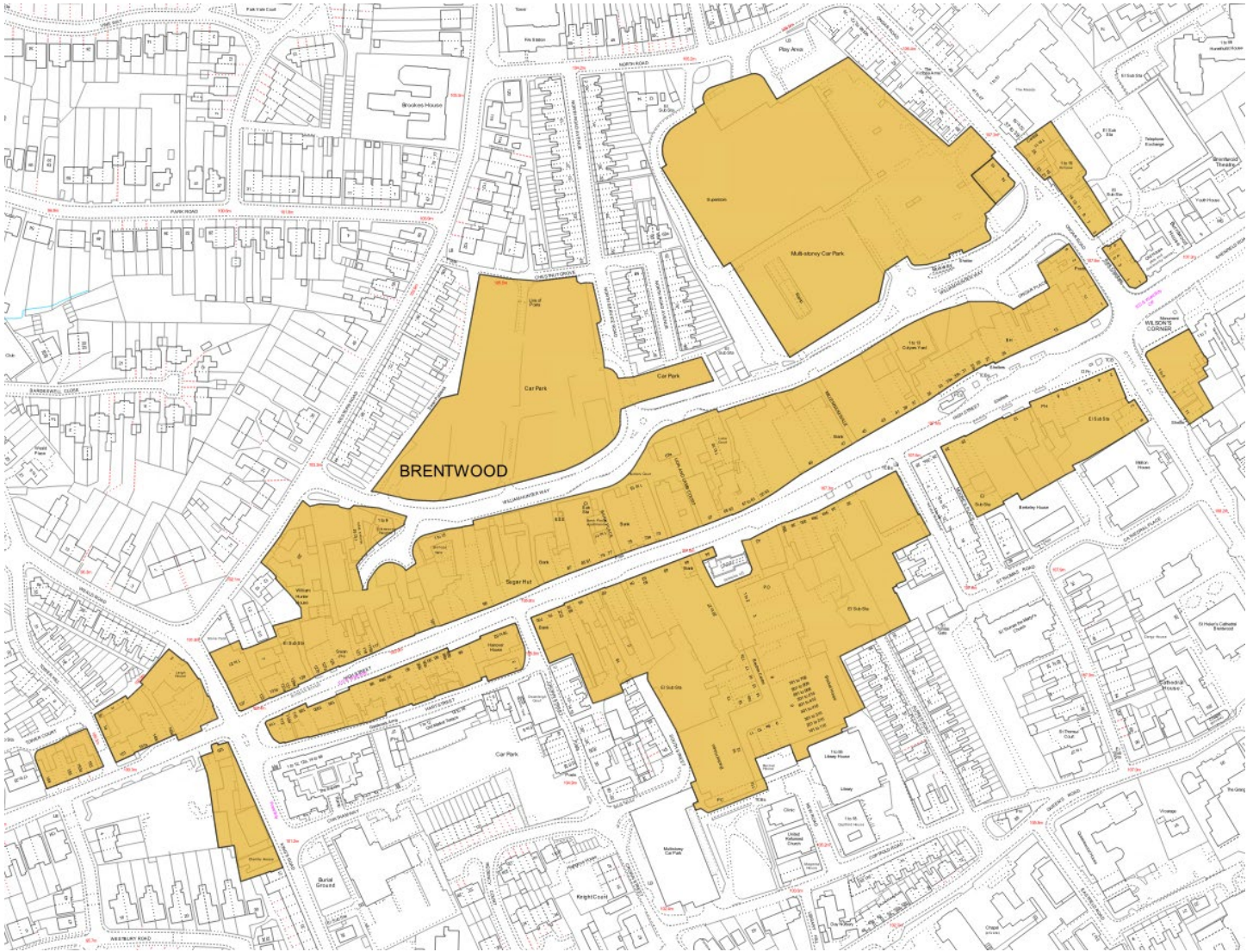
# Retail Designation Changes



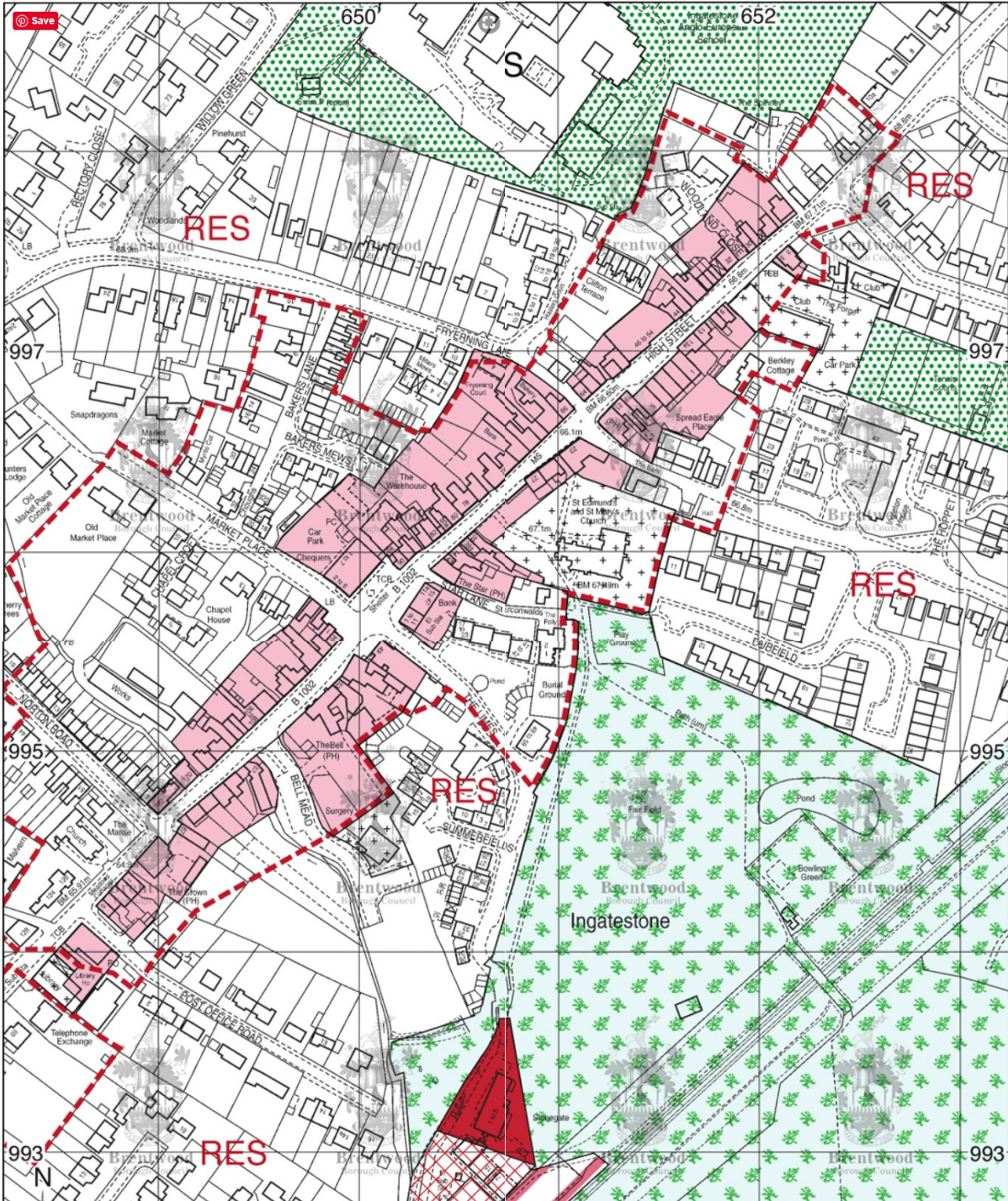
Brentwood High Street - extract from 2005 Local Plan Policies Map





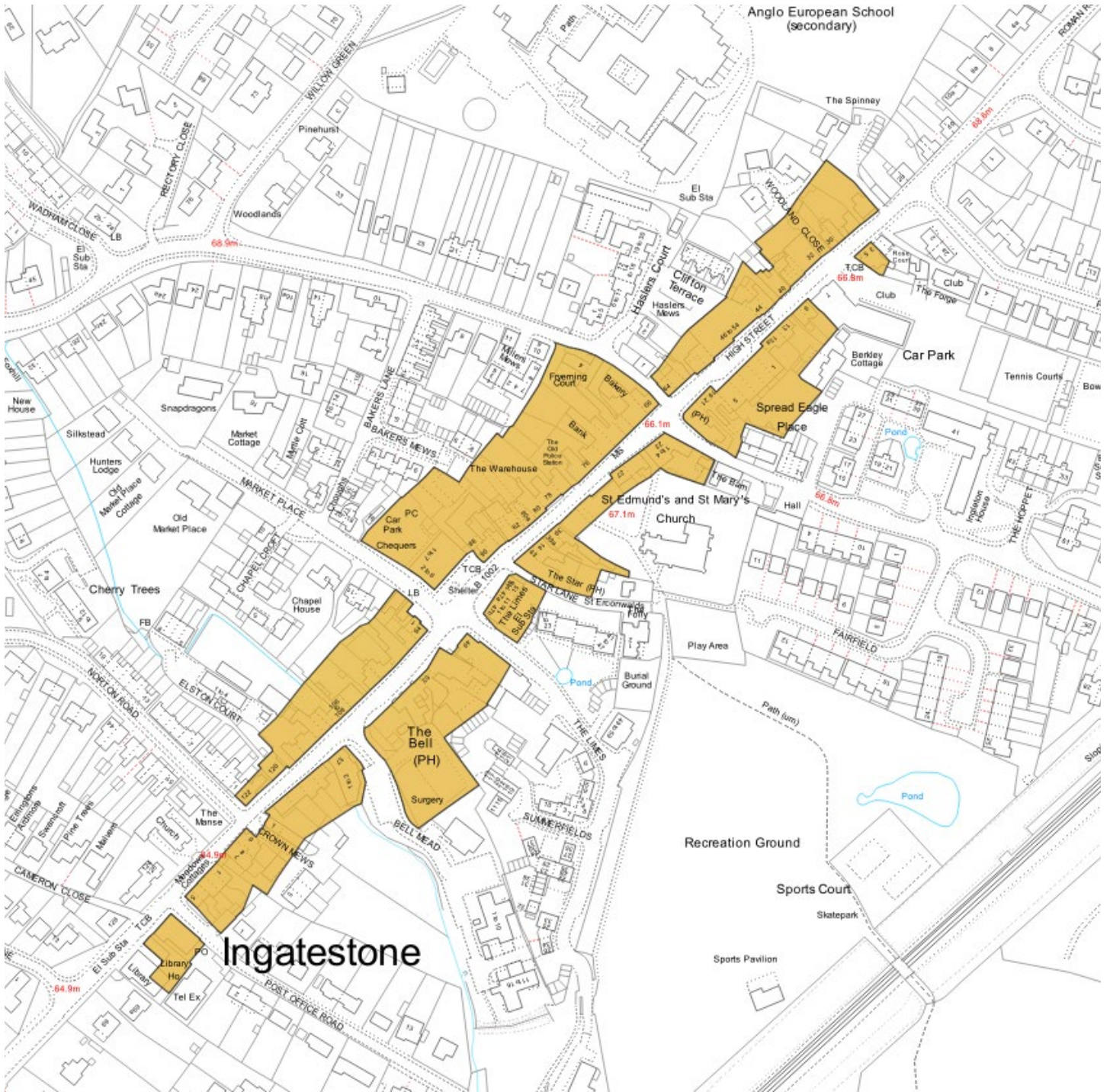


Brentwood High Street Primary Shopping Area (Policy PC08)



Ingatestone High Street - extract from 2005 Local Plan Policies Map





Ingatestone High Street Primary Shopping Area (Policy PC08)



Hutton Road - extract from 2005 Local Plan Policies Map

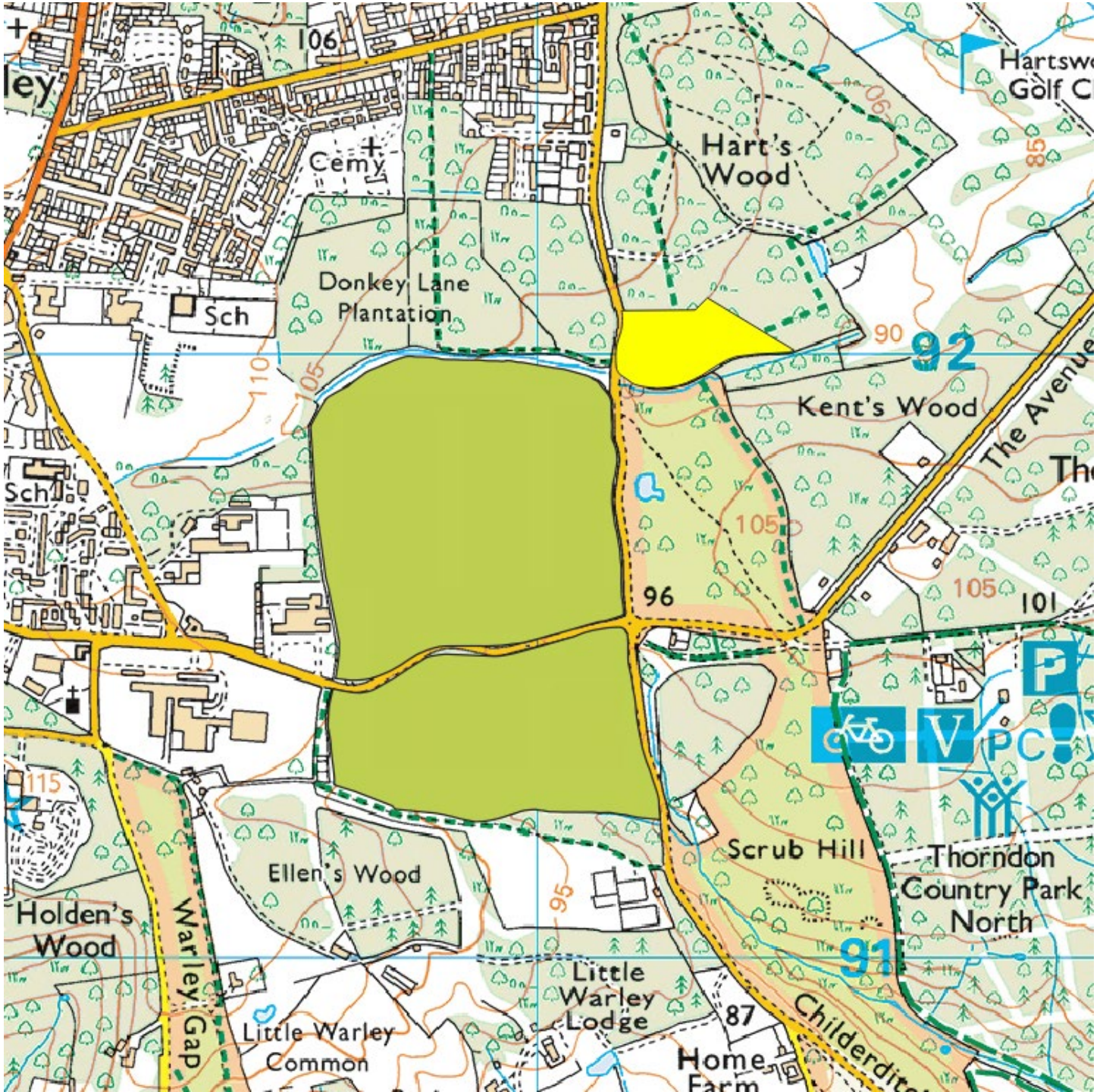
-  Shops/Residential  
**H4, H5, TC3, TC4**
-  Shops/Offices
-  Cycleway Proposals  
**T14**
-  Car Parking  
**T6, T7, T9, TC10**



Hutton Road Primary Shopping Area (Policy PC08)

The Primary Shopping Area at Dunton Hills Garden Village is to be informed by the Masterplan Framework for Dunton Hills Garden Village

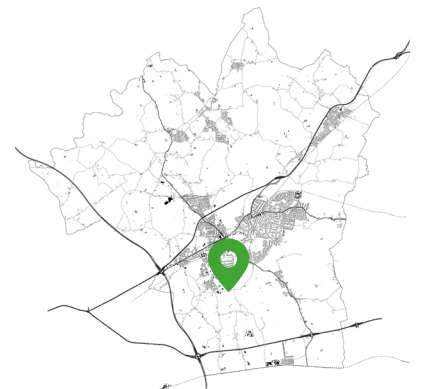
# Article 4 Changes



ADDITIONAL ARTICLE 4 AREA IN BRENTWOOD BOROUGH



-  Existing adjacent Article 4 area
-  Additional Article 4 area



# BRENTWOOD LOCAL DEVELOPMENT PLAN

 [planning.policy@brentwood.gov.uk](mailto:planning.policy@brentwood.gov.uk)

 [BrentwoodCouncil](https://www.facebook.com/BrentwoodCouncil)

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Published February 2020 by Brentwood Borough Council  
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telephone: 01277 312 500





# BRENTWOOD LOCAL PLAN

## Proposed Changes to Submitted Policies Map

September 2021

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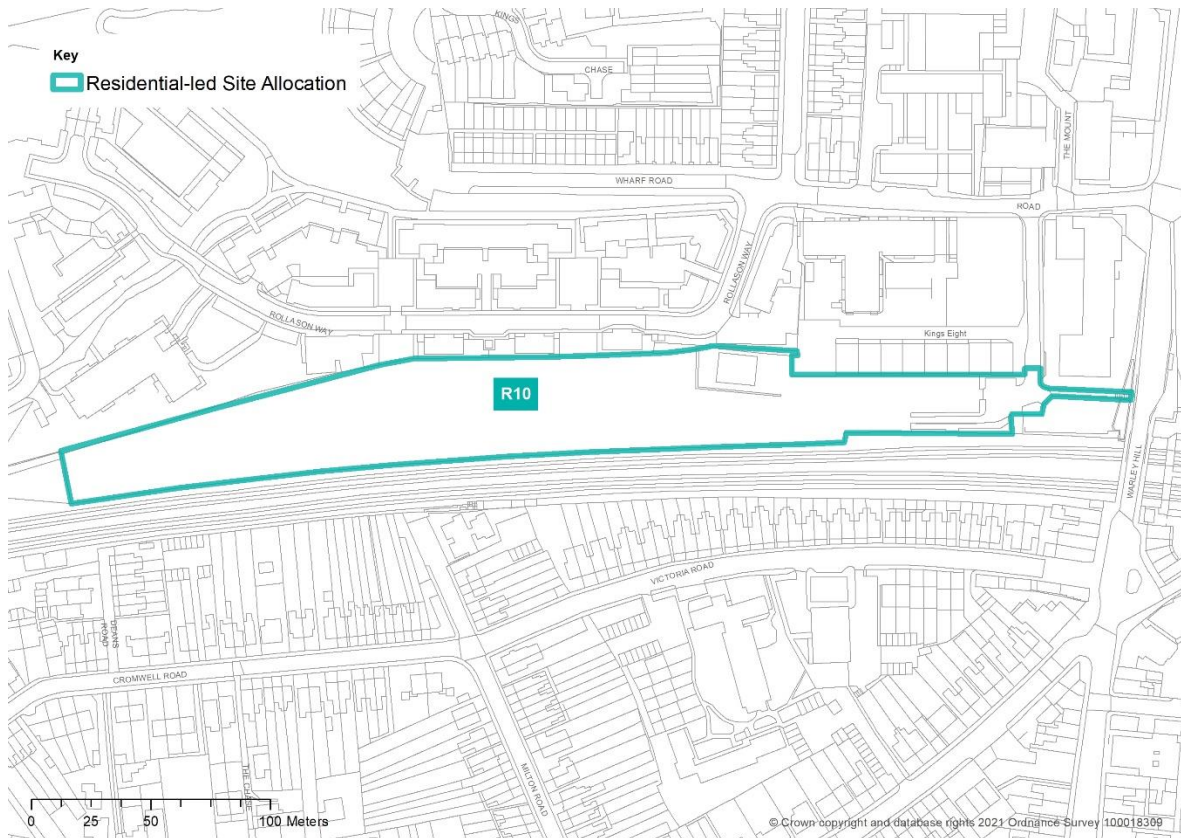
## Introduction

1. This document sets out the proposed changes to the submitted Policies Map that have arisen since the submission of the Brentwood Local Plan in February 2020.
2. An updated Composite Policies Map is included as part of this document. A higher resolution version of the Policies Map is available separately online [www.brentwood.gov.uk/local-plan-examination](http://www.brentwood.gov.uk/local-plan-examination) This is scaled at 1:22,000 at A0 page size, so details of map boundaries can be seen by zooming in.
3. The following designations from the 2005 Policies Map are proposed to be deleted. These were not previously set out in Appendix 4 of the Submitted Plan (Examination document A1) or in the Proposed Changes to Policies Map – February 2020 (Examination document A8). These do not have any corresponding policies or have been superseded and therefore are no longer justified.
  - Grade II agricultural land;
  - Article 4 direction;
  - Indoor recreation;
  - Residential;
  - Major housing site;
  - Hutton mount;
  - Prime shopping frontage
  - Employment-general;
  - Car Parking
  - Crossrail safeguarded area;
  - Railway station;
  - Medical health
  - Hospital
  - Telephone exchange policy;
  - Baytree centre boundary;
  - Cycleway proposals.

# Residential-led site allocation boundary changes

4. The boundary of the residential-led allocation R10 Brentwood Railway Station Car Park set out below is proposed to be amended.
5. In addition, residential-led site allocations R18: Land at Crescent Drive, Shenfield and R20: The Eagle and Child Public House, Shenfield are proposed to be deleted. This reflects MM100 and MM102 respectively of the Schedule of Potential Main Modifications.

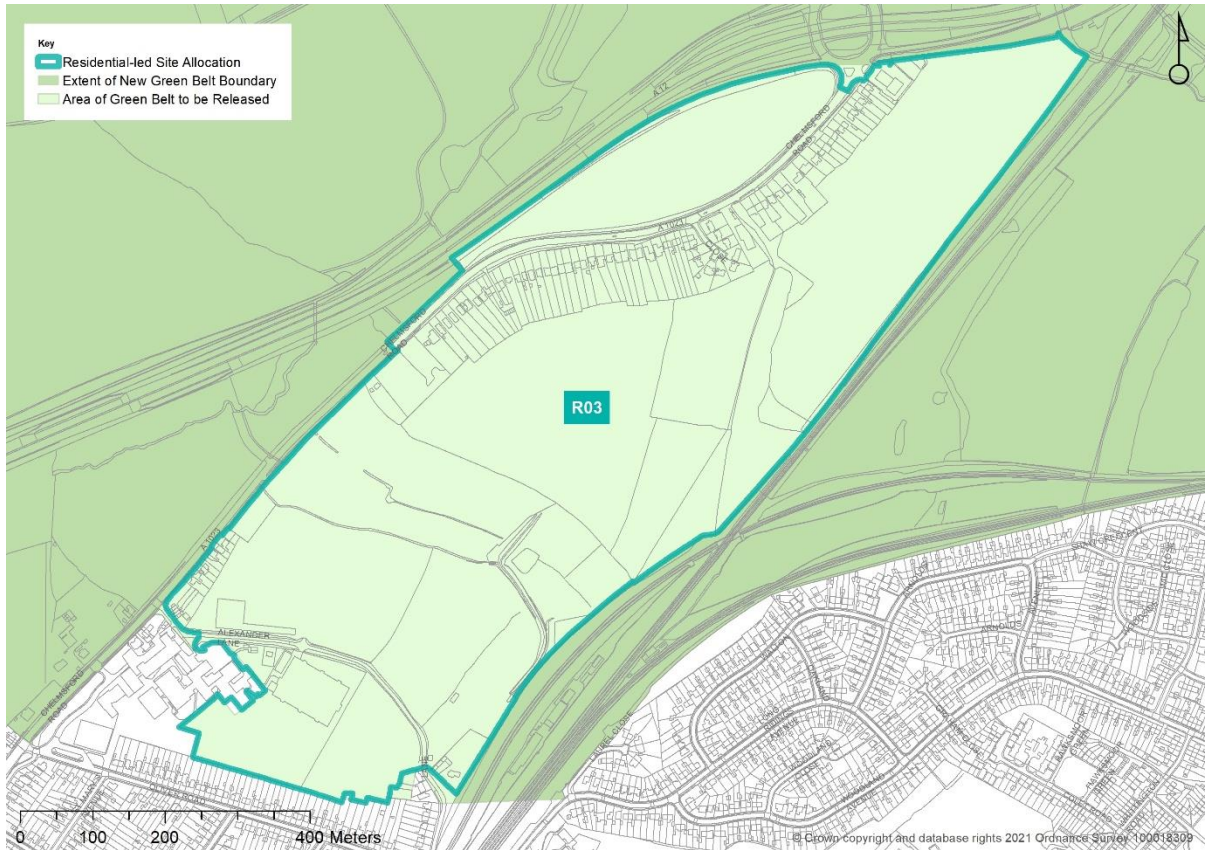
## R10 - BRENTWOOD RAILWAY STATION CAR PARK



# Green Belt boundary changes relating to Residential-led site allocations

- The boundaries of the residential-led allocations set out below remain unchanged but there are proposed changes to the surrounding Green Belt boundaries.

## R03 - LAND NORTH OF SHENFIELD



### R07 - SOW AND GROW NURSERY, ONGAR ROAD



### R09 - LAND WEST OF WARLEY HILL



### R16 - LAND OFF DODDINGHURST ROAD NORTH AND SOUTH



### R21 - SITE ADJACENT TO INGATESTONE GARDEN CENTRE



### R22 - LAND ADJACENT TO INGATESTONE BY-PASS

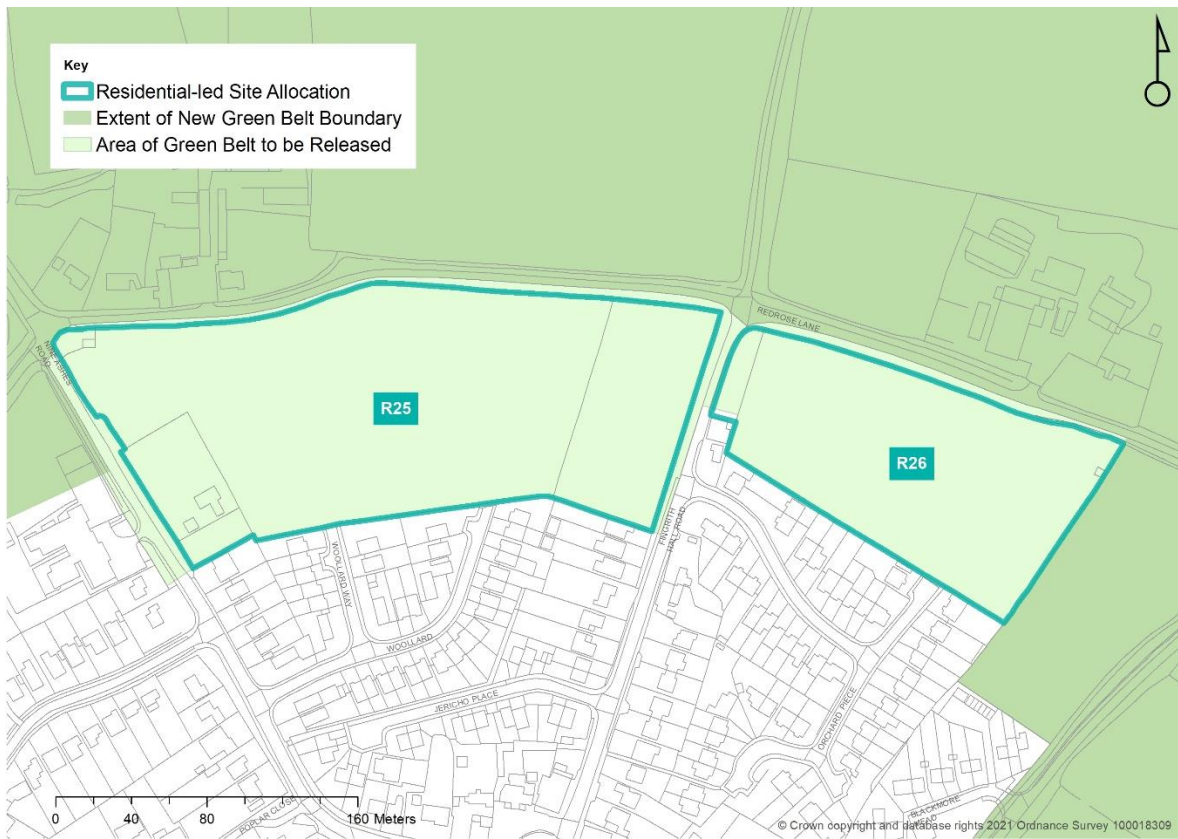


### R24 - LAND OFF STOCKS LANE KELVEDON HATCH





### R25 AND R26 LAND SOUTH OF REDROSE LANE



# Green Belt boundary changes relating to Employment site allocations

7. The boundary of the Employment site allocation set out below remains unchanged but there are proposed changes to the surrounding Green Belt boundary.

## E08 – LAND ADJACENT TO INGATESTONE BY-PASS



## Existing Employment Sites

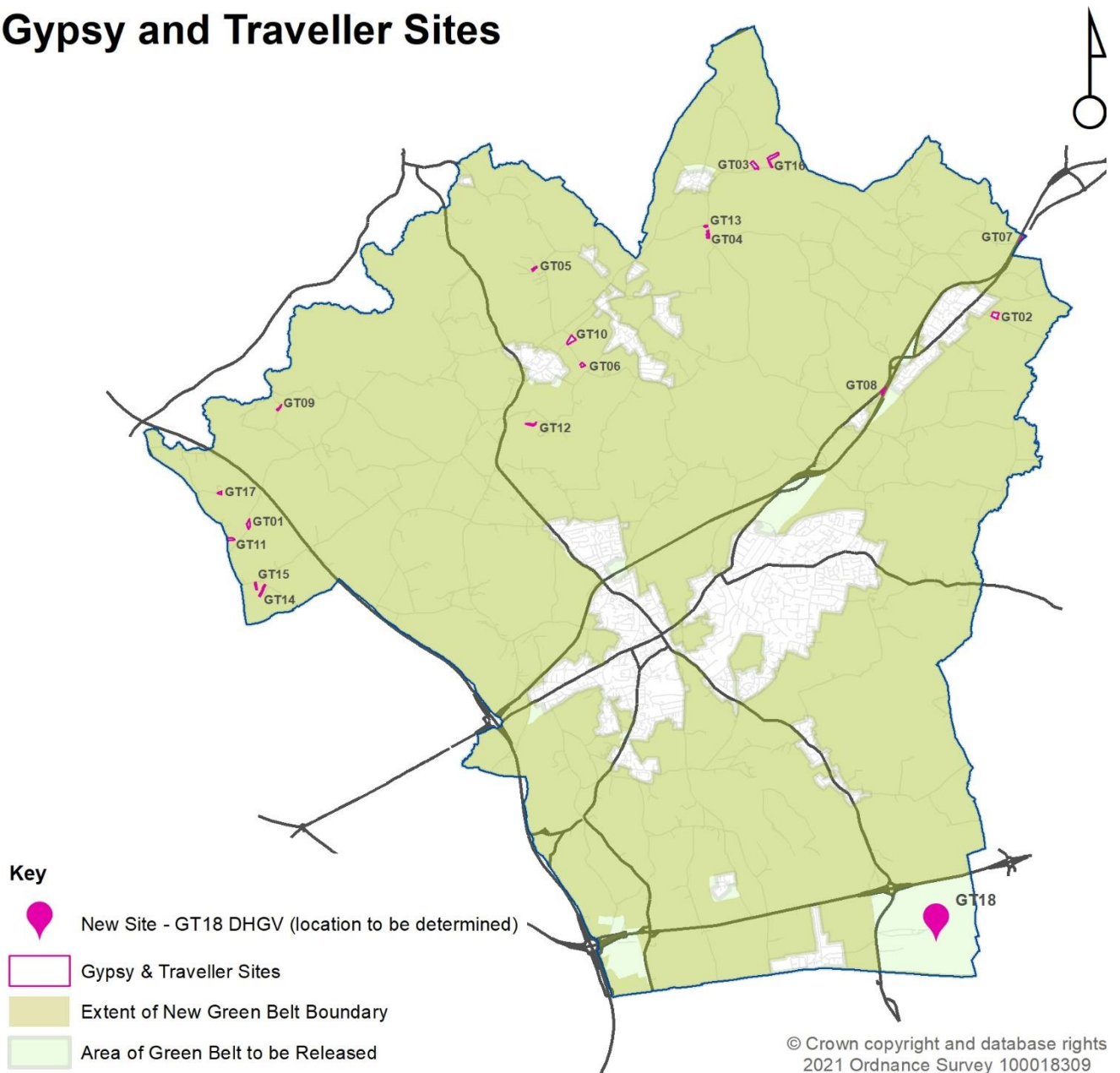
8. The two existing employment sites at Upminster Trading Park and Peri Site, Warley Street are proposed to be added to the Policies Map. This reflects Strategic Policy PC01: Safeguarding Employment Land as set out in MM58 of the Schedule of Potential Main Modifications.



# Green Belt boundary changes relating to Gypsy and Traveller site allocations

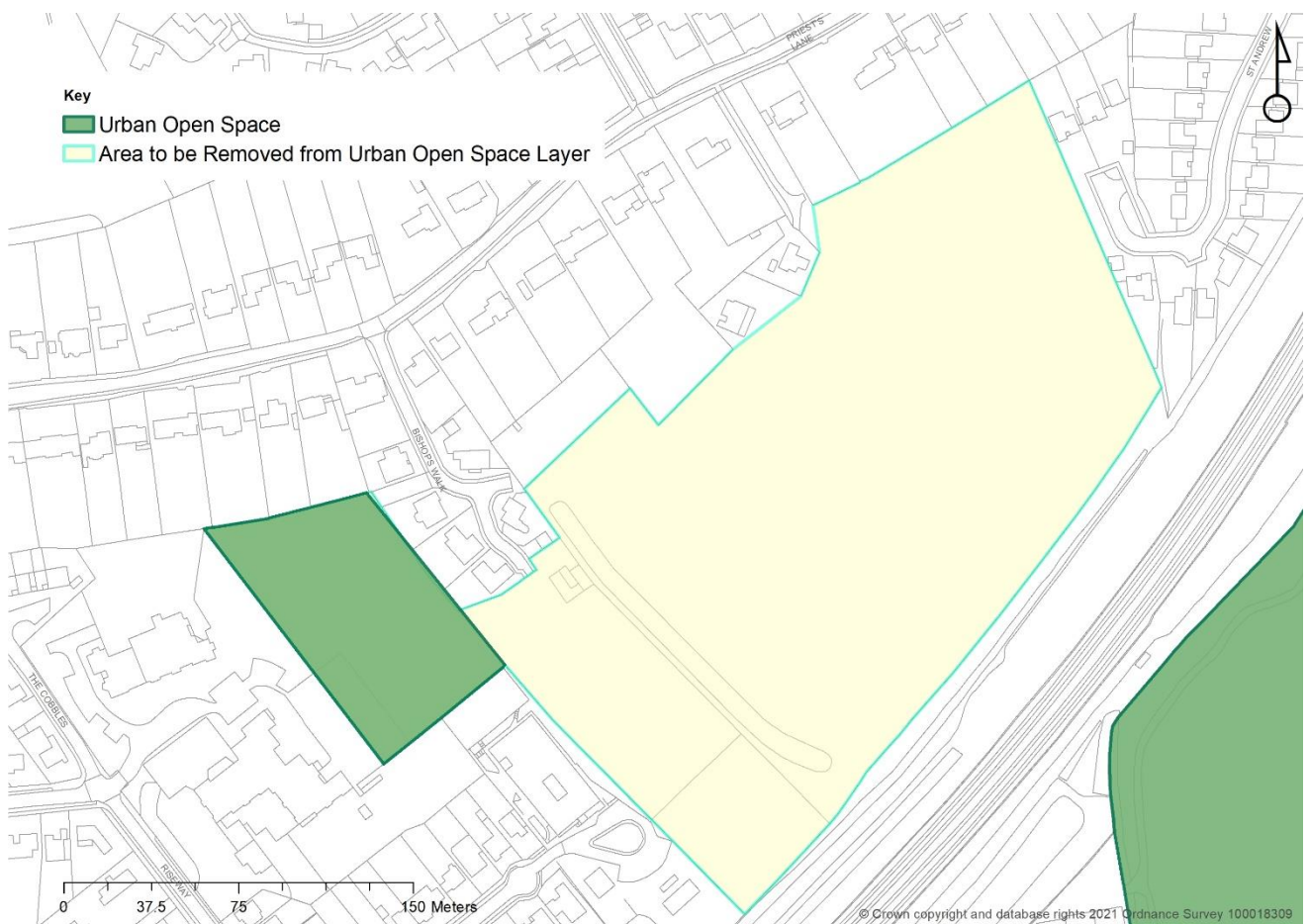
9. The Gypsy and Traveller site allocation boundaries remain unchanged; however they are now proposed be removed from the Green Belt on the Policies Map. This reflects Policy HP07: Provision for Gypsies and Travellers, Policy HP08: Safeguarding Permitted Sites and paragraph 6.77 as set out in MM41, MM42 and MM43 respectively of the Schedule of Potential Main Modifications.

## Gypsy and Traveller Sites



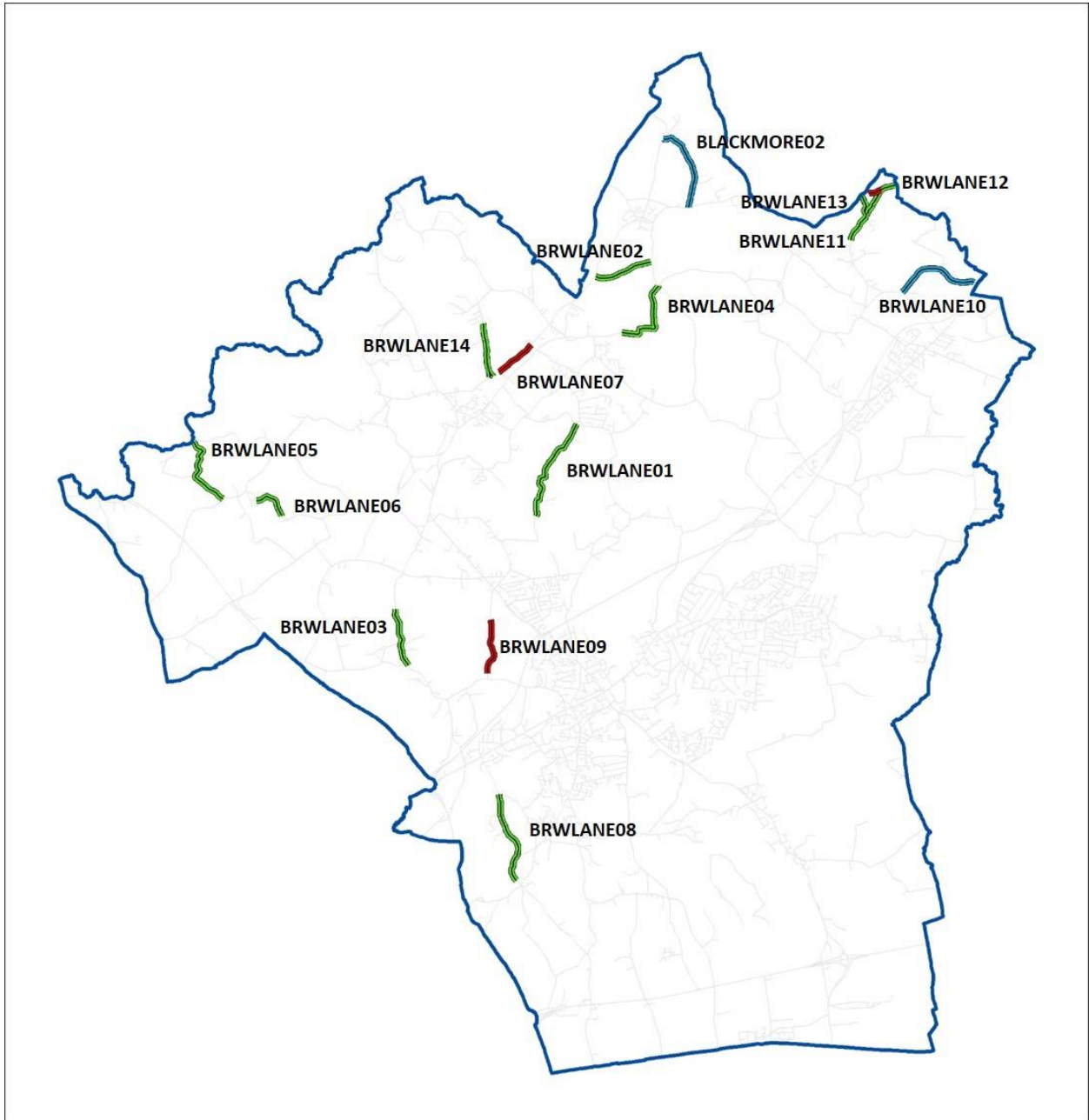
## Urban Open Space

- Urban Open Space (previously identified as Protected Urban Open Space) is proposed to be amended in one location on the Policies Map. The change relates to land at Priests Lane, which has been allocated for residential-led development as per Policy R19 Land at Priests Lane, Shenfield. In addition allotments are now proposed to be shown separately of Urban Open Space. This reflects Policy NE05: Open Space and Recreational Facilities as set out in MM33 of the Schedule of Potential Main Modifications.



# Protected Lanes

11. Protected Lanes are proposed to be amended on the Policies Map as set out below. This reflects Policy BE16: Conservation and Enhancement of Historic Environment as set out in MM51 of the Schedule of Potential Main Modifications.



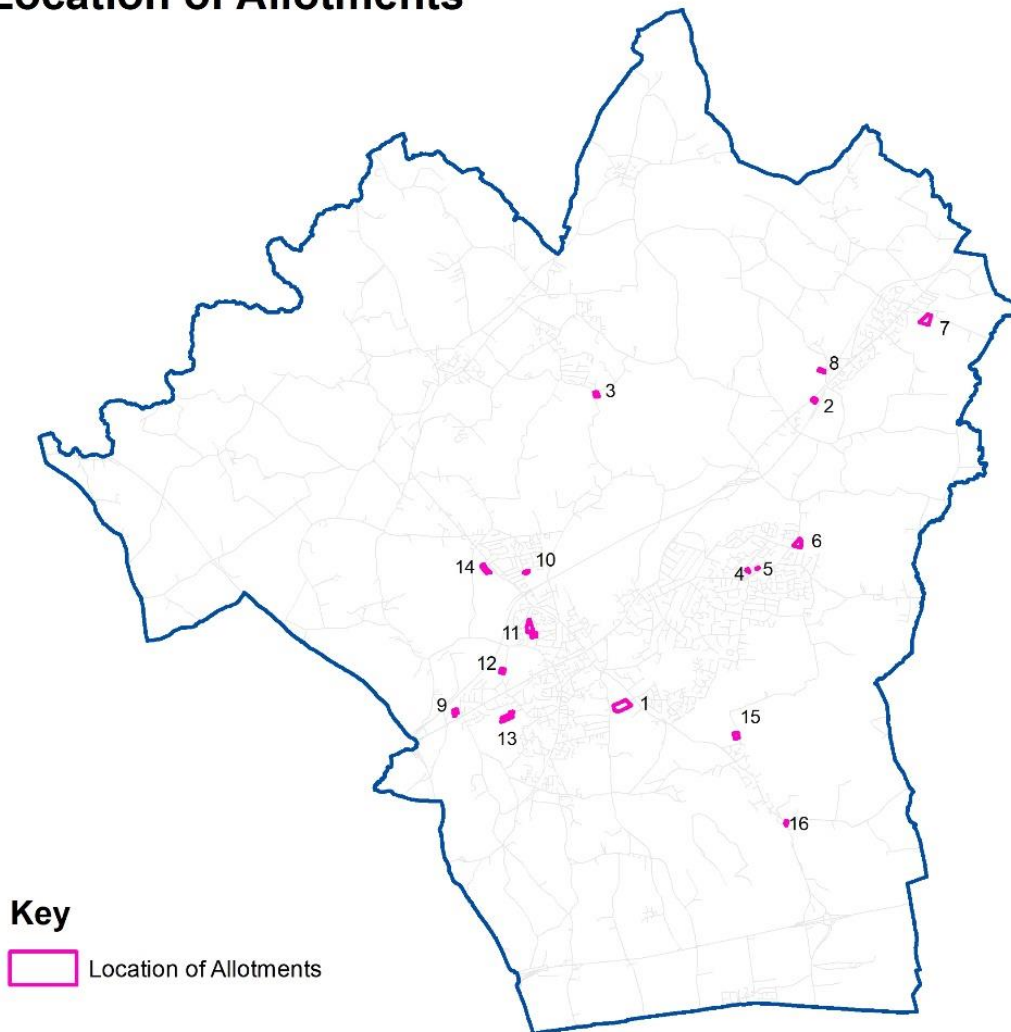
Brentwood Protected Lanes Changes

 Added  Removed  Original Protected Lanes

# Allotments

12. Allotments are proposed to be added to the Policies Map to reflect Policy NE06: Allotments and Community Food Growing Space as set out in MM31 of the Schedule of Potential Main Modifications.

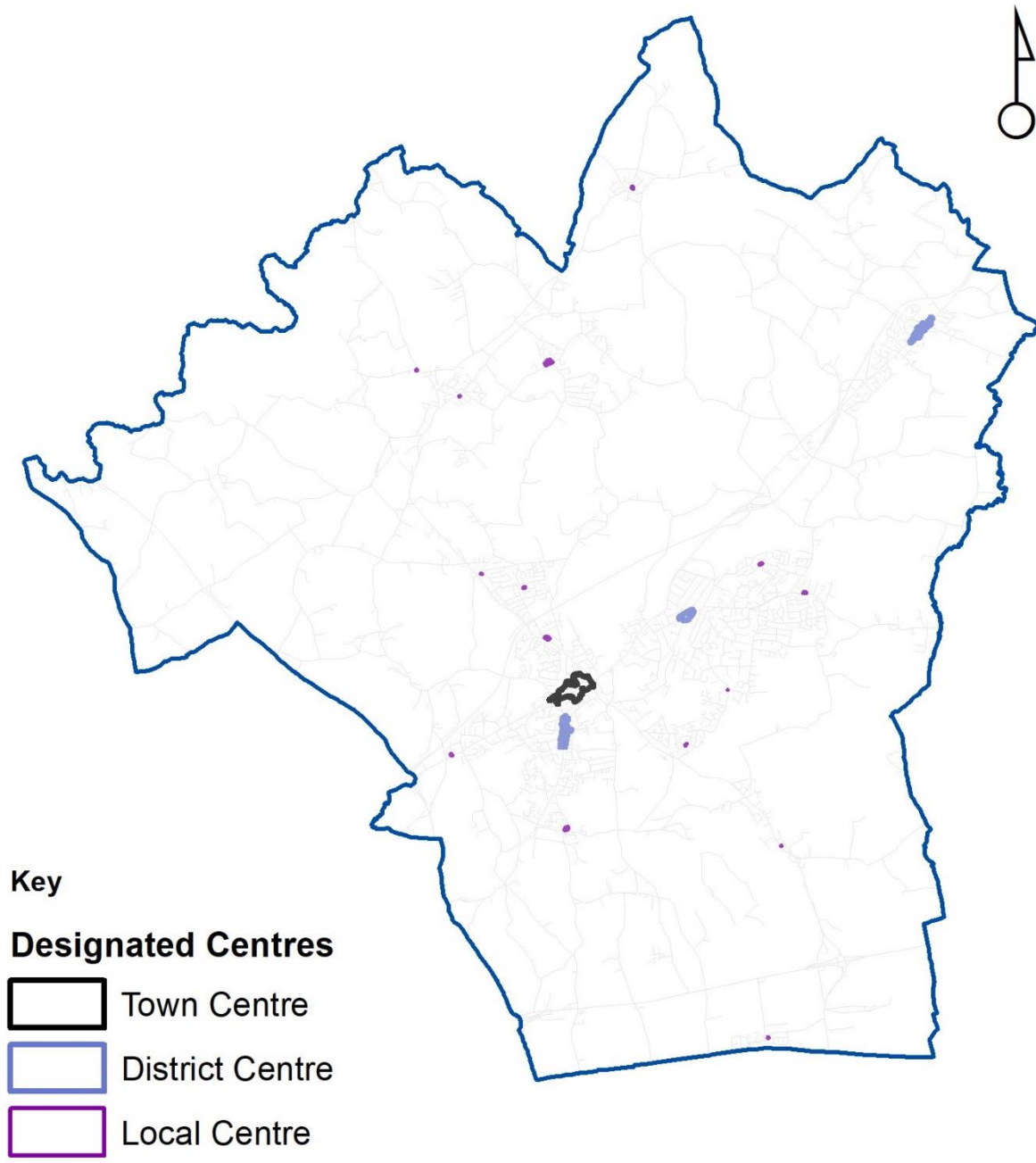
## Location of Allotments



ID	Site_Name	Status
1	Hartswood Allotments	Statutory Allotment
2	Roman Road Allotments	
3	Mountnessing Lane Allotments	
4	Fielding Way Allotments	Statutory Allotment
5	Birkbeck Road allotments	Statutory Allotment
6	Wash Road Allotments	
7	Stock Lane Allotments	
8	Roman Road allotments	
9	River Road Allotments	Statutory Allotment
10	Bishops Hall Road Allotments	Statutory Allotment
11	Park Road Allotments	Statutory Allotment
12	HoneyPot Lane Allotments	Statutory Allotment
13	Crescent Road Allotments	Statutory Allotment
14	Ongar Road Allotments	Statutory Allotment
15	Middle Road allotments	Statutory Allotment
16	Rectory Lane Allotments	

# Designated Centres

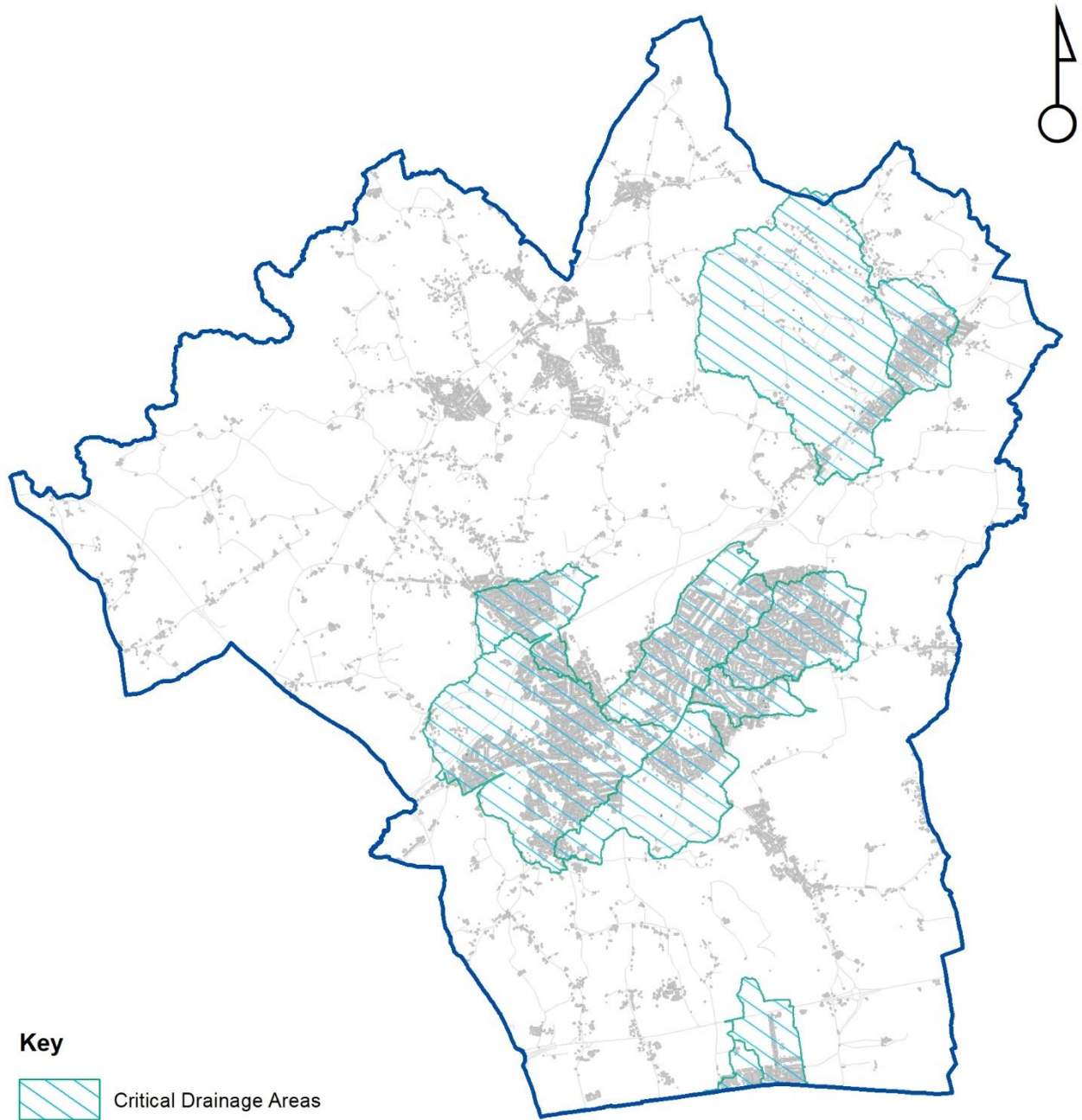
13. Designated centres are propose to be added to the Policies Map to reflect Strategic Policy PC04: Retail Hierarchy of Designated Centres as set out in MM63 of the Schedule of Potential Main Modifications.





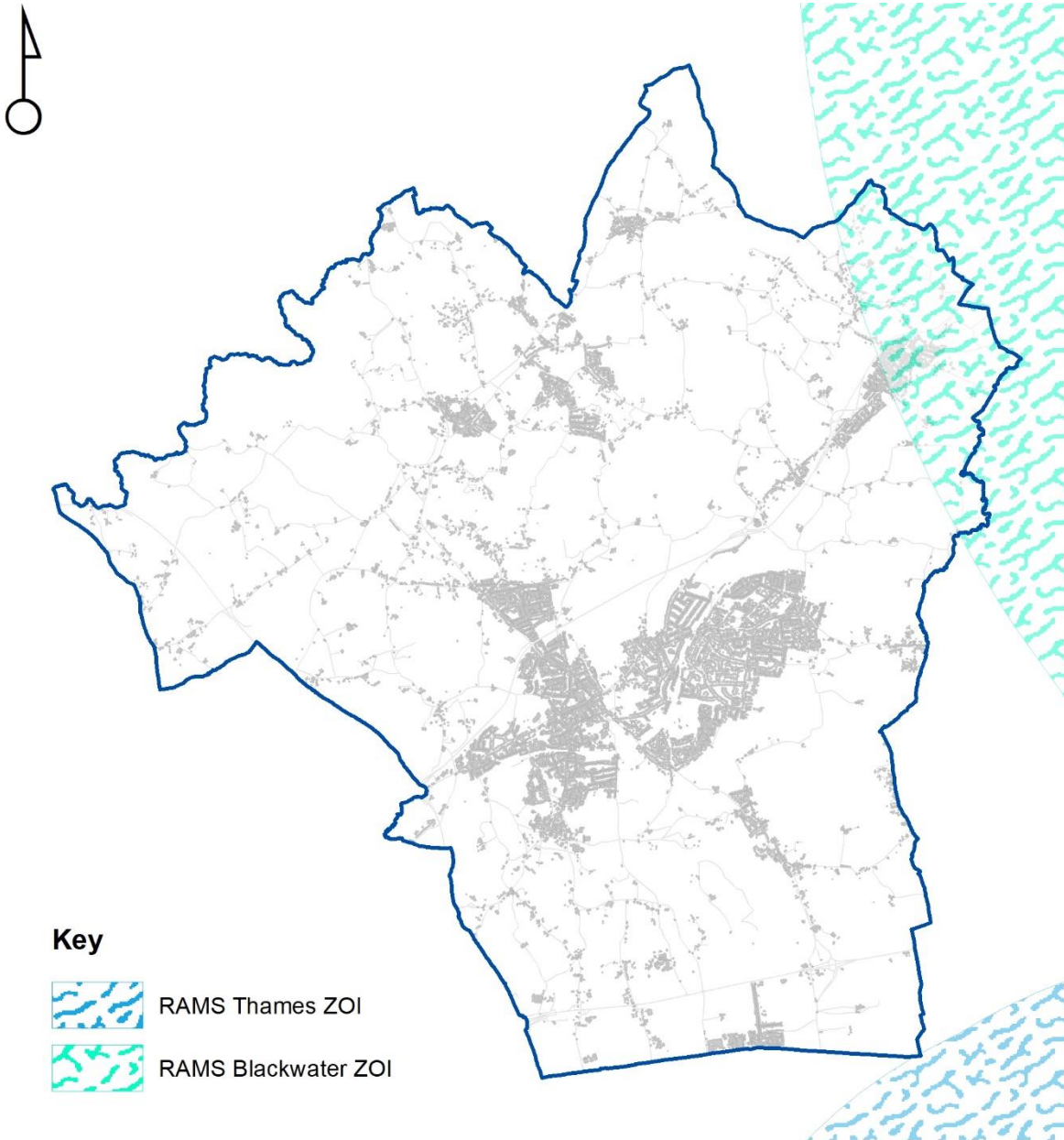
## Critical Drainage Areas

14. The updated Critical Drainage Areas (CDA) are proposed to be included in the Policies Map to reflect Strategic Policy NE09: Flood Risk as set out in MM78 of the Schedule of Potential Main Modifications.



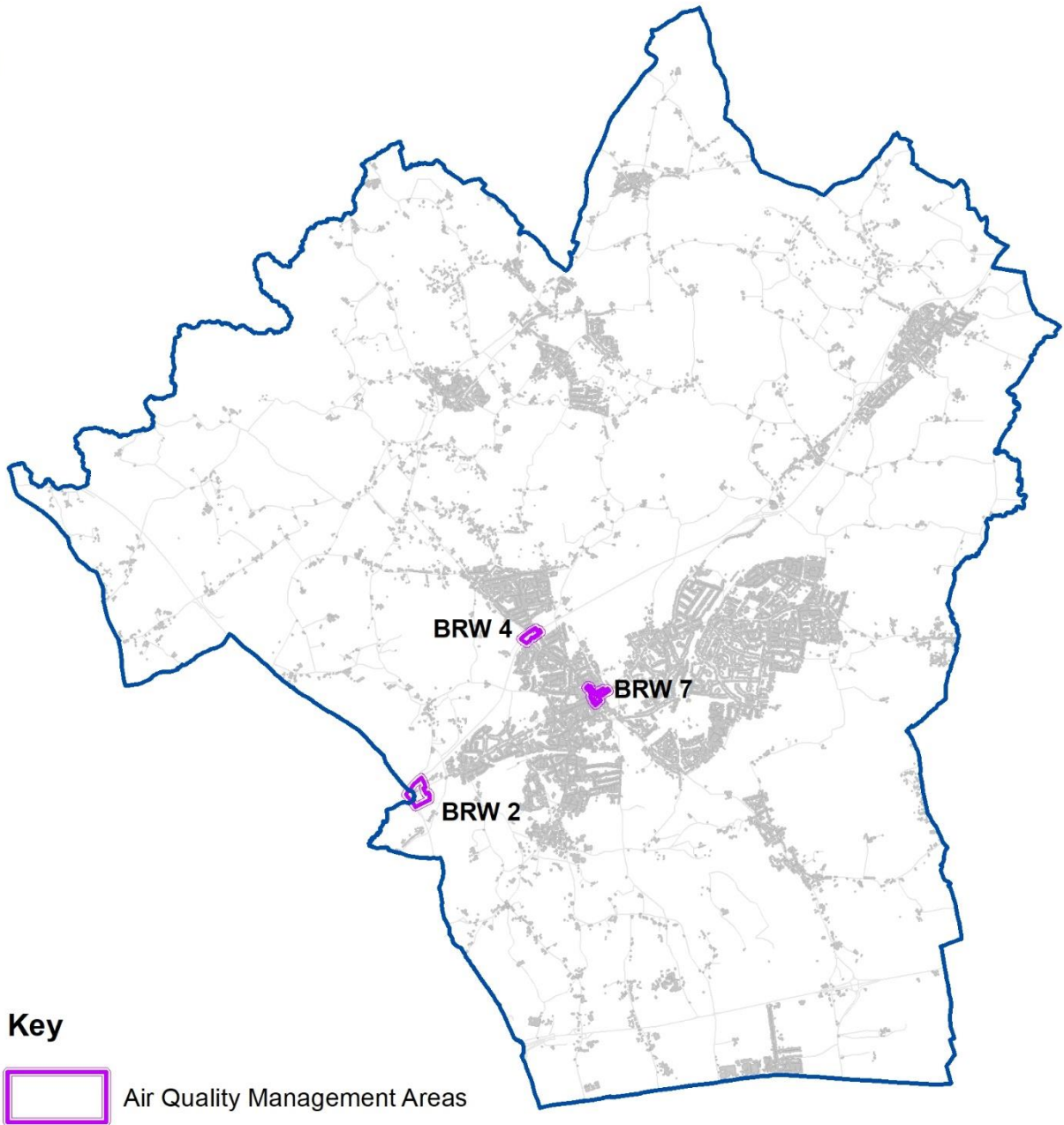
# RAMS

15. The Recreational Avoidance Mitigation Scheme (RAMS) is proposed to be added to the Policies Map to reflect Strategic Policy NE01: Protecting and Enhancing the Natural Environment as set out in MM74 of the Schedule of Potential Main Modifications.



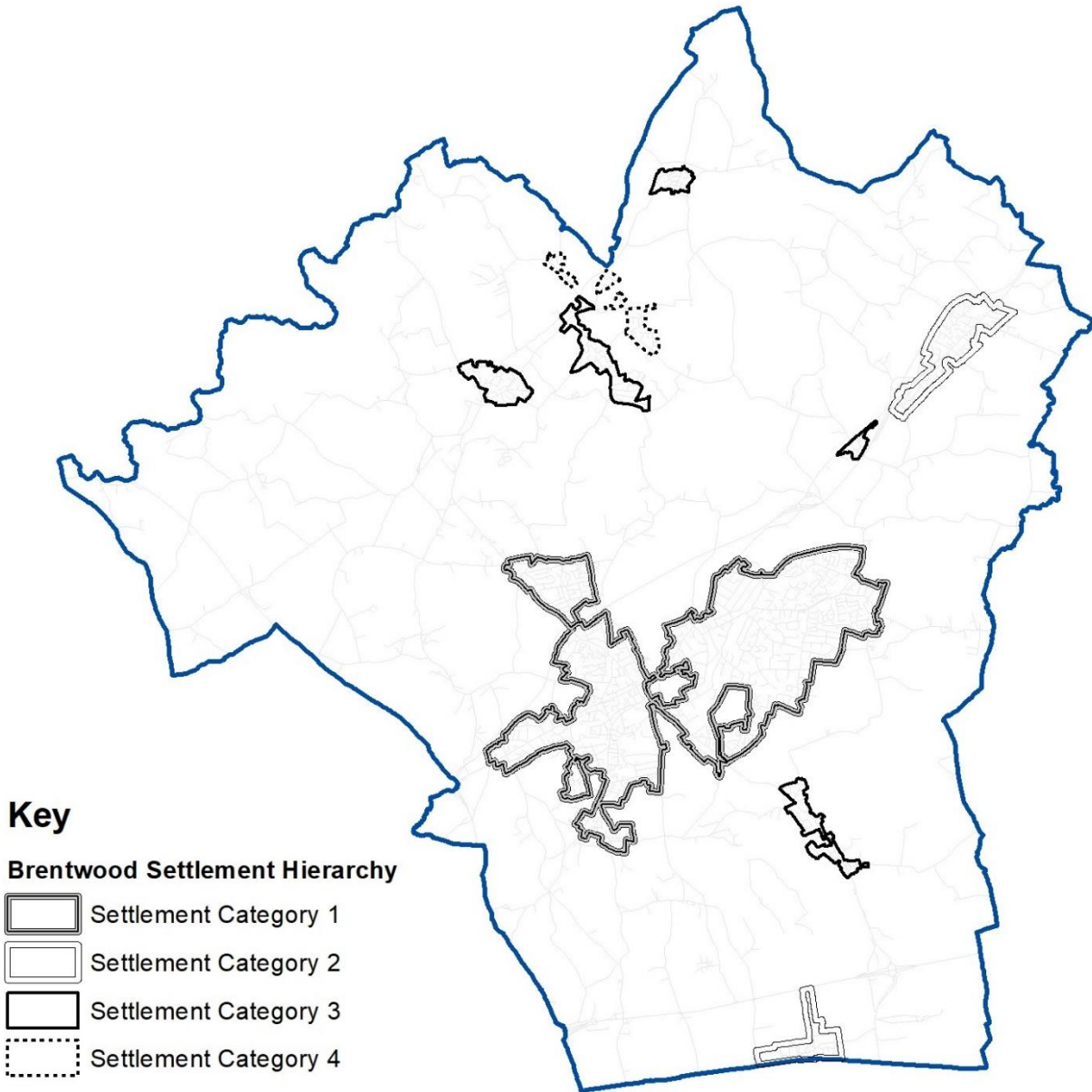
## Air Quality Management Areas

16. Air Quality Management Areas (AQMAs) are proposed to be added to the Policies Map to reflect Policy NE08: Air Quality as set out in MM77 of the Schedule of Potential Main Modifications.



# Settlement Hierarchy

17. The settlement hierarchy is proposed to be added to the Policies Map to reflect Policy MG03: Settlement Hierarchy as set out in MM5 of the Schedule of Potential Main Modifications.










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# Brentwood Borough Council Policies Map Local Plan 2016-2033

## KEY





### General

-  Brentwood Borough Boundary
- Brentwood Settlement Hierarchy [MG03]**
-  Settlement Category 1
-  Settlement Category 2
-  Settlement Category 3
-  Settlement Category 4


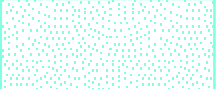





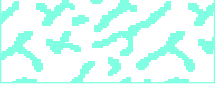

### Green Belt

-  Green Belt Boundary


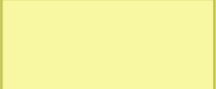
### Heritage & Conservation

-  Protected Lanes [BE16]
-  Scheduled Ancient Monuments [BE16]
-  Conservation Areas [BE16]
-  Registered Parks & Gardens [BE16]




### Natural Heritage Assets

-  Local Wildlife Sites [NE01]
-  Local Nature Reserve [NE01]
-  Ancient Woodlands [NE01, NE03]
-  SSSI [NE01]
-  Writtle Ancient Landscape [NE01]
-  Thames Chase Community Forest [NE04]
-  RAMS Thames ZOI [NE01]
-  RAMS Blackwater ZOI [NE01]
-  RAMS Epping Forest ZOI [NE01]




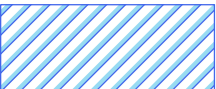
### Social Infrastructure

-  Community Facilities [PC10]
-  Education Facilities [PC11]

### Open Space & Recreation

-  Urban Open Space [NE05]
-  Allotments [NE06]
-  Country Parks [NE02; NE05]



### Environment

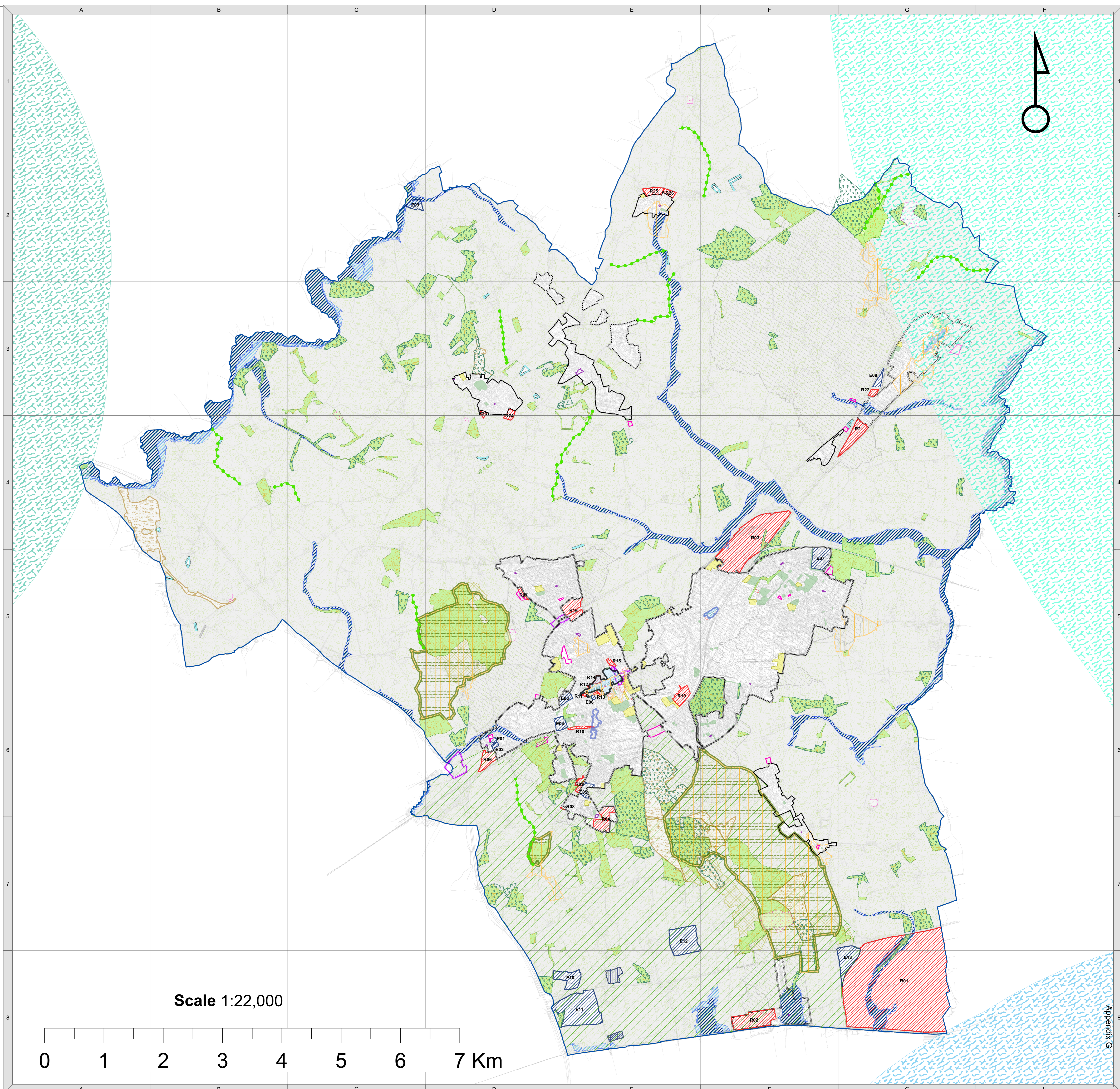
-  AQMA [NE08]
-  Critical Drainage Area [BE05; NE09]
-  Flood Zone 3 [NE09]
-  Flood Zone 2 [NE09]

### Retail & Employment

-  Primary Shopping Area [PC07]
-  Employment Site Allocations [MG01; PC01]
-  Existing Employment Sites [PC01]
- Designated Centres [PC04]**
-  Town Centre
-  District Centre
-  Local Centre

### Residential

-  Residential-Led Site Allocations [MG01]
-  Gypsy & Traveller Site Allocations [MG01; HP07; HP08]



Scale 1:22,000

0 1 2 3 4 5 6 7 Km



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All efforts undertaken to ensure currency and accuracy of spatial data at the time of printing. Information can not be guaranteed beyond this date.  
This map should be read in conjunction with the Brentwood Local Plan (2016-2033).  
The most relevant policy reference number is indicated in the key.  
Brentwood Borough Council, Town Hall, Ingrave Road, Brentwood, CM15 8AY  
Published: March 2022

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## **BRENTWOOD BOROUGH COUNCIL ADOPTION STATEMENT**

**Notice of the adoption of the Brentwood Local Plan 2016 – 2033**

**in accordance with**

**The Planning and Compulsory Purchase Act 2004 (as amended)**

**The Town and County Planning Act (Local Planning) (England) Regulations  
2012 (as amended)**

Notice is hereby given that (in accordance with above-mentioned legislation) Brentwood Borough Council formally adopted the Brentwood Local Plan 2016-2033 on 23 March 2022.

The Brentwood Local Plan 2016-2033 guides growth and development across Brentwood Borough to 2033. It identifies locations to deliver local housing needs and supporting infrastructure, such as employment, retail, leisure, community, education, and transport, as well as identifying areas for protection. It contains strategic policies, non-strategic development management policies and site allocations.

The Brentwood Local Plan 2016-2033 was the subject of an independent examination conducted by Yvonne Wright BSc (Hons) Dip TP DMS MSc MRTPI and Mike Worden BA (Hons) Dip TP MRTPI, Inspectors appointed by the Secretary of State for Levelling Up, Housing and Communities. The examination commenced on 14 February 2020 and ran until 23 February 2022 and included public hearing sessions.

In the Inspectors Report published on 23 February 2022, the Inspectors' confirmed, subject to a number of main modifications, that the Brentwood Local Plan 2016-2033 is sound, legally compliant and capable of adoption. The recommended main modifications along with additional and consequential minor modifications, have been included in the adopted Brentwood Local Plan 2016-2033, which now carries full weight in the consideration of planning applications and replaces the Brentwood Replacement Local Plan, August 2005 (Saved Policies, August 2008).

Any person aggrieved by the Brentwood Local Plan 2016-2033 may, with the leave of the High Court, make an application to the High Court under Section 113(3) of the Planning and Compulsory Purchase Act 2004 on the grounds that:

- I. the Brentwood Local Plan 2016-2033 is not within the appropriate power conferred by Part 2 of the Planning and Compulsory Purchase Act 2004; and/or
- II. a procedural requirement (as defined within Section 113 (10) of the Planning and Compulsory Purchase Act 2004) has not been complied with.

**Any such application to the High Court must be made not later than the end of the period of six weeks beginning with the day after the date on which the Brentwood Local Plan 2016-2033 was adopted (i.e. six weeks from 24 March 2022 – being the day after adoption).**

In accordance with Regulations 26 and 35 of the 2012 Regulations the following documents have been made available:

- the Brentwood Local Plan 2016-2033 including accompanying Policies Map;
- this Adoption Statement;
- the final Sustainability Appraisal Report and Sustainability Appraisal Adoption Statement;

These documents can be viewed on the Council’s website at

[www.brentwood.gov.uk/localplan](http://www.brentwood.gov.uk/localplan).

Paper copies of these documents are available for public inspection at Brentwood Borough Council Offices - Town Hall, Ingrave Road, Essex, CM15 8AY (Weekdays 9am to 4pm), and at the library locations listed below:

Brentwood Library, New Road, CM14 4BP	9am to 5.30pm Mon, Wed, Thur, Fri; 9am to 7pm Tue; 9am to 5pm Sat
Ingatestone Library, High Street, CM4 9EU	2pm to 7pm Mon; 9am to 1pm Wed; 9am to 5pm Sat
Shenfield Library, Hutton Road, CM15 8NJ	9am to 5:30pm Mon, Tue, Wed, Fri; 9am to 5pm Sat

A copy of this Adoption Statement will be sent to all parties who have asked to be notified of the adoption of the Local Plan and to the Secretary of State for Levelling Up, Housing and Communities.

For further information please refer to the Council’s website

[www.brentwood.gov.uk/localplan](http://www.brentwood.gov.uk/localplan) or contact the Planning Policy Team by email at [planning.policy@brentwood.gov.uk](mailto:planning.policy@brentwood.gov.uk) or by telephone on 01277 312 500

**Phil Drane**



**Corporate Director – Planning & Economy  
23 March 2022**

# Sustainability Appraisal (SA) of the Brentwood Local Plan

SA Adoption Statement

March 2022

REVISION SCHEDULE					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	Feb 2022	SA Statement published alongside the adopted version of the Local Plan	Mark Fessey Associate Director	Steve Smith Technical Director	Steve Smith Technical Director

**Limitations**

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AECOM Ltd.  
2 Leman Street, London E1 8FA

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## 1 INTRODUCTION

### Background

- 1.1.1 Brentwood Borough Council submitted the Brentwood Local Plan to the Secretary of State for Housing, Communities and Local Government (now Levelling Up, Homes and Communities) on 14<sup>th</sup> February 2020 for examination by the Planning Inspectorate.
- 1.1.2 The appointed Planning Inspectors issued their final report to the Council on 23<sup>rd</sup> February 2022, finding the Plan 'sound' subject to main modifications. The next stage will be for the Council to formally adopt the Local Plan.
- 1.1.3 A parallel process of Sustainability Appraisal (SA) was undertaken alongside plan-making. SA is a mechanism for considering and communicating the likely effects of an emerging plan, and reasonable alternatives, with a view minimising negative impacts and maximising positives.

### SA explained

- 1.1.4 It is a requirement that SA involves a series of procedural steps. The final step in the SA process involves preparing a 'statement' at the time of plan adoption. This SA Statement presents:
- 1) The 'story' of plan-making / SA up to the point of adoption.  
Specifically, there is requirement<sup>1</sup> to: *"summaris[e] how environmental considerations have been integrated into the plan....and how the environmental report... the opinions expressed... and the results of consultations... have been taken into account... and the reasons for choosing the plan... as adopted, in the light of...reasonable alternatives..."*
  - 2) Measures decided concerning the monitoring of plan implementation.  
Specifically, there is a requirement to explain *"the measures... to be taken to monitor the significant environmental effects of the implementation of the plan or programme."*

### This SA Statement

- 1.1.5 This is the Local Plan SA Statement. It considers **(1)** and **(2)** in turn, and then concludes by presenting a checklist aimed at demonstrating a legally compliant SA process.

## 2 THE PLAN-MAKING / SA 'STORY'

### 2.1 Introduction

- 2.1.1 Key stages in the plan-making / SA process were as follows:
- 1) Issues and Options consultation **2009**
  - 2) Preferred Options consultation **2013**
  - 3) Strategic Growth Options consultation **2015**
  - 4) Draft Plan consultation **2016**
  - 5) Preferred Allocations consultation **2018**
  - 6) Publication **2019**
  - 7) Focused Changes consultation **2019**
  - 8) Potential Main Modifications consultation **2021**
  - 9) Inspectors' report **2022**

<sup>1</sup> Regulation 16 of the Environmental Assessment of Plans and Programmes (SEA) Regulations.

## 2.2 Issues and Options consultation 2009

- 2.2.1 The primary focus of the first Interim SA (ISA) Report was an appraisal of the following spatial strategy alternatives: 1) Centralised growth; 2) Transport corridor-led growth; 3) Semi-dispersed growth; and 4) Dispersed growth.
- 2.2.2 The alternatives that were a focus of appraisal and consultation at this stage were in the form of conceptual spatial approaches, which contrasts to later stages of the plan-making / SA process. The alternatives were mapped across pages 17 to 20 of the ISA Report.
- 2.2.3 The appraisal conclusion (pages 23 and 24) served to highlight numerous arguments in support of Option 2 (it was found to perform relatively well, or on a par with other options, in respect of all SA objectives bar one) and very limited arguments in support of Option 4 (it was found to perform relatively well in terms of only one SA objective).

## 2.3 Preferred Options consultation 2013

- 2.3.1 The second ISA Report presented an appraisal of:
- Spatial strategy alternatives – the Council's preferred option at the time (Option 1) was appraised alongside the same four options previously appraised at the Issues and Options stage (Options 2 to 5). The appraisal (Section 16) found there to be limited arguments in support of the two 'dispersal' options (Options 4 and 5), but highlighted a more nuanced picture in respect of Options 1 to 3, with all options associated with pros and cons.
  - Housing quanta alternatives – the preferred option at the time, which involved providing for 170 new dwellings per annum (dpa), was appraised against two higher growth options. The alternatives were not spatially defined, which limited the potential to draw meaningful conclusions. However, the appraisal served to highlight higher growth options as preferable in socio-economic terms, but more problematic in environmental terms.
  - Site options – the report presented an appraisal of 48 site options, with the aim being to highlight options standing-out as performing notably well, or notably poorly, in respect of each of the SA objectives in turn.

## 2.4 Strategic Growth Options consultation 2015

- 2.4.1 The primary focus of the ISA Report at this stage was to provide an appraisal of five competing spatial strategy alternatives: 1) focus new development at Dunton Hills; 2) focus at West Horndon; 3) focus at south-east of Brentwood/Shenfield; 4) focus at Pilgrims Hatch; and 5) dispersal across smaller urban extensions at Brentwood, Hutton, Pilgrims Hatch, Shenfield and Warley. These alternatives were explained in Section 11 and Appendix III of the ISA Report.
- 2.4.2 The appraisal served to highlight a nuanced picture, with all options being associated with pros and cons. For example, the appraisal found 'Dunton' to perform relatively well in terms of five objectives, but relatively poorly in terms of four (heritage, flood risk, landscape and soils).

### Dunton Hills Garden Suburb consultation 2015

- 2.4.3 This consultation was run concurrently with the Strategic Growth Options consultation above. It was a joint consultation with Basildon Borough Council.
- 2.4.4 The ISA Report, prepared by Basildon's SA consultants (LUC), focused on appraising the emerging proposals only, and did not present an appraisal of alternatives. The appraisal concluded the likelihood of significant positive effects in terms of: Prosperity, economic growth and regeneration (given location and the potential to deliver employment land); Town centres (given proximity to local centres at Laindon and Great Berry); and Housing (given the potential for a good mix of housing, including affordable housing). The appraisal concluded the likelihood of significant negative effects in terms of: Landscape (given the low capacity of the landscape to accommodate change); Cultural heritage (given that the eastern part of the area sits within an area of sensitivity); Biodiversity (given onsite and nearby habitats); Efficiency of land use (given the greenfield nature of the site); and Flood risk (given onsite issues).

## 2.5 Draft Plan consultation 2016

2.5.1 The ISA Report prepared at this stage aimed to present all of the information legally required of the SA Report, and was presented in a series of 'parts' accordingly.

### Part 1 of the report

2.5.2 The aim was to explain the process of exploring spatial strategy reasonable alternatives (RAs). Specifically:

- Section 6 explained the process of arriving at RAs;
- Section 7 presented an appraisal of the RAs; and
- Section 8 presented the Council's response to the appraisal.

2.5.3 Sub-section 6.2 notably explained the 'context and background' to the establishment of RAs in 2016, with reference to preceding stages of plan-making / SA, including consultation responses received. Importantly, the RAs ultimately arrived-at were *site-specific*.

2.5.4 The appraisal (Section 7) served to highlight the Council's preferred option at the time (Option 1) as performing relatively well in a number of respects, but also being associated with drawbacks, perhaps most notably in respect of biodiversity, landscape and soils.

2.5.5 The Council responded (Section 8), acknowledging "*the complexity and challenges raised by the Sustainability Appraisal, and anticipates further investigation of these matters including through the on-going commissioning and publication of evidence. The Draft Local Plan consultation will enable further comments on the development of the Plan and the identified sites, which will be used to inform the next iteration of the Plan.*"

### Part 2 of the report

2.5.6 The appraisal was presented as a series of narrative discussions under the SA objectives (the 'SA framework'), with a final section drawing conclusions and presenting recommendations.

## 2.6 Preferred Allocations consultation 2018

2.6.1 The ISA Report prepared at this stage was structured as per the previous report.

### Part 1 of the report

2.6.2 Section 6 presented the findings of a step-wise process to arrive at spatial strategy RAs, which was summarised in a flow diagram (Figure 6.1). Section 6.4 notably explained work completed to appraise all site options in isolation, using a GIS-based methodology (N.B. similar analysis was also reported in Appendix II of the 2016 ISA Report); and Section 6.5 notably examined competing site options at Brentwood/Shenfield.

2.6.3 The appraisal (Section 7) found the Council's preferred option at the time (Option 3) to perform well, or relatively well, in terms of a number of objectives, but highlighted drawbacks in terms of biodiversity, landscape and housing. Option 1 (low growth) was found to perform best from a landscape perspective, but with drawbacks from a housing perspective. The high growth options (Options 9 and 10) performed very well from a housing perspective, but with drawbacks in respect of a number of environmental issues/objectives, most notably air quality.

2.6.4 The Council responded in detail (Section 8) explaining the potential to put in place measures to address (i.e. avoid or mitigate) the drawbacks associated with the preferred spatial strategy.

### Part 2 of the report

2.6.5 The appraisal was again presented as a series of narrative discussions under the SA framework. The appraisal concluded significant positive effects in respect of Housing and the Economy; significant negative effects in respect of Landscape and Soils; uncertain effects in respect of Community and wellbeing and Water; and minor concerns in respect of several other objectives.



## 2.7 Publication 2019

2.7.1 The SA Report was published alongside the Pre-submission Local Plan in February 2019, presenting the information required by Regulation 12 and Schedule 2 of the SEA Regulation).

### Part 1 of the report

2.7.2 Section 5 presented the findings of a step-wise process to arrive at spatial strategy RAs, which was summarised in a flow diagram (Figure 5.1). In summary:

- High level issues/options – Section 5.2 presented a discussion of alternative housing **growth quanta** options and **broad distribution** options, drawing upon evidence from Regulation 18.
- Strategic site options – Section 5.3 introduced the **strategic site options** previously considered over the course of the Regulation 18 stage, highlighted two further potential strategic site options (para 5.3.5) and also presented a brief discussion of areas of search for other strategic site options (para 5.3.7).
- Site options – Section 5.4 explained work completed to examine **site options** in isolation (regardless of whether ‘strategic’ or ‘non-strategic’). Paragraph 5.4.2 explained a focus on those site options found to be ‘deliverable or developable’ through the Council’s Housing and Economic Land Availability Assessment (HELAA).
- Sub-area alternatives – Section 5.5 drew upon the preceding ‘top down’ and ‘bottom up’ analysis to identify and informally examine alternative approaches to growth at **four sub-areas** in turn, with a view to identifying options to progress to the final stage of the process.
- Spatial strategy RAs – Section 6.6 collated the sub-area options (see Table 5.4) and then explored means of packaging these up into spatial strategy RAs for **the Borough as a whole**, leading to the spatial strategy RAs presented in Table 5.5 and across subsequent maps.

2.7.3 Section 6 presented the appraisal of spatial strategy RAs, finding the Council’s preferred option (Option 3) to perform relatively well in respect of a number of objectives, but with notable drawbacks in respect of landscape (lower growth options were appraised as preferable) and ‘soils’ (all RAs performed poorly, and broadly on a par).

2.7.4 The Council responded in detail (Section 7) explaining their reasons for supporting Dunton Hills Garden Village (DHGV), which is a central component of the preferred strategy, and also providing clear reasons for not supporting each of the non-preferred options (para 7.2.4). The Council’s reasons from para 7.2.4 are reproduced here – Box 1.

### *Box 1: The Council’s reasons for supporting the preferred option and rejecting alternatives (February 2019)*

**Lower growth (Options 1 and 2):** There is a need to provide for a land supply significantly in excess of the ‘2016-based’ LHN figure of 350 dpa, including the need to be mindful of the higher ‘2014-based’ LHN figure.

**Additional strategic growth at Brentwood (Options 2, 4, 5 and 7):** A primary concern is in respect of traffic congestion (also noting the two air quality management areas), with a secondary concern relating to the capacity of existing community infrastructure to absorb additional growth. All of the sites available and deliverable at the current time are subject to constraints, and are of an insufficient scale to deliver strategic infrastructure upgrades.

**West Horndon (Options 1, 4, 5, 6, 7):** The Council would favour a strategic scheme involving growth both to the East and West, but equally considers the opportunity associated with growth at West Horndon to be less than the opportunity that presents itself at DHGV, where there is the opportunity for a larger and more comprehensive scheme. The Council notes that Thurrock Council is exploring the option of developing West Horndon as a large new settlement, but concludes that this proposal is at such an early stage of formulation that it cannot be considered a constraint to delivering DHGV.

### Part 2 of the report

2.7.5 The appraisal concluded significant positive effects in respect of Housing and positive effects in respect of Climate change mitigation, Community and wellbeing and Economy/employment. However, the appraisal concluded significant negative effects in respect of Landscape and Soils and ‘notable tensions’ with objectives for Air quality, Water quality and Traffic.

## 2.8 Focused Changes consultation 2019

- 2.8.1 Two SA documents were published as part of the consultation in October 2019:
- **SA Report Addendum** - presented an appraisal of A) the Focused Changes; and B) the Pre-submission plan plus focused changes. This was a concise document presenting tailored information, i.e. it did not aim to present the information required of the SA Report.
  - **Updated SA Report** - the SA Report, as previously published alongside the Pre-submission Plan in February 2019, was updated simply to A) incorporate the implications of the Focused Changes; and B) account for a notable change in the evidence-base, namely a new higher Local Housing Need (LHN) figure for Brentwood Borough (454 dpa). The scope of the updates was explained within a box on page “i” of the report, and all updates were presented within stand-alone highlighted sections (all within Section 9 of the Report).

## 2.9 SA Report Addendum 2021

- 2.9.1 Following submission of Local Plan and supporting documentation (including the SA Report of February 2018 and its October 2018 update) a series of examination hearings were held, which led to agreement on a series of potential main modifications (henceforth ‘potential modifications’), which were then published for consultation in September 2021.
- 2.9.2 An SA Report Addendum was published, as part of the consultation, that simply presented an appraisal of the potential modifications (also ‘the submitted plan plus potential modifications’). It should be noted that the report did not present an appraisal of reasonable alternatives, for the reasons set out in Section 1.4 of the report.
- 2.9.3 The appraisal conclusions, in respect of the potential modifications, were as follows:
- **Climate change mitigation** - the proposed changes to site allocations / the housing supply trajectory do not give rise to any significant concerns, from a climate change mitigation perspective. With regards to site-specific and thematic policy, there are invariably opportunities to ‘go further’; however, it is recognised that there is a need to balance decarbonisation aspirations with development viability and a range of other considerations. A recommendation is made regarding the policy approach to planning for decentralised energy (which primarily equates to heat networks). **Neutral effects** are predicted on balance, including as there should be the potential to adjust policy through the immediate Local Plan review, if necessary.
  - **Community and wellbeing** - the proposed changes to site allocations, specifically increased densities, do give rise to tensions with ‘community and well-being’ objectives, but it is difficult to conclude that concerns are ‘significant’, when viewed from a strategic perspective. As for the proposed changes to site-specific and borough-wide thematic policies, these are strongly supported. Overall, it is appropriate to ‘flag’ **a risk of negative effects**.
  - **Economy and employment** – proposed modifications relating to transport infrastructure lead to notably **positive effects**.
  - **Flood risk** - the proposal to increase development density at Blackmore potentially gives rise to a degree of risk. However, in practice there is little reason to question the potential to appropriately address surface water flood risk through masterplanning, Sustainable Drainage Systems (SuDS) and design. At this stage it is appropriate to ‘flag’ **a risk of negative effects**.
  - **Housing** - the proposal is to plan for fewer homes, in comparison to the submission plan, but to require an immediate review of the Local Plan to boost the planned supply of housing. It is appropriate to conclude **strongly negative effects**, mindful of the representations made on this proposed approach by a number of examination participants in June 2021 (see F132 in the examination library), including the Home Builders Federation, who concluded: “Given that affordability in Brentwood is worsening with the work placed based affordability ratio increasing from 12.24 to 13.22 from 2019 to 2020 there is clearly a need for more supply earlier in the plan period to try and limit a further worsening of affordability in this area.” However, the only alternative approach would be to significantly prolong the Local Plan examination to identify sites to deliver additional supply, giving rise to a host of issues.

- **Landscape** - the proposed changes to site allocations / the housing supply trajectory give rise to mixed but overall **positive effects**, and changes to site-specific policy are supported.

## 2.10 The Inspectors' Report 2022

2.10.1 The Inspectors' Report was published on 25<sup>th</sup> February 2022, setting out conclusions on the main modifications necessary to enable the plan to be adopted, and reasons for finding the plan, as modified, to be 'sound', having regard to the tests of soundness set out in the NPPF.

2.10.2 The Inspectors' Report discusses many of the same issues that have been a focus of the SA process, over the years. For example:

- The housing requirement – *“Policy SP02 of the Plan identifies the housing requirement as 7,752 net new homes to be provided during the Plan period. This reflects the identified housing need and is therefore justified.”*
- Housing supply trajectory – *“Overall, [there is] an updated housing land supply figure for the Plan period of 7,146 new dwellings. Accordingly, the Plan is not able to meet the identified housing requirement of 7,752 new dwellings, resulting in a shortfall of 606 dwellings over the Plan period... It is imperative that there is a Plan in place to enable housing to come forward now, including the removal of land from the Green Belt to facilitate this, otherwise there would be a significant shortage of housing land supply in the Borough, due to limited opportunities outside the Green Belt... Furthermore... an immediate review of the Plan needs to be carried out, with the objective of meeting in full the identified housing needs...”*
- Broad spatial strategy – *“Overall, we are satisfied that the spatial strategy makes effective use of the Borough's assets and opportunities, aligns with the overarching strategic aims and objectives and provides a suitable framework to achieve sustainable development.”*
- Site selection – *“[Sites] in the HELAA have been assessed against a number of reasonable criteria to establish site suitability, availability and achievability... Following this the findings of the Green Belt Study 2018 and SA assisted the selection of sequentially preferable sites.”*
- Dunton Hills Garden Village –
  - *“We acknowledge that the amount of housing development planned for this location is substantial and that concerns about the loss of Green Belt and other impacts on the locality, including the effect on the local and strategic road networks have been raised. However, the proposal seeks to deliver a development using sustainable Garden Community principles. We consider that this and the elements highlighted above will assist in the proposal contributing towards mitigating, as far as possible, its moderate to high impact on the purposes of the Green Belt.”*
  - *We have carefully considered the anticipated timescale for the delivery of Dunton Hills Garden Village within the Plan period. The trajectory in the Plan shows housing being delivered from 2022/23, which is clearly not achievable...”*
  - *“The deletion of the policy and replacement with succinct design requirements to be delivered through a masterplanning process, provides necessary clarity, justification and effectiveness and ensures the policy is consistent with national policy.”*
- Land at Priests Lane, Shenfield – *“In order to make effective use of land and accord with national policy, the density of the site should be increased to that set out in the Pre-Submission version of the Plan.”*
- Adjacent sites at Blackmore – *“Development of the sites would encroach into the countryside, but this would be limited in extent. The sites would appear as modest extensions to the village. They are relatively well contained with defensible boundaries. Furthermore, the policies require the provision of good pedestrian and cycling connections and public open space. The development of the two sites would contribute to meeting local housing need and support the existing local services...”*
- Affordable housing – *“Policy HP05 seeks 35% of dwellings to be provided as affordable... This is a higher percentage than the 30.6% requirement set out in the SHMA, in recognition that not all sites will deliver affordable housing... This is an appropriate response, which will assist in meeting the identified needs... The required tenure mixes in the policy are based on the SHMA evidence...”*

- Gypsy and traveller pitches within DHGV – *“The siting of 5 pitches within the Garden Village is being considered through the ongoing site masterplanning process. This approach will ensure that the pitches are integrated... to support inclusive communities...”*
- Gypsy and traveller pitches elsewhere – *“MM41... merges Policies HP07 and HP08 to form one cohesive policy (Policy HP07) that allocates the three gypsy and traveller sites within the Plan and removes them from the Green Belt.”*
- Development management policy – including in respect of biodiversity net gain, built environment decarbonisation and air quality.

### 3 MEASURES DECIDED CONCERNING MONITORING

3.1.1 Section 12 of the SA Report (2019) stated broad support for the Council’s proposed Local Plan monitoring framework, on the basis that proposed indicators cover the great majority of issues/impacts highlighted through appraisal, but also made a number of [recommendations](#) in respect of potential adjustments to the monitoring framework.

3.1.2 Subsequently, at the potential main modifications stage, MM117 dealt with changes to the monitoring framework. The SA Report Addendum (2021) explained:

*“There is a notable increased focus on site allocation-specific monitoring indicators, with a particular aim of ensuring close monitoring of affordable housing and infrastructure delivery (in-line with the Infrastructure Delivery Plan, IDP). There is also a new focus on monitoring the production of heritage statements for certain sites, and certain key site specific environmental factors and, in certain cases, a specific commitment to monitor impacts to specified listed buildings. These changes to the monitoring framework are broadly supported.”*

3.1.3 MM117 was then taken forward, with the Inspectors’ Report explaining:

*“The Plan is to be monitored through the key indicators and targets set out in the monitoring framework within Appendix 3 of the Plan. Whilst the monitoring tables provide key indicators and targets against each relevant policy, these do not provide sufficient detail and clarity to be effective. They also do not include actions and contingencies to be taken by the Council, should the policies not deliver the required outcomes.*

*We therefore consider it necessary for the Plan’s monitoring framework to be amended to ensure that the indicators are appropriate and consistent with other MMs for the Plan and set appropriate triggers and actions. MM117 rectifies this...”*

### 4 CONCLUSIONS ON THE SA PROCESS

4.1.1 This SA Statement demonstrates a robust SA process progressed alongside plan-making, with appraisal findings and consultation responses feeding in to decision-making at key junctures.

4.1.2 Most importantly, in terms of compliance with both the SEA Regulations<sup>2</sup> and Local Planning Regulations,<sup>3</sup> the SA Report was published alongside the proposed submission version of the Local Plan in 2018/19, presenting an appraisal of “the plan and reasonable alternatives” and “an outline of the reasons for selecting the alternatives dealt with”. The report served to inform representations on the plan, and then served to inform plan finalisation.

4.1.3 This SA Statement is the final step in the SA process. Its aim is to explain the ‘story’ of the plan-making / SA process, and also present measures decided concerning monitoring. **Table 4.1** serves to demonstrate that this report presents the required information.

<sup>2</sup> Environmental Assessment of Plans and Programmes Regulations 2004

<sup>3</sup> Town and Country Planning (Local Planning) (England) Regulations 2012

*Regulatory checklist*

The SA Statement must...	How has this Statement presented the required information?
Summarise how environmental (and wider sustainability) considerations have been integrated into the plan	<p>This Statement has sought to provide examples of key sustainability considerations that have been highlighted through appraisal and consultation and, in turn, integrated into the plan.</p> <p>First and foremost, the relative merits of reasonable alternatives were appraised in terms of a range of sustainability issues/objectives, with a view to informing decision-making.</p>
Summarise how the SA Report and consultation responses received, as part of the Draft Plan / SA Report consultation, have been taken into account when finalising the plan.	<p>This statement seeks to explain a step-wise process over time. It was naturally the case, at each step in the process, that account was taken of earlier consultation responses, alongside wider evidence.</p> <p>In particular, the reports published in 2016, 2018 and 2019 all included clear reference to consultation responses received: as part of the ‘outline reasons for selecting alternatives’; as part of the appraisal of reasonable alternatives; and as part of the draft plan appraisal. For example, <a href="#">Section 5</a> of the SA Report (2019) presents a detailed discussion of issues raised by key stakeholder organisations, including neighbouring local authorities. Most recently, the SA Report Addendum (2021) notably reached its conclusion on effects in terms of ‘housing’ objectives in light of consultation responses received from the development industry including from the National Home Builders Federation.</p> <p>Further information on consultation responses received, including in respect of spatial strategy / site selection (which was a particular focus of the SA process), is presented within the <a href="#">Consultation Statement</a> submitted alongside the Local Plan in 2020.</p>
Summarise the reasons for choosing the plan as adopted, in the light of reasonable alternatives.	Reasonable alternatives were defined and appraised at several points in the plan-making / SA process in order to inform decision-making ahead of consultation, with officers providing a response to the appraisal, equating to the Council’s reasons for supporting the preferred option.
Summarise the measures that are to be taken to monitor the significant environmental effects of the implementation of the plan	See Section 3

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# Brentwood Local Plan

Habitat Regulations Assessment (HRA) Adoption  
Statement

Brentwood Borough Council

February 2022

### Quality information

<u>Prepared by</u>	<u>Checked by</u>	<u>Verified by</u>	<u>Approved by</u>
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### Revision History

<u>Revision</u>	<u>Revision date</u>	<u>Details</u>	<u>Authorized</u>	<u>Name</u>	<u>Position</u>
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# 1. Adoption Statement

## 1. Introduction

AECOM has been assisting Brentwood Borough Council in undertaking a Habitats Regulations Assessment of the Brentwood Local Plan, which began in in 2018 with the determination of Likely Significant Effects and continued through the Main Modifications.

The need for Appropriate Assessment is set out within British law by the Conservation of Habitats and Species Regulations 2017 (as amended)<sup>1</sup>. The Regulations apply the precautionary principle to European sites. Plans and projects can only be permitted having ascertained that there will be no adverse effect on the integrity of the site(s) in question. Plans and projects with predicted adverse impacts on European sites may still be permitted if there are no alternatives to them and there are Imperative Reasons of Overriding Public Interest (IROPI) as to why they should go ahead. In such cases, compensation would be necessary to ensure the overall integrity of the site network.

In order to ascertain whether or not site integrity will be affected, an Appropriate Assessment should be undertaken of the plan or project in question:

Box 1: The legislative basis for Appropriate Assessment:

### Conservation of Habitats and Species Regulations 2017 (as amended)

The Regulations state that:

*"A competent authority, before deciding to ... give any consent for a plan or project which is likely to have a significant effect on a European site ... shall make an appropriate assessment of the implications for the site in view of that site's conservation objectives... The authority shall agree to the plan or project only after having ascertained that it will not adversely affect the integrity of the European site".*

The UK left the EU on 31 January 2020 under the terms set out in the European Union (Withdrawal Agreement) Act 2020 ("the Withdrawal Act"). The most recent amendments to the Habitats Regulations – the Conservation of Habitats and Species (Amendment) (EU Exit) Regulations 2019 – make it clear that the need for HRA will continue after Brexit.

Over time the phrase 'Habitats Regulations Assessment' (HRA) has come into wide currency to describe the overall process set out in the Habitats Directive from screening through to Imperative Reasons of Overriding Public Interest (IROPI). This has arisen in order to distinguish the process from the individual stage described in the law as an 'Appropriate Assessment'. Throughout this report we use the term 'Habitats Regulations Assessment' for the overall process and restrict the use of 'Appropriate Assessment' to the specific stage of that name.

## 2. Scope of the Project

There is no guidance that dictates the physical scope of a HRA of a Development Plan Document. Therefore, in considering the physical scope of the assessment, we were guided primarily by the identified impact pathways rather than by arbitrary 'zones'. Current guidance suggests that the following European sites be included in the scope of assessment:

- All sites within the Brentwood Borough boundary; and
- Other sites shown to be linked to development within the borough boundary through a known 'pathway' (discussed below).

<sup>1</sup><https://www.legislation.gov.uk/ukxi/2017/1012/contents/made> [accessed 05/03/2019]. The regulations were subject to minor amendments in late 2018 but these do not affect the Local Development Plan HRA process or the tests that must be met

Briefly defined, impact pathways are routes by which a change in activity provided within a Local Development Plan document can lead to an effect upon an internationally designated site. Guidance from the Ministry of Housing Communities and Local Government<sup>2</sup> states that the HRA should be 'proportionate to the geographical scope of the [plan policy]' and that 'an AA need not be done in any more detail, or using more resources, than is useful for its purpose' (MHCLG, 2006, p.6).

No European sites are located within the Brentwood borough boundary. There are four European sites that lie beyond the borough boundary but are located within sufficient proximity that the Brentwood Local Plan could provide linking impact pathways that could impact the integrity of those European sites. These are:

- Epping Forest SAC (6km west of the borough, 9km west of the nearest small village (Navestock Heath) and 13km west of the nearest suburb (Pilgrims Hatch));
- Thames Estuary and Marshes SPA and Ramsar site (8.3km south-east);
- Essex Estuaries SAC (12.4km east);
- Crouch and Roach Estuaries SPA and Ramsar site (12.4km east);
- Benfleet and Southend Marshes SPA and Ramsar site (13.4km south-east); and
- Blackwater Estuary SPA and Ramsar site (19.8km north-east).

### 3. HRA Task 1: Likely Significant Effects (LSE)

Following evidence gathering, the first stage of any Habitat Regulations Assessment and the purpose of this assessment is a Likely Significant Effect (LSE) test - essentially a risk assessment to decide whether the full subsequent stage known as Appropriate Assessment is required. The essential question is:

"Is the Plan, either alone or in combination with other relevant projects and plans, likely to result in a significant effect upon European sites?"

The objective is to 'screen out' those plans and projects that can, without any detailed appraisal, be said to be unlikely to result in significant adverse effects upon European sites, usually because there is no mechanism for an adverse interaction with European sites.

### 4. HRA Task 2: Appropriate Assessment (AA)

Where it is determined that a conclusion of 'no likely significant effect' cannot be drawn, the analysis has proceeded to the next stage of HRA known as Appropriate Assessment. Case law has clarified that 'Appropriate Assessment' is not a technical term. In other words, there are no particular technical analyses, or level of technical analysis, that are classified by law as belonging to appropriate assessment rather than determination of likely significant effects. Therefore, it is legal to undertake the fullest level of technical assessment possible and still term the analysis an investigation into likely significant effects. Drawing the line between the studies that belong in the 'likely significant effects' section of analysis and those that belong in the 'appropriate assessment' of the analysis is therefore a judgment to be made by each competent authority. The ultimate legal requirement is that, whether the analysis is termed an investigation into likely significant effects or an appropriate assessment, the analysis supports the conclusion.

## 5. Consideration of Likely Significant Effects

### Recreational pressure

It should be noted, that whilst the Local Plan provides both residential and employment site allocations, these have previously been subject to HRA<sup>3</sup>. As site allocations remain unchanged, these are not revisited. The HRA enabled all site allocations to be screened out when considered in isolation; however in combination effects required further consideration.

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<sup>2</sup> CLG (2006) Planning for the Protection of European Sites, Consultation Paper.  
[http://webarchive.nationalarchives.gov.uk/20061101113831/http://www.communities.gov.uk/staging/embedded\\_object.asp?id=1502353](http://webarchive.nationalarchives.gov.uk/20061101113831/http://www.communities.gov.uk/staging/embedded_object.asp?id=1502353)

<sup>3</sup> AECOM. (October 2019) Habitats Regulations Assessment of Brentwood Regulation 19 Local Plan

All Local Plan policies were also screened out from resulting in likely significant effects when considered in isolation. This is primarily due to the distances from Brentwood borough boundary and European designated sites. However, the Likely Significant Effects test identified that the following policies, as submitted to the SoS, (further modifications have been made since their submission, which are further discussed in section 7), had the potential to act in combination with neighbouring plans, and result in a Likely Significant Effect in combination which thus required further discussion.

Policies:

- MG01: Managing Growth: This policy allocates 7,752 net new houses during the plan period. It provides for increased recreational pressure as potential linking impact pathway to the Essex Coast European sites.
- HP07: Provision for Gypsies and Travellers. This policy allocates 13 permanent Gypsy and Traveller pitches consisting of 2 existing unauthorised sites with 8 pitches and a minimum of 5 new pitches at Dunton Hills Garden Village over the plan period. It provides for increased recreational pressure as potential linking impact pathway to the Essex Coast European sites.

## Air Quality

Due to the large distances involved, it was deemed very unlikely that any individual site allocations (either employment or residential) in Brentwood would affect the integrity of a European site in isolation; however, in combination effects with other plans and projects required further consideration. The following policies could not be dismissed as being unlikely to lead to significant effects 'in combination' as a result of increased atmospheric pollution contributions. Therefore, further discussion took place in the appropriate assessment:

- MG01: Managing Growth: This policy allocates 7,752 net new houses during the plan period. This policy also allocates a total of 46.64 of employment land and 5,000 additional jobs during the plan period. It provides for atmospheric pollution as a linking impact pathway to Epping Forest SAC.
- HP07: Provision for Gypsies and Travellers. This policy allocates 13 permanent Gypsy and Traveller pitches, regularisation of 8 pitches and the incorporation of a minimum of 5 served Gypsy and Traveller pitches during the plan period. This policy also allows those sites with temporary and/or personal permissions to get permanent permission and are to be removed from the green belt. It provides for atmospheric pollution as a linking impact pathway to Epping Forest SAC.
- E11: Brentwood Enterprise Park. This policy allocates a single development site for employment purposes at the Brentwood Enterprise Park. It provides for atmospheric pollution as a linking impact pathway to Epping Forest SAC.
- PC03: Retail and Commercial Leisure Growth. This policy allocates 1,604 square metres (net) of comparison retail floorspace and 4,438 square metres (net) of convenience floorspace within Brentwood Borough. It provides for atmospheric pollution as a linking impact pathway to Epping Forest SAC.

## Water Quality

Water from both Ingatestone wastewater treatment works (WwTW) (serves the settlement of Ingatestone) and Doddinghurst WwTW (serves the settlements of Doddinghurst and Kelvedon Hatch) discharges into the River Wid, and ultimately the River Chelmer before flowing into the River Blackwater and the Blackwater Estuary SPA and Ramsar site and the Essex Estuaries SAC more than 19km downstream from the Borough boundary (in a straight line). The features for which these sites are designated are likely to be affected by wastewater discharge to a much smaller extent than other estuarine sites, particularly at distances of more than 19km, with consequent extensive dilution.

It was identified that the Council needed confidence in the deliverability of its housing allocations. In light of the fact that Ingatestone, Doddinghurst, Upminster and Brentwood WwTW's have been modelled to have insufficient capacity to support the planned level of development without technical interventions, it was recommended that the Council liaise with Thames Water and Anglian Water to ensure that development is delivered in locations that can accommodate increased sewage inputs. If upgrades to two WwTW, or novel treatment solutions, were required then the housing trajectory should reflect the need for those upgrades by (for example) avoiding front-loading of growth in the catchments of these WwTWs. This discussion took place and no amendments to the housing trajectory were deemed necessary.

Due to the large distances involved, it is very unlikely that any individual site allocations (either employment or residential) in Brentwood would affect the integrity of a European site in isolation; however, in combination effects with other plans and projects required further consideration. The following policies could not be dismissed as being unlikely to lead to significant effects 'in combination' as a result of potential for water quality impacts. Therefore, further discussion took place in the appropriate assessment:

- **MG01: Managing Growth:** This policy allocates 7,752 net new houses during the plan period. This policy also allocates a total of 46.64 of employment land and 5,000 additional jobs during the plan period. It provides adverse water quality as potential linking impact pathways to the Essex Coast European sites.
- **HP07: Provision for Gypsies and Travellers.** This policy allocates 13 permanent Gypsy and Traveller pitches, regularisation of 8 pitches and the incorporation of a minimum of 5 served Gypsy and Traveller pitches during the plan period. This policy also allows those sites with temporary and/or personal permissions to get permanent permission and are to be removed from the green belt. It provides for adverse water quality as potential linking impact pathways to the Essex Coast European sites.
- **E11: Brentwood Enterprise Park.** This policy allocates a single development site for employment purposes at the Brentwood Enterprise Park. It provides adverse water quality as a potential linking impact pathways to the Essex Coast European sites.
- **PC03: Retail and Commercial Leisure Growth.** This policy allocates 1,604 square metres (net) of comparison retail floorspace and 4,438 square metres (net) of convenience floorspace within Brentwood Borough. It provides adverse water quality as a potential linking impact pathways to the Essex Coast European sites.

## 6. Findings of Appropriate Assessment

The HRA for the submitted Local Development Plan included both consideration of likely significant effects as summarised above, and an appropriate assessment in combination with other plans and projects, particularly regarding growth in adjacent local authorities' Local Plans. The appropriate assessment concluded no adverse effect on the integrity of Thames Estuary and Marshes SPA and Ramsar site, Crouch and Roach Estuaries SPA and Ramsar site, Benfleet and Southend Marshes SPA and Ramsar site or Blackwater Estuary SPA and Ramsar site through any pathway of impact.

In addition, it concluded that should the measures recommended within the HRA be undertaken for Epping Forest SAC with regards to recreational pressure and air quality and Essex Estuaries SAC with regards to recreational pressure the Brentwood Local Development Plan would have a suitable framework in place to ensure that development delivered would not affect the integrity of any European sites either alone or 'in-combination' with other plans and projects. The conclusion for Epping Forest SAC and Essex Estuaries SAC was based on the following considerations.

### Recreational Pressure on Essex Coastal European Sites

It was identified that coastal European sites in Essex are vulnerable to increased recreational pressure. As such Natural England has worked with neighbouring district, borough, and county authorities to devise a strategic mitigation strategy to ensure that the increase in residential development within these authorities does not affect the sensitive European sites. In November 2017, Natural England issued interim advice regarding the 'Essex Recreational Disturbance Avoidance and Mitigation Strategy (RAMS)'. A final version of the strategy was produced in January 2019 and signed off by Natural England in March 2019. A draft SPD resulted from this process which went into public consultation in early 2020.

This work identified core recreational catchments or 'Zone of Influence' (ZoI) for the Essex Coastal sites as follows:

Table 1: The Recreational Zone of Influence for Essex Coastal European Sites

European Site	Zone of Influence (km)	Distance from the Borough Boundary (km)
*Colne Estuary SPA and Ramsar site and the portion of Essex Estuaries SAC that coincides	9.7	>37

* Foulness Estuary SPA and Ramsar and the portion of Essex Estuaries SAC that coincides	13	>27
*Dengie SPA and Ramsar and the portion of Essex Estuaries SAC that coincides	20.8	>35
Thames Estuary and Marshes and SPA	8.1	8.3
*Crouch and Roach Estuaries and SPA and the portion of Essex Estuaries SAC that coincides	4.5	12.4
Benfleet and Southend Marshes and SPA	4.3	13.4
*Blackwater Estuary Ramsar and the portion of Essex Estuaries SAC that coincides	22	19.8

\* The Essex Estuaries SAC comprise the Colne Estuary, Blackwater Estuary, Dengie, Crouch and Roach Estuaries and Foulness Estuary and so follow the respective ZOIs throughout

Table 1 identified that two European sites have a recreational ZOI that extends to Brentwood Borough. These are the Blackwater Estuary Ramsar site and SPA (with a Recreational Zone of Influence of 22km) and the portion of the Essex Estuary that coincides with the SPA and Ramsar site (with the same ZOI as the corresponding SPA/Ramsar site; in this case the Blackwater Estuary). Due to the distances involved any potential effect on the remaining Essex Coastal sites discussed in Table 1 could be dismissed.

The Council produced protective policies that safeguard the local environment and the European Sites that lies within catchment of the Brentwood Borough. In the submitted Local Plan, these policies and policy text included:

- NE01: Protecting and Enhancing the Natural Environment:
  - 'A. New residential development within the RAMS Zone of Influence will be subject to proportionate contributions to deliver all mitigation measures identified (including strategic measures) through project level HRAs, to mitigate any recreational disturbance impacts in compliance with the Habitat Regulations and Habitats Directive.*
  - B. *Proposals will need to implement on-site options for avoidance and/or reduction in recreational disturbance impact through sensitive layout and design measures and green and blue infrastructure proportionate to the scale of the development.*
  - C. *The Council will seek appropriate financial contributions towards off-site mitigation as prescribed in the Essex Coastal RAMS mitigation strategy and the Epping Forest RAMS mitigation strategy (as applicable)...*
- NE01: Protecting and Enhancing the Natural Environment:
  - 'A. The Council will support proposals which minimise the use of natural resources and proactively conserve and enhance the quality of the natural environment according to their international, national and local significance, aiming to achieve::..*
  - d habitat and species conservation and enhancement (both statutory and non-statutory, including priority habitats and species) of international, national and local importance commensurate with their status..'*
  - *'C. Development should avoid adverse impact on existing natural heritage assets as a first principle and enable net gains by designing in landscape and biodiversity features and enhancements. Where adverse impacts are unavoidable, they must be adequately and proportionately mitigated in accordance*

*with their international, national and local significance. Proposals must demonstrate how they have taken all necessary steps of avoidance, minimisation and then mitigation; if insufficient to fully address adverse impacts, consideration will be given to compensation measures. Following this process, a proposal will only be supported subject to the following hierarchy:*

- a. *where a site of international importance, being a Special Area of Conservation (SAC), Special Protection Area (SPA) or Ramsar site, would be affected, there has to be exceptional overriding reasons of human health, public safety or environmental benefit; impact on these international (European) sites will also be subject to Policy NE02...'*

The text of these policies was refined in the Main Modifications process for the Local Plan. The issue of recreational pressure on the Essex Coastal European sites, is thus resolved by the Council's participation in a mitigation strategy and which is reflected in Local Plan policy. This leads to the conclusion that increased recreational pressure stemming from increased residential development provided by the Plan will not affect the integrity of any of the Essex Coastal European sites in combination.

## Water Quality within Essex Coastal European Sites

It is ultimately of the responsibility of the competent authority (in this case the Environment Agency) and water company to determine headroom capacities of WwTW such as Ingatestone and Doddinghurst and it is the Environment Agency's Review of Consents process that will ultimately determine whether amended consents can be granted. However, the Council needs confidence in the deliverability of its housing allocations. In light of the fact that Ingatestone, Doddinghurst, Upminster and Brentwood WwTW's have been modelled to have insufficient capacity to support the planned level of development without technical interventions, it was recommended that the Council liaise with Thames Water and Anglian Water to ensure that development is delivered in locations that can accommodate increased sewage inputs. If upgrades to two WwTW, or novel treatment solutions, are required then it was recommended that the housing trajectory should reflect the need for those upgrades by (for example) avoiding front-loading of growth in the catchments of these WwTWs.

To aid this decision, process it is noted that Plan policy provides the following protective policies:

- BE02: Water Efficiency and Management, Criterion 3 (*Previously separate NE06: Flood Risk, and since has had wording refined*) and reiterated by Policy BE05: Sustainable Drainage, Criterion 6:
- *'D. Applications will need to demonstrate that the sewerage provider has been contacted to identify whether the sewerage network has adequate capacity both on and off-site to serve the development and to assess the need to contribute to any additional connections for the development to prevent flooding or pollution of land and water courses.*
- *E Where sewerage capacity is identified as insufficient, development will only be permitted if it is demonstrated that improvements will be completed prior to occupation of the development.'*

It was considered that a conversation between the Council and the relevant water companies is also required at a strategic level. This discussion took place and no amendments to the housing trajectory were deemed necessary. It could therefore be confirmed that no adverse effect on integrity would arise from the Brentwood Local Plan.

## Air Quality within Epping Forest SAC

Epping Forest SAC is known to be adversely affected by relatively poor local air quality alongside the roads that traverse the SAC, and this has been demonstrated to have negatively affected the epiphytic lichen communities of the woodland. The nature of the road network around Epping Forest SAC is such that journeys between a number of key settlements around the Forest by car, van or bus effectively necessitate traversing the SAC. Modelling undertaken for the West Essex/East Hertfordshire Housing Market Area (HMA) authorities in 2016 indicated that even on B roads through the SAC vehicle flows are substantial (e.g. a 2014 base case of c.20,000 AADT on the B1393) while the A121 between Wake Arms Roundabout and the M25 had 2014 base flows of 25,000 AADT. Moreover, queues are known to build around most arms of Wake Arms Roundabout, which increases emissions compared to the same volume and composition of free-flowing traffic. In response to this, the HMA Authorities have co-signed a Memorandum of Understanding<sup>4</sup> (MoU) that identified the need for a mitigation strategy to address potential increases in atmospheric pollution at Epping Forest SAC as a result of planned development. The

<sup>4</sup> MoU on. Managing the impacts of growth within the West Essex/ East Hertfordshire Housing Market Area on Epping Forest Special Area of Conservation (draft September 2016)



modelling results were published as part of the Epping Forest Local Plan HRA in early 2019. Epping Forest has since devised an interim Air Pollution Mitigation Strategy (APMS).

The modelling clearly indicates that for the key roads through the SAC in Essex projected housing and employment growth arising from outside the HMA plays a negligible contribution in forecast changes in traffic and thus roadside air quality. This is due to the minimal role that the modelled roads play in journeys to work for people resident outside the West Essex/East Herts HMA. Indeed, changes in traffic flows on the modelled roads are overwhelmingly dominated by housing and employment growth in Epping Forest District itself, with even other parts of the same HMA (Harlow, East Herts and Uttlesford) playing a minimal role.

While parts of the SAC also lie within 200m of the A12 and A406 in the London Borough of Waltham Forest, 2011 Census data indicate that only 305 road-based journeys to work currently arising from Brentwood borough are to destinations which *might* involve using those routes i.e., destinations in the London Boroughs of Waltham Forest, Haringey, or Hackney. This is less than 2% of the 17,752 daily journeys to work to other districts that arise from Brentwood and is likely to be considerably less than 1% of all journeys to work for Brentwood residents when one adds in those people who both live and work in Brentwood. In short, routes through Epping Forest SAC play a negligible role in journeys to work for Brentwood residents and there is no reason to expect this pattern to change.

It was therefore considered that a conclusion of no adverse effects on integrity alone or in combination can be reached with regard to the Brentwood Plan.

## Recreational Pressure on Epping Forest SAC

Epping Forest SAC receives a great many visits per year (estimated at over 4 million) and discussions with the City of London Corporation have identified long-standing concerns about increasing recreational use of the Forest resulting in damage to its interest features. A programme of detailed formal visitor surveys has been undertaken in recent years. A 2011 visitor survey report<sup>5</sup> identified that those living within 2km of the edge of the Forest comprise at least 95% of all visitors. However, further analysis of these data was undertaken by Footprint Ecology in September 2016<sup>6</sup>. This further analysis identified that, although the scale of the data was substantial (in 2014 alone almost 900 questionnaires were returned) the catchment appeared to be larger than suggested by previous reports. A new survey was therefore undertaken in late 2017 and this identified that 75% of visitors live within 6.2km of the SAC, although visitor origin is not evenly distributed around the SAC; in Essex the major points of visitor origin are within 3km of the SAC, while in London the points of visitor origin are much more dispersed.

As such it is this distance of 6.2km from Epping Forest SAC site boundary that is considered to be the recreational Zone of Influence (Zoi). Brentwood borough just clips this zone (as noted in the Natural England advice); however, the area within the 6.2km Zoi is (from review of freely available online imagery and mapping) woodland and arable farmland located in a rural setting and is highly unlikely to receive net new residential development (as opposed to replacement dwellings) within the Plan period; certainly, none is allocated.

The nearest area that *might* receive a very small net increase in dwellings during the plan period due to (for example) windfall is Navestock Heath but this is a very small village and is situated well outside the 6.2km zone, being 9km from the SAC at its closest. The nearest suburban or urban area to the SAC (most likely to receive net new housing) is Pilgrims Hatch located 13km from the SAC. It is therefore concluded that recreational pressure on Epping Forest SAC is not a realistic linking impact pathway linking to the Brentwood Plan. In the event that the 6.2km core recreational catchment of the SAC changes sufficiently to include settlements in Brentwood following update visitor surveys currently being undertaken, this eventuality is already covered by NE01 Protecting and Enhancing the Natural Environment (*Previously separate Policy NE02: Recreational Disturbance Avoidance and Mitigation Strategy (RAMS)*), which includes the statement that '*The Council will seek appropriate financial contributions towards off-site mitigation as prescribed in the Essex Coastal RAMS mitigation strategy and the Epping Forest RAMS mitigation strategy (as applicable)*

It is therefore considered that a conclusion of no adverse effects on integrity alone or in combination can be reached with regard to the Brentwood Plan because the 6.2km core catchment of the SAC only clips a small part of Brentwood where no allocations are proposed and little if any development is likely to come forward.

<sup>5</sup> Alison Millward Associates. 2011. Epping Forest Visitor Survey 2011: Results Summary

<sup>6</sup> Footprint Ecology (2016). Initial review of current visitor data for Epping Forest

## 7. Main Modifications

Following the Examination into the Brentwood Local Plan the Inspector recommended a series of Main and Minor Modifications to be made to the Plan. It was therefore necessary for those modifications to be analysed in order to confirm that they will not themselves introduce new likely significant effects that were not thoroughly investigated for the HRA of the submitted Local Plan.

In particular Main Modification 74 involved the creation of a new Policy NE01 which included the following text regarding European sites:

*'B. When determining planning applications, the council will apply the principles relevant to habitats and biodiversity as set out in National Planning Policy.*

### *International Designated Sites*

*C. Where a proposed development is likely to have an adverse impact on European Designated Site (whether individually or in combination with other plans or proposals) permission will not be granted unless there is due compliance with the requirements of the Habitats Regulations.*

*D. New residential development within the Essex RAMS and Epping Forest SAC Zones of Influence will be required to provide appropriate on-site measures for the avoidance of, and/or reduction in, recreational disturbance on European Designated Sites through the incorporation of recreational opportunities, including the provision of green space and footpaths in the proposals. Proposals will be required to follow the mitigation hierarchy by seeking to avoid creating recreational impacts first and foremost, with mitigation measures considered separately to avoidance'.*

Further explanatory text was also added to the supporting text for this policy.

Following the analysis of the Main and Minor Modification it was concluded that they will not lead to likely significant effects on European sites and do not undermine the conclusions of the HRA of the Local Development Plan. Indeed, some of the changes strengthen and reinforce the conclusions of that HRA that the Local Development Plan will not have adverse effects on the integrity of any European sites.

The four issues relevant to the Plan included:

- Recreational pressure on the Essex Coastal European sites, which is resolved by the Council's participation in a mitigation strategy, and which is reflected in Local Plan policy;
- Water quality issues on the Essex Coastal European sites, which is resolved by a conversation between the Council and the relevant water companies required at a strategic level to determine headroom capacities of WwTW;
- Air quality issues on Epping Forest SAC, which are dismissed for the reason that routes through Epping Forest SAC play a negligible role in journeys to work for Brentwood residents and there is no reason to expect this pattern to change; and
- Recreational pressure on Epping Forest SAC, which are dismissed because the 6.2km core catchment of the SAC only clips a small part of Brentwood where no allocations are proposed and little if any development is likely to come forward.

The Main Modifications HRA concluded that while the number of dwellings allocated in several sites has increased, this has no negative HRA implications because individual sites are screened out due to the long distances to the relevant European sites. Given the overall quantum of growth remains unchanged, the in-combination Appropriate Assessment undertaken for the Regulation 19 Local Plan can continue to be relied upon.

## 8. Conclusion

In conclusion therefore the Brentwood Local Plan, as modified, meets its legal requirements in ensuring that no adverse effect on the integrity of any European sites will arise from its adoption, either alone or in combination with other plans or projects.

[aecom.com](http://aecom.com)

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Brentwood Local Development Plan

# Schedule of Potential Main Modifications Consultation Feedback Report

March 2022

## 1. Introduction

- 1.1 This report summarises the consultation undertaken by Brentwood Borough Council for the Schedule of Potential Main Modifications on the emerging Local Plan.
- 1.2 In addition to complying with the Regulations and where required the Coronavirus (Amendment) Regulations 2020<sup>1</sup>, the Council has also complied with the provisions of its Statement of Community Involvement, published in December 2018. This sets out the Council's strategy for effective community participation in the planning process, including for a local Plan.
- 1.3 The consultation sought views on the below documents:
- Schedule of Potential Main Modifications, September 2021
  - Annexe 1 – (MM114) Appendix 1 - Local Plan Housing Trajectory
  - Annexe 2 – (MM116) Appendix 2 - Strategic and non-strategic policies and their relationship to Strategic Objectives
  - Annexe 3 – (MM117) Appendix 3 - Monitoring Framework
- 1.4 The following documents were published to support the consultation, comments on these documents were accepted:
- Sustainability Appraisal, September 2021
  - Habitats Regulations Assessment, September 2021
  - Proposed changes to the Submitted Policies Map
- 1.5 Further documents were added to the Examination Library following the week 6 hearing session held in July 2021. Comments on these documents were also accepted during the consultation:
- F81A Appendix 1 Housing trajectory update (August 2021)
  - F139 Brentwood Monitoring Report Housing Delivery 2020-21
  - F140A Five Year Housing Land Supply Statement as at 31 March 2021
  - F140B Five Year Land Supply Site Schedule as at 31 March 2021
- 1.6 The consultation ran for a 6 week period between 30 September 2021 to 11 November 2021. All comments received to the consultation can be viewed in full on the Council's local plan consultation portal, selecting 'Historic Documents', at <https://brentwood.oc2.uk>

## 2. Who we consulted

- 2.1 The Council has consulted extensively at all stages of preparing the Local Plan, to encourage the maximum level of feedback, this continued during the consultation of the Main Modifications.
- 2.2 The Council has consulted the following bodies and persons:
- Statutory bodies as set out in legislation, including Essex County Council, neighbouring Councils, local Parish Councils, National Highways, Natural England, NHS East of England Ambulance Service, Sport England, Transport for London,

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<sup>1</sup> Applicable during the "relevant period" meaning the period beginning with 16<sup>th</sup> July 2020 and ending with 31<sup>st</sup> December 2021

Historic England, the Marine Management Organisation, the Environment Agency, amongst others.

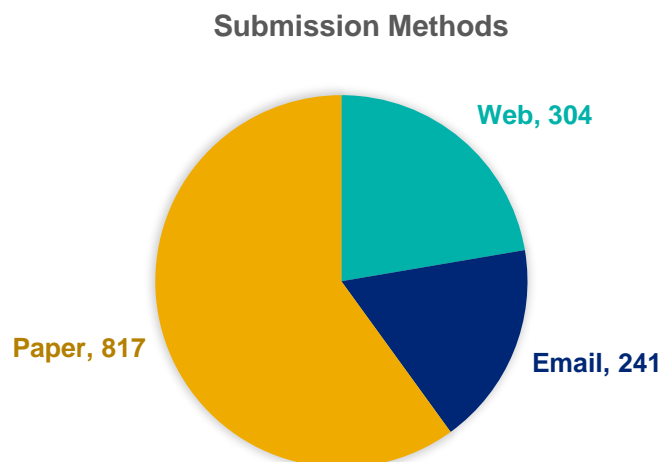
- Local stakeholders, local businesses, voluntary and community groups.
- Developers and landowners and their agents.
- The public.

### 3. How we consulted

- 3.1 The consultation was available to view, download and comment on the Council’s website and the Council’s local plan consultation portal during the consultation dates.
- 3.2 A ‘Statement of Representation Procedure and Availability of Documents’ notice (see appendices) was published on the Council’s website, advising on the content of the consultation, consultation dates and how to respond.
- 3.3 Temporary changes to Government Regulations<sup>2</sup> in response to Covid-19 removed the requirement to make hard copies of the consultation documents available.
- 3.4 The Council also sent direct emails/letter notifications to all consultees registered on the Council’s Local Plan consultation database and whom had previously responded to the Local Plan consultation.

### 4. Representations received

- 4.1 During the consultation there was a total of 1,362 representations made from 352 respondents; 87 representations were made in support and 1,275 raised an objection.
- 4.2 People were able to respond to the consultation in a number of ways – using the Councils local plan consultation portal, by e-mail, or in writing. People made their comments in the following way:



<sup>2</sup> [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012 \(legislation.gov.uk\)](https://www.legislation.gov.uk/uksi/2012/2746/contents/making)

- 4.3 Whilst no formal petitions were received to the consultation, the vast majority of respondents were residents of Blackmore, with a smaller but significant number of respondents being residents of Priests Lane, Shenfield – an overview of the issues made follows below.

## 5. Main issues

- 5.1 The summaries below provide the Council’s overview of the main issues raised in the consultation responses received to the Schedule of Potential Main Modifications.
- 5.2 The summaries do not seek to identify all the issues raised in the representations. Some respondents raised issues which do not relate to the specific modifications, these were outside the scope of the consultation and have not been summarised.
- 5.3 A separate feedback report sets out the main issues raised in representations to the Sustainability Appraisal (SA) (September 2021) and Habitat Regulations Assessment (HRA) (September 2021).
- 5.4 An overview of the main issues identified by the Council to the Schedule of Potential Main Modifications consultation are as follows:

### Chapters 1-3 (MM1-2)

- A significant number of objections from the public in relation to the inclusion of housing allocation sites R25 and R26 in Blackmore. Inclusion of the sites is not considered by objectors to align with the Council’s Strategic Objectives (MM2).

### Chapter 4 (MM3-10)

- Amendments are requested from a site promoter that MM4 should be changed to include a housing requirement that reflects local housing need based on up-to-date Standard Method.
- A number of site promoters object to the use of a stepped housing trajectory, requesting the inclusion of additional site allocations to address shortfall against the proposed housing requirement, set out in MM4.
- Objections from the public in relation to the identification of Blackmore within Category 3 in the settlement hierarchy, set out in MM5.
- Support from the East of England Ambulance Service in respect of Policy MG04 (MM6) however request that the Inspectors review the MM to ensure funding via S106 or CIL is included for health services to meet population requirements.
- Essex County Council considers that the review policy MG06 (MM10) gives Brentwood Borough Council the opportunity to address not only the highways and transportation matters raised by National Highways, but also those matters raised by Essex County Council, as set out in Hearing Statement F76A.
- Amendments are requested from site promoters that Policy MG06 (MM10) be changed to incorporate a commitment to progressing the Local Plan review to adoption, with an



appropriate timeframe set. A number of promoters request the policy wording be flexible to enable certain sites to come forward for development in the event the Council does not meet its own commitment.

- Amendments are requested from National Highways that Policy MG06 (MM10) paragraph D be modified.
- Objection from a site promoter to Policy MG06 (MM10), as the partial review does not include a commitment to meet full new employment land need.

#### **Chapter 5 (MM11-34)**

- A significant number of objections from the public in relation to MM14 and the inclusion of housing allocation sites R25 and R26 in Blackmore – it is considered by objectors the proposals will cause increased flood risk.
- Objections from site promoters to modifications to part B of Policy BE03 (MM15) which seeks to group sites together that are capable of delivering more than 500 units and requires them to include energy masterplans that incorporate a decentralised energy infrastructure.
- In their capacity as highways and transportation authority, amendments sought by Essex County Council in relation to Policy BE08 (MM22) with regards to definitions, clarifications and policy wording.
- Amendments are requested from site promoters that Policy BE08 (MM22) be subject to further modifications making clear that contributions to transport infrastructure will only be sought where they are directly related to development proposal and to make it acceptable in planning terms.
- Amendments are requested from National Highways that Policy BE08 (MM22) paragraph C be modified.
- Support from Essex County Council in that MM23 (deletion of policy BE12) does not prevent the ambition of offering a choice of travel modes and reducing the dependency on car use which can be addressed through Policies BE13 and BE17.
- In their capacity as highways and transportation authority, amendments sought by Essex County Council in relation to Policy BE12 (MM27) with regards to policy wording.
- Support from Sport England in relation to Policy NE05 (MM33).

#### **Chapter 6 (MM35-55)**

- Objections from site promoters to the revision of Policy HP01 (MM35) part C that seeks to reduce the threshold from 500 units to 100 or more dwellings where part a. and b. would apply, requiring provision for self-build homes and specialist accommodation respectively.

- Amendment requested from local estates group that a Main Modification is included for the insertion of Policy H15 from the 2005 Replacement Local Plan (or similar) which recognises the special character of the Hutton Mount estate.

### **Chapter 7 (MM56-71)**

- Amendment requested by Essex County Council in relation to Policy PC01 (MM58), seeking additional supporting text to be provided that clarifies what is considered 'reliable evidence' as required in criterion A.b.
- Support for main modification MM69 from Sport England and Essex County Council.
- Various amendments requested by Essex County Council in relation to Policy PC11 (MM70), including additional paragraph regarding the availability of local vocational education and an additional paragraph in respect of special education needs.

### **Chapter 8 (MM72-82)**

- Broad support for main modification MM74 from Natural England, however they have requested further amendments to the wording of Policy NE01.
- Support from Essex County Council as lead local flood authority are satisfied in principle with the amended policy for NE06 (MM78) Flood Risk. However, they seek amendments to wording in paragraph 8.57.
- A significant number of objections from the public in relation to MM78 and the inclusion of housing allocation sites R25 and R26 in Blackmore – it is considered by objectors the proposals will cause increased flood risk.
- A significant number of objections from the public in relation to MM81 and the inclusion of housing allocation sites R25 and R26 in Blackmore – it is considered by objectors' exceptional circumstances for Green Belt release at these sites has not been proven.

### **Chapter 9 (MM83-113)**

- Objections from Essex County Council as the authority with responsibilities for education and childcare requirements for Dunton Hills Garden Village, seeking various amendments to wording in Policy R01 (MM84) to ensure education and childcare requirements are provided for on-site; and amendment to paragraph to include text on 'all through learning'.
- Various amendments are requested from Essex County Council that Policy R01 (MM84) requires further changes to ensure policy is sound, including text concerning 'Employment and Skills Plans', flood risk and 'movement corridors', amongst other matters.
- Confirmation sought from Natural England that omitted wording in Policy R01 (MM84) concerning details of securing the delivery of green infrastructure are to be added into the Dunton Hills SPD.

- Various amendments are requested from a site promoter that Policy R01 (MM84) requires further changes to ensure the policy is effective and clearer.
- Amendments are requested from Essex County Council to a number of main modifications as currently drafted to provide detail/guidance on what a 'quietway' cycle route is and their locations and what a transfer hub is and their locations.
- Amendments are requested from Essex County Council to a number of main modifications as currently drafted to ensure factual representation of current flooding position from the lead local flood authority.
- Objections from site promoters to the revision of policy R03 (MM87) concerning policy wording around the provision of self and custom build units.
- Support for main modification MM93 from Transport for London.
- Confirmation is sought from Essex County Council to a number of main modifications as currently drafted in respect of ensuring the retention of public parking spaces being sufficient to meet overall town centre public parking needs.
- Objection from a local resident seeking restoration of the submitted Plan's commitment to maintain the existing level of parking spaces across sites R11 (MM94), R13 (MM96) and R14 (MM97).
- Objections from the public in relation to MM101 and the inclusion of housing allocation sites R19 land at Priests Lane, Shenfield – concerns from objectors regarding traffic impacts generated by proposals on local and wider road network, amongst other issues.
- A significant number of objections from the public in relation to MM107 & MM108, concerning the inclusion of housing allocation sites R25 land north of Blackmore and R26 land north of Orchard Piece, Blackmore – disagreement from objectors expressed with the reinstatement of 70 dwellings (total). Concerns broadly relate to flooding, lack of infrastructure (roads, public transport, schools, doctors and amenities etc) and impact on the natural environment.
- Various amendments requested by Essex County Council in relation to Policy E11 (MM109), seeking changes in policy wording.
- Amendment requested from a site promoter in relation to Policy E11 (MM109), concerning site boundary and Green Belt release. Objections also raised with regards to contributions to improvements to infrastructure items named within Policy E10 (M111) and Policy E11 (M109)

#### **Appendix 1 (MM114)**

- Objection from site promoters that the Council should adopt the Sedgfield method when calculating 5 year housing land supply.

- Objection from site promoters in relation to the use of a stepped housing trajectory – amendments sought to allocate more housing land.

### Appendix 3 (MM117)

- Support from Natural England however a request to amend some identified targets.
- Amendment requested from Essex County Council to include an additional policy to monitor – BE10 Sustainable Passenger Transport and BE12 Mitigating the Transport Impacts of Development, amongst other suggested amendments.

### Policies Map

- Amendment requested from Natural England seeking a revision to show the Epping SAC ZOI.

## 6. How the comments have been used

6.1 All the representations received to the Schedule of Potential Main Modifications consultation were submitted to the Inspectors who have considered them when preparing their report. In some cases, this resulted in the Inspectors making amendments to the published main modifications. The final Schedule of Main Modifications is appended to the final Inspector's Report received by the Council on 23 February 2022. The further modifications made by the Inspectors in their final report are summarized below:

- MM10: Policy MG06 Local Plan Review and Update - amended wording of the policy to add 'Update' to accord with national policy and ensure it is justified, as it is clear an update is necessary. A consequential change was also made to MM116: List of strategic and non-strategic policies;
- MM51: Policy BE16 Conservation and Enhancement of Historic Environment - revised in relation to non-designated heritage assets to ensure consistency with national policy;
- MM57: Policy MG01 Spatial Strategy - employment requirement range adjusted from "33.76 to 45.96ha" to "38.41 to 50.61ha" to reflect revised evidence presented during the examination;
- MM74: Policy NE01 Protecting and Enhancing the Natural Environment - revised so that it effectively reflects the Essex coast recreational disturbance avoidance and mitigation strategy (RAMS) requirements, clarifies that a small part of the borough is within the Epping Forest Special Area of Conservation Zone of Influence, and removed reference to the Habitats Directive;
- MM85: Policy R01(II) Spatial Design of Dunton Hills Garden Village - revised to clarify that reference to public rights of way is to the network, which should be retained and enhanced. Also removed criterion 3 relating to the timing of education provision to make this effective and justified, as confirmed by Essex County Council; and

- MM119: New main modification inserting appendix to local plan which lists plans and policies to be superseded. This was made public prior to the first hearing session and discussed during the examination. Necessary to add as appendix to the plan as this is a legal requirement. The addition does not undermine the participatory process.

- 6.2 In light of the above further modifications made by the Inspectors in their final report, in relation to MM74, concerning clarification that a small part of the borough is within the Epping Forest Special Area of Conservation Zone of Influence; in order to comply with the legislation and give effect to the plan's policies, the Council will need to update the Policies Map to reflect this modification.
- 6.3 Receipt of the final Inspector's Report by the Council marks the end of the Examination process. The report concludes that the Local Plan is legally compliant and sound, subject to the appended main modifications. This means the Council can now formally adopt the plan.
- 6.4 The Council has taken into account all issues raised in response to the Schedule of Potential Main Modifications, the final Inspectors' Report as well as any necessary factual updates and corrections to prepare a Schedule of Additional Modifications to the Local Plan. These are changes which do not materially affect the Policies of the Local Plan and do not fall within the scope of the Plan Examination. Together with the main modifications, the additional modifications will be incorporated into the adopted Local Plan. Please see the Schedule of Additional Modifications, March 2022, for the comprehensive list of additional modifications, a summary of which is given below:

- Genal changes to reflect the final document title and publication date.
- Make relevant grammatical changes, amend typographical errors and update weblinks.
- Update contents table, figures and policy numbering where required to reflect the modifications to the Local Plan.
- Delete specified text which is now outdated and is not relevant for Local Plan publication, for example the removal of reference to previous consultation stages.
- Amend reference from the NPPF 2018 to reflect updated NPPF 2021.
- Update use class references to align with the main modifications resulting from Use Class Order changes.
- Make incidental changes to specified supporting text/figures resulting from the main modifications.
- Make minor updates to specified sub-text to provide further information/clarity.
- Make relevant factual changes to specified supporting text, for example where legislation or supporting documents referred to in the text have been updated.
- Add the definition of 'Mineral Consultation Area' to the Glossary in Appendix 6.

## 7. Appendices

1. Statement of representation procedure and availability of documents
2. Notification letter and e-mail text
3. Representation form / guidance note
4. Main Modifications web page text

## **Statement of representation procedure and availability of documents**

### **Brentwood Local Plan 2016-2033 Consultation on Schedule of Potential Main Modifications, September 2021**

#### **Planning and Compulsory Purchase Act 2004 Town and County Planning (Local Planning) (England) Regulations 2012**

#### **Title of document**

The consultation is seeking views on the '**Schedule of Potential Main Modifications, September 2021**', incorporating:

- **Annexe 1 – (MM114) Appendix 1 – Local Plan Housing Trajectory**
- **Annexe 2 – (MM116) Appendix 2 – Strategic and non-strategic policies and their relationship to Strategic Objectives**
- **Annexe 3 – (MM117) Appendix 3 – Monitoring Framework**

#### **Subject matter**

The Brentwood Local Plan 2016-2033 was submitted to the Government on 14 February 2020 for examination.

A series of examination hearings overseen by independent planning Inspectors, Yvonne Wright BSc (Hons) Dip TP DMS MSc MRTPI and Mike Worden BA (Hons) Dip TP MRTPI, took place from 1 December 2020 to 29 July 2021. The Authority has now been invited by the Inspectors to consult on a schedule of main modifications to the Local Plan, required to make the Plan sound in the light of issues identified during examination.

The **Schedule of Potential Main Modifications**, September 2021, sets out a series of changes required to resolve issues that make the Local Plan unsound or where it is not legally compliant. These generally involve changes to policies and text that are essential to enable the Plan to be adopted.

The following documents have been prepared to support the proposed main modifications to the Plan.

- **Sustainability Appraisal, September 2021**
- **Habitats Regulations Assessment, September 2021**

Further documents have been added to the Examination Library following the week 6 hearing sessions held in July 2021. Comments on these documents will also be accepted.

- F81A Appendix 1 Housing trajectory update (August 2021)
- F139 Brentwood Monitoring Report Housing Delivery 2020-21
- F140A Five Year Housing Land Supply Statement as at 31 March 2021
- F140B Five Year Land Supply Site Schedule as at 31 March 2021

We have also published a number of **Proposed changes to the Submitted Policies Map** that have been required as a result of some main modifications.

Please note - this consultation is confined to the **Schedule of Potential Main Modifications** and above associated supporting documents. No representations should be made about parts of the Plan that are not proposed to be modified. Such representations will not be considered by the inspector. It is not necessary to repeat comments already made on other aspects of the Plan as these are already being considered by the Inspectors.

The main modifications are put forward without prejudice to the Inspectors' final conclusions and recommendations on the Plan.

#### **Area covered by the document**

Brentwood Borough

#### **Consultation period**

Representations on the Schedule of Potential Main Modifications and supporting documents are invited from noon on Thursday 30 September 2021 and will run for a 6 week period, ending at 5pm on Thursday 11 November 2021.

#### **How to submit representations**

The quickest and easiest way to make representations is via our Local Plan Online Consultation Portal at <https://brentwood.oc2.uk/>

Alternatively, a representation form can be downloaded from the website (<http://www.brentwood.gov.uk/local-plan-examination>) and responses emailed to [planning.policy@brentwood.gov.uk](mailto:planning.policy@brentwood.gov.uk)

If you cannot use email, hard copies can be posted to:

MM Consultation 2021  
 Planning Policy Team  
 Brentwood Borough Council  
 Town Hall, Ingrave Rd  
 Brentwood,  
 Essex, CM15 8AY

At the close of the consultation period, all duly made representations will be submitted to the Inspectors. Anonymous representations cannot be considered duly made.

The Inspectors will consider the representations and then set out their recommendations in a report.



## Availability of documents

All the consultation documents are available to view and download on the Local Plan website at <http://www.brentwood.gov.uk/local-plan-examination>

Please note paper copies of the documents are not available; temporary changes to Government Regulations<sup>3</sup> in response to Covid-19 have removed the requirement to make hard copies available.

## Additional Supporting Documents

The following additional supporting documents are also made available for information purposes only on the Local Plan website [www.brentwood.gov.uk/localplan](http://www.brentwood.gov.uk/localplan):

- **Schedule of Potential Additional Modifications, September 2021**
- **Equalities Impact Assessment, September 2021**
- **Health Impact Assessment, September 2021**

Please note, the Schedule of Potential Additional Modifications, Equalities Impact Assessment and Health Impact Assessment do not impact the intent or interpretation of the Plan and are not required for soundness. They have been prepared by the Council and they do not form part of the Inspectors' examination of the Plan. They are made available for information purposes only and do not form part of the consultation and no representations should be made on them.

## Further Information

For further information or advice, about the consultation documents and/or process, please contact the Planning Policy Team by email at [planning.policy@brentwood.gov.uk](mailto:planning.policy@brentwood.gov.uk) or by telephone on 01277 312 500

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<sup>3</sup> [The Town and Country Planning \(Local Planning\) \(England\) Regulations 2012 \(legislation.gov.uk\)](http://legislation.gov.uk)

APPENDIX 2.



Date: 30 September 2021  
Our reference: LDP/SEP/2021

Address 1  
Address 2  
Address 3  
Address 4

Dear Consultee

**Brentwood Local Plan: Notification of consultation on Schedule of Potential Main Modifications and accompanying updated Sustainability Appraisal and Habitats Regulations Assessment.**

I am writing to you as a registered consultee on Brentwood Borough Council's Local Plan consultation database. Please be advised that in accordance with The Town and Country Planning (Local Planning) (England) Regulations 2012, the Council is publishing the above documents for consultation for six weeks from: **Thursday 30 September to 5pm Thursday 11 November 2021**

The Brentwood Local Plan 2016-2033 is undergoing an independent examination following its submission to the Government in February 2020.

Examination hearings took place from 1 December 2020 to 29 July 2021 under the direction of Planning Inspectors (Yvonne Wright BSc (Hons) Dip TP DMS MSc MRTPI and Mike Worden BA (Hons) Dip TP MRTPI).

The Authority has now been invited by the Inspectors to consult on a schedule of Potential Main Modifications to the Local Plan, required to make the Plan sound in the light of issues identified during examination.

The Schedule of Potential Main Modifications, September 2021, sets out a series of changes required to resolve issues that make the Local Plan unsound or where it is not legally compliant. These generally involve changes to policies and text that are essential to enable the Plan to be adopted.

The following documents have been prepared to support the proposed Main Modifications to the Plan.

- Sustainability Appraisal, September 2021
- Habitats Regulations Assessment, September 2021

Further documents have been added to the Examination Library following the week 6 hearing sessions held in July 2021. Comments on these documents will also be accepted.

- F81A Appendix 1 Housing trajectory update (August 2021)
- F139 Brentwood Monitoring Report Housing Delivery 2020-21
- F140A Five Year Housing Land Supply Statement as at 31 March 2021
- F140B Five Year Land Supply Site Schedule as at 31 March 2021

We have also published a number of proposed changes to the submitted Policies Map that have been required as a result of main modifications.

All the consultation documents are available to view and download on the Local Plan website at [www.brentwood.gov.uk/localplan](http://www.brentwood.gov.uk/localplan)

### **How do I comment?**

The quickest and easiest way to make representations is via our Local Plan Online Consultation Portal at <https://brentwood.oc2.uk/>

Alternatively, a representation form can be downloaded from the website ([www.brentwood.gov.uk/localplan](http://www.brentwood.gov.uk/localplan)) and responses emailed to [planningpolicy@brentwood.gov.uk](mailto:planningpolicy@brentwood.gov.uk)

If you cannot use email, hard copies can be posted to: MM Consultation 2021, Brentwood Borough Council, Town Hall, Ingrave Road, Essex, CM15 8AY

Please note - this consultation is confined to the Main Modifications and associated supporting documents. **No representations should be made about parts of the Plan that are not proposed to be modified. Such representations will not be considered by the Inspectors.** It is not necessary to repeat comments already made on other aspects of the Plan as these are already being considered by the Inspectors.

Representations should focus on whether the Proposed Main Modifications are legally compliant and whether it is considered to meet the tests of soundness, as specified in the National Planning Policy Framework.

### **Data Protection**

The Council has a duty to collect your information under the Town and Country Planning (Local Planning) (England) Regulations 2012 and any comments you make will be a matter of public record. Please note whilst all personal contact details will be treated as confidential, each comment and the name of the person who made them will be featured on the Council's website.

Your comments, including your name, address and contact details will be shared with the Planning Inspectorate and Programme Officer. Please advise us if you do not wish your information to be shared, however this means that your comments will be withdrawn.

By submitting a representation, you are agreeing to the above conditions.

### **Additional Supporting Documents**

The following additional supporting documents are also made available for information purposes only on the Local Plan website [www.brentwood.gov.uk/localplan](http://www.brentwood.gov.uk/localplan):

- Schedule of Potential Additional Modifications, September 2021
- Equalities Impact Assessment, September 2021
- Health Impact Assessment, September 2021

Please note, the schedule of additional modifications, Equalities Impact Assessment and Health Impact Assessment do not impact the intent or interpretation of the Plan and are not required for soundness. They have been prepared by the Council and they do not form part of the Inspector's examination of the Plan. They are made available for information purposes only and do not form part of the consultation and no representations should be made on them.

## **Further Information**


For further information or advice, about the consultation documents and/or process, please contact the Planning Policy Team by email at [planning.policy@brentwood.gov.uk](mailto:planning.policy@brentwood.gov.uk) or by telephone on 01277 312 500

Yours sincerely

### **Phil Drane**

Corporate Director, Planning and Economy

You can view Brentwood Council's privacy policy at [www.Brentwood.gov.uk/privacy](http://www.Brentwood.gov.uk/privacy)



**BRENTWOOD**  
BOROUGH COUNCIL

## Consultation on Potential Main Modifications to the Local Plan 2016-33

September 2021

### REPRESENTATION FORM

This form should be used to make representations on the Main Modifications to the Brentwood Local Plan 2016-2033 submission version as contained within the Schedule of Potential Main Modifications and accompanying updated Sustainability Appraisal and Habitats Regulations Assessment.

The Schedule of Potential Main Modifications and all required supporting documents can be accessed via the Local Plan website at <http://www.brentwood.gov.uk/local-plan-examination>

Please note this form has two sections:

- Section A – Personal information
- Section B – Your representation

Please ensure you complete **both** parts of the form.

Where possible, we would prefer responses are provided using our Local Plan online consultation portal. This is the quickest and easiest way to make representations. To respond in this way, please follow this link: <https://brentwood.oc2.uk/>

Comments will be considered by the independent Planning Inspectors undertaking the examination.

**All responses must be received by 5pm Thursday 11 November 2021**

Please return forms either by attaching completed forms by email to [planning.policy@brentwood.gov.uk](mailto:planning.policy@brentwood.gov.uk) or alternatively by post to MM Consultation 2021, Planning Policy Team, Brentwood Borough Council, Town Hall, Brentwood, Essex CM15 8AY

**Data Protection**

All personal information that you provide will be used solely for the purpose of the Local Plan consultation. Please note whilst all addresses will be treated as confidential, comments will not be confidential. Each comment and the name of the person who made the comment will be featured on the Council's website.

By submitting this form, you are agreeing to the above conditions.

**Guidance Note on Legal Compliance**

The Inspectors have assessed whether the Plan meets the legal requirements under section 20(5) of the Planning and Compulsory Purchase Act 2004 (as amended (PCPA), which includes whether the Local Planning Authority has complied with the Duty to Cooperate (section 33 of the PCPA) when preparing the Plan, before moving on to test the Plan for soundness.

In relation to this consultation, comments regarding legal compliance should only be submitted where they relate to the potential Main Modifications.

**Guidance Note on Soundness**

Local Plans are required to be assessed against the tests of soundness. If you are objecting to a potential Main Modification, Question 3 of the representation form asks you to identify which of the below tests of soundness you consider the modification fails to address (soundness is explained in National Planning Policy Framework (NPPF 2021) paragraph 35).

**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.

**Justified** - The Plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

**Effective** - The Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.

**Consistent with national policy** - The Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

The preparation of the Local Plan has had regard to all policies in the NPPF.

However, insofar as your comments relate to the Main Modifications, you may take the view that the Local Plan:

- a) Fails to address a requirement of the NPPF; in this case you should explain what else it needs to include. Please note that the Local Plan does not need to repeat national policies; or
- b) Departs from national planning policies without good local reasons. In this case, please explain why.

Please keep in mind the information provided above to assist with correctly completing your comment form.

Section A: Personal Details	
Title	
First Name	
Last Name	
Job Title (if applicable)	
Organisation (if applicable)	
Address	
Post Code	
Telephone Number	
Email Address	

Do you wish to be notified when the Brentwood Local Plan 2016-2033 is adopted by the Council?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
---	------------------------------	-----------------------------

**Section B: Your Representation**

Please complete a separate sheet for each representation that you wish to make. You must complete 'Part A – Personal Details' for your representation to be accepted.

Representations cannot be treated as confidential and will be published on our Consultation Portal. Any representations that are considered libelous, racist, abusive or offensive will not be accepted. All representations made will only be attributed to your name. We will not publish any contact details, signatures or other sensitive information.

Full Name	
-----------	--

Question 1: Which **Main Modification and/or supporting document** does your representation relate to?

Each Main Modification within the Schedule has a reference number. This can be found in the first column i.e. MM1, MM2

Any representations on a supporting document should clearly state which paragraphs of the document it relates to and, as far as possible, your comments should be linked to specific Main Modifications. You should avoid lengthy comments on the supporting documents themselves.

Representations on the Policies Map must be linked to specific modifications in that they reflect a change required as a result of a Main Modification.

Schedule of Potential Main Modifications	MM no. <input style="width: 100%;" type="text"/>
Sustainability Appraisal	para(s) <input style="width: 100%;" type="text"/>
Habitat Regulations Assessment	para(s) <input style="width: 100%;" type="text"/>
Policies Map or other supporting documents	Please specify <input style="width: 100%;" type="text"/>



Question 2: Do you consider this **Main Modification and/or supporting document**:

Legally Compliant?

YES

NO

Sound?

YES

NO

Question 3: If you consider the **Main Modification and/or supporting document** unsound, please indicate which of the soundness test(s) does it fail (please mark all that apply):

Not positively prepared

Not justified

Not effective

Not consistent with national planning policy

Question 4: Please provide details of either:

- Why you consider the **Main Modification and/or supporting document** to be sound or legally compliant; or
- Why you consider the **Main Modification and/or supporting document** to be unsound or is not legally compliant.

Please continue on a separate sheet if necessary

Question 5: Please set out what change(s) you consider necessary to make the **Main Modification and/or supporting document** sound or legally compliant, having regard to the matters that you identified above.

You will need to say why this change will make the Submission Version of the Local Plan sound or legally compliant. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as accurate as possible.

Please continue on a separate sheet if necessary

## APPENDIX 4.

### Main Modifications

#### Details of the Consultation

Following the Examination Hearing Sessions for the emerging Local Plan, the Council has prepared a number of changes, known as Main Modifications, to the Brentwood Pre Submission Local Plan and Addendum of Focussed Changes to the Pre-Submission Local Plan to address issues of soundness and/or legal compliance identified by the Inspectors. These are put forward without prejudice to the Inspectors' final conclusions on the Plan.

Representations are invited on the Main Modifications and supporting documents only. The consultation will run for 6 weeks from noon Thursday 30 September 2021 to 5pm Thursday 11 November 2021.

The Schedule of Main Modifications and supporting documents can be viewed below.

A schedule of Additional Modifications has been prepared which are minor changes to the Plan and not those necessary for soundness. They do not form part of the Inspectors' examination of the Plan. The schedule of Additional Modifications is not being consulted on but is available for reference and can be viewed below.

#### How to make your representations

The quickest and easiest way to make your representations is via the **Local Plan Consultation Portal** (<https://brentwood.oc2.uk/>).

Alternatively, a representation form can be downloaded here (<https://brentwood.sharefile.eu/d-sd514335a1ba3426eadcdf21f201c9769>) and responses emailed to [planning.policy@brentwood.gov.uk](mailto:planning.policy@brentwood.gov.uk)

If you cannot use email, hard copies can be posted to:

MM Consultation 2021  
Planning Policy Team  
Brentwood Borough Council  
Town Hall, Ingrave Rd  
Brentwood  
Essex, CM15 8AY

#### Statement of Representation Procedure

The Council's Statement of Representation Procedure providing full details of the consultation can be accessed below:

Statement of representation procedure and availability of documents  
(<https://brentwood.sharefile.eu/d-sa4f8366db7544562ab760db3e596fd32>)

## Schedule of Potential Main Modifications

Schedule of Potential Main Modifications (<https://brentwood.sharefile.eu/d-s25091ca014b340899620c6bab240a478>) incorporating:

Annexe 1 – (MM114) Appendix 1 – Local Plan Housing Trajectory (<https://brentwood.sharefile.eu/d-s81fff942cc0c4c1e92d1326e8ee047fd>)

Annexe 2 – (MM116) Appendix 2 – Strategic and non-strategic policies and their relationship to Strategic Objectives (<https://brentwood.sharefile.eu/d-sdbaf54597e4148f19882b0e31466019a>)

Annexe 3 – (MM117) Appendix 3 – Monitoring Framework (<https://brentwood.sharefile.eu/d-sae6ddce18e6542cd921fb6a8572903c3>)

## Proposed changes to the submitted Policies Map

Proposed changes to the Submitted Policies Map (<https://brentwood.sharefile.eu/d-s9e72c2ac2b27483e8a30beb7f7010e7d>)

Policies Map (large scale version) (<https://brentwood.sharefile.eu/d-s01b72bdc0b054bb8953884eec924ae5c>)

## Supporting documents

The following documents have been prepared to support the Schedule of Potential Main Modifications to the Plan. Representations concerning their content will be accepted to the extent that they are relevant to inform your comments on the Main Modifications.

Sustainability Appraisal (September 2021) (<https://brentwood.sharefile.eu/d-s98b54a6b92a144e5a94a5a017cf21f36>)

Habitats Regulations Assessment (September 2021) (<https://brentwood.sharefile.eu/d-s894f3a657d8a446f966a3ede8e96c6cf>)

Further documents have been added to the Examination Library following the week 6 hearing sessions held in July 2021. Comments on these documents will also be accepted.

F81A Appendix 1 Housing trajectory update (August 2021) (<https://brentwood.sharefile.eu/d-sb685cfa85b5849c98173985b666c5644>)

F139 Brentwood Monitoring Report Housing Delivery 2020-21 (<https://brentwood.sharefile.eu/d-s307bde615c374861a8733bae129204ad>)

F140A Five Year Housing Land Supply Statement as at 31 March 2021 (<https://brentwood.sharefile.eu/d-s9affdf4278c43d29d80f1ede1097946>)

F140B Five Year Land Supply Site Schedule as at 31 March 2021 (<https://brentwood.sharefile.eu/d-s57f1d69dc67a42c69dc41d8a9e76fc8b>)

## Additional documents

Schedule of Potential Additional Modifications (<https://brentwood.sharefile.eu/d-s60058397ef0848428def016313b2b696>)

Equalities Impact Assessment (<https://brentwood.sharefile.eu/d-s1bada481565747adaa8bd976abbd3a5b>)

Health Impact Assessment(<https://brentwood.sharefile.eu/d-sfcbdb342fc06423592174ff2fa74a887>)

It may be helpful to refer to the Pre-Submission Local Plan and Addendum of Focussed Changes to the Pre-Submission Local Plan alongside the Schedule of Main Modifications:

Brentwood Pre-Submission Local Plan  
(<https://document.brentwood.gov.uk/pdf/31012019170028000000.pdf>)

Addendum of Focussed Changes to the Pre-Submission Local Plan  
(<https://document.brentwood.gov.uk/pdf/10102019123257000000.pdf>)



## Final

This is a live document and has been updated throughout the Plan making process. This version has been updated to reflect the modifications required as directed by the Planning Inspectors to make the Local Plan sound. This is the final iteration of the document.

# Final Equalities Impact Assessment 2022 V.5.0

Brentwood Local Plan Policies (2022)

Last Update: February 2022

### Summary

This document contains the Equality Impact Assessment (EqIA) tables for Brentwood Borough's development management policies contained within the adopted Local Plan based on the modifications required to make the Plan sound as outlined in the Planning Inspectors Report. This has been an iterative process and has been updated to reflect each stage of the plan making process.

The purpose of the EqIA is to ensure that equality is placed at the centre of policy development and review, it identifies the likely impact of this Plan on the existing and future communities. The EqIA can anticipate and recommend ways to avoid any discriminatory or negative consequences for a particular group.

The duty to carry out an EqIA of new policies is set out in the Equality Act 2010. The Act protects people from discrimination on the basis of certain characteristics, which are known as protected characteristics. The protected characteristics are:

- Age;
- Disability;
- Ethnicity/Race;
- Gender/Sex;
- Gender reassignment;
- Marriage and Civil Partnership;
- Pregnancy and maternity;
- Religion or beliefs and;
- Sexual orientation.

The Duty requires public bodies to have due regard for the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people when carrying out their activities and Brentwood Borough has considered the commentary in the EqIA assessment tables. Due to the changes in policy numbering and names in the Potential Main Modifications version of the Brentwood Local Plan to avoid confusion appendix 1 contains the table for the Main Modifications and appendix 2 contains a table for the 2016 Draft Local Plan produced in 2017 in the drafting of policies for the 2018 Draft Local Plan. The policies of the Local Plan were not re-assessed following the Inspectors Report as there were no further major modification required to the policies. Some minor word changes have been made, however these changes had no impact on the principles of what the policies aim to achieve.



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  - 1.1 EqIA and the Local Plan
- 2. What is an Equalities Impact Assessment (EqIA)?
  - 2.1 The Purpose of an Equalities Impact Assessment
- 3. Appraisal
  - 3.1 Population Profile
    - 3.1.1 Geographic Characteristics of Brentwood
    - 3.1.2 Brentwood Population Profile
  - 3.2 Assessment of Policies
  - 3.3 Roles and Responsibilities
- 4. Findings
  - Table 1 Coding System
- 5. Net Steps

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- Appendix 1: Main Modifications, Policy Assessment
- Appendix 2: Pre-Submission Local Plan, Policy Assessment

## 1. Introduction

### 1.1 EqlA and the Local Plan

The new adopted Local Plan will now replace the adopted Replacement Local Plan (2005) and sets out the spatial strategy for future growth and development for the period 2016-2033.

The Local Plan integrates with other policies and strategies of Brentwood Borough Council and other organisations. The Local Plan aims to address priorities set out in the Council's Corporate Strategy – 'Brentwood 2025', under the themes: growing our economy, protecting our environment, developing our communities, improving housing, delivering an effective and efficient council. The Local Plan is one of the ways in which the aims and objectives of the Corporate Strategy are achieved.

Supporting the delivery of this vision are a series of strategic objectives and spatial development principles outlining how growth and change is to be managed across the borough through the Plan period. The Spatial Strategy described in the Local Plan (Chapter 3) provides the framework for managing change and shaping how the area develops in future.

Principally, the spatial strategy sets out the level and location of development and growth and the key areas of change up to 2033, highlights the borough's built and natural assets to be safeguarded and enhanced.

The Local Plan was subject to Sustainability Appraisal/Strategic Environmental Assessment and Habitats Regulation Assessment to assess its environmental, social and economic performance at each stage of plan making. It was informed and shaped by a number of public and stakeholder consultations. All consultations were carried out in accordance with the Council's SCI.

The Council's Authority Monitoring Report will continue to measure progress with implementing the Local Plan, these reports will also be presented, when appropriate, to Council Committees.

The Local Plan seeks to promote social inclusion and ensure that all people (including vulnerable groups) have access to the services and opportunities that they may need such as housing, employment, public transport and community facilities (e.g. education, health and local shopping). This will work towards meeting the public sector equality duty as the needs of these individuals are being incorporated into the Local Plan.

## 2. What is an Equalities Impact Assessment (EqIA)?

This Equality Impact Assessment (EqIA) reviews the Brentwood Borough Council adopted Local Plan. The purpose of the EqIA is to ensure that equality is placed at the centre of policy development and review and identifies the likely impact of this Plan on the borough's community. The EqIA can anticipate and recommend ways to avoid any discriminatory or negative consequences for a particular group.

The duty to carry out an EqIA of new policy is set out in the Equality Act 2010. The Act protects people from discrimination on the basis of certain characteristics, which are known as protected characteristics. The protected characteristics are:

- Age
- Disability
- Ethnicity/Race
- Gender/Sex
- Gender reassignment
- Marriage and Civil Partnership
- Pregnancy and maternity
- Religion or beliefs and;
- Sexual orientation

The duty requires public bodies to have due regard for the need to eliminate discrimination, advance equality of opportunity, and foster good relations between different people when carrying out their activities.

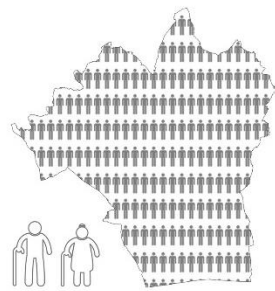
The EqIA has been prepared following an iterative process. This involved identifying the likely impacts arising from each draft policy and then considering these impacts as positive, negative or neutral in light of the thrust of the relevant policy. This was set against known facts, information and evidence gathered from the Council's robust evidence base which underpins the Local Plan and which relates specifically to the protected characteristics listed in the Equality Act 2010. Recommendations on ways by which the negative impacts could be removed or mitigated and the positive impacts strengthened were then sought. The draft policies affected are then reconsidered and re-examined again in the same iterative process until they emerge with no known negative impacts and became more acceptable.

### 3. Appraisal

#### 3.1 Population Profile

The population of Brentwood in 2011 was 73,601 (Census), of which approximately 70% live within Brentwood Town. The 2014 mid-year population estimates show's that this has increased to 75,600. A large portion of the population are retired with an aging population trend projected to continue. The proportion of the population from black and minority ethnic groups in the borough is well below average for the Eastern region and England. The largest non-white minority ethnic group is made up of Asian origins.

Figure 1: Brentwood Population  
(Source: Brentwood Borough Profile)



The borough's population is over 73,600 with a significant retired population - an ageing population trend projected to continue



The health of people in Brentwood is generally better than the England average. Deprivation is lower than average, however about 10.8% children live in poverty. Life expectancy for both men and women is higher than the England average. Local health priorities include improving the health of older people, increasing vaccination coverage, and reducing cardiovascular disease by reducing the prevalence of obesity

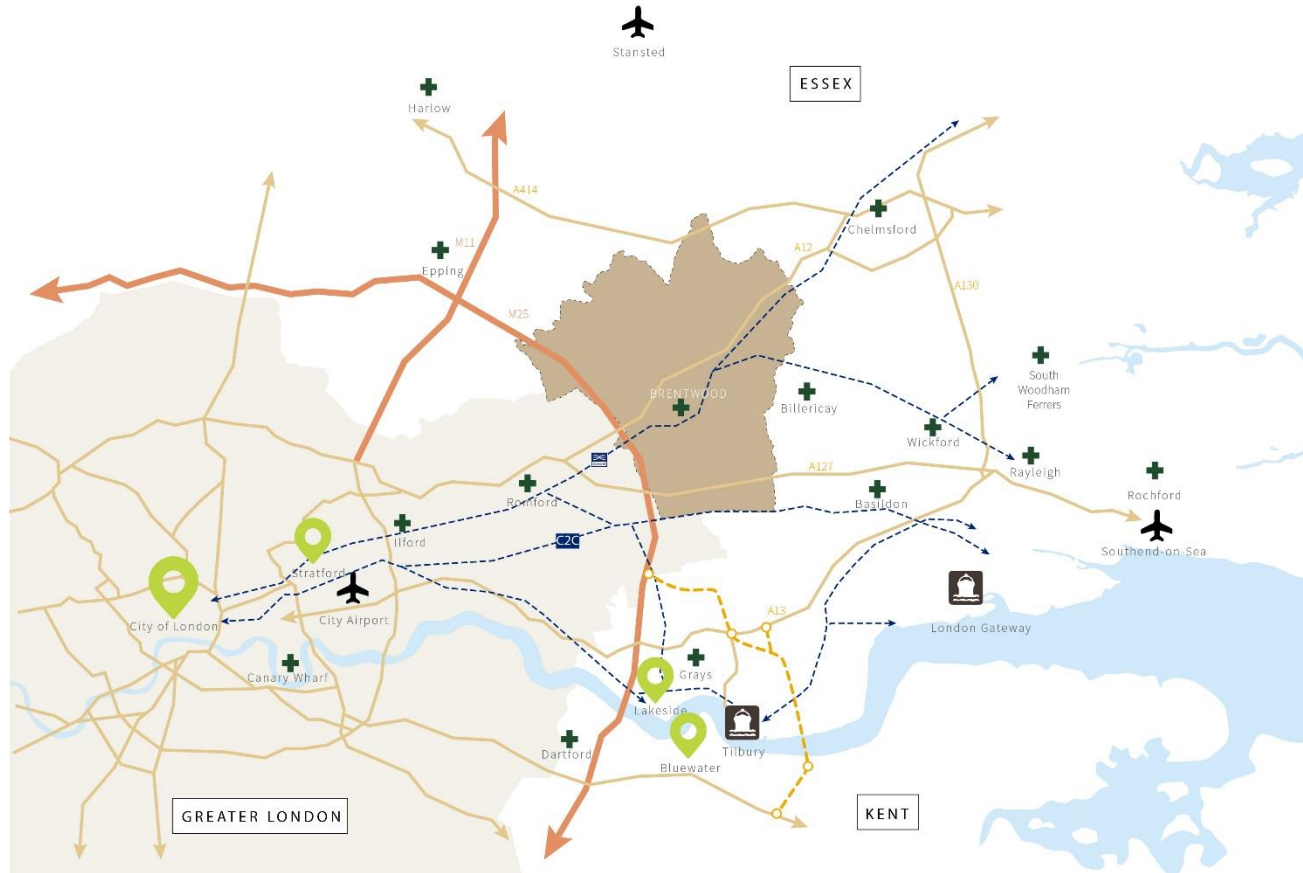


ONS data 2015/2016 indicates an economic activity rate of 79%, slightly lower than the regional rate of 80.1% but higher than the GB rate of 77.9% Notably the number of self-employed persons was at 12.5% which was significantly above East of England (10.7%) and GB (10.3%) averages. Long-term unemployed rates were less than both regional and national averages

### 3.1.1 Geographic Characteristics of Brentwood

Brentwood Borough is located in the south-west of Essex and east of Greater London. The Borough is approximately 15,300 hectares. The Borough is centred on the market town of Brentwood, which is surrounded by some suburban areas and villages set amongst the Essex countryside. The Borough is only 20 miles from Central London with strong transport links, including the current development of Crossrail, into London. The Borough is 89% green belt, giving the community ample access to open green space. The cost of a house in Brentwood cost an average £320,000 which is £100,000 higher than the average house price within England. Despite this, approximately 80% of the population own their own home. Brentwood is one of the most affluent areas in England, within the least deprived 10% of the country.

Figure 2: Geographic Characteristics of Brentwood  
(Source: Brentwood Borough Profile)



## 3.2 Assessment of Policies

Applying the principles from the Equality Act 2010, as outlined in section 2 of this report, the Local Plan and all the underpinning policies (as amended within the adopted Local Plan, March 2022) were assessed according to the chapters found within the Local Plan framework:

- Managing Growth;
- Resilient Built Environment;
- Housing Provision;
- Prosperous Community;
- Natural Environment; and
- Site Allocations

The EqIA table found in appendix 1 is organised based on the chapters found within the Schedule of Potential Main Modifications, September 2021 Local Plan Framework and adopted Local Plan. The EqIA table found in appendix 2 is organised based on the chapters found within the 2018/19 Pre-Submission Local Plan Framework.

The coding system used to assess the policies are described in the table below.

Table 1: Coding System

Description	Symbol
Those policies that make a significant positive impact to the identified protected characteristic	(++)
Those policies that make a positive impact to the identified protected characteristic	(+)
Those policies which do not have a positive or negative impact to the identified protected characteristic	(N)
Those policies which have a minor negative impact to the identified protected characteristic	(-)
Those policies which have significant negative impact to the identified protected characteristic	(--)

#### 4. Findings

The Equalities Assessment of the individual policies, as illustrated in appendix 1, clearly shows that majority of the policies found within the Local Plan have a positive impact on the community when assessed against the Equalities Act (2010) characteristics. It is important to note that the Local Plan policies are supported and enhanced by additional national and local policies, such as the revised National Planning Policy Framework (NPPF) and the National Planning Practice Guidance, Essex Design Guide, and Licensing Policy, etcetera, which in themselves have an overall positive benefit on the community. These wider policies and regulations were not considered as part of this assessment.



## 5. Next Steps:

This is the final iteration of the Equalities Impact Assessment (EqIA) and concludes the process. The adopted Local Plan has been examined in public by two appointed Planning Inspectors from the Secretary of State. A Potential Main Modifications consultation was held to reflect changes made to the Local Plan which were necessary to ensure the Local Plan was sound based on the requirements set out within the NPPF. The modifications did not result in any reduction in scoring through the EqIA process. Following the completion of the Potential Main Modifications consultation, the Local Plan and all the required supporting documents were provided to the two Planning Inspectors, which the Inspectors reviewed to make their final decision on the soundness of the Plan. The Council received the Inspectors Report on 23<sup>rd</sup> February 2022 which concluded the Local Plan could be adopted stating that *the duty to co-operate has been met and that with the recommended main modification the Brentwood Local Plan satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.*

This concludes the EqIA process for this adopted Local Plan. A new EqIA was be undertaken as part of the early Local Plan Review.

## Appendices

### Appendix 1: Main Modifications, Policy Assessment

Policy Title	Age;	Disability;	Ethnicity / Race;	Gender / Sex;	Gender reassignment;	Marriage & Civil Partnership	Pregnancy & maternity;	Religion or beliefs	Sexual orientation	Commentary
Strategic Objectives										
STRATEGIC OBJECTIVE S01: Managing Growth Sustainably	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	
STRATEGIC OBJECTIVE S02: Delivery a Healthy and Resilient Built Environment	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	
STRATEGIC OBJECTIVE S03: Deliver Sustainable Communities with Diverse Economic & Social-cultural Opportunities for All	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	
STRATEGIC OBJECTIVE S04: Deliver Beautiful,	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	

Policy Title	Age;	Disability;	Ethnicity / Race;	Gender / Sex;	Gender reassignment;	Marriage & Civil Partnership	Pregnancy & maternity;	Religion or beliefs	Sexual orientation	Commentary
Biodiverse, Clean and a Functional Natural Environment										
04. Managing Growth										
STRATEGIC POLICY MG01: Spatial Growth	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Aiming to fulfil requirement for growth for employment and new homes, in line with Government requirements, increasing number and variety of accommodation available for all.
STRATEGIC Policy MG02: Green Belt (originally NE09)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Seeking to achieve sustainable, well-designed places that protect and enhancing Green Belt locations.
Policy MG03: Settlement Hierarchy	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Provides greater clarity on the density of developments to ensure the existing character of the villages are protected while still permitting an appropriate level of growth.
POLICY MG04: Health Impact Assessments (HIAs)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Promoting healthier and inclusive environments for all.
POLICY MG05: Developer Contributions	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Financial contributions to meet new infrastructure requirements
POLICY MG06: Local Plan Review	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Early review of the Plan to ensure that appropriate transport infrastructure is

Policy Title	Age;	Disability;	Ethnicity / Race;	Gender / Sex;	Gender reassignment;	Marriage & Civil Partnership	Pregnancy & maternity;	Religion or beliefs	Sexual orientation	Commentary
										able to come forward to support development and an opportunity for the Council to review its housing needs to ensure the right amount and mix of dwelling our provided to support the local community.
05 . Resilient Built Environment										
STRATEGIC POLICY BE01: Carbon Reduction and Renewable Energy	(++)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Positive resource use and home efficiency for all with particular positive impact on the young of more sustainable resource uses to consider future generational impact.
POLICY BE02: Water Efficiency and Management	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Positive impact on the environment and access to clean water for local residents.
POLICY BE03: Establishing Low Carbon and Renewable Energy Infrastructure Network	(N)	(N)	(N)	(N)	(N)	(N)	(N)	(N)	(N)	Community led initiative for renewable and low carbon energy. Positive development initiative with generally neutral impact on protected characteristic.
POLICY BE04: Managing Heat Risk	(++)	(++)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Positive resource use and impact of extreme heat for all with particular positive impact on the young of more sustainable resource uses to consider future generational

Policy Title	Age;	Disability;	Ethnicity / Race;	Gender / Sex;	Gender reassignment;	Marriage & Civil Partnership	Pregnancy & maternity;	Religion or beliefs	Sexual orientation	Commentary
										impact and improvement for older persons and those with disabilities who may be more home-bound.
POLICY BE05: Sustainable Drainage	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Positive for all, implementation of flood resilience schemes impact on new and existing residents alike.
STRATEGIC POLICY BE06: Communications Infrastructure	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Positive for all, implementation of improved communication infrastructure impact on new residents alike, overall improvement to infrastructure likely to benefit existing residents and businesses.
POLICY BE07: Connecting New Developments to Digital Infrastructure	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Positive for all, implementation of improved communication infrastructure impact on new residents.
STRATEGIC POLICY BE08: Strategic Transport Infrastructure	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Improvement to strategic transport infrastructure offers benefits to all
STRATEGIC POLICY BE09: Sustainable Means of Travel and Walkable Streets	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Better options for travel and improved streetscapes are positive for all
POLICY BE10: Sustainable	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Sustainable passenger transport that considers community facilities, schools,

Policy Title	Age;	Disability;	Ethnicity / Race;	Gender / Sex;	Gender reassignment;	Marriage & Civil Partnership	Pregnancy & maternity;	Religion or beliefs	Sexual orientation	Commentary
Passenger Transport										specialist older person housing. Positive for all
POLICY BE11: Electric and Low Emission Vehicle	(++)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Considering future transport changes and beyond immediate time horizons. Minimising shock and impact of stresses of future transport change. Particular positive impact on the young.
POLICY BE12: Mitigating the Transport Impacts of Development	(N)	(N)	(N)	(N)	(N)	(N)	(N)	(N)	(N)	Avoidance of negative impact from new development. Neutral to all
POLICY BE13: Parking Standards	(N)	(N)	(N)	(N)	(N)	(N)	(N)	(N)	(N)	Design standards for parking provision for new homes. Neutral impact on protected characteristic groups.
STRATEGIC POLICY BE14: Creating Successful Places	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Positive for all – beneficial for inclusiveness to all communities.
POLICY BE15: Planning for Inclusive Communities	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Positive for all – beneficial for inclusiveness to all communities.
STRATEGIC Policy BE16: Conservation and Enhancement of Historic Environments	(++)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Protection and enhancement, for all of the community, particularly positive for future generations.

Policy Title	Age;	Disability;	Ethnicity / Race;	Gender / Sex;	Gender reassignment;	Marriage & Civil Partnership	Pregnancy & maternity;	Religion or beliefs	Sexual orientation	Commentary
POLICY BE 17: Schedule Monuments and Archaeological Remains	(++)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Protection and enhancement, for all of the community, particularly positive for future generations.
06 Housing Provision										
STRATEGIC POLICY HP01: Housing Mix	Hp01	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	New homes that offer an inclusive, accessible environment. Noted that proposed focused changes may impact on this policy reducing affordable and accessible homes.
POLICY HP02: Protecting the Existing Housing Stock	(N)	(N)	(N)	(N)	(N)	(N)	(N)	(N)	(N)	No net loss of homes. Neutral impact
POLICY HP03: Residential Density	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Introducing new homes that are appropriate for the location
POLICY HP04: Specialist Accommodation	(++)	(++)	(N)	(N)	(N)	(N)	(N)	(N)	(N)	Accommodation to fit the identified need, particularly with appropriate access, internal layout and location.
POLICY HP05: Affordable Housing	(++)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Affordable home may particularly benefit the young and new families. Noted that proposed focused changes may impact on this policy reducing affordable homes.

Policy Title	Age;	Disability;	Ethnicity / Race;	Gender / Sex;	Gender reassignment;	Marriage & Civil Partnership	Pregnancy & maternity;	Religion or beliefs	Sexual orientation	Commentary
POLICY HP06: Standards for new housing	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Beneficial to all groups to provide appropriate accommodation of a positive size
POLICY HP07: Provision for Gypsies and Travellers	(N)	(N)	(++)	(N)	(N)	(N)	(N)	(N)	(N)	Particularly beneficial to Gypsy and Traveller community to meet identified need
POLICY HP08: Safeguarding permitted sites	(N)	(N)	(++)	(N)	(N)	(N)	(N)	(N)	(N)	Particularly beneficial to Gypsy and Traveller community to meet identified need
POLICY HP09: Sub-Division of Pitches or Plots	(N)	(N)	(++)	(N)	(N)	(N)	(N)	(N)	(N)	Particularly beneficial to Gypsy and Traveller community to meet identified need
POLICY HP10: Proposals for Gypsies, Travellers and Travelling Showpeople On Windfall sites	(N)	(N)	(++)	(N)	(N)	(N)	(N)	(N)	(N)	Particularly beneficial to Gypsy and Traveller, and Travelling Showpeople community to meet identified need
07. Prosperous Community										
STRATEGIC POLICY PC01: Safeguarding Employment Land Allocations	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Promotion and support for employment and economic locations, positive for all
POLICY PC02: Supporting the Rural Economy	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Promotion and support for employment and economic locations, positive for all



Policy Title	Age;	Disability;	Ethnicity / Race;	Gender / Sex;	Gender reassignment;	Marriage & Civil Partnership	Pregnancy & maternity;	Religion or beliefs	Sexual orientation	Commentary
STRATEGIC POLICY PC03: Retail and Commercial Leisure Growth	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Promotion and support for employment and economic locations, positive for all
STRATEGIC POLICY PC04: Retail Hierarchy of Designated Centres	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Promotion and support for retail, employment and economic locations, positive for all
POLICY PC05: Brentwood Town Centre	(+)	(+)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Promotion and support for retail, employment and economic locations, positive for all. Access must be considered.
POLICY PC06: Mixed Use Development in Designated Centres	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Promotion and support for employment and economic locations, positive for all
POLICY PC07: Primary Shopping Areas	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Promotion and support for employment and economic locations, positive for all
POLICY PC08: Non-centre Uses	(++)	(++)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Promotion and support for employment and economic locations, positive for all. Local facilities provides better facilities for those where mobility is more challenging.
POLICY PC09: Night Time Economy	(+)	(N)	(N)	(N)	(N)	(N)	(N)	(N)	(N)	Opportunity for increased out of hours employment and social locations. In particular for younger adults.

Policy Title	Age;	Disability;	Ethnicity / Race;	Gender / Sex;	Gender reassignment;	Marriage & Civil Partnership	Pregnancy & maternity;	Religion or beliefs	Sexual orientation	Commentary
STRATEGIC POLICY PC10: Protecting and Enhancing Community Assets	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Protection and enhancement, for all of the community
POLICY PC11: Education Facilities	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Beneficial for all of community
07. Natural Environment										
STRATEGIC POLICY NE01: Protecting and enhancing the natural environment	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Seeking to achieve sustainable, well-designed places that promote community wellbeing and protecting and enhancing natural environment.
STRATEGIC Policy NE02: Green and Blue Infrastructure	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Positive for all – beneficial for inclusiveness and access to natural environment for all communities.
POLICY NE03: Trees, Woodlands, Hedgerows	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Seeking to achieve sustainable, well-designed places that promote community wellbeing and protecting and enhancing natural environment.
POLICY NE04: Thames Chase Community Forest	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Seeking to achieve sustainable, well-designed places that promote community wellbeing and protecting and enhancing natural woodland environment.

Policy Title	Age;	Disability;	Ethnicity / Race;	Gender / Sex;	Gender reassignment;	Marriage & Civil Partnership	Pregnancy & maternity;	Religion or beliefs	Sexual orientation	Commentary
POLICY NE05: Open Space in New Development	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Positive social integration, contribute to improved mental and physical wellbeing. Access needs consideration.
POLICY NE06: Allotments and Community Food Growing Space	(++)	(+)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Positive social integration, contribute to improved mental and physical wellbeing. Access needs consideration.
POLICY NE07: Protecting Land for Gardens	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Retention of gardens contribute to improved mental and physical wellbeing
STRATEGIC POLICY NE08: Air Quality	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Seeking to achieve sustainable, well-designed places that promote community wellbeing and protecting and enhancing air quality
STRATEGIC POLICY NE09: Flood Risk	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Seeking to achieve sustainable, well-designed places that protect against flood risk.
POLICY NE10: Contaminated Land and Hazardous Substances	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Seeking to achieve sustainable, well-designed places that promote healthy places and enhancing natural environment.
POLICY NE11: Floodlighting and Illumination	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Seeking to achieve sustainable, well-designed places protect and enhancing the light environment.
09. Site Allocations										
Dunton Hills Garden Village	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	New inclusive community with appropriate facilities and infrastructure, to benefit

Policy Title	Age;	Disability;	Ethnicity / Race;	Gender / Sex;	Gender reassignment;	Marriage & Civil Partnership	Pregnancy & maternity;	Religion or beliefs	Sexual orientation	Commentary
Strategic Allocation.										communities now and into the future.
Housing/Site Allocations	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	New inclusive homes with appropriate facilities and infrastructure, to benefit communities now and into the future.
Employment Site Allocations	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Proposed areas of expansion for employment use with strategic site close to main roadways.

Appendix 2. Pre-Submission Local Plan, Policy Assessment

Policy Title	Age;	Disability;	Ethnicity / Race;	Gender / Sex;	Gender reassignment;	Marriage & Civil Partnership	Pregnancy & maternity;	Religion or beliefs	Sexual orientation	Commentary
Strategic Objectives										
STRATEGIC OBJECTIVE S01: Managing Growth Sustainably	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	
STRATEGIC OBJECTIVE S02: Delivery a Healthy and Resilient Built Environment	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	
STRATEGIC OBJECTIVE S03: Deliver Sustainable Communities with Diverse Economic & Social-cultural Opportunities for All	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	
STRATEGIC OBJECTIVE S04: Deliver Beautiful,	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	

Policy Title	Age;	Disability;	Ethnicity / Race;	Gender / Sex;	Gender reassignment;	Marriage & Civil Partnership	Pregnancy & maternity;	Religion or beliefs	Sexual orientation	Commentary
Biodiverse, Clean and a Functional Natural Environment										
04. Managing Growth										
STRATEGIC POLICY SP01: Sustainable Development	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Positive approach to reflect presumption of sustainable development for new homes and employment.
STRATEGIC POLICY SP02: Managing Growth	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Aiming to fulfil requirement for growth for new homes, in line with Government requirements, increasing number and variety of accommodation available for all.
STRATEGIC POLICY SP03: Health Impact Assessments (HIAs)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Promoting healthier and inclusive environments for all.
STRATEGIC POLICY SP04: Developer Contributions	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Financial contributions to meet new infrastructure requirements
STRATEGIC POLICY SP05: Construction Management	(+)	(+)	(N)	(N)	(N)	(N)	(N)	(N)	(N)	Considerate construction, minimising impact on existing residents and business
STRATEGIC POLICY SP06:	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	More new homes, in line with Government requirements, increasing

Policy Title	Age;	Disability;	Ethnicity / Race;	Gender / Sex;	Gender reassignment;	Marriage & Civil Partnership	Pregnancy & maternity;	Religion or beliefs	Sexual orientation	Commentary
Effective Delivery of Development										number and variety of accommodation available for all from constructive masterplanning .
05 . Resilient Built Environment										
POLICYBE01: Future Proofing	(++)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Considering future changes and beyond immediate time horizons. Minimising shock and impact of stresses of future events. Particular positive impact on the young.
POLICY BE02: Sustainable Construction and Resource Efficiency	(++)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Particular positive impact on the young of more sustainable resource use to consider future generational impact.
POLICY BE03: Carbon Reduction, Renewable Energy and Water Efficiency	(++)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Positive resource use and home efficiency for all with particular positive impact on the young of more sustainable resource uses to consider future generational impact.
POLICY BE04: Establishing Low Carbon and Renewable Energy Infrastructure Network	(N)	(N)	(N)	(N)	(N)	(N)	(N)	(N)	(N)	Community led initiative for renewable and low carbon energy. Positive development initiative with generally neutral impact on protected characteristic.

Policy Title	Age;	Disability;	Ethnicity / Race;	Gender / Sex;	Gender reassignment;	Marriage & Civil Partnership	Pregnancy & maternity;	Religion or beliefs	Sexual orientation	Commentary
POLICY BE05: Assessing Energy Infrastructure	(++)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Positive resource use and home efficiency for all with particular positive impact on the young of more sustainable resource uses to consider future generational impact.
POLICY BE06: Improving Energy Efficiency in Existing Dwellings	(++)	(++)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Positive resource use and home efficiency for all with particular positive impact on the young of more sustainable resource uses to consider future generational impact and improvement for older persons and those with disabilities who may be more home-bound.
POLICY BE07: Managing Heat Risk	(++)	(++)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Positive resource use and impact of extreme heat for all with particular positive impact on the young of more sustainable resource uses to consider future generational impact and improvement for older persons and those with disabilities who may be more home-bound.
POLICY BE08: Sustainable Drainage	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Positive for all, implementation of flood resilience schemes impact on new and existing residents alike.
POLICY BE09: Communications Infrastructure	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Positive for all, implementation of improved communication infrastructure impact on new residents alike, overall improvement to infrastructure likely to benefit existing residents and businesses.
POLICY BE10: Connecting New Developments to	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Positive for all, implementation of improved communication



Policy Title	Age;	Disability;	Ethnicity / Race;	Gender / Sex;	Gender reassignment;	Marriage & Civil Partnership	Pregnancy & maternity;	Religion or beliefs	Sexual orientation	Commentary
Digital Infrastructure										infrastructure impact on new residents.
POLICY BE11: Strategic Transport Infrastructure	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Improvement to strategic transport infrastructure offers benefits to all
POLICY BE12: Car-Limited Development	(N) (-)	(N) (-)	(++)	(++)	(++)	(++)	(N) (-)	(++)	(++)	Car limited development may be positive for those with full mobility to use alternatives. Neutral -negative to those who find non-car travel more challenging. Design and location of development will need to consider this.
POLICY BE13: Sustainable Means of Travel and Walkable Streets	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Better options for travel and improved streetscapes are positive for all
POLICY BE14: Sustainable Passenger Transport	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Sustainable passenger transport that considers community facilities, schools, specialist older person housing. Positive for all
POLICY BE15: Electric and Low Emission Vehicle	(++)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Considering future transport changes and beyond immediate time horizons. Minimising shock and impact of stresses of future transport change. Particular positive impact on the young.
POLICY BE16: Mitigating the Transport	(N)	(N)	(N)	(N)	(N)	(N)	(N)	(N)	(N)	Avoidance of negative impact from new development. Neutral to all

Policy Title	Age;	Disability;	Ethnicity / Race;	Gender / Sex;	Gender reassignment;	Marriage & Civil Partnership	Pregnancy & maternity;	Religion or beliefs	Sexual orientation	Commentary
Impacts of Development										
POLICY BE17: Parking Standards	(N)	(N)	(N)	(N)	(N)	(N)	(N)	(N)	(N)	Design standards for parking provision for new homes. Neutral impact on protected characteristic groups.
POLICY BE18: Green and Blue Infrastructure	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Positive for all – beneficial for inclusiveness and access to natural environment for all communities.
POLICY BE19: Access to Nature	(++)	(+)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Positive for all – beneficial for inclusiveness and access to natural environment for all communities.
POLICY BE20: Allotments and Community Food Growing Space	(++)	(+)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Positive social integration, contribute to improved mental and physical wellbeing. Access needs consideration.
POLICY BE21: Protecting Land for Gardens	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Retention of gardens contribute to improved mental and physical wellbeing
POLICY BE22: Open Space in New Development	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Positive social integration, contribute to improved mental and physical wellbeing. Access needs consideration.
POLICY BE23: Open Space, Sport and Recreational Facilities	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Positive social integration, contribute to improved mental and physical wellbeing. Access needs consideration.
06 Housing Provision										

Policy Title	Age;	Disability;	Ethnicity / Race;	Gender / Sex;	Gender reassignment;	Marriage & Civil Partnership	Pregnancy & maternity;	Religion or beliefs	Sexual orientation	Commentary
POLICY HP01: Housing Mix	Hp01	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	New homes that offer an inclusive, accessible environment. Noted that proposed focused changes may impact on this policy reducing affordable and accessible homes.
POLICY HP02: Protecting the Existing Housing Stock	(N)	(N)	(N)	(N)	(N)	(N)	(N)	(N)	(N)	No net loss of homes. Neutral impact
POLICY HP03: Residential Density	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Introducing new homes that are appropriate for the location
POLICY HP04: Specialist Accommodation	(++)	(++)	(N)	(N)	(N)	(N)	(N)	(N)	(N)	Accommodation to fit the identified need, particularly with appropriate access, internal layout and location.
POLICY HP05: Affordable Housing	(++)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Affordable home may particularly benefit the young and new families. Noted that proposed focused changes may impact on this policy reducing affordable homes.
POLICY HP06: Standards for new housing	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Beneficial to all groups to provide appropriate Accomodation of a positive size
POLICY HP07: Provision for Gypsies and Travellers	(N)	(N)	(++)	(N)	(N)	(N)	(N)	(N)	(N)	Particularly beneficial to Gypsy and Traveller community to meet identified need
POLICY HP08: Regularising	(N)	(N)	(++)	(N)	(N)	(N)	(N)	(N)	(N)	Particularly beneficial to Gypsy and Traveller community to meet identified need

Policy Title	Age;	Disability;	Ethnicity / Race;	Gender / Sex;	Gender reassignment;	Marriage & Civil Partnership	Pregnancy & maternity;	Religion or beliefs	Sexual orientation	Commentary
suitable existing traveller sites										
POLICY HP09: Safeguarding permitted sites	(N)	(N)	(++)	(N)	(N)	(N)	(N)	(N)	(N)	Particularly beneficial to Gypsy and Traveller community to meet identified need
POLICY HP10: Sub-Division of Pitches or Plots	(N)	(N)	(++)	(N)	(N)	(N)	(N)	(N)	(N)	Particularly beneficial to Gypsy and Traveller community to meet identified need
POLICY HP11: Proposals for Gypsies, Travellers and Travelling Showpeople On Windfall sites	(N)	(N)	(++)	(N)	(N)	(N)	(N)	(N)	(N)	Particularly beneficial to Gypsy and Traveller, and Travelling Showpeople community to meet identified need
POLICY HP12: Planning for Inclusive Communities	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Positive for all – beneficial for inclusiveness to all communities.
POLICY HP13: Creating Successful Places	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Positive for all – beneficial for inclusiveness to all communities.
POLICY HP14: Responding to Context	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Positive for all – beneficial for sense of place for all communities.
POLICY HP15: Permeable and Legible Layout	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Positive for all – beneficial for access to all communities.

Policy Title	Age;	Disability;	Ethnicity / Race;	Gender / Sex;	Gender reassignment;	Marriage & Civil Partnership	Pregnancy & maternity;	Religion or beliefs	Sexual orientation	Commentary
POLICY HP16: Buildings Design	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Positive for all – beneficial for inclusiveness to all communities.
POLICY HP17: Paving over Front Garden	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Positive for all – beneficial for sense of place and flood impact to all communities.
POLICY HP18: Designing Landscape and the Public Realm	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Positive for all – beneficial for inclusiveness to all communities.
POLICY HP19: Conservation and Enhancement of Historic Environment	(++)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Protection and enhancement, for all of the community, particularly positive for future generations.
POLICY HP20: Listed Buildings	(++)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Protection and enhancement, for all of the community, particularly positive for future generations.
POLICY HP21: Conservation Areas	(++)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Protection and enhancement, for all of the community, particularly positive for future generations.
POLICY HP22: Local Heritage Assets	(++)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Protection and enhancement, for all of the community, particularly positive for future generations.
POLICY HP23: Scheduled Monuments and Archaeological Remains	(++)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Protection and enhancement, for all of the community, particularly positive for future generations.
06. Prosperous Community										

Policy Title	Age;	Disability;	Ethnicity / Race;	Gender / Sex;	Gender reassignment;	Marriage & Civil Partnership	Pregnancy & maternity;	Religion or beliefs	Sexual orientation	Commentary
POLICY PC01: Cultivating a Strong and Competitive Economy	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Promotion and support for employment and economic locations, positive for all
POLICY PC02: Job Growth and Employment Land	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Promotion and support for employment and economic locations, positive for all
POLICY PC03: Employment Land Allocations	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Promotion and support for employment and economic locations, positive for all
POLICY PC04: Development and Expansion of Business Space	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Promotion and support for employment and economic locations, positive for all
POLICY PC05: Employment Development Criteria	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Promotion and support for employment and economic locations, positive for all
POLICY PC06: Supporting the Rural Economy	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Promotion and support for employment and economic locations, positive for all
POLICY PC07: Retail and Commercial Leisure Growth	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Promotion and support for employment and economic locations, positive for all
POLICY PC08: Retail Hierarchy	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Promotion and support for retail, employment and economic locations, positive for all

Policy Title	Age;	Disability;	Ethnicity / Race;	Gender / Sex;	Gender reassignment;	Marriage & Civil Partnership	Pregnancy & maternity;	Religion or beliefs	Sexual orientation	Commentary
of Designated Centres										
POLICY PC09: Brentwood Town Centre	(+)	(+)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Promotion and support for retail, employment and economic locations, positive for all. Access must be considered.
POLICY PC10: Mixed Use Development in Designated Centres	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Promotion and support for employment and economic locations, positive for all
POLICY PC11: Primary Shopping Areas	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Promotion and support for employment and economic locations, positive for all
POLICY PC12: Non-centre Uses	(++)	(++)	(+)	(+)	(+)	(+)	(+)	(+)	(+)	Promotion and support for employment and economic locations, positive for all. Local facilities provides better facilities for those where mobility is more challenging.
POLICY PC13: Night Time Economy	(+)	(N)	(N)	(N)	(N)	(N)	(N)	(N)	(N)	Opportunity for increased out of hours employment and social locations. In particular for younger adults.
POLICY PC14: Protecting and Enhancing Community Assets	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Protection and enhancement, for all of the community
POLICY PC15: Education Facilities	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Beneficial for all of community

Policy Title	Age;	Disability;	Ethnicity / Race;	Gender / Sex;	Gender reassignment;	Marriage & Civil Partnership	Pregnancy & maternity;	Religion or beliefs	Sexual orientation	Commentary
POLICY PC16: Buildings for Institutional Purposes	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Beneficial for all of community
07. Natural Environment										
POLICY NE01: Protecting and enhancing the natural environment	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Seeking to achieve sustainable, well-designed places that promote community wellbeing and protecting and enhancing natural environment.
POLICY NE02: Recreational disturbance Avoidance and Mitigation Strategy (RAMS)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Seeking to achieve sustainable, well-designed places that promote community wellbeing and protecting and enhancing natural environment.
POLICY NE03: Trees, Woodlands, Hedgerows	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Seeking to achieve sustainable, well-designed places that promote community wellbeing and protecting and enhancing natural environment.
POLICY NE04: Thames Chase Community Forest	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Seeking to achieve sustainable, well-designed places that promote community wellbeing and protecting and enhancing natural woodland environment.
POLICY NE05: Air Quality	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Seeking to achieve sustainable, well-designed places that promote community wellbeing and protecting and enhancing air quality



Policy Title	Age;	Disability;	Ethnicity / Race;	Gender / Sex;	Gender reassignment;	Marriage & Civil Partnership	Pregnancy & maternity;	Religion or beliefs	Sexual orientation	Commentary
POLICY NE06: Flood Risk	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Seeking to achieve sustainable, well-designed places that protect against flood risk.
POLICY NE07: Contaminated Land and Hazardous Substances	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Seeking to achieve sustainable, well-designed places that promote healthy places and enhancing natural environment.
POLICY NE08: Floodlighting and Illumination	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Seeking to achieve sustainable, well-designed places protect and enhancing the light environment.
POLICY NE09: Green Belt	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Seeking to achieve sustainable, well-designed places that protect and enhancing Green Belt locations.
POLICY NE10: New Development, Extension and Replacement of Buildings In Green Belt	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Seeking to achieve sustainable, well-designed places that protect and enhancing Green Belt locations.
POLICY NE11: Established Areas of Development and Structures In The Green Belt	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Seeking to achieve sustainable, well-designed places that protect and enhancing Green Belt locations.
POLICY NE12: Previously	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Seeking to achieve sustainable, well-designed places that protect and

Policy Title	Age;	Disability;	Ethnicity / Race;	Gender / Sex;	Gender reassignment;	Marriage & Civil Partnership	Pregnancy & maternity;	Religion or beliefs	Sexual orientation	Commentary
Developed Land in Green Belt										enhancing Green Belt locations.
POLICY NE13: Site Allocations in Green Belt	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Seeking to achieve sustainable, well-designed places that protect and enhancing Green Belt locations.
POLICY NE14: Agricultural Workers Dwellings	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Seeking to achieve sustainable, well-designed places that protect and enhancing Green Belt locations.
POLICY NE15: Re-Use and Residential Conversion of Rural Buildings	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Seeking to achieve sustainable, well-designed places that protect and enhancing Green Belt locations.
08. Site Allocations										
Dunton Hills Garden Village Strategic Allocation.	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	New inclusive community with appropriate facilities and infrastructure, to benefit communities now and into the future.
Housing/Site Allocations	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	New inclusive homes with appropriate facilities and infrastructure, to benefit communities now and into the future.
Employment Site Allocations	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	(++)	Proposed areas of expansion for employment use with strategic site close to main roadways.



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Brentwood Local Development Plan

# Health Impact Assessment (HIA)

Version 6

FINAL

*March 2022*

Page 877

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# Executive Summary

Brentwood Council recognises the important connections between planning and the health and wellbeing of communities and considers that the Local Plan would benefit from a Health Impact Assessment (HIA) to ensure that the policies are robust as possible. The purpose of this report is to describe the steps and actions taken as a result of the HIA.

## **The purpose of a HIA is to:**

- Identify the potential health consequences of a proposal on a specific population and/or community; and
- Maximise the positive health benefits and minimise potential adverse effects on health and inequalities

The Assessment has been carried out on various iterations of the Local Plan including:

- Draft Local Plan 2016 (Regulation 18);
- Site Allocation Focused 2018 (Regulation 18);
- Pre-Submission Local Plan 2019 (Regulation 19);
- Addendum Focussed Changes Pre-Submission Local Plan 2019 (Regulation 19); and
- Potential Main Modification consultation 2021.

The first iteration of the Health Impact Assessment found that there were a number of policies from the 2016 Draft Local Plan which had a positive impact on health, but also identified where there were information gaps (modifications required), and the need for new policies.

Since the submission of the Brentwood Local Plan to the Secretary of State in February 2020, the Plan has been examined in public. A number of modifications were suggested in order to ensure the Plan can be found 'sound' as required by the National Planning Policy Framework. The Council consulted on these amendments for six weeks as required by the National Planning Policy Framework.

Following the Potential Main Modifications consultation, the Planning Inspectors issued their final recommendations, stating that *the duty to co-operate has been met*



*and that with the recommended main modification the Brentwood Local Plan satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.*

**The HIA is a live document and regular updates have been made as required throughout the planning process.** This marks the final stage of this process, and therefore version 6 Health Impact Assessment is the last iteration for this Local Plan. A new Health Impact Assessment will be undertaken at the time of the early Local Plan Review.

# 1. Introduction

The natural and built environments play a vital role in the health and wellbeing of the community. The benefits of planning for sustainable and healthy communities can have a positive effect on both established and developing communities which can last for generations. Good planning can result in safer communities, by reducing opportunities for criminal behaviour and stronger community cohesion, improved design and healthier living spaces, assist with reducing risk of obesity, and improving the communities overall physical and mental health. The challenge is determining how to provide sufficient homes for an ever-growing population whilst promoting health and wellbeing.

One means of influencing and promoting health and wellbeing through development is to ensure that the Local Plan is sufficiently robust to maximise health gains and where there is a risk of negative impacts, to mitigate against this. Undertaking a Health Impact Assessment (HIA) on Brentwood's Local Plan makes the Plan more robust. The HIA of the Local Plan has resulted in revision and improvements to the policies, inclusion of a Health and Wellbeing policy, and requirements for major development to submit a HIA along with other supporting documents for consideration at the pre-application stage.

## 1.1 Purpose of this report

Brentwood Council recognises the important connections between planning and the health and wellbeing of communities and considers that the Local Plan would benefit from a Health Impact Assessment (HIA) to ensure that the policies are robust as possible. The purpose of this report is to describe the steps and actions taken as a result of the HIA. This report outlines the following:

- A brief description of the Brentwood Local Plan (LP)
- What a Health Impact Assessment (HIA) is
- The process followed in undertaking the HIA
- Finding and actions taken as a result of the assessment
- Additional recommendations

## 1.2 What is the Brentwood Local Plan?

Brentwood Borough Council has been preparing a new Local Plan, a key part of the Brentwood's development plan. The Plan sets out a long-term vision for how the Borough should be developed over the next 15 years 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.

## 1.3 Vision

*“Bearing testimony to its market town origins, Brentwood Borough will continue to thrive as a place of commerce and enterprise, strengthened by our proposals to protect existing employment sites, and enhance and develop new sites of economic opportunity, with good connectivity to wider markets.*

*Brentwood will continue to be a desirable, liveable place to live and visit, providing the ‘best of both worlds’ where the benefits of urban living can be enjoyed, the bustling high street can continue to thrive and provide opportunities for entertainment and culture, where the surrounding countryside and numerous Country Parks will continue to provide havens to wildlife, as well as beautiful and historic locations to be explored.*

*We are a ‘Borough of Villages’ and we will continue to maintain our village character, ensuring development respects and enhances these environmental qualities that give Brentwood its distinctive character. We will encourage this through landscape-led development, where new development responds to a ‘design and build with nature’ approach, firmly embedding high quality green infrastructure through the public realm to create a seamless transition to our surrounding countryside.”*

The vision is underpinned by three strategic aims:

1. Promoting Sustainable Mobility Through Transit-Orientated Growth;
2. Developing Naturally and Sustainability; and
3. Healthy Communities;

## 1.4 Strategic Objectives and Policies

The 2016 iteration of the LP consisted of a number of Strategic Objectives which the policies within the Plan aimed to support. These Strategic Objectives were revised from 13 Strategic Objectives to 4 Strategic Objectives. These core Strategic Objective have remained the same for the Regulation 19, Potential Main Modification, and the final adopted version of the Local Plan. These policies are split

into two types – spatial and development management policies. The Strategic Objectives within the adopted Local Plan are:

1. SO1: Managing Growth Sustainably
2. SO2: Deliver a Healthy and Resilient Built Environment
3. SO3: Deliver Sustainable Communities with Diverse Economic & Social-cultural Opportunities for All; and
4. SO4: Deliver Beautiful, Biodiverse, Clean and a Functional Natural Environment

Under each of these Strategic Objectives are a number of policies which will be used to inform planning application decisions. Each of these policies have been evaluated from a Health and Wellbeing perspective, which is described in greater details throughout this report. Appendix 1 includes a table of the evaluation of each of the Local Plan policies comparing the Pre-Submission Local Plan document (this includes both the 2018/19 Pre-Submission Plan and the Addendum of Focussed Changes) and the Potential Main Modifications consultation document. As there were no further main modifications required following the receipt of the Inspectors Report there was no need to re-evaluate the policies for the adopted version of the Plan. Some minor word changes have been made, however these changes had no impact on the principles of what the policies aim to achieve. For comparison, Appendix 2 includes a table of the evaluation of each of the policies for the 2016 LDP (Draft Local Plan), 2018/19 LP (Pre-Submission Local Plan), the Addendum of Focussed Changes to the Pre-Submission Local Plan. An update to the Local Plan Health Impact Assessment has been made at each stage of the Plan-making process. This is the final HIA for this iteration of the Local Plan. A New health impact assessment will be undertaken as part of the early Local Plan Review process.

The new Local Plan was informed by the revised NPPF (2018) and additional modifications made where needed to align with the updated NPPF (2021), which has the principals of healthy, inclusive, beautiful places, and sustainable developments embedded throughout the Framework. The revised Local Plan Framework is illustrated in Figure 1 on the following page.

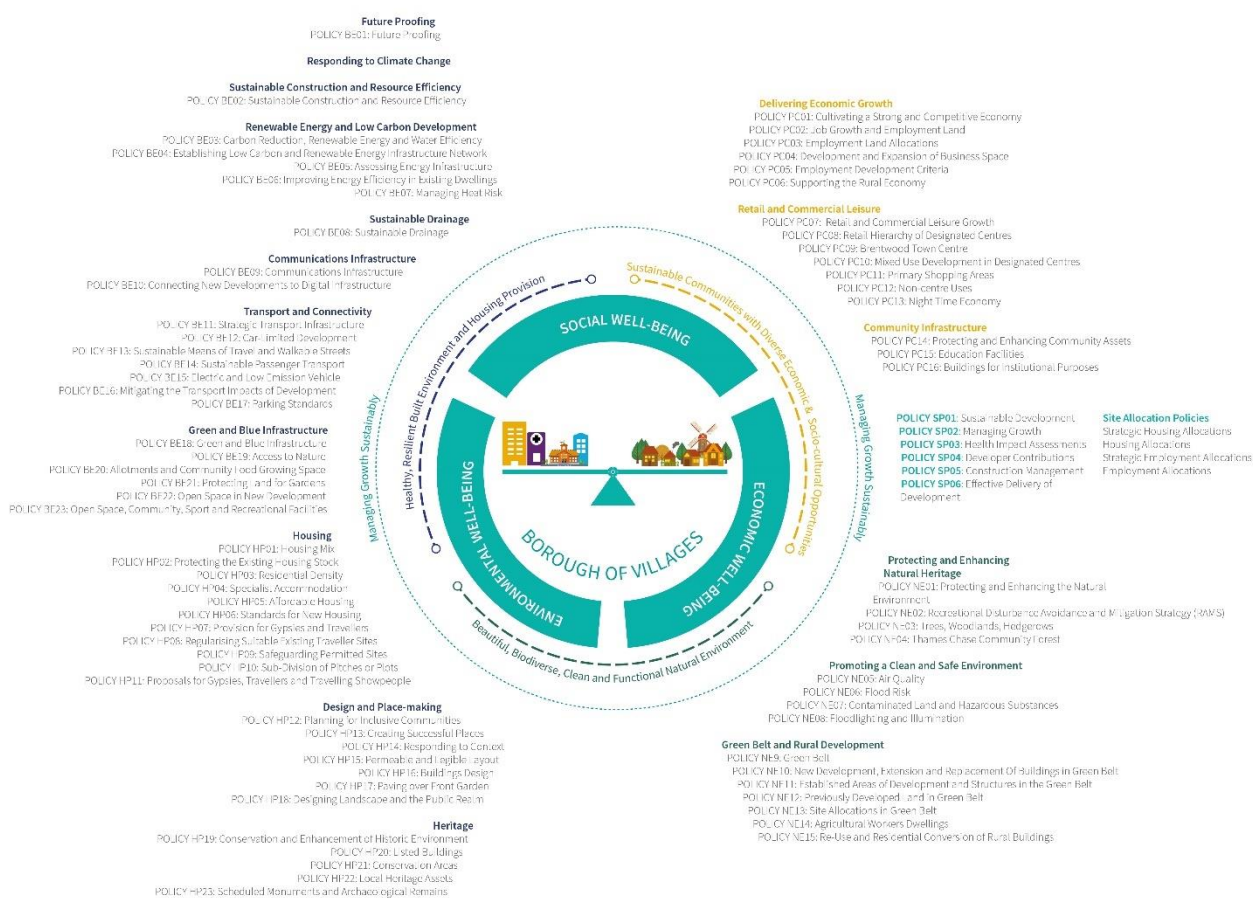
## 1.5 National Planning Policy Framework (NPPF, 2018 and 2021)

The Local Plan must be consistent with the National Planning Policy Framework (NPPF). The NPPF recognises that the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. The

recent update to the NPPF (2018) and subsequent update in 2021 has made it clear their priorities in ensuring Plans are developed in such a way that they promote health and wellbeing as outlined in Chapter 8, para 92-97 (NPPF, 2021).

**Figure 1: Local Plan Framework**

(Source: Brentwood Local Development Plan)



## 2. What is a Health Impact Assessment (HIA)?

A Health Impact Assessment (HIA) is a practical approach that seeks to assess how a proposal will impact on a person's or communities health. HIA is typically used to assess the likely significant specific health impacts and allow an assessment of the overall health impacts of proposals be that a strategy or specific development. Health is affected by a number of determinants including, but not limited to, transport, housing, education, environment and economic activities. The analysis using HIA results in recommendations that can inform developers and decision-makers.

## 2.1 The Purpose of a Health Impact Assessment

The purpose of a HIA is to:

- Identify the potential health consequences of a proposal on a specific population and/or community; and
- Maximise the positive health benefits and minimise potential adverse effects on health and inequalities

There are a number of HIA tools available. These tools all follow a similar process which include:

1. Screening: identify whether or not an HIA would be useful;
2. Scoping: planning the HIA;
3. Assessment: identifying groups / populations affected and quantifying health impacts;
4. Recommendations: suggesting practical actions to promote positive health and minimise negative effects;
5. Reporting: presenting the results from the HIA; and
6. Monitoring and evaluating: determining the HIA's impact on the decision and health status.

## 3. Health Impact Assessment Process

### 3.1 Screening

The screening stage considers the need for and type of HIA required. (Types of HIA described in section 3.3)

## 3.2 Establishing the need for an HIA

While there are no statutory requirements to undertake an HIA when preparing a Local Plan, national and regional policies and local strategy all recognise the important connections between planning and the health and wellbeing of communities, and led to the decision to proceed with an HIA:

National Planning Policy Framework (2021) para 92 states:

*“Planning policies and decisions should aim to achieve healthy, inclusive and safe places which:*

*Promote social interaction, including opportunities for meetings between people who might not otherwise come into contact with each other – for example through mix-used developments, strong neighbourhood centres, street layouts that allow for easy pedestrian and cycle connections within and between neighbourhoods, and active street frontages;*

*Are safe and accessible, so that crime and disorder, and the fear of crime, do not undermine the quality of life or community cohesion – for example through the use of clear and legible pedestrian routes, and high-quality public space, which encourage the active and continual use of public areas; and*

*Enable and support healthy lifestyles, especially where this would address identified local health and well-being needs – for example through the provision of safe and accessible green infrastructure, sports facilities, local shops, access to healthier food, allotments and layouts that encourage walking and cycling”*

Planning Practice Guidance states:

*“Achieving healthy and inclusive communities*

*The design and use of the built and natural environments, including green infrastructure are major determinants of health and wellbeing. Planning and health need to be considered together in two ways: in terms of creating environments that support and encourage healthy lifestyles, and in terms of identifying and securing the facilities needed for primary, secondary, and tertiary care, and wider health and care system (taking into account the changing needs of the population).*

*Public health organisations, health service organisations, commissioners, providers, and local communities can use this guidance to help them work effectively with local planning authorities to promote healthy and inclusive communities and support appropriate health infrastructure..”*

*(Paragraph: 001 Reference ID: 53-001-20190722)*

*Public Health England – Health Impact Assessment in spatial planning (2020)*

*‘HIA is a tool used to identify the health impacts of a plan or project and to develop recommendations to maximise the positive impacts and minimise the negative impacts, while maintaining a focus on addressing health inequalities. By bringing such health considerations to the fore, HIAs add value to the planning process.*

*When used in the planning system, HIAs can also identify opportunities to deliver co-benefits across a range of policy areas: better quality housing, particularly in areas where they are most needed, will in the long term improve health outcomes; more and better active travel infrastructure in areas of poor air quality will lead to improved cardiovascular health; safer and more inclusive spaces for older people as well as those with a mental or physical health problem will deliver benefits to individual quality of life. Each of the above opportunities will also contribute to reduction in health inequalities’*

*Essex Design Guide:*

*“The health and wellbeing theme were established to recognise how the positive characteristics and qualities of an environment can promote healthier lifestyles, support preventing poor health and encourage inclusivity and accessibility whilst reducing health inequalities.”*

*(Updated 2021)*

*Brentwood’s Health and Well-being Strategy:*

*“Growing from a market town to the diverse economy it is today, future development should capitalise on this evolution ensuring not only a balance of diverse employment opportunities for all - adapting to a changing economic context - but that*



*vibrant hubs of economic and social-cultural activity evolve to provide attractive, connected, walkable, lively and stimulating destinations that provide the necessary facilities, recreation opportunities and services required to sustain healthy communities.”*

### 3.3 Selecting an HIA Approach

There are three main types of HIA:

1. Prospective HIA – at the start of the development of a project proposal, or plan
2. Concurrent HIA – runs alongside the implementation of the project (or policy)
3. Retrospective HIA – assesses the effect of an existing project or policy and can be used as an evaluation tool. Retrospective assessments can also be made of unexpected events, as a way of learning lessons for future similar events.

Within any of the above, HIA can take one of the three different forms, depending on the focus and the time and resources available:

1. Desktop HIA – encompasses a small number of participants around the table using existing knowledge and evidence to assess a proposal, policy, or plan.
2. Rapid HIA – establishing a small steering group and often uses the approach of a participatory stakeholder workshop. This typically involves a brief investigation of health impacts, including a short literature review of quantitative and qualitative evidence and the gathering of knowledge and further evidence from a number of local stakeholders.
3. Comprehensive HIA – in-depth analysis, with extensive literature searches and collection of primary data.

Often, however, a HIA fits in between two of these categories as the approach taken will be determined by the nature of the proposal, the timescales involved and the human, organisational and financial resources available to undertaking the process.

The Planning Policy Team decided to undertake a Desktop HIA of the Local Development Plan because:

- The Council wanted to ensure compliance with the new NPPF (2021) and PPG which highlights the importance of including elements of health and wellbeing throughout

the policies within a Local Plan as well as the commitments made by the Essex Planning Officers Association (EPOA) regarding HIA.

- There was existing knowledge and evidence to inform the HIA.
- The need to take into account a number of underpinning policies within a short time frame made workshops impractical and the planned wider consultation of the Local Plan as required under Regulation 19 of the Town and Country Planning (Local Planning)(England) Regulations 2018.

## 4. Health Impact Assessment

### 4.1 Scoping

This step defines the scope and scale of the HIA. Table 1 below highlights the steps involved and the Councils approach.

**Table 1: Scoping – Steps and Approach**

Steps	What's involved	Councils Approach
Purpose	Establishing the terms of reference, roles and responsibilities and agreed plan for the HIA	Roles and responsibilities were agreed
Timescales	Establishing the decision-making timescales of the proposal to ensure the HIA can have an opportunity to inform decisions.	HIA was produced alongside the review of the Local Plan policies in preparation for Regulation 19.
Geographical Boundaries	Understanding of the geographical boundaries of the HIA.	Brentwood Borough
Resources	Clear understanding of the financial and time resources available for the purpose of carrying out the study	Due to limited financial resources and availability of in-house knowledge, resources were limited to Officers time.

Steps	What's involved	Councils Approach
Internal and External Support	Refers to the commissioning of the HIA to external resources for those studies which are more in-depth.	Inter-department resources were utilised and well as assistance from Essex County Council.
Type of Assessment	Identifying which of the three assessment types – Desktop, Rapid, or Comprehensive – is most suitable given the purpose, timescales and resources available.	Given time and resource constraints, as well as the level of detail required a Desktop approach was deemed most appropriate.

## 5. Appraisal

This stage is focused on information gathering about the potential nature, size, likelihood and distribution of the proposal's health impacts. It also provides an opportunity to suggest possible ways of maximising the health benefits and minimising the risks, particularly to those whose health may be most vulnerable or the most disadvantaged population groups. It also provides an opportunity to identify and suggest actions that might address 'gaps' in the proposal or plan.

### 5.1 Summary of Evidence used to inform Brentwood's Local Development Plan

Table 2 below outlines the various key pieces of evidence used to help form the policies within the Local Plan.

**Table 2: LDP Evidence Base**

Category	Title	Date Published
Economy	Economic Futures 2013-2033	January 2018

Category	Title	Date Published
	Retail and Commercial Leisure Study	December 2014
	Heart of Essex Economic Futures	June 2012
	Employment Land Review	September 2010
Environment	Green Belt Assessment: Parts 1-3	October 2018
	Landscape Review	October 2018
	Green Infrastructure Strategy	September 2015
	Habitats Regulations Assessment	October 2019
	Surface Water Management Plan for Brentwood Borough	January 2015
	Sustainability Appraisal	October 2019
	Renewable Energy Study	April 2014
	Local Wildlife Sites Review	December 2012
	Mid Essex Landscape Character Assessment	September 2006
Housing & Demography	Strategic Housing Market Assessment (SHMA) Part I	October 2018
	Strategic Housing Market Assessment (SHMA) Part	June 2016

Category	Title	Date Published
	II – Objectively Assessed Need for Affordable Housing	
	Greater Essex Demographic Forecast 2012-2037 (Phase 7)	May 2015
	Heart of Essex Housing Growth Scenarios	June 2012
	Strategic Housing Land Availability Assessment (SHLAA)	October 2011
	Brentwood Gypsy and Traveller Accommodation Assessment	October 2017
	South Essex Gypsy, Traveller and Travelling Showpeople Accommodation Assessment Update 2016-2038	January 2019
	Equalities Impact Assessment (EqIA)	February 2020 and the February 2022 update
	Viability Assessment	October 2018
Site Assessment	Site Assessment Methodology and Summary of Outcomes	January 2018
	Housing and Employment Land Availability Assessment (HELAA)	October 2018
Transport	Transport Assessment	February 2020, Updated January 2021. Additional information found on the

Category	Title	Date Published
		Local Plan Examination Document Library under F66.
Leisure, Recreation & Town Centres	Open Space, Sport and Leisure Needs Assessment	August 2016
	Play Pitch Strategy (PPS)	October 2018
	Golf Course Needs Assessment	November 2019
	Brentwood Borough Council Leisure Strategy	March 2019
	Brentwood Town Centre Regeneration Strategy	May 2010
	Hotel & Visitor Accommodation Futures Study	April 2008
Infrastructure	Infrastructure Delivery Plan (IDP) sections 1-14*	February 2020
Health	Health Impact Assessment	February 2020 and updated 2022

\* Note the IDP is a live document

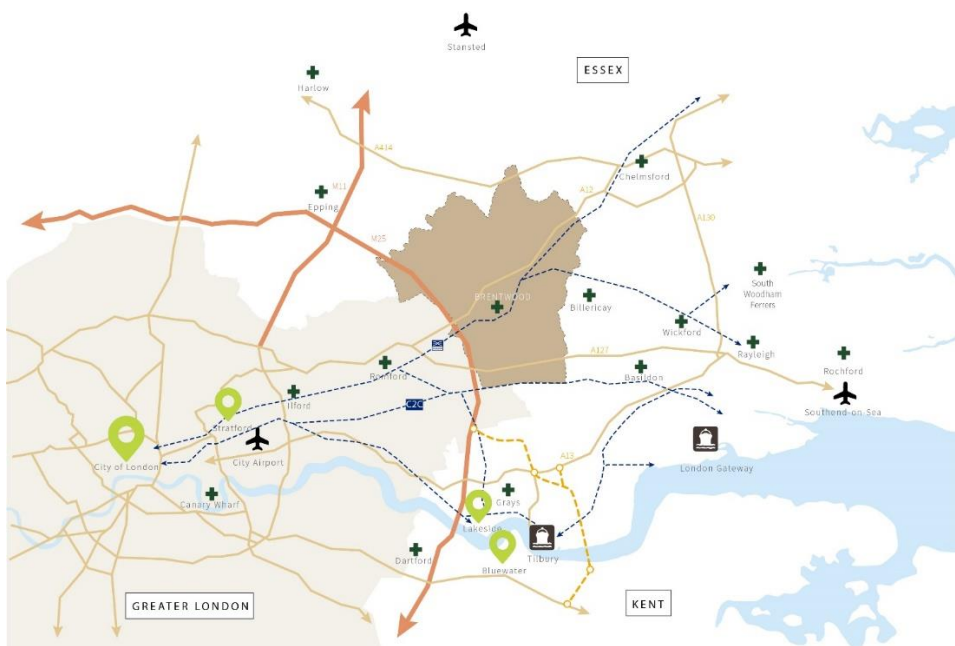
## 5.2 Brentwood Population Health Profile

### 5.2.1 Geographic Characteristics of Brentwood

Brentwood Borough is located in the south-west of Essex and east of Greater London. The Borough is approximately 15,300 hectares. The Borough is centred on the market town of Brentwood, which is surrounded by some suburban areas and villages set amongst the Essex countryside. The Borough is only 20 miles from Central London with strong transport links, including the current development of Crossrail, into London. The Borough is 89% green belt, giving the community ample access to open green space. The cost of a house in Brentwood cost an average £320,000 which is £100,000 higher than the average house price within England. Despite this, approximately 80% of the population own their own home. Brentwood is one of the most affluent areas in England, within the least deprived 10% of the country.

**Figure 2: Geographic Characteristics of Brentwood**

*(Source: Brentwood Borough Profile)*

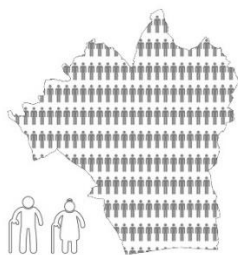


## 5.2.2 Brentwood’s Population Profile

The population of Brentwood in 2011 was 73,601 (Census), of which approximately 70% live within Brentwood Town. The 2014 mid-year population estimates show’s that this has increased to 75,600. A large portion of the population are retired with an ageing population trend projected to continue. The proportion of the population from black and minority ethnic groups in the borough is well below average for the Eastern region and England. The largest non-white minority ethnic group is made up of Asian origins.

**Figure 3: Brentwood’s Population Profile**

*(Source: Brentwood Borough Profile)*



The borough’s population is over 73,600 with a significant retired population - an ageing population trend projected to continue



The health of people in Brentwood is generally better than the England average. Deprivation is lower than average, however about 10.8% children live in poverty. Life expectancy for both men and women is higher than the England average. Local health priorities include improving the health of older people, increasing vaccination coverage, and reducing cardiovascular disease by reducing the prevalence of obesity



ONS data 2015/2016 indicates an economic activity rate of 79%, slightly lower than the regional rate of 80.1% but higher than the GB rate of 77.9% Notably the number of self-employed persons was at 12.5% which was significantly above East of England (10.7%) and GB (10.3%) averages. Long-term unemployed rates were less than both regional and national averages

## 5.2.3 Typical Household for Brentwood

There are just over 32,000 homes in Brentwood Borough. The main property type is detached and semi-detached houses, which at almost 63% total stock is higher than the national level (53%). The main property size of stock is 3-bedrooms (25%) and 4-bedroom homes (23%). House prices in the borough are very high. This can cause issues preventing people from buying homes with entry level housing often too expensive for many newly forming households and the need for a significant deposit.

There is an established Gypsy and Traveller community in Brentwood. Local Planning Authorities must identify the need for pitches through a Gypsy and Traveller Accommodation Assessment (GTAA) to ensure this need is met. According



to the Brentwood GTAA Need Summary during the period of the Local Plan, the borough will need to provide an additional 11 pitches, which the borough has planned to provide.

**Figure 4: Brentwood Housing Stock**

*(Source: Brentwood Borough Profile)*



The current housing stock is largely made up of detached and semi-detached houses with less small unit accommodation



The higher average salaries in London and the south-east have resulted in higher house prices, making affordability a pressing issue in Brentwood

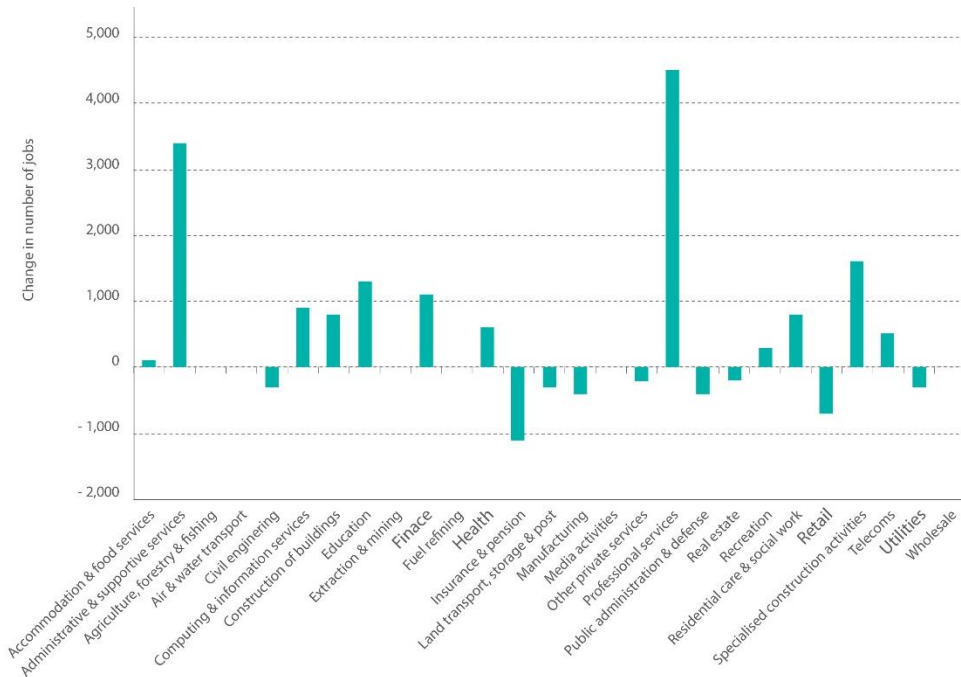
## 5.2.4 Brentwood Economy

Brentwood Borough has a successful local economy, providing over 30,000 jobs. Banking and finance are the main business sector followed by distribution/hotel/restaurants and public service. Office employment areas are mainly in Brentwood town centre, Brentwood station and Warley Business Park. Despite the Borough's rural character employment in agriculture is below the national average, as is manufacturing. 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.

Brentwood has four rail stations – Ingatestone, Shenfield, and Brentwood stations on the Great Eastern Main line to London Liverpool Street, and West Horndon station on the London Fenchurch Street to Southend. Shenfield is also one of the future Crossrail stations. The borough is also well connected by a number of major roads such as the M25, A127, A12, and A13. There is a very high car ownership compared to the national average.

**Figure 5: Brentwood Absolute Change in Employment Sector**

(Source: Reproduced from Economic Futures)



### 5.2.5 Brentwood Health and Fitness Profile

The health of people in Brentwood is varied compared with the England average, however life expectancy for both men and women is higher to the England average. According to Public Health England (2017), the key factors of Brentwood residents are:

- At year 6, the number of children classed as obese was 14.0%, which is lower than the regional figure of 17.9% and below the national average of 20%.
- Estimated levels of adult excess weight and smoking are lower than the regional and national averages.
- Death caused by CVD for under 75's is 53.2%, compared to the England average of 73.5%.
- Percentage of 16-64 year olds in employment is 72.3%, lower than the regional of 77.2% and national average of 74.4%.
- GCSE attainment is 69.3%, above the national average of 57.8%.

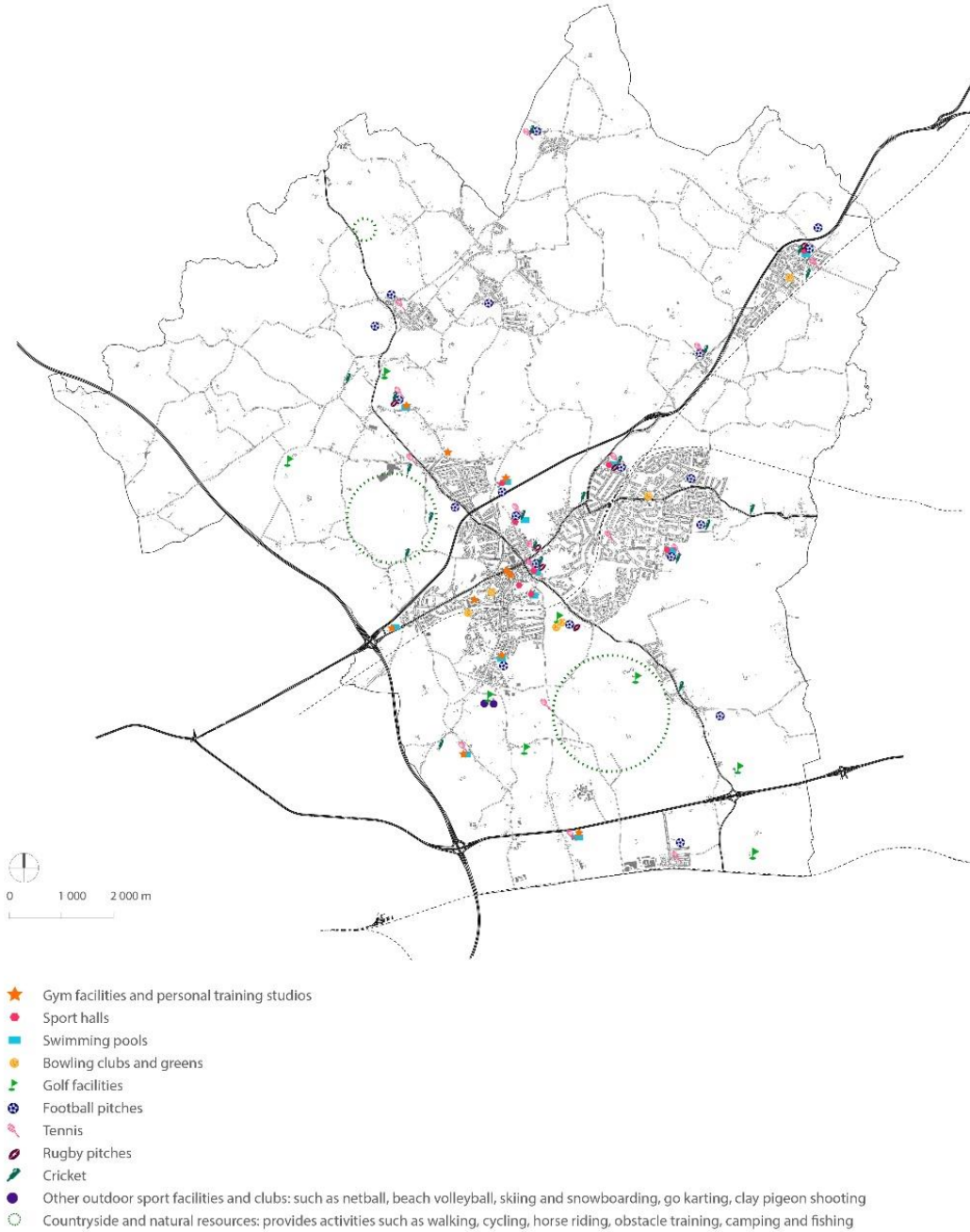
The Public Health England definition for physical activity states that people should participate in 150 minutes or equivalent of at least moderate intensity activity per week. Based on this definition 21.8% of adults within Brentwood are doing enough physical activity to benefit their health (i.e. three times or more times per week), the second highest in the county and above the national average of 17.6%.

**Table 3: Physical Active vs Inactive rates**

<b>Rate</b>	<b>Brentwood</b>	<b>Essex</b>	<b>England</b>
<b>% Active</b>	67.6%	61.6%	61.8%
<b>% Inactive</b>	25.1%	26.3%	25.7%

**Figure 6: Brentwood's Sport Facilities**

*(Source: Brentwood Borough Profile)*



## 5.3 Assessment of Policies

Applying the Wales Health Impact Assessment tool, the Local Plan and all the underpinning policies were assessed according to the chapters found within the Local Plan framework:

- Managing Growth;
- Resilient Built Environment;
- Housing Provision;
- Prosperous Community;
- Natural Environment; and
- Site Allocations

The Health Impact Assessment table found in appendix 1 is organised based on the chapters found within the 2022 Adopted Local Plan Framework, as identified in section 1.4 of this report.

The policies were assessed based on the following key:

**Table 4: Coding System Use**

Description	Symbol
Those policies that make a significant contribution to the overall health and wellbeing community	(++)
Those policies that make a positive contribution to the overall health and wellbeing of the community	(+)
Those policies which do not affect health and wellbeing – neither positive or negative	(N)
Those policies which have a minor negative impact on health and wellbeing which should be considered for review	(-)
Those policies which have significant negative impact on the health and wellbeing of the community and require review	(--)

This is the sixth and final HIA review of the Local Plan policies. The first HIA highlighted the possible impacts of the 2016 draft Local Plan to help identify where improvements were needed when producing the Regulation 19 Pre-Submission Local Plan to ensure it was as robust as possible when considering health and wellbeing. The 2016 Draft Local Plan and previous consultation responses were used to assist in informing the development of the Health Impact Assessment.

The second review identified changes from the 2016 draft Local Plan (Regulation 18) for the Regulation 19 Pre-Submission Local Plan. This process allowed for identifying where some policies should be removed and the addition of others. Therefore, in some sections of the table found in appendix 1, there is a score of 'N/A'. This indicates that the policy did not exist in that version of the Local Plan. For the 2016 version those scored as 'N/A' were new policies which serve the purpose of filling an information gap. In the situation where 'N/A' is listed under the 2018/19 Local Plan, it indicates that this policy no longer exists, and in most cases has been included as part of a new policy.

The third review was focused on the impacts of the Addendum of Focussed Changes to the Pre-Submission Local Plan (Regulation 19) which consists of five key changes to the following allocated housing sites:

- Policy R01 (I) Dunton Hills Garden Village Strategic Allocation – increasing the housing from 2,700 to 2,770 dwellings over the Plan period. (An increase of 70 dwellings to account for the 70 dwellings reduced from four allocated sites);
- Policy R18 Land off Crescent Drive – a reduction of dwelling from 55 to 35 dwelling;
- R19 Land at Priests Lane – a reduction from 75 to 45 dwelling;
- R25 Land North of Wollard Way – a reduction from 40 to 30 dwelling; and
- R26 Land North of Orchard Piece – a reduction from 30 to 20 dwelling.

The fourth version was an update of the report (not a new evaluation of the policies) prepared as part of the evidence base included as part of the Regulation 22 Submission of the Local Plan.

The fifth review examines the changes made as a result of the Local Plan examination process. Some changes have been made in order to ensure the Plan aligns with the NPPF. Changes to the capacity of some of the Local Plan allocated sites have been made, as outlined below:

- R01: Dunton Hills Garden Village – There has been a reduction from 2,770 dwelling over the Plan period to 1,650 dwellings over the Plan period. There are no changes to the overall capacity of the site, for 4,000 new homes for

over the development period for the site, however these additional home will come forward after the current plan period and will be included in the next iteration of the Local Plan. This change was made due to the delay in adopting the Local Plan and is viewed to be a more realist number based on historic development rates.

- R04 & R05: Ford Headquarters and Council Depot – this site has been reduced, from 473 to 133 dwellings. This change has been made as a portion of the site has already been awarded planning permission, and thus removed from the remaining total.
- R10: Brentwood Railway Station – increased from 100 to 200 new dwelling based on discussion held during the hearing sessions which highlighted the fact the developers were able to provide the additional dwelling and to align with the NPPF to ensure efficient use of land
- R15: Wates Way – a reduction from 80 to 46 new dwellings
- R18: Land off Crescent Drive – this site has been removed from the Local Plan as the site has been awarded planning permission.
- R20: Eagle and Child Public House – this site has been removed from the Local Plan as the site has been award planning permission.
- R19: Land at Priest Lane – increased from 45 dwellings back to 75 dwellings and the requirement for a care home was removed. These changes were made to align with the NPPF ensuring efficient use of land.
- R24: Stocks Lane – site increased from 30 to 40 new dwellings to align with the NPPF ensuring efficient use of land.
- R25 Land North of Wollard Way – increased from 30 dwellings to 40 dwelling to align with the NPPF ensuring efficient use of land
- R26 Land North of Orchard Piece – increased from 20 dwellings to 30 dwelling align with the NPPF ensuring efficient use of land

At the point of the Pre-Submission Plan the Council was in a position to meet its full housing needs. However, there has been a reduction in the number of dwellings that can be provided during the plan period due to the removal of those sites which have already been granted planning permission and the reduction at Dunton Hills Garden Village. To address this short fall the Council has included a new policy, MG06 for an early plan review to ensure the borough's full housing needs can be met over the plan period and all supporting transport infrastructure can be provided.

Finally, the Council also made changes to the Monitoring Framework to include specific targets, triggers when action is needed, and identified what actions would be taken if a policy requirement was not being met. This allowed for the Monitoring Framework to be strengthened and act as a clear guide to aid in the monitoring of the policies identified to ensure modifications are made early on to strengthen ineffective policies.

These modifications have been made by the planning policy team and consulted on through the Potential Main Modifications consultation in September 2021. Following the completion of the Potential Main Modifications consultation, all representations and documents related to this version of the Plan were submitted to the Planning Inspectors for consideration. The Council received the final Inspectors Report on 23<sup>rd</sup> February 2022 which stated that *the duty to co-operate has been met and that with the recommended main modification the Brentwood Local Plan satisfies the requirements referred to in Section 20(5)(a) of the 2004 Act and is sound.*

## 5.4 Roles and Responsibilities

The following departments within the Council and external groups were also consulted with to ensure health and wellbeing was embedded throughout the Local Plan:

- Assets;
- Corporate Health & Safety;
- Community Safety;
- Community Services;
- Environmental Health;
- Finance;
- Housing;
- Planning Development Management;
- Waste/Refuse;
- Active Brentwood; and
- Brentwood Health and Wellbeing Board

## 6. Findings

The HIA process highlighted where there were possible gaps in policies requiring either additional work / evidence to strengthen the policy and/or the creation of new policies. The assessment also helped to identify where there were no gaps and thus needed no changes. A more detailed key appraisal of finding of the policies can be found within appendix 3. The overall findings were:

- The Local Plan Framework was restructured to ensure Health and Wellbeing, Inclusive Developments, Environmental Protection, and Sustainable Developments were a cross-cutting theme throughout the Local Plan and in line with the revised NPPF (2018);



- The 2016 Local Plan consisted of a number of policies that had a positive score on health and wellbeing, although information gaps were identified and as a result, new policies were created, such as assessing energy infrastructure, education facilities, and three additional Dunton Hills Garden Village section; and
- Specific policies related to health and wellbeing were included in the Local Plan to strengthen the importance of health and wellbeing throughout the Plan.
- Additional evidence was commissioned during the Local Plan hearing sessions on Air Quality to ensure no negative impacts on air quality would arise from the growth proposed within the Local Plan.

It is important to note that the Local Plan policies are supported and enhanced by additional national and local policies, such as Building Regulations, Essex Design Guide, and Licensing Policy, and so on which in themselves have been developed to benefit the community. These wider policies and regulations along with the National Planning Policy Framework were not considered as part of this HIA.

In response to the findings of the HIA revisions were made to the Local Plan. Some of the key changes made to the Local Plan were:

- Embedding health and wellbeing throughout the Local Plan;
- Restructuring the Local Plan Framework so that it was aligned with the principles of sustainable development – environmental, social, and economical;
- Including a Health and Wellbeing Policy and a Health Impact Assessment Policy to highlight the importance of health and wellbeing to those wishing to develop and invest in the borough;
- Ensuring strong support for active travel through improved access to cycle and walking paths, car limited policy;
- More in-depth policies were established for Dunton Hills Garden Village, to ensure this development takes advantage of the Garden Village Principles, that design strategies are used to create a sense of place / community, limit environmental impacts, and promote a health throughout the development.

## 7. Recommendations

As a result of the HIA process, in addition to changes being made the Local Plan policies to ensure health and wellbeing is embedded throughout the Local Plan, the following additional recommendations / actions will be carried out:

- Inclusion of a Health Impact Assessment policy in the Local Plan requiring all major developments conduct a HIA (included as part of a major application check list and

required at the pre-application stage) and encouraging minor developments to voluntarily prepare a HIA to ensure all potential health impacts have been considered;

- Ongoing joint working with both internal and external departments such as the Active Brentwood Board and Health and Wellbeing Board;
- Creation of a working group with key stakeholders to assist with providing comments on planning applications which include an HIA to ensure best practice and healthy developments within the borough; and
- Review of the HIA at the same time as the early review of the Local Plan and make the necessary changes to policies in regards to improving the health and wellbeing of the community and natural environment within the borough.

## 8. Conclusions

In order for the borough to meet its need in regards to housing, employment, and the associated infrastructure, development within the borough is unavoidable. One of the objectives of the Local Plan is to ensure that development and growth are carefully planned in order to optimise the benefits for the community and environment and to mitigate any negative impacts.

As the HIA of the Brentwood Local Plan (LP) has shown, the undertaking of the HIA has not only identified and addressed areas where there were policy gaps in the Local Plan, it has also contributed to assurances that many of the underpinning policies and planning processes had already taken into account the relationship between planning and health, thus requiring no modifications.

The HIA of the Local Plan has helped to demonstrate at a local level the impacts that development can have on health and wellbeing, and where there are opportunities to enhance health gains and mitigate against negative impacts. This in turn has led to the recommendation to further embed HIA in the planning process. **The HIA is a live document and regular updates have been made as required throughout the plan making process.**

## 9. Next Steps

This HIA supports the adopted Local Plan. This review of the HIA is an updated to reflect any changes made as a result of the Local Plan examination process and all changes required as instructed by the Planning Inspectors to ensure the Local Plan is 'sound'. This is the final iteration of the Health Impacted Assessment for the Local Plan. A new HIA will be undertaken for the early review Local Plan.





# Appendices

## Appendix 1: Health Impact Assessment (HIA) of the Brentwood Pre-Submitted Plan (2020) and Main Modifications (2021)

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Chapter	Policy Number	Policy Name (Main Modifications Version)	Notes on changes made to Plan structure (post examination)	Pre-Submission Local Plan including the Addendum Focussed Changes	Changes made to Pre-Submitted Local Plan related to Health and Wellbeing	Main Modifications Local Plan	Adopted Local Plan
Managing Growth	SP01	Sustainable Development (new)	Policy deleted	(++)	Policy deleted	N/A	
	MG01	Managing Growth	Policy number originally SP02	(N)	This policy has now been identified as a strategic policy and includes all forms of growth including	(N)	

Chapter	Policy Number	Policy Name (Main Modifications Version)	Notes on changes made to Plan structure (post examination)	Pre-Submission Local Plan including the Addendum Focussed Changes	Changes made to Pre-Submitted Local Plan related to Health and Wellbeing	Main Modifications Local Plan	Adopted Local Plan
					gypsy and travellers and employment		
	MG02	Green Belt	Moved from Natural Environment – originally NE09	(+)	This policy has now been identified as a strategic policy	(++)	
	MG03	Settlement Hierarchy	This is a new policy aimed to help manage growth to align with the settle hierarchy	N/A	This was originally included in the Pre-Submission Plan for information. By moving it into a policy will help manage growth.	(+)	
	MG04	Health Impact Assessment	This policy was originally numbered as SP03	(++)	No change <sup>1</sup>	(++)	

<sup>1</sup> NOTE: where it reads ‘no change’ this does not refer to modifications made to the policy but rather despite the modifications made to the policy there are no changes to the impact of the policy on health and wellbeing.

Chapter	Policy Number	Policy Name (Main Modifications Version)	Notes on changes made to Plan structure (post examination)	Pre-Submission Local Plan including the Addendum Focussed Changes	Changes made to Pre-Submitted Local Plan related to Health and Wellbeing	Main Modifications Local Plan	Adopted Local Plan
	MG05	Developer Contributions	This policy was originally numbered as SP04	(N)	No change	(N)	
	SP05	Construction Management	This policy has been removed	(++)	This policy no longer exists	N/A	
	SP06	Effective Delivery of Development	This policy has been removed	(++)	Core requirements of this policy have been moved to policy the new BE14	N/A	
Resilient Built Environment	BE01	Future Proofing	This policy has been removed	(+)	This policy has been removed	N/A	
	BE02	Sustainable Construction and Resource Efficiency	This policy was split into two - Sustainable Construction and Efficient Resource Management, and Carbon Reduction, Renewable Energy	(++)	This policy has been removed	N/A	

Chapter	Policy Number	Policy Name (Main Modifications Version)	Notes on changes made to Plan structure (post examination)	Pre-Submission Local Plan including the Addendum Focussed Changes	Changes made to Pre-Submitted Local Plan related to Health and Wellbeing	Main Modifications Local Plan	Adopted Local Plan
			and Water Efficiency - to allow for ease of reading and applying the policy where applicable.				
	BE01	Carbon Reduction, and Renewable Energy	This policy was originally numbered BE03	(++)	This policy has now been made a strategic policy	(++)	
	BE02	Water Efficiency and Management	New policy	N/A	All water efficiency and management requirements set out in the Pre-Submission Local Plan policies BE02, BE03, BE18 and NE06 are now in a dedicated policy. Although this does not have an impact from a health perspective it does	(++)	



Chapter	Policy Number	Policy Name (Main Modifications Version)	Notes on changes made to Plan structure (post examination)	Pre-Submission Local Plan including the Addendum Focussed Changes	Changes made to Pre-Submitted Local Plan related to Health and Wellbeing	Main Modifications Local Plan	Adopted Local Plan
					ensure greater effectiveness.		
	BE03	Establishing Low Carbon and Renewable Energy Infrastructure Network	Policy originally numbered BE04	(++)	No changes	(++)	
	BE05	Assessing Energy Infrastructure	Policy removed	(+)	Policy removed	N/A	
	BE06	Improving Energy Efficiency in Existing Dwellings	Policy removed	(++)	Policy removed	N/A	

Chapter	Policy Number	Policy Name (Main Modifications Version)	Notes on changes made to Plan structure (post examination)	Pre-Submission Local Plan including the Addendum Focussed Changes	Changes made to Pre-Submitted Local Plan related to Health and Wellbeing	Main Modifications Local Plan	Adopted Local Plan
	BE04	Managing Heat Risk	Policy originally numbered BE07	(++)	No changes	(++)	
	BE05	Sustainable Drainage	Policy originally numbered BE08	(++)	No changes	(++)	
	BE06	Communications Infrastructure	Originally numbered BE 09. Policy is now a strategic policy	(+)	Policy is now strategic.	(+)	
	BE07	Connecting New Developments to Digital Infrastructure	Originally numbered BE10.	(+)	No changes	(+)	
	BE08	Strategic Transport Infrastructure	Originally numbered BE11. Policy is now identified as strategic.	(++)	Policy is now strategic	(++)	
	BE12	Car-Limited Development	Policy removed as covered by other	(++)		N/A	

Chapter	Policy Number	Policy Name (Main Modifications Version)	Notes on changes made to Plan structure (post examination)	Pre-Submission Local Plan including the Addendum Focussed Changes	Changes made to Pre-Submitted Local Plan related to Health and Wellbeing	Main Modifications Local Plan	Adopted Local Plan
			policies within the Plan				
	BE09	Sustainable Means of Travel and Walkable Streets	Originally numbered BE13. Policy is now identified as strategic.	(++)	Policy is now strategic	(++)	
	BE10	Sustainable Passenger Transport	Originally numbered BE14	(+)	No changes	(+)	
	BE11	Electric and Low Emission Vehicles	Originally numbered BE15	(+)	No changes	(+)	
	BE12	Mitigating the Transport Impacts of Development	Originally number BE16	(+)	No changes	(+)	
	BE13	Parking Standards	Originally numbered BE17	(+)	No changes	(+)	

Chapter	Policy Number	Policy Name (Main Modifications Version)	Notes on changes made to Plan structure (post examination)	Pre-Submission Local Plan including the Addendum Focussed Changes	Changes made to Pre-Submitted Local Plan related to Health and Wellbeing	Main Modifications Local Plan	Adopted Local Plan
	BE18	Green and Blue Infrastructure	Policy moved and renumbered as NE02	(++)	Refer to NE02	N/A	
	BE19	Access to Nature	Policy removed	(++)		N/A	
	BE20	Allotment and Community Food Growing Space	Policy moved and renumbered as NE06	(+)	Refer to NE06	N/A	
	BE21	Protecting Land for Gardens	Policy moved and renumbered as NE07	(N)	Refer to NE07	N/A	
	BE22	Open Space in New Development	Policy moved and renumbered as NE05	(+)	Refer to NE05	N/A	

Chapter	Policy Number	Policy Name (Main Modifications Version)	Notes on changes made to Plan structure (post examination)	Pre-Submission Local Plan including the Addendum Focussed Changes	Changes made to Pre-Submitted Local Plan related to Health and Wellbeing	Main Modifications Local Plan	Adopted Local Plan
	BE23	Open Space, Sport and Recreational Facilities	Policy moved and renumbered as NE05	(++)	Refer to NE05	N/A	
	BE14	Creating Successful Places	Originally numbered as HP13. Policy is now identified as strategic.	(++)	No changes	(++)	
	BE15	Planning for Inclusive Communities	Originally numbered as HP12.	(++)	No change	(++)	
	BE16	Conservation and Enhancement of Historic Environment	Originally numbered HP19. Policy is now identified as strategic	(N)	No change	(N)	

Chapter	Policy Number	Policy Name (Main Modifications Version)	Notes on changes made to Plan structure (post examination)	Pre-Submission Local Plan including the Addendum Focussed Changes	Changes made to Pre-Submitted Local Plan related to Health and Wellbeing	Main Modifications Local Plan	Adopted Local Plan
	BE17	Archaeological Remains	Originally numbered as HP23.	(N)	No change	(N)	
Housing Provision	HP01	Housing Mix	Policy is now strategic	(++)	No change	(++)	
	HP02	Protecting the Existing Housing Stock		(N)	No change	(N)	
	HP03	Residential Density		(N)	No change	(N)	
	HP04	Specialist Accommodation		(+)	No change	(+)	
	HP05	Affordable Housing		(+)	No change	(+)	
	HP06	Standards for New Housing		(N)	No change	(N)	

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Chapter	Policy Number	Policy Name (Main Modifications Version)	Notes on changes made to Plan structure (post examination)	Pre-Submission Local Plan including the Addendum Focussed Changes	Changes made to Pre-Submitted Local Plan related to Health and Wellbeing	Main Modifications Local Plan	Adopted Local Plan
	HP07	Provision for Gypsies and Travellers	Policy removed and merged with HP08	(N)	This policy has been moved and merged with HP08 for improved clarity and effectiveness of the policy	N/A	
	HP07	Regularising Suitable Existing Traveller Sites	Originally numbered as HP08	(+)	All gypsy and traveller sites have now been removed from the green belt as required by	(+)	

Chapter	Policy Number	Policy Name (Main Modifications Version)	Notes on changes made to Plan structure (post examination)	Pre-Submission Local Plan including the Addendum Focussed Changes	Changes made to Pre-Submitted Local Plan related to Health and Wellbeing	Main Modifications Local Plan	Adopted Local Plan
					planning policy. This change has a positive impact for the gypsy and traveller community.		
	HP08	Safeguarding Permitted Sites	Originally numbered as HP09	(N)	All gypsy and traveller sites have now been removed from the green belt as required by planning policy. This change has a positive impact for the gypsy and traveller community.	(+)	
	HP09	Sub-Division of Pitches or Plots	Originally numbered as HP10	(N)	All gypsy and traveller sites have now been removed from the green belt as required by planning policy. This change has a	(+)	



Chapter	Policy Number	Policy Name (Main Modifications Version)	Notes on changes made to Plan structure (post examination)	Pre-Submission Local Plan including the Addendum Focussed Changes	Changes made to Pre-Submitted Local Plan related to Health and Wellbeing	Main Modifications Local Plan	Adopted Local Plan
					positive impact for the gypsy and traveller community. This policy allows for additional gypsy and traveller pitches which will help ensure the Council is able to provide beyond the needs identified within the GTAA.		
	HP10	Proposals for Gypsies, Travellers and Travelling Showpeople on Windfall Sites	Originally numbered as HP11	(N)	This policy allows for additional gypsy and traveller pitches which will help ensure the Council is able to provide beyond the needs identified within the GTAA.	(N)	

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	HP12	Planning for Inclusive Communities	Policy moved and renumbered as BE15	(++)		N/A	
	HP13	Creating Places	Policy moved and renumbered as BE14	(++)		N/A	
	HP14	Responding to Context	Policy removed	(+)		N/A	
	HP15	Permeable and Legible Layout	Policy removed	(++)		N/A	
	HP16	Building Design	Policy removed	(++)		N/A	

Chapter	Policy Number	Policy Name (Main Modifications Version)	Notes on changes made to Plan structure (post examination)	Pre-Submission Local Plan including the Addendum Focussed Changes	Changes made to Pre-Submitted Local Plan related to Health and Wellbeing	Main Modifications Local Plan	Adopted Local Plan
	HP17	Paving Over Front Gardens	Policy removed	(N)		N/A	
	HP18	Designing Landscape and the Public Realm	Policy removed	(++)		N/A	
	HP19	Conservation and Enhancement of Historic Environment	Policy has been moved and renumbered as BE16	(N)		N/A	
	HP20	Listed Buildings	Policy has been removed	(N)		N/A	
	HP21	Conservation Areas	Policy has been removed	(+)		N/A	
	HP22	Local Heritage Assets	Policy has been removed	(++)		N/A	

Chapter	Policy Number	Policy Name (Main Modifications Version)	Notes on changes made to Plan structure (post examination)	Pre-Submission Local Plan including the Addendum Focussed Changes	Changes made to Pre-Submitted Local Plan related to Health and Wellbeing	Main Modifications Local Plan	Adopted Local Plan
Prosperous Communities	HP23	Scheduled Monuments and Archaeological Remains	Policy has been moved and renumbered as BE17	(N)		N/A	
	PC01	Cultivating a Strong and Competitive Economy	Policy has been removed	(++)		N/A	
	PC02	Job Growth and Employment Land	Policy has been merged with MG01	(N)		N/A	
	PC01	Safeguarding Employment Land	Policy originally numbered as PC03. This policy is now strategic.	(+)	No change	(+)	
	PC04	Development and Expansion	Policy has been removed	(+)		N/A	

Chapter	Policy Number	Policy Name (Main Modifications Version)	Notes on changes made to Plan structure (post examination)	Pre-Submission Local Plan including the Addendum Focussed Changes	Changes made to Pre-Submitted Local Plan related to Health and Wellbeing	Main Modifications Local Plan	Adopted Local Plan
		of Business Space					
	PC05	Employment Development Criteria	Policy has been removed	(+)		N/A	
	PC02	Supporting the Rural Economy	Originally numbered as PC06	(+)	No change	(+)	
	PC03	Retail and Commercial Leisure Growth	Originally numbered as PC07. Policy has now been made strategic	(+)	No change	(+)	
	PC04	Retail Hierarchy of Designated Centres	Originally numbered as PC08. Policy has now been made strategic	(+)	No change	(+)	

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	PC05	Brentwood Town Centre	Originally numbered as PC 09	(+)	No change	(+)	
	PC06	Mixed Use Development in Designated Centres	Originally numbered as PC10	(++)	No change	(++)	
	PC07	Primary Shopping Areas	Originally numbered as PC11	(+)	No change	(+)	
	PC08	Non-Centre Uses	Originally numbered as PC12	(+)	No change	(+)	
	PC09	Night Time Economy	Originally numbered as PC13	(++)	No change	(++)	
	PC10	Protecting and Enhancing Community Facilities	Originally numbered as PC14. This policy has now been made strategic	(++)	No change	(++)	

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	PC11	Education Facilities	Originally numbered as PC15	(+)	No change	(+)	
	PC16	Building for Institutional Purposes	Policy has been removed	(+)		N/A	
Natural Environment	NE01	Protecting and Enhancing the Natural Environment	Policy has now been made strategic	(+)	Policy has been updated to include the requirements that were originally set out in NE02.	(++)	

Chapter	Policy Number	Policy Name (Main Modifications Version)	Notes on changes made to Plan structure (post examination)	Pre-Submission Local Plan including the Addendum Focussed Changes	Changes made to Pre-Submitted Local Plan related to Health and Wellbeing	Main Modifications Local Plan	Adopted Local Plan
Page 928	NE02	Recreational Disturbance and Mitigation Strategy (RAMS)	Policy removed and merged with NE01	(++)		N/A	
	NE02	Green and Blue Infrastructure	Policy originally numbered as BE18. Policy has been made strategic.			N/A	
	NE03	Trees, Woodlands, Hedgerows	Policy wording has been modified but no changes from a health and wellbeing have been made.	(++)	No changes	(++)	



Chapter	Policy Number	Policy Name (Main Modifications Version)	Notes on changes made to Plan structure (post examination)	Pre-Submission Local Plan including the Addendum Focussed Changes	Changes made to Pre-Submitted Local Plan related to Health and Wellbeing	Main Modifications Local Plan	Adopted Local Plan
	NE04	Thames Chase Community Forest		(++)	No changes	(++)	
	NE05	Open Space and Recreation Provision	This policy has been merged – originally BE22 and BE23.	(++)	Significant changes to policy wording however no change to the impacts on health and wellbeing.	(++)	
	NE06	Allotment and Community Food Growing Space	Policy originally BE20	(+)	No change	(+)	
	NE07	Protecting Land for Gardens	Policy originally BE21	(N)	No change	(N)	
	NE08	Air Quality	This policy has been made strategic and includes greater	(+)	Increase clarity in the policy will help to ensure good air	(++)	

Chapter	Policy Number	Policy Name (Main Modifications Version)	Notes on changes made to Plan structure (post examination)	Pre-Submission Local Plan including the Addendum Focussed Changes	Changes made to Pre-Submitted Local Plan related to Health and Wellbeing	Main Modifications Local Plan	Adopted Local Plan
			clarity on the steps to be taken to ensure good air quality throughout the borough. Policy previously NE05.		quality throughout the borough.		
	NE09	Flood Risk	This policy is now Strategic.	(+)	No change	(+)	
	NE10	Contaminated Land and Hazardous Substances		(+)	No change	(+)	
	NE08	Floodlighting and Illumination		(N)	No change	(N)	
	NE09	Green Belt	Policy moved to MG02	(+)		N/A	

Chapter	Policy Number	Policy Name (Main Modifications Version)	Notes on changes made to Plan structure (post examination)	Pre-Submission Local Plan including the Addendum Focussed Changes	Changes made to Pre-Submitted Local Plan related to Health and Wellbeing	Main Modifications Local Plan	Adopted Local Plan
	NE10	New Development, Extension and Replacement of Buildings in the Green Belt	Policy deleted	(N)		N/A	
	NE11	Established Areas of Development and Structures in the Green Belt	Policy deleted	(N)		N/A	
	NE12	Previously Developed Land in Green Belt	Policy deleted	(+)		N/A	

Chapter	Policy Number	Policy Name (Main Modifications Version)	Notes on changes made to Plan structure (post examination)	Pre-Submission Local Plan including the Addendum Focussed Changes	Changes made to Pre-Submitted Local Plan related to Health and Wellbeing	Main Modifications Local Plan	Adopted Local Plan
Page 932		Site Allocations in the Breen Belt		(N)		N/A	
	NE13		Policy deleted				
	NE14	Agricultural Workers Dwellings	Policy deleted	(N)		N/A	

Chapter	Policy Number	Policy Name (Main Modifications Version)	Notes on changes made to Plan structure (post examination)	Pre-Submission Local Plan including the Addendum Focussed Changes	Changes made to Pre-Submitted Local Plan related to Health and Wellbeing	Main Modifications Local Plan	Adopted Local Plan
	NE15	Re-Use and Residential Conversion of Rural Buildings	Policy deleted	(+)		N/A	

Site Allocations

			The single policy on Dunton was considered sufficient and additional policies were identified as being needed. This policy has been spilt into three policies with the overarching themes of garden village principals, spatial design, and management specific for the Dunton Hills Garden Village. Note that these policies are also sign posted to the relevant LDP core policies.	N/A			
N/A	Dunton Hills Garden Village						
R01 (I)	Dunton Hills Garden Village			(+)	No change	(+)	

Chapter	Policy Number	Policy Name (Main Modifications Version)	Notes on changes made to Plan structure (post examination)	Pre-Submission Local Plan including the Addendum Focussed Changes	Changes made to Pre-Submitted Local Plan related to Health and Wellbeing	Main Modifications Local Plan	Adopted Local Plan
		Strategic Allocation					
	R01 (II)	Spatial Design of Dunton Hills Garden Village	Policy deleted and merged with R01	(+)		N/A	
	R01 (III)	Scheme Delivery and Legacy Management	Policy deleted and merged with R01	(+)		N/A	
	R02	Land at West Horndon Industrial Estate		(+)	No change	(+)	
	R03	Land North of Shenfield		(+)	No change	(+)	

Chapter	Policy Number	Policy Name (Main Modifications Version)	Notes on changes made to Plan structure (post examination)	Pre-Submission Local Plan including the Addendum Focussed Changes	Changes made to Pre-Submitted Local Plan related to Health and Wellbeing	Main Modifications Local Plan	Adopted Local Plan
	R04	Ford Headquarters and Council Depot South side Warely Road	Policy R04 and R05 merged	(+)		(+)	
	R05	Ford Headquarters and Council Depot North side of Warely Road	Policy R04 and R05 merged	(+)		N/A	
	R06	Land at Nags Head Lane, Brentwood		(+)	No change	(+)	
	R07	Sow and Grow Nursery, Pilgrims Hatch		(+)	No change	(+)	
	R08	Land at Mascalls Lane, Warley		(+)	No change	(+)	



Chapter	Policy Number	Policy Name (Main Modifications Version)	Notes on changes made to Plan structure (post examination)	Pre-Submission Local Plan including the Addendum Focussed Changes	Changes made to Pre-Submitted Local Plan related to Health and Wellbeing	Main Modifications Local Plan	Adopted Local Plan
	R09	Land at Warely Hill, Warley		(+)	No change	(+)	
	R10	Brentwood Railway Startion Car Park, Brentwood	Capacity of the site has changed from 100 to 200 dwellings	(N)	No change	(+)	
	R11	Westbury Road Car Park, Brentwood		(N)	No change	(N)	
	R12	Land at Hunter House, Brentwood		(N)	No change	(N)	
	R13	Chatham Way Car Park, Brentwood		(N)	No change	(N)	
	R14	William Hunter Way Car Park, Brentwood		(N)	No change	(N)	

Chapter	Policy Number	Policy Name (Main Modifications Version)	Notes on changes made to Plan structure (post examination)	Pre-Submission Local Plan including the Addendum Focussed Changes	Changes made to Pre-Submitted Local Plan related to Health and Wellbeing	Main Modifications Local Plan	Adopted Local Plan
	R15	Wates Way Industrial Estate, Brentwood	Change in capacity from 80 to 46	(+)	The reduction in site capacity will result in a reduction of affordable homes in this location.	(N)	
	R16	Land off Doddinghurst Road, Pilgrims Hatch		(N)	No change	(N)	
	R17	Land off Doddinghurst Road, Brentwood	Merged with R16	(N)		N/A	
	R18	Land off Crescent Drive, Shenfield	Policy deleted – planning permission granted	(N)		N/A	
	R19	Land at Priests Lane, Shenfield	Increase in capacity from 45 to 75.	(N)	Increase in capacity will make better use of land and increase the affordable	(+)	

Chapter	Policy Number	Policy Name (Main Modifications Version)	Notes on changes made to Plan structure (post examination)	Pre-Submission Local Plan including the Addendum Focussed Changes	Changes made to Pre-Submitted Local Plan related to Health and Wellbeing	Main Modifications Local Plan	Adopted Local Plan
					housing provision for this site.		
	R20	The Eagle and Child Public House, Shenfield	Policy deleted – planning permission granted	(N)		N/A	
	R21	Land South of Ingatestone, Ingatestone		(N)	No change	(N)	
	R22	Land Adjacent to the A12, Ingatestone		(N)	No change	(N)	
	R23	Brizes Corner Field, Kelvedon Hatch		(N)	No change	(N)	

Chapter	Policy Number	Policy Name (Main Modifications Version)	Notes on changes made to Plan structure (post examination)	Pre-Submission Local Plan including the Addendum Focussed Changes	Changes made to Pre-Submitted Local Plan related to Health and Wellbeing	Main Modifications Local Plan	Adopted Local Plan
	R24	Land off Stocks Lane, Kelvedon Hatch	Capacity of the site has been increased from 30 to 40 new dwellings	(N)	No change	(N)	
	R25	Land North of Woollard Way, Blackmore	Site capacity has been increased from 30 to 40 new dwellings	(N)	No change	(N)	
	R26	Land North of Orchard Piece, Blackmore	Site capacity has been increased from 20 to 30	(N)	No change	(N)	
Strategic Employment Sites	E11	Brentwood Enterprise Park		(+)	No change	(+)	
	E12	Childerditch Industrial Estate		(+)	No change	(+)	

Chapter	Policy Number	Policy Name (Main Modifications Version)	Notes on changes made to Plan structure (post examination)	Pre-Submission Local Plan including the Addendum Focussed Changes	Changes made to Pre-Submitted Local Plan related to Health and Wellbeing	Main Modifications Local Plan	Adopted Local Plan
	E13	East Horndon Hall		(+)	No change	(+)	
	E08	Land Adjacent to A12 Slip Road, Ingatestone		(N)	No change	(+)	

## Appendix 2: Health Impact Assessment of the 2016 Draft Local Plan (Reg 18), 2018 Pre-Submission Local Plan (Reg 19), and Addendum of Focused Changes to the Pre-Submission Local Plan (Reg 19).

Chapter	Policy Number	Policy Name	2016 LD Policies Impact on Health	Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing	Justification for changes (if made)	2018/19 LP Policies	Changes Made	Focused Changes
Managing Growth	SP01	Sustainable Development (new)	N/A			(++)	No changes made	(++)
	SP02	Managing Growth (new)	N/A			(N)	No changes made	(N)
	SP03	Health Impact Assessment	N/A			(++)	No changes made	(++)
	SP04	Developer Contributions	N/A			(N)	No changes made	(N)
	SP05	Construction Management	N/A			(++)	No changes made	(++)

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Chapter	Policy Number	Policy Name	2016 LD Policies Impact on Health	Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing	Justification for changes (if made)	2018/19 LP Policies	Changes Made	Focused Changes
	SP06	Effective Delivery of Development	N/A			(++)	No changes made	(++)
Resilient Built Environment	BE01	Future Proofing	N/A			(+)	No changes made	(+)
	BE02	Sustainable Construction and Resource Efficiency	(++)		This policy was split into two - Sustainable Construction and Efficient Resource Management, and Carbon Reduction, Renewable Energy and Water Efficiency - to allow for ease of reading and applying the	(++)	No changes made	(++)

Chapter	Policy Number	Policy Name	2016 LD Policies Impact on Health	Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing	Justification for changes (if made)	2018/19 LP Policies	Changes Made	Focused Changes
					policy where applicable.			
	BE03	Carbon Reduction, Renewable Energy and Water Efficiency	N/A			(++)	No changes made	(++)
	BE04	Establishing Low Carbon and Renewable Energy Infrastructure Network	N/A			(++)	No changes made	(++)



Chapter	Policy Number	Policy Name	2016 LD Policies Impact on Health	Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing	Justification for changes (if made)	2018/19 LP Policies	Changes Made	Focused Changes
	BE05	Assessing Energy Infrastructure	N/A			(+)	No changes made	(+)
	BE06	Improving Energy Efficiency in Existing Dwellings	N/A			(++)	No changes made	(++)
	BE07	Managing Heat Risk	N/A			(++)	No changes made	(++)
	BE08	Sustainable Drainage	(++)			(++)	No changes made	(++)
	BE09	Communications Infrastructure	(+)			(+)	No changes made	(+)
	BE10	Connecting New Developments to Digital Infrastructure	N/A			(+)	No changes made	(+)

Chapter	Policy Number	Policy Name	2016 LD Policies Impact on Health	Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing	Justification for changes (if made)	2018/19 LP Policies	Changes Made	Focused Changes
Page 946	BE11	Strategic Transport Infrastructure	N/A			(++)	No changes made	(++)
	BE12	Car-Limited Development	N/A			(++)	No changes made	(++)
	BE 13	Sustainable Means of Travel and Walkable Streets	N/A			(++)	No changes made	(++)
	BE14	Sustainable Passenger Transport	N/A			(+)	No changes made	(+)
	BE15	Electric and Low Emission Vehicles	N/A			(+)	No changes made	(+)
	BE16	Mitigating the Transport	N/A			(+)	No changes made	(+)

Chapter	Policy Number	Policy Name	2016 LD Policies Impact on Health	Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing	Justification for changes (if made)	2018/19 LP Policies	Changes Made	Focused Changes
		Impacts of Development						
	BE17	Parking Standards	N/A			(+)	No changes made	(+)
	BE18	Green and Blue Infrastructure	(++)	Policy name change from Green Infrastructure to Green & Blue Infrastructure		(++)	No changes made	(++)
	BE19	Access to Nature	N/A			(++)	No changes made	(++)
	BE20	Allotment and Community Food Growing Space	N/A			(+)	No changes made	(+)
	BE21	Protecting Land for Gardens	N/A			(N)	No changes made	(N)

Chapter	Policy Number	Policy Name	2016 LD Policies Impact on Health	Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing	Justification for changes (if made)	2018/19 LP Policies	Changes Made	Focused Changes
	BE22	Open Space in New Development	(+)			(+)	No changes made	(+)
	BE23	Open Space, Sport and Recreational Facilities	(++)			(++)	No changes made	(++)
Housing Provision	HP01	Housing Mix	(++)			(++)	No changes made	(++)
	HP02	Protecting the Existing Housing Stock	N/A			(N)	No changes made	(N)
	HP03	Residential Density	(N)			(N)	No changes made	(N)
	HP04	Specialist Accommodation	(+)			(+)	No changes made	(+)

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Chapter	Policy Number	Policy Name	2016 LD Policies Impact on Health	Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing	Justification for changes (if made)	2018/19 LP Policies	Changes Made	Focused Changes
	HP05	Affordable Housing	(+)			(+)	No changes made	(+)
	HP06	Standards for New Housing	(N)			(N)	No changes made	(N)
	HP07	Provision for Gypsies and Travellers / (Previously named Gypsy and Traveller in the 2016 LP)	(N)	Consideration is needed to identify which sites have the capacity to be intensified and over what period of time, as well as identify what is the maximum density to ensure overcrowding does not occur.	The Gypsy and Traveller policy was split into five policies to address specific situations experienced within the borough. There is often a conflict between the green belt policies, the location of traveller pitches, and borough's ability to meet its need. The five policies aim	(N)	No changes made	(N)

Chapter	Policy Number	Policy Name	2016 LD Policies Impact on Health	Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing	Justification for changes (if made)	2018/19 LP Policies	Changes Made	Focused Changes
					to resolve this so that when a need for additional pitches is identified planning permission can be granted within a specific criteria.			
	HP08	Regularising Suitable Existing Traveller Sites	N/A			(+)	No changes made	(+)
	HP09	Safeguarding Permitted Sites	N/A			(N)	No changes made	(N)

Chapter	Policy Number	Policy Name	2016 LD Policies Impact on Health	Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing	Justification for changes (if made)	2018/19 LP Policies	Changes Made	Focused Changes
	HP10	Sub-Division of Pitches or Plots	N/A			(N)	No changes made	(N)
	HP11	Proposals for Gypsies, Travellers and Travelling Showpeople on Windfall Sites	N/A			(N)	No changes made	(N)
	HP12	Planning for Inclusive Communities	N/A			(++)	No changes made	(++)
	HP13	Creating Places	N/A			(++)	No changes made	(++)
	HP14	Responding to Context	N/A			(+)	No changes made	(+)
	HP15	Permeable and Legible Layout	N/A			(++)	No changes made	(++)

Chapter	Policy Number	Policy Name	2016 LD Policies Impact on Health	Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing	Justification for changes (if made)	2018/19 LP Policies	Changes Made	Focused Changes
	HP16	Building Design	(+)	Policy could include something about using design to ensure the development of inclusive environments.		(++)	No changes made	(++)
	HP17	Paving Over Front Gardens	N/A			(N)	No changes made	(N)
	HP18	Designing Landscape and the Public Realm	N/A			(++)	No changes made	(++)
	HP19	Conservation and Enhancement of Historic Environment	(N)			(N)	No changes made	(N)
	HP20	Listed Buildings	(N)			(N)	No changes made	(N)



Chapter	Policy Number	Policy Name	2016 LD Policies Impact on Health	Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing	Justification for changes (if made)	2018/19 LP Policies	Changes Made	Focused Changes
	HP21	Conservation Areas	(+)			(+)	No changes made	(+)
	HP22	Local Heritage Assets	N/A			(++)	No changes made	(++)
	HP23	Scheduled Monuments and Archaeological Remains	(N)			(N)	No changes made	(N)
Prosperous Communities	PC01	Cultivating a Strong and Competitive Economy	N/A			(++)	No changes made	(++)
	PC02	Job Growth and Employment Land	N/A			(N)	No changes made	(N)

Chapter	Policy Number	Policy Name	2016 LD Policies Impact on Health	Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing	Justification for changes (if made)	2018/19 LP Policies	Changes Made	Focused Changes
Page 954	PC03	Employment Land Allocations	(+)			(+)	No changes made	(+)
	PC04	Development and Expansion of Business Space	N/A			(+)	No changes made	(+)
	PC05	Employment Development Criteria	N/A			(+)	No changes made	(+)
	PC06	Supporting the Rural Economy	(+)			(+)	No changes made	(+)
	PC07	Retail and Commercial Leisure Growth	(+)	Policy name change		(+)	No changes made	(+)
	PC08	Retail Hierarchy of Designated Centres	N/A			(+)	No changes made	(+)

Chapter	Policy Number	Policy Name	2016 LD Policies Impact on Health	Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing	Justification for changes (if made)	2018/19 LP Policies	Changes Made	Focused Changes
	PC09	Brentwood Town Centre	(+)			(+)	No changes made	(+)
	PC10	Mixed Use Development in Designated Centres	N/A			(++)	No changes made	(++)
	PC11	Primary Shopping Areas	N/A			(+)	No changes made	(+)
	PC12	Non-Centre Uses	N/A			(+)	No changes made	(+)
	PC13	Night Time Economy	N/A			(++)	No changes made	(++)
	PC14	Protecting and Enhancing Community Assets	N/A			(++)	No changes made	(++)

Chapter	Policy Number	Policy Name	2016 LD Policies Impact on Health	Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing	Justification for changes (if made)	2018/19 LP Policies	Changes Made	Focused Changes
Page 956	PC15	Education Facilities	N/A			(+)	No changes made	(+)
	PC16	Building for Institutional Purposes	(+)	policy could be strengthen by including text about ensuring design and location are utilised to create an inclusive environment with the existing community.		(+)	No changes made	(+)
Natural Environment	NE01	Protecting and Enhancing the Natural Environment	N/A			(+)	No changes made	(+)

Chapter	Policy Number	Policy Name	2016 LD Policies Impact on Health	Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing	Justification for changes (if made)	2018/19 LP Policies	Changes Made	Focused Changes
	NE02	Recreational Disturbance and Mitigation Strategy (RAMS)	N/A			(++)	No changes made	(++)
	NE03	Trees, Woodlands, Hedgerows	N/A	This policy has been created to merge the previous 2016 LDP policies Landscape Protection and Woodlands, and Wildlife and Nature Conservation		(++)	No changes made	(++)
	N/A	Wildlife and Nature Conservation	(++)	This policy has been renamed / added into a new policy named Trees, Woodlands, Headerows.		N/A		N/A

Chapter	Policy Number	Policy Name	2016 LD Policies Impact on Health	Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing	Justification for changes (if made)	2018/19 LP Policies	Changes Made	Focused Changes
	N/A	Landscape Protection and Woodland Management	(+)	This policy has been renamed / added into a new policy named Trees, Woodlands, Headerows.		N/A		N/A
	NE04	Thames Chase Community Forest	(++)			(++)	No changes made	(++)
	NE05	Air Quality	(+)			(+)	No changes made	(+)
	NE06	Flood Risk	(+)			(+)	No changes made	(+)
	NE07	Contaminated Land and Hazardous Substances	(+)			(+)	No changes made	(+)
	NE08	Floodlighting and Illumination						

Chapter	Policy Number	Policy Name	2016 LD Policies Impact on Health	Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing	Justification for changes (if made)	2018/19 LP Policies	Changes Made	Focused Changes
	NE09	Green Belt	(+)			(+)	No changes made	(+)
	NE10	New Development, Extension and Replacement of Buildings in the Green Belt	(N)			(N)	No changes made	(N)
	NE11	Established Areas of Development and Structures in the Green Belt	(N)			(N)	No changes made	(N)
	NE12	Previously Developed Land in Green Belt	(+)			(+)	No changes made	(+)

Chapter	Policy Number	Policy Name	2016 LD Policies Impact on Health	Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing	Justification for changes (if made)	2018/19 LP Policies	Changes Made	Focused Changes
	NE13	Site Allocations in the Breen Belt	(-)	need to include that the de-allocation of GB sites will be determined based on appropriate evidence base to ensure minimal harm to the to the natural environment and most sustainable locations for new developments		(N)	No changes made	(N)
	NE14	Agricultural Workers Dwellings	(N)			(N)	No changes made	(N)



Chapter	Policy Number	Policy Name	2016 LD Policies Impact on Health	Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing	Justification for changes (if made)	2018/19 LP Policies	Changes Made	Focused Changes
	NE15	Re-Use and Residential Conversion of Rural Buildings	(+)			(+)	No changes made	(+)

	N/A	Dunton Hills Garden Village	(N)	<p>Consider making reference to the Health and Wellbeing Policy given that the development will provide more than 50 units. Also, include some of the elements that will be considered within the Masterplanning process that will ensure a healthy community such as cycle paths, walkable neighbourhoods, design elements to improve the inclusiveness of the community.</p>	<p>The single policy on Dunton was considered sufficient and additional policies were identified as being needed. This policy has been spilt into three policies with the overarching themes of garden village principals, spatial design, and management specific for the Dunton Hills Garden Village. Note that these policies are also sign posted to the relevant LDP core policies.</p>	N/A	N/A
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Chapter	Policy Number	Policy Name	2016 LD Policies Impact on Health	Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing	Justification for changes (if made)	2018/19 LP Policies	Changes Made	Focused Changes
	R01 (I)	Dunton Hills Garden Village Strategic Allocation	N/A			(+)	The changes to the Plan, resulted in an additional 70 homes to be moved into DHGV. This change will have an impact on the density of the site on a minor scale. Therefore, the policy is still viewed as having a positive impact allowing for diverse building types and tenures.	(+)
	R01 (II)	Spatial Design of Dunton Hills Garden Village	N/A			(+)	No changes made	(+)
	R01 (III)	Scheme Delivery and Legacy Management	N/A			(+)	No changes made	(+)

Chapter	Policy Number	Policy Name	2016 LD Policies Impact on Health	Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing	Justification for changes (if made)	2018/19 LP Policies	Changes Made	Focused Changes
	R02	Land at West Horndon Industrial Estate				(+)	No changes made	(+)
	R03	Land North of Shenfield				(+)	No changes made	(+)
	R04	Ford Headquarters and Council Depot South side Warely Road					No changes made	
	R05	Ford Headquarters and Council Depot North side of Warely Road					No changes made	
	R06	Land at Nags Head Lane, Brentwood					No changes made	

Chapter	Policy Number	Policy Name	2016 LD Policies Impact on Health	Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing	Justification for changes (if made)	2018/19 LP Policies	Changes Made	Focused Changes
	R07	Sow and Grow Nursery, Pilgrims Hatch				(+)	No changes made	(+)
	R08	Land at Mascalls Lane, Warley				(+)	No changes made	(+)
	R09	Land at Warely Hill, Warley				(+)	No changes made	(+)
	R10	Brentwood Railway Startion Car Park, Brentwood				(N)	No changes made	(N)
	R11	Westbury Road Car Park, Brentwood				(N)	No changes made	(N)
	R12	Land at Hunter House, Brentwood				(N)	No changes made	(N)

Chapter	Policy Number	Policy Name	2016 LD Policies Impact on Health	Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing	Justification for changes (if made)	2018/19 LP Policies	Changes Made	Focused Changes
Page 966	R13	Chatham Way Car Park, Brentwood				(N)	No changes made	(N)
	R14	William Hunter Way Car Park, Brentwood				(N)	No changes made	(N)
	R15	Wates Way Industrial Estate, Brentwood				(+)	No changes made	(+)
	R16	Land off Doddinghurst Road, Pilgrims Hatch				(N)	No changes made	(N)
	R17	Land off Doddinghurst Road, Brentwood				(N)	No changes made	(N)
	R18	Land off Crescent Drive, Shenfield				(N)	The new housing numbers have been reduce by 20, originally 55 now 35. The reduced figured will still require the site to provide 35% affordable homes	(N)

Chapter	Policy Number	Policy Name	2016 LD Policies Impact on Health	Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing	Justification for changes (if made)	2018/19 LP Policies	Changes Made	Focused Changes
							(equates to 12-13 affordable homes on site) and no negative impact on the Councils 5-yr housing supply. The reduced density will also allow for a great portion of open public green spaces for the local community.	
	R19	Land at Priests Lane, Shenfield				(+)	The changes to the policy has resulted in a reduction of 30 dwelling, from 75 to 45 new dwelling. The reduced figured will still require the site to provide 35% affordable homes (equates to 15-16 affordable homes on site) and no negative impact on the Councils 5-yr housing supply. However, the reduction in the numbers means that wheelchair accessible dwellings are required on site as set out in Policy HP01 as the	(N)

Chapter	Policy Number	Policy Name	2016 LD Policies Impact on Health	Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing	Justification for changes (if made)	2018/19 LP Policies	Changes Made	Focused Changes
							threshold is for those sites of 60 or more dwellings.	
	R20	The Eagle and Child Public House, Shenfield				(N)	No changes made	(N)
	R21	Land South of Ingatestone, Ingatestone				(N)	No changes made	(N)
	R22	Land Adjacent to the A12, Ingatestone				(N)	No changes made	(N)
	R23	Brizes Corner Field, Kelvedon Hatch				(N)	No changes made	(N)
	R24	Land off Stocks Lane, Kelvedon Hatch				(N)	No changes made	(N)



Chapter	Policy Number	Policy Name	2016 LD Policies Impact on Health	Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing	Justification for changes (if made)	2018/19 LP Policies	Changes Made	Focused Changes
	R25	Land North of Woollard Way, Blackmore				(N)	The new policy will result in a reduction of 10 dwelling, from 40 to 30 dwelling. The reduction will not impact on the requirement for affordable housing or the Councils 5-yr housing supply.	(N)
	R26	Land North of Orchard Piece, Blackmore				(N)	The new policy will result in a reduction of 10 dwelling, from 30 to 20 dwelling. The reduction will not impact on the requirement for affordable housing or the Councils 5-yr housing supply.	(N)
Strategic Employment Sites	E11	Brentwood Enterprise Park				(N)	No changes made to policy - however the employment site will have a direct positive effect due to the increased density at DHGV by providing employment, goods and	(+)

Chapter	Policy Number	Policy Name	2016 LD Policies Impact on Health	Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing	Justification for changes (if made)	2018/19 LP Policies	Changes Made	Focused Changes
							services to the local community.	
	E12	Childerditch Industrial Estate				(N)	No changes made to policy - however the employment site will have a direct positive effect due to the increased density at DHGV by providing employment, goods and services to the local community.	(+)
	E13	East Horndon Hall				(N)	No changes made to policy - however the employment site will have a direct positive effect due to the increased density at DHGV by providing employment, goods and services to the local community.	(+)

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Chapter	Policy Number	Policy Name	2016 LD Policies Impact on Health	Changes made to the 2016 Draft Policy (if needed) related to Health and Wellbeing	Justification for changes (if made)	2018/19 LP Policies	Changes Made	Focused Changes
	E08	Land Adjacent to A12 Slip Road, Ingatestone				(N)	No changes made	(N)



## Appendix 3: Key Appraisal Findings

The Health Impact Assessment process was structured around the Main Modifications 2021 chapter structure of the Local Plan as outlined in section 5.3 Assessment of Policies of this report. This identified gaps in the policies, policies that have positive impacts on health, and those policies that could be further enhanced to improve health outcomes. Section 6.0 provides a brief summary of the assessment and section 7.0 outlines the actions that were taken. This appendix provides greater detail of the process undertaken.

### (i) **Strategic Policies**

These strategic policies were established as they apply to all development in the Borough. The Plan's vision, strategic objectives and planning policies are all underpinned by the spatial strategy. The Spatial Strategy Policies within the LP set out the aims of the Strategy. The Strategic and Development Management Policies provide the framework for this to be delivered. It was felt that this new document structure and framework ensures that the overarching spatial strategy aims – transit-oriented growth, Developing Naturally and Sustainably and Healthy Communities – were considered throughout the Local Plan.

### (ii) **Managing Growth**

Development of any kind can have an impact on health and wellbeing. The policies found within the Local Plan aimed to promote healthy, inclusive, and sustainable developments. The Managing Growth policies set out how sustainable development is to be achieved, the optimal locations to ensure accessible and sustainable growth, and what development proposals must respond to.

New policies included to ensure sustainable development is made a priority while still ensuring the borough is able to meet its full housing need are:

- Spatial Strategy (MG01) – identifies the quantum and type of development including housing, gypsy and traveller pitches, and employment, the designated growth in Neighbourhood Planning areas, the housing

trajectory outlining the amount of development that is expected to come forward throughout the plan period, and guidance on the distribution of growth throughout the borough.

- Developers Contributions (MG05) – this policy now includes a requirement for retrospective contributions where necessary to ensure appropriate infrastructure is provided at the appropriate time.
- Local Plan Review (MG06) – this policy requires the Council to undertake an early review (28 months from adoption of the current plan) to ensure the full housing needs and associated transport infrastructure can be met throughout the plan period. Ongoing collaborative working will continue with both Essex County Council (ECC) and National Highways (formally Highways England) on all transport related matters.
- 

### **(iii) Resilient Built Environment**

These policies focus on how developments can be more efficient and resilient so that the borough can adapt better to changes as a result of climate change and other treats. Resilience-building strategies can be considered to be ‘reactive’ or ‘proactive’. A reactive approach focuses on mitigating consequences, maintaining stability and the status quo, whereas a proactive approach focuses on change and adaptation and looks more towards addressing long term stresses. Both approaches are incorporated in the LP.

There were a number of new policies established within this chapter as part of the Pre-Submission Plan 2019/2019 to ensure information gaps were addressed. Some of the new policies which were established to strengthen this chapter include:

- Sustainable means of travel and walkable streets;
- Establishing Low Carbon and Renewable Energy Infrastructure Network;
- Managing Heat Risk; and
- Creating Successful Places

One policy from the 2016 LP was strengthen from a health and wellbeing perspective, Building Design, which now includes the requirement of creating inclusive environments through design.

This chapter has been modified following the Local Plan examination to include strategic policies and combine policies to improve the effectiveness of the policies. The New strategic policies in this chapter which have been identified to have a positive impact on health and wellbeing include:

- Strategic Policy BE01: Carbon Reduction and Renewable Energy – this policy clearly sets out the carbon reduction and construction standards required by developments.
- Strategic Policy BE08: Strategic Transport Infrastructure – this policy requires developments to contribute to the transport related improvements such as cycle paths to ensure better connectivity throughout the borough.
- Strategic Policy BE14: Creating Successful Places – this policy has been moved from chapter 6, housing provision, and requires all developments to provide high design standards and deliver safe, inclusive, attractive and accessible places.

#### **(iv) Prosperous Community**

The policies found within this chapter of the Local Plan consist of a wide variety of subjects including employment, mixed use developments, and educational facilities. All these types of developments can have either a positive or negative impact on a person's / community's health and wellbeing.

The Council has made some structural changes to the Local Plan since the Local Plan examination to improve the overall effectiveness of the Local Plan policies. Although there has been a significant reordering and combining of policies, these changes have been to ensure they are aligned with the National Planning Policy Framework and overall effectiveness. Therefore, no changes to the health and wellbeing scores have been identified for this chapter.

#### **(v) Natural Environment**

Access to green space / open space can have a very positive impact on a person's health and wellbeing. The importance of access to open spaces and nature was highlighted throughout the coronavirus global pandemic (COVID-19). Brentwood Borough is 89% green belt, which means the community has significant access to open space. All but one per-existing policies from the 2016 Local Plan policy was found to have a positive impact on health. The 2016 Site

Allocations in Green Belt policy was highlighted as needing additional work / evidence to support the policy to ensure health and wellbeing was adequately considered. This update was made allowing the policy to receive a neutral score.

New policies were also identified for the Pre-Submission Local Plan for strengthening the protection of the borough's open spaces such as:

- Protecting and Enhancing the Natural Environment;
- Recreational Disturbance and Mitigation; and
- Trees, Woodlands, Hedgerows

Changes to the structure of the Local Plan were made as part of the Main Modifications Local Plan. Some of the key strategic policies identified through this process which have an impact on health and wellbeing include:

- Strategic Policy NE01: Protecting and Enhancing the Natural Environment – this policy has combined both the Protecting and Enhancing the Natural Environment and Recreational Disturbance and Mitigation policies from the Pre-Submission Local Plan and made the policy strategic. These changes will improve the effectiveness of the policy.
- Strategic Policy NE02: Strategic Green and Blue Infrastructure – this policy requires the protection, enhancement, and creation of multifunctional spaces. This has significant positive impacts on the environment, wildlife, climate change, and creation of spaces for recreation and access to nature.
- Strategic Policy NE08: Air Quality – greater clarity to ensure developments do not create unacceptable risk to poor air quality.

#### **(vi) Dunton Hills Garden Village**

The 2016 Local Plan consisted of a single policy on Dunton Hills Garden Village (DHGV). Given the number of homes planned for this site an entire chapter was created to ensure that the spatial vision and aspirations for the development are achieved. Three aims were identified for DHGV, one of which states, “*to create a distinctive and well-designed new settlement at Dunton Hills that responds to its spatial context, and incorporates all the necessary components to achieve a healthy, liveable and self-sustaining Garden Village*”. None of the new policies were found to have a negative impact on health and wellbeing, as this principle was considered



throughout the process of developing the new policies. Details on how each of these policies scored are illustrated in Appendix 1 (Main Modification version) and Appendix 2 (Pre-Submission Local Plan).

## BRENTWOOD LOCAL DEVELOPMENT PLAN

 [planning.policy@brentwood.gov.uk](mailto:planning.policy@brentwood.gov.uk)

 [BrentwoodCouncil](#)

 [@Brenwood\\_BC](#)



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# LOCAL DEVELOPMENT PLAN EXAMINATION BY NUMBERS



**6** weeks of hearings



**39** participants



**5,431** online views

Page 979

**14** matters discussed



**20** hearing days

**140** post-submission documents published



**35** hearing sessions



**207** inspector's questions answered

**6** Topic Papers

totalling **102** hours,

**43** Statements of Common Ground

and **14** minutes

Appendix N



## LOCAL DEVELOPMENT PLAN EXAMINATION TIMELINE

<b>Mar 2022</b>	Plan adopted
<b>Feb 2022</b>	Inspectors final report, examination concludes
<b>Sep 2021</b>	Modifications consultation
<b>Jul 2021</b>	Week six hearings
<b>Mar 2021</b>	Week five hearings
<b>Feb 2021</b>	Weeks two, three & four hearings
<b>Dec 2020</b>	Week one hearings
<b>Oct 2020</b>	Matters, Issues and Questions
<b>Jun 2020</b>	Inspectors initial questions
<b>Feb 2020</b>	Plan submitted





## LOCAL DEVELOPMENT PLAN: HOUSING PROVISION



**7,146**

new homes



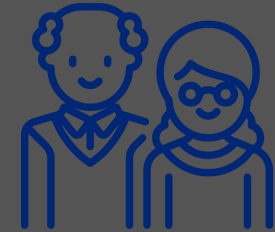
**1,641**

affordable homes  
on allocated sites



**4,690**

total homes to be  
built to meet  
requirement M4(2)  
accessible and  
adaptable  
dwellings, unless  
built to M4(3)  
wheelchair  
accessible  
dwellings, on  
allocated sites



**6**

care homes with  
capacity for **420**  
beds across four  
strategic  
allocations. Plus  
specialist  
accommodation on  
larger  
developments

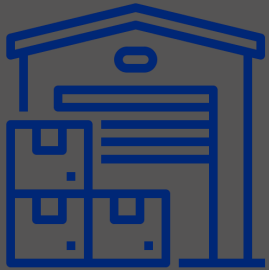


**208**

custom/self-build  
homes on  
allocated sites

**74**

affordable homes  
built to meet M4(3)  
wheelchair  
accessibility, on  
allocated sites



**46.64**

hectares of new  
employment land



**1,604**

square metres  
(net) of  
comparison retail  
floorspace



**4,438**

square metres  
(net) of  
convenience  
floorspace



**5,000**

(minimum)  
additional jobs  
created through  
employment land  
allocations

## **Members Interests**

Members of the Council must declare any pecuniary or non-pecuniary interests and the nature of the interest at the beginning of an agenda item and that, on declaring a pecuniary interest, they are required to leave the Chamber.

- **What are pecuniary interests?**

A person's pecuniary interests are their business interests (for example their employment trade, profession, contracts, or any company with which they are associated) and wider financial interests they might have (for example trust funds, investments, and asset including land and property).

- **Do I have any disclosable pecuniary interests?**

You have a disclosable pecuniary interest if you, your spouse or civil partner, or a person you are living with as a spouse or civil partner have a disclosable pecuniary interest set out in the Council's Members' Code of Conduct.

- **What does having a disclosable pecuniary interest stop me doing?**

If you are present at a meeting of your council or authority, of its executive or any committee of the executive, or any committee, sub-committee, joint committee, or joint sub-committee of your authority, and you have a disclosable pecuniary interest relating to any business that is or will be considered at the meeting, you must not :

- participate in any discussion of the business at the meeting, of if you become aware of your disclosable pecuniary interest during the meeting participate further in any discussion of the business or,
- participate in any vote or further vote taken on the matter at the meeting.

These prohibitions apply to any form of participation, including speaking as a member of the public.

- **Other Pecuniary Interests**

Other Pecuniary Interests are also set out in the Members' Code of Conduct and apply only to you as a Member.

If you have an Other Pecuniary Interest in an item of business on the agenda then you must disclose that interest and withdraw from the room while that business is being considered

- **Non-Pecuniary Interests**

Non –pecuniary interests are set out in the Council's Code of Conduct and apply to you as a Member and also to relevant persons where the decision might reasonably be regarded as affecting their wellbeing.

A 'relevant person' is your spouse or civil partner, or a person you are living with as a spouse or civil partner

If you have a non-pecuniary interest in any business of the Authority and you are present at a meeting of the Authority at which the business is considered, you must disclose to that meeting the existence and nature of that interest whether or not such interest is registered on your Register of Interests or for which you have made a pending notification.



## **Extraordinary Council Terms of Reference**

Business at extraordinary meetings of the Council shall be restricted to the following:

- (a) to appoint a Member to preside at the meeting if neither the Mayor nor the Deputy Mayor are present and able to preside;
- (b) to receive apologies for absence from Members;
- (c) to receive any declarations of interest from Members and Officers;
- (d) to consider any business set out in the notice convening the meeting;
- (e) to consider any matter which, by reason of special circumstances to be specified in the minutes of the meeting, the Mayor considers should be considered at the meeting as a matter of urgency.

No other business will be transacted.

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