

Appendix A: Brentwood Local Plan Update Report – November 2017

INTRODUCTION: PREPARING THE LOCAL PLAN

1. The Council needs to produce a new local plan (referred to as ‘the plan’), which will set out a long-term vision for how and where the Borough will develop over the next 15-20 years (to 2033) in line with the unique local character of the area. The plan will propose a clear spatial vision, a sustainable pattern of 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. The plan will also need to provide the right range of community and physical infrastructure at the right time to support sustainable development.
2. The key recent public consultations informing the direction of the plan include the Strategic Growth Options Consultation (2015), and the Draft Local Plan (2016), which included both draft planning policies but also potential housing and employment site allocations. The detail from these consultations will be subject to a separate report at the next stage of formal consultation on the plan, but some of the key headlines are detailed below:
 - a) **Housing sites** - considerable objections to proposed sites for new homes. Site specific objection and petitions received for: Honeypot Lane, Priests Lane and Hatch Lane area (not proposed).
 - b) **Development generally** - need better explanation for selection of sites and justification of rejection and unclear if all options for locating development have been considered. No growth option should be seriously considered. Disagree that new homes are needed to this extent. Proposals just encourage new people to come to borough rather than provide for existing residents. Object to proposed developments as the impact on existing residents and local infrastructure is too high. Concerned that development is proposed near high pressure gas pipes and high voltage electric lines.
 - c) **Types of housing** - need more affordable homes and more smaller homes to downsize to. Need a mixture of new homes of different size and tenure.
 - d) **Green Belt** - objection to any development in Green Belt. Concerns raised over incremental release of Green Belt and support for building on brownfield only. Higher density development needed to reduce Green Belt release.
 - e) **Corridor strategy**- objections received for Dunton Hills Garden Village in principle. Object in principle and to the extent of development in the south of the borough. Impact on Basildon of development is too great, object to development along the A127. Development should focus on the A12 corridor. Need to distribute housing and economic growth throughout the borough and not just the south.
 - f) **Plan evidence** - more evidence needed: to justify location of proposed development sites: Highway impacts, junction modelling and mitigation; infrastructure impacts and

need; education; health care, particularly GPs; public transport; Objectively Assessed Housing Need; Strategic Housing Market Assessment; historic windfall statistics; affordable homes need; strategic green belt review; viability; SA, HRA and SEA updates; Gypsy Traveller and Travelling Showpeople need assessment; settlement hierarchy; economic impacts of Crossrail; landscape assessment; historic asset impacts and infrastructure information. New development must have timely new infrastructure.

- g) **Environmental considerations** - need to encourage policies and proposals which incorporate measures to reduce traffic generation at source. Must conserve all wildlife sites and support indicated for environmental protection.
 - h) **Duty to co-operate** - more information on engagement with other boroughs on strategic matters.
3. A total of 1,281 people or groups made representations to the Draft Local Plan (2016) consultation. Many consultees made multiple representations in response to the draft policies and particularly on proposed sites. In total, 3,942 representations were made, approximately 11.6% were submitted directly onto the Council's online Local Development Plan portal, 51.7% of which were submitted via email and the remaining 36.7% were submitted on paper. Of the total representations made, 12.8% were in support; 24.8% were comments and 62.4 % were objecting to part of the plan.
4. In light of responses received and emerging new national planning policy directions and focus upon delivering sustainable development, officers have been working with a range of specialist consultants to enhance the evidence base to the plan and develop a strategy which is considered both sound and sustainable. This report focuses upon some of the emerging new evidence base for the plan, the direction of travel in the plan and the critical path to delivering a sustainable plan for the Borough.
5. Detail on next steps and indicative timetables are set out later in this report. The Council is not yet at the stage where it is finalising sites as evidence is still being gathered.
6. The Council consulted on the Community Infrastructure Levy (CIL) Preliminary Draft Charging Schedule between 27 October and 8 December 2016. Specific issues raised included:
- a) **Valuation study** - Should cover settlements to the south of the A127; Base data should include adjoining areas.
 - b) **Proposed charges** – Should be more comparable to adjoining areas to prevent issues of viability for nearby proposed developments; Joint charging zones could be an appropriate; Charging rate should not be determined until the funding gap that CIL needs to be fund is established; Rate reviews should be undertaken bi-annually; CIL should be reviewed if market changes significantly; Proposed charges may act as disincentive for development in Brentwood, an average family home will be charged circa £20k; Support nil rate for non-residential development; £200 per square metre (psm) rate is too high and will render allocated sites undeliverable; Question why rate has risen £70 psm since 2013; Will cost £16k for average sized home, typically see costs between £6k and £9k across Essex; Blanket charge of £200 psm for food retail

development (A1) proposed would be one of the highest in the south east of England; High rate for food retail reduces viability for smaller supermarkets, may be appropriate to introduce tiers of differentiation.

- c) **Strategic Sites** - Major strategic sites should be zero rated for CIL with infrastructure funded by S106; Concerned that it is premature to confirm CIL rates in respect of large strategic sites such as Dunton Hills Garden Village, likely that zero rate is appropriate; Larger strategic sites require major infrastructure delivery but this has not been reflected in the viability report; Implications of CIL charges on larger schemes (500+) needs to be appraised.
 - d) **Installments policy** - Should be used cautiously due to costs of collecting multiple payments; Considered appropriate and necessary to reduce pressure on cashflow and viability.
 - e) **Discretionary relief** - Likely to open unwelcomed loop-holes; Important where development affects heritage assets and their setting and CIL could make them unviable; Useful for large strategic sites where there are many variable factors through the life of the development.
 - f) **CIL timetable**: Production of CIL is considered to be premature in advance of a sound plan being established.
 - g) **IDP & Regulation 123 List** - Not apparent that CIL has been suitably informed by the IDP and Reg 123 List; No evidence as to what infrastructure items and projects CIL is intended to fund.
 - h) **Affordable Housing** - Affordable rent has been assumed as the only delivery mechanism for affordable housing, a more realistic tenure mix should be applied as per the SHMA; Delivery of affordable housing should be a priority as only 15.4% of homes built between 2001-2014 were affordable.
 - i) **Viability Assessment** - No allowance for site servicing infrastructure as a cost within the appraisals; Interest of 5% assumed for development finance is low in comparison to the standard 6% or 7% across the industry; Development of brownfield land does not appear to have been taken into account; Concerned over the number of assumptions used in the assessment this should be reviewed and corrected where necessary.
7. Since this consultation, further work has also been undertaken on the financial viability analysis for a number of the proposed allocation sites and it is likely that a refresh of the CIL evidence base may be required to support the next stage of public consultation on the CIL, which is scheduled to be undertaken alongside the Regulation 18 consultation on the plan. Significant work has also been progressed on producing a supporting Infrastructure Delivery Plan to accompany both the plan and CIL.

PLAN-MAKING AND EVIDENCE BASE

8. The production of a sound plan rests upon a solid foundation base of evidence. The evidence base for the plan also needs to be up to date and reflect any changes in national planning policy and guidance. Table 1 sets out the current status of the main evidence base for the plan. Work on the plan has been undertaken over a number of years and some of the original evidence base will be superseded shortly by more up to date material. Where appropriate, the list of evidence base material will be updated on the Council's website.

Table 1: Review of Evidence Base

Updates (published)	Under Development	Published but Currently Under Review	Likely to be Superseded
Sustainability Appraisal			
Brentwood Scoping Report (May 2013)			Sustainability Appraisal: Scoping Report 2009
Brentwood Local Plan Interim SA Report (Aug 2013)			SEA Baseline Information Profile 2006-7
Strategic Growth Options – Interim SA (Jan 2015)			Core Strategy – Sustainability Appraisal of Issues and Options 2009
Draft Local Plan Interim SA and Non-Technical Summary (Feb 2016)			Gypsies and Travellers DPD
			Interim Sustainability Appraisal Report (2008)
			Final SA Report (2009)
	Local Plan Interim SA (2018)		
Duty to Cooperate			
	Duty to Cooperate Statement and Action Plan (2018)		
Consultation			
	Consultation Statement (2018)		
Economy			
Economic Futures 2013-2033 Draft Report (Draft)			Economic Futures 2015-2030 Final Report and Exec Summary
	Retail and Commercial Leisure Study Update (2018)	Retail and Commercial Leisure Study Final Report and Exec Summary (Dec 2014)	
Economic Futures 2013-2033 Draft Report (Draft)		Heart of Essex Economic Futures Study (June 2012)	
Economic Futures 2013-2033 Draft Report (Draft)	Brentwood Borough Housing and Employment Land Availability Assessment (HELAA) 2018	Employment Land Review – Final Report and Exec Summary (Sept 2010)	
Environment			
Green Belt Review Part 1 Strategic Overview (2017) (Draft)			
Green Belt Review Part 2 Parcels (2017) (Draft)			
	Green Belt Review Part 3 Site Assessments (2018)	Green Belt Assessment (March 2016)	
	Green Belt Review Part 4 – Boundaries (2018)		
Green Infrastructure Strategy (Sept 2015)	Green Infrastructure Audit and Action Plan (2018)		
Surface Water Management Plan for Brentwood Borough			

(January 2015)			
Renewable Energy Study (April 2014)			
	Local Wildlife Sites Update (2018)	Local Wildlife Sites Review (Dec 2012)	
Strategic Flood Risk Assessment (SFRA) Nov 2017 (Draft)			Strategic Flood Risk Assessment (SFRA) Feb 2011
	Water Cycle Study Update (2018)	Water Cycle Study (Feb 2011)	
Mid Essex landscape Character Assessment (Sept 2006)			
	Brentwood Landscape Capacity Study (2018)		
	Conservation Area Boundaries and Appraisals (2018)	Conservation Area Boundaries and Appraisals (various)	
	Heritage Assets (Local List) (2018)		
Housing and Demography			
	SHMA Part 2 (Update 2018)	SHMA Part 2 (June 2016)	
Brentwood OAN Summary 2017	SHMA Part 1 (2018)	SHMA Part 1 (Dec 2014)	
		Greater Essex Demographic Forecasts 2012-2037	
		Heart of Essex Housing Growth Scenarios (June 2012)	
	Brentwood Borough Housing and Employment Land Availability Assessment (HELAA) (2018)		Strategic Housing Land Availability Assessment (October 2011)
	Affordable Housing Viability Assessment (2018)		Affordable Housing Viability Assessments (August 2010)
Draft Gypsy and Traveller Needs Assessment (Nov 2017)			Gypsy and Travellers DPD SA
	Brownfield Register		
Self and Custom Build Register			
	Site Assessment Methodology and Review (2018)		
Transport			
	Highways Modelling and Multi-modal Study (2018)	Highways Modelling – Draft Report (Feb 2016)	
	Cycling Action Plan (2018)		
Leisure, Recreation and Town Centres			
	Indoor Facilities Strategy (2017) / Playing Pitches Strategy (2018) / Green Infrastructure Audit and Action Plan (2018)		Open Space, Sport and Leisure Needs Assessment – Final Report (August 2016)

	Town Centre Design Plan / Town Centre Design Guide (2018)	Brentwood Town Centre Regeneration Strategy (May 2010)	
	Retail and Commercial Leisure Study Update (2018)		Hotel & Visitor Accommodation Futures Study (April 2008)
Strategic Growth Areas			
	A127 Growth Corridor Study (2018)		
	Dunton Hills Masterplan (2018)		
	Town Centre Design Plan / Town Centre Design Guide (2018)		
Delivery, Viability and Infrastructure Planning			
	Dunton Hills Viability Study (2018)		
	Whole Plan and CIL Viability Assessment (2018)		Whole Plan and CIL Viability Assessment (May 2016)
	CIL Land and Property Value Appraisal Study (2018)		CIL Land and Property Value Appraisal Study (April 2016)
	CIL Viability Construction Cost Study (March 2018)		CIL Viability Construction Cost Study (March 2016)
	Draft Infrastructure Delivery Plan (2018)	Draft Infrastructure Delivery Plan Update Note (October 2016)	

9. A number of draft evidence base reports are discussed in summary below and attached as technical appendices to this report where available.

MEETING OUR HOUSING AND ACCOMMODATION NEEDS

Objectively Assessed Housing Need

10. Based upon the best available evidence at the start of 2016, the Draft Local Plan (2016) set out an objectively assessed housing need of 362 dwellings per annum, for the lifetime of the plan (2013-2033), which equaled 7,240 dwellings in total. Consultancy work by Peter Brett Associates (PBA) in the form of the Strategic Housing Market Assessment (SHMA) (Part 1) 2015 report and a subsequent report on affordable housing provision (Part 2 of the SHMA) underpinned the Draft Local Plan (2016) position.
11. Since the SHMA was published in 2015, the Office for National Statistics (ONS) and Department for Communities and Local Government (CLG) have released new data, which have been considered as part of assessing housing need and as required by national planning policy and guidance. The key dataset releases included: the 2014 based household projections and two rounds of Mid-Year Population Estimates (MYP) in 2015 and 2016. Comparing the 2012 and

2014 CLG household projections reveals a slight uplift in households from 308 to 332, which converted to dwellings from the household data suggests an increase from 322 to 348 net new dwellings. This level of objectively assessed need (OAN) remains lower than PBA's previously recommended housing need.

12. In line with National Planning Practice Guidance, housing assessment studies should test official demographic projections to see if they seem a reasonable reflection of underlying trends. PBA has looked at testing the housing assessment, via:
 - a) Reviewing household formation rate data (time series and local data);
 - b) Reviewing the CLG relatively short-range projections against longer range projections;
 - c) Meeting employment needs; and
 - d) Reviewing market signals (such as house prices, affordability, market rents, overcrowding and concealed households).
13. The review of demographics and employment variables has not indicated a need to consider a higher level of housing above the updated demographic data level (348 dwellings). The tests have indicated that the official projections are unstable – partly a product of the short-term (5 year) trend period used in the projections. It is considered that a short-term increase in migration data for one of the years (2014 data point) in the official projection, particularly impacts on the short-term based forecast for Brentwood. Longer term demographic projections indicate a much lower demographic figure for Brentwood of circa 280 dwellings per annum. PBA consider 280 dwellings per annum (dpa) as a suitable and more stable baseline demographic starting position.
14. However, importantly due to the worsening of the affordability ratio in Brentwood and the increased costs of rental levels, the consultants have concluded that there is a need for a reasonable market signal adjustment for Brentwood. Compared to most of Essex, the district is much less affordable, homes are more expensive and now less affordable than the last housing boom. The degree of market signal uplift is a matter of professional judgment and PBA have indicated a 30% uplift above the new 280 dpa demographic baseline plus a small contingency of 6% should new official projections indicate a slightly different position to that forecast or expected.
15. In summary, using the minimum revised net dwelling baseline figure (280) plus combined market signal adjustment and contingency adjustment of 36% this leaves a OAN of circa 380 dwellings per annum or 7,600 dwellings across the plan period (2013-33). This revised OAN is an increase of 380 dwellings across the plan period compared to the Draft Local Plan (2016) OAN position in 2015/16. A technical update note by PBA is included as Appendix B.
16. The production of SHMA's are complex and often contested, creating significant problems for local authorities attempting to progress local plans. The Department for Communities and Local Government (CLG) has recently consulted on the methodology for a standardised approach to calculating local housing need in England to which the Council has responded raising concerns

over the bias in the affordability uplift calculation used and the volatile nature of the short-term projection data in the official demographic projections, amongst other factors. Using the currently proposed standardised methodology and datasets Brentwood would see an increase in its OAN to 454 dwellings per annum, 73 additional dwellings per annum. It is important to note that this proposal is for consultation and the Government will need to consider consultation responses on technical points before progressing. The Council will continue to use the latest OAN evidence to inform plan-making, i.e. 380 dpa.

17. For plan-making, officers are currently working through site options and reviewing any scope to meet the higher OAN figure, should this apply at the time the plan is submitted. Officers are also considering whether it would be prudent for the local authority to have a set of sites which technically delivers housing numbers slightly above the 380 dpa OAN figure to create some degree of flexibility or contingency should some housing sites fail to come forward as expected.

Specialist Accommodation

18. The OAN for the Borough does not take into consideration specialist accommodation need linked to residential care homes / nursing homes (classified as C2 – ‘residential institutions’ under the Use Classes Order), and Gypsy & Traveller pitches and accommodation provision.
19. National planning guidance advises (para 21) that the future need for specialist accommodation for older people broken down by tenure and type (e.g. sheltered, enhanced sheltered, extra care, registered care) should be assessed and can be obtained from a number of online tool kits provided by the sector. The assessment should set out the level of need for residential institutions (Use Class C2). The Council’s published SHMA Part 2 (2016) uses the Strategic Housing for Older People Analysis Tool – SHOP, which is available from the Housing Learning and Improvement Network (LIN). The Elderly Accommodation Council (EAC) classifications are used for the purpose of defining residential care and nursing care accommodation as follows:
 - a) **Residential care:** Where a care homes is registered to provide residential (personal) care only, all beds are allocated to residential care.
 - b) **Nursing care:** Where a care homes is registered to provide nursing care all beds are allocated to nursing care, although in practice not all residents might be in need of or receiving nursing care.
20. **Need for Residential Institutions (Use Class C2).** The current need for this care as identified through the SHOP analysis is 494 spaces for residential care and 342 spaces for nursing care equalling 836 spaces in total. A snapshot of current provision using the EAC database indicates a total provision of 805 spaces, suggesting a current shortfall of 31 spaces. The published SHMA Part 2 identifies a forecast requirement for 424 spaces within Registered Care to be provided between 2013-2033 (21.2 spaces per annum). This is housing for people living in registered care homes which are managed and run by a care provider who is responsible for all aspects of their daily needs and wellbeing. Such housing is not self-contained and is often referred to as either residential or nursing care. As part of monitoring the plan, officers will be preparing a detailed

housing trajectory which will include specialist housing and accommodation indicators, including those for C2 spaces.

21. A Gypsy and Traveller Accommodation Assessment (GTAA) has recently been prepared by specialist consultants Opinion Research Services (ORS), the Brentwood GTAA (October 2017) forms part of a wider study that covers the whole of Essex. Due to the complexity of this wider study, the overall Essex GTAA Report has not yet been completed. However, the fieldwork has been completed for Brentwood and a final assessment of need has been undertaken providing the Council with a summary of the levels of need for the period 2016-33 to provide evidence for its plan, this is included as Appendix C.
22. The GTAA 2017 identifies those Gypsies, Travellers and Travelling Showpeople which should be planned for in accordance with the Government's Planning Policy for Traveller Sites Statement (PPTS), as they meet the 2015 planning definition of 'travelling' households, and those which should otherwise have their specific cultural needs of living accommodation met in accordance with the Equalities Act 2014, the Children's and Families act 2014 and the Human Rights Act 1998, but do not meet the 2015 planning definition of 'travelling' households and are referred to as 'non-travelling'. Through the survey a number of 'unknowns'¹ were also identified.
23. Brentwood has a reasonably modest Gypsy and Traveller need requirement for the period 2016-2033, calculated to be:
 - a) Gypsy and Travellers which meet the planning definition (PPTS) (+10% of unknown need) = 12 pitches
 - b) Gypsy and Travellers not meeting the planning definition (+90% of unknown need) = 66 pitches
24. There are currently no transit sites in the Borough although the GTAA (2017) recommends the Council engage, through the Duty to Cooperate, with other Essex authorities to establish whether there is a need for investment in more formal transit sites or emergency stopping places. ORS advise a review of the evidence base relating to unauthorised encampments should be undertaken in autumn 2018 once there is a new 3-year evidence base following the changes to PPTS in 2015. The GTAA 2017 finds no evidence of need for Travelling Showpeople accommodation within the Borough.
25. It is likely that the provision of sites / pitches towards meeting this need will follow a sequential approach, as outlined below:
 - a) Vacant / available pitches and commitments;
 - b) Potential additional pitch provision at existing expired and temporary sites;

¹ The GTAA identifies 16 households where it has not been possible to determine the planning status. The needs of the households where an interview was not completed have been considered as part of the GTAA. Interview data collected and completed by ORS since the changes to PPTS in 2015 suggests that overall a national average of approximately 10% of households who have been interviewed meet the definition, in the absence of further information this ratio can then be applied to unknown households.

- c) Unauthorised sites which may be potentially suitable for regularisation;
 - d) Potential intensification of existing Traveller sites;
 - e) Potential extension of existing Traveller sites;
 - f) Identification of new sites aligned to the settlement hierarchy and preferred allocation sites.
26. In line with monitoring for residential care spaces, officers will also be establishing a set of specialist accommodation indicators for travelling and non-travelling households and pitch provision.

Deliverable and Developable Housing Sites

27. While work has been progressing on establishing an updated housing and accommodation need position, attention has also been given to reviewing the delivery capacity of previously identified housing sites. This has included finetuning and revising net delivery rates, developable areas and density calculations, as well as updating the planning status of each site. Officers have also commissioned and completed work on a Brentwood Town Centre Design Plan, which has also informed potential site yields. The National Planning Policy Framework (NPPF), is clear in the need for local plans to be supported by a robust set of evidence on deliverable (within the first 5 years of the plan) and developable (years 6 to 10 of the plan) housing sites.²
28. The Draft Local Plan (2016) included a table of potential proposed housing allocation sites (Figure 7.2), which is replicated below in Table 2. This followed from all sites being listed in the Strategic Growth Options (2015) consultation document. Comments have been added against each site following further detailed work on site delivery and developability. It can be noted that the overall approximate dwelling yield from this set of draft allocations has dropped from 5,155 dwellings to circa 4,920 units (decrease of 235 dwellings in total). This work is still under and a final decision on sites will be indicated in the next formal consultation on the plan (further Regulation 18 consultation).

Table 2 – Draft Local Plan (2016) Original Proposed Housing Allocations

Site Ref	Site Name	Original Approx. Dwellings	Comments	Updated Dwellings
	Urban Area			
001A & 001B	Land north of Highwood Close including St Georges Court, Brentwood [redevelopment to include replacement of lost sheltered housing]	52	No net gain forecast in dwelling numbers	0
003	Wates Way Industrial Estate, Ongar Road, Brentwood [mixed use including retail]	80	No change in yield	80
005	Essex County Fire Brigade HQ,	50	Potential increase in site yield linked	132

² NPPF Footnote 11: To be considered deliverable, sites 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 and in particular that development of the site is viable. Sites with planning permission should be considered deliverable until permission expires, unless there is clear evidence that schemes will not be implemented within five years, for example they will not be viable, there is no longer a demand for the type of units or sites have long term phasing plans. NPPF Footnote 12: To be considered developable, sites should be in a suitable location for housing development and there should be a reasonable prospect that the site is available and could be viably developed at the point envisaged.

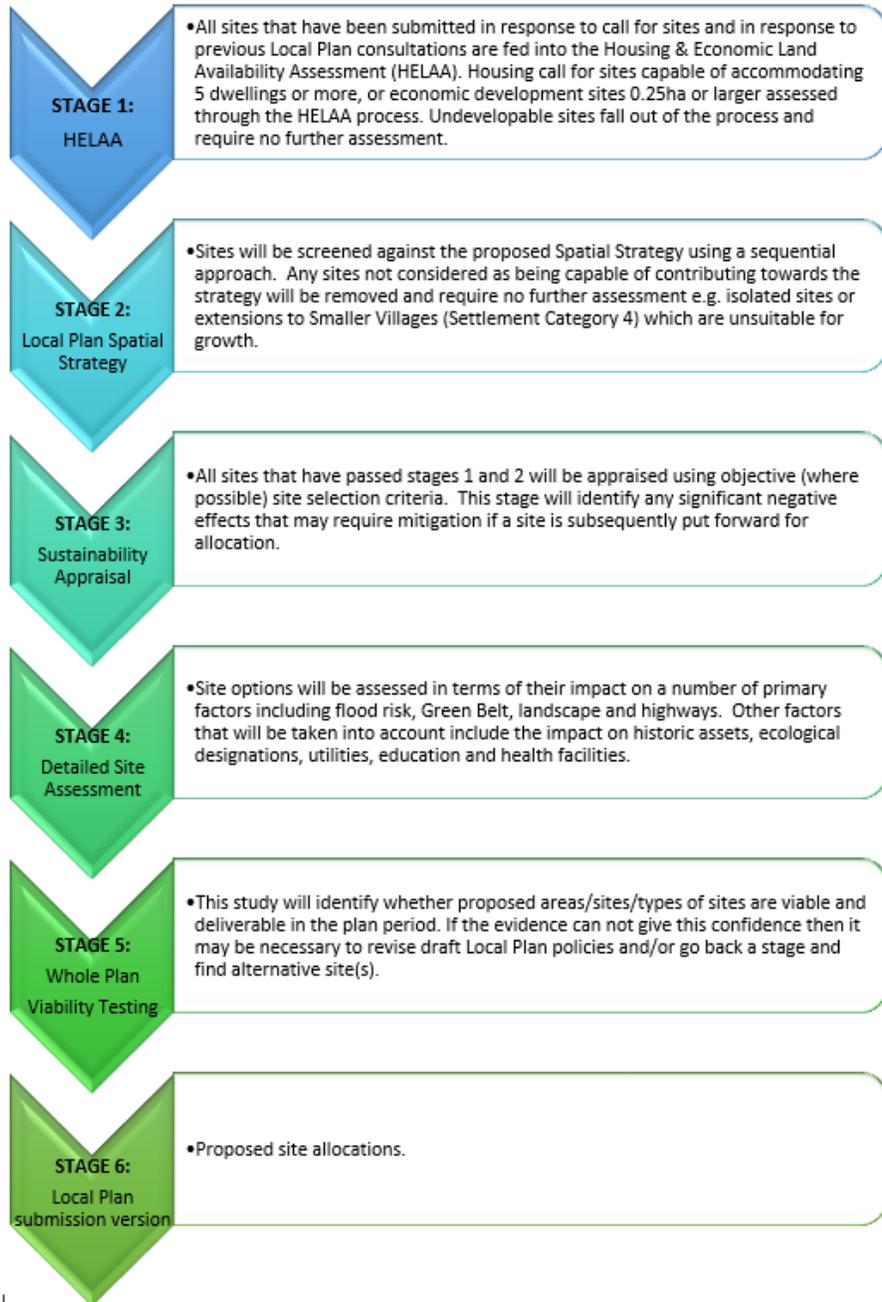
	Rayleigh Road, Brentwood		to site developer interest	
013B	Warley Training Centre, Essex Way, Warle	50	Now included in planning permissions	0
020, 021 & 152	West Horndon Industrial Estates, Childerditch Lane and Station Road, West Horndon [mixed use with a range of supporting local services]	500	Further work on masterplanning has indicated an increased yield	580
039	Westbury Road Car Park, Westbury Road, Brentwood [could retain parking as part of redevelopment]	22	Potential increase in site yield	36
040	Chatham Way/ Crown Street Car Park, Brentwood [could retain parking as part of redevelopment]	26	Potential slight increase in site yield	31
041	Land at Hunter House, Western Road, Brentwood	22	Potential increase in site yield linked to site developer interest	48
042	Land at Bell Mead, Ingatestone	16	Under construction	0
044&178	Land at Priests Lane, Brentwood (to include provision of open space and / or sport facilities for public use)	130	Slight reduction in site yield	95
081	Council Depot, The Drive, Warley	68	Currently exploring higher density scheme options	123
098	Ingleton House, Stock Lane, Ingatestone [redevelopment to include replacement of lost sheltered housing]	10	No net gain forecast in dwelling numbers	0
099	Victoria Court, Victoria Road, Brentwood [redevelopment to include replacement of lost sheltered housing]	40	No net gain forecast in dwelling numbers	0
100	Baytree Centre, Brentwood [residential units provided above retail redevelopment]	200	Reduced site yield without significant area remodeling	65
	<i>Original Sub-Total</i>	<i>1266</i>	<i>Revised Sub-Total</i>	<i>1190</i>
	Brownfield Green Belt Urban Extensions			
010	Sow and Grow Nursery, Ongar Road, Pilgrims Hatch	37	Very slight change in net dwelling yield	38
128	Ingatestone Garden Centre, Roman Road, Ingatestone	60	Potential increase in site yield linked to site developer interest	110
	<i>Original Sub-Total</i>	<i>97</i>	<i>Revised Sub-Total</i>	<i>148</i>
	Strategic Sites			
200	Dunton Hills Garden Village	2500	No change in site yield also options are being explored to speed up delivery rates.	2500
	<i>Original Sub-Total</i>	<i>2500</i>		<i>2500</i>
	Greenfield Green Belt			
022	Land at Honeypot Lane, Brentwood	250	Lower density options currently being explored.	200
023	Land off Doddinghurst Road, either side of A12, Brentwood	250	Lower density options currently being explored.	200
032	Land east of Nags Head Lane, Brentwood	150	Slightly lowered site yield	125
034,087&235	Officer's Meadow, Shenfield [potential for open space/sport uses and/or Crossrail park and walk facility]	600	Potential lower site yield, but detail subject to masterplan and planning application detail.	500
079A	Land adjacent to Ingatestone by-pass (part bounded by Roman Road)	42	Potential increase in site yield linked to site developer interest	57
	<i>Original Sub-Total</i>	<i>1292</i>	<i>Revised Sub-Total</i>	<i>1082</i>
	TOTAL	5155	TOTAL	4920

29. The combination of reduced dwelling yields and increased OAN partly informed the decision earlier in 2017 for officers to undertake a call for sites and a full update to the current Strategic Housing Land Availability Assessment (SHLAA) (now integrating employment sites and called a 'Housing and Employment Land Availability Assessment' – HELAA), which was last updated in 2011. The local authority needs to be confident that it has explored all reasonable sustainable site options in selecting its final list of preferred site allocations (both housing and employment). Since the Draft Local Plan (2016) consultation, a number of promoted sites have also come forward, which are currently under review. This remains a work in progress as assessment continues using a wide range of emerging evidence base and strategic decisions on future growth are made. A number of issues, constraints and future opportunities are being considered.

Site Assessments

30. The Council received a number of representation on the Draft Local Plan (2016) suggesting that there was a lack of information about the site assessment methodology and overall process. Officers are currently finalising a detailed site assessment methodology paper to sit alongside future site consultation work, but figure 1 below outlines the process adopted to date. This work is based upon best practice and is considered to provide a robust framework for site assessment and selection.

Figure 1: Site Assessment Methodology



Five Year Housing Land Supply

31. In 2016/17 the Council recorded net dwelling completions of 150 units against a rounded OAN of 380 dpa. This was 40% of the annual target and since 2013/14 the number of completions against target is about 35%. In 2016/17 affordable housing completions (22) were running at about 20% of target (107). The current deficit to OAN is 993 dwellings. These latest figures are reported in the 2016/17 authority monitoring report for housing delivery, being brought to Extraordinary Council for approval and publication (15 November 2017).

32. The Housing White Paper, introduced a housing delivery test, looking at the first assessment period of 2014/15 to 2016/17³. Over this three-year period the housing requirement was 1,140 dwellings (based on 380 OAN) whilst housing delivery was 420 dwellings, resulting in under delivery at just 37% of the borough's OAN. Therefore, to accord with the White Paper, from November 2017, as delivery of housing would have fallen below 85% of the housing requirement authorities are expected to plan for a 20% buffer on their five-year land supply.
33. The current 5YHLS statement using the 'Sedgefield approach' is based upon the methodology of including the five-year requirement, plus buffer of 20% and shortfall 'catch-up' within the 5 year forward forecast period results in a 2.6 years of housing supply, well below the expected minimum of 5 years.
34. Looking forward and using the Sedgefield approach it is considered unlikely that the Council will be able to demonstrate a 5YHLS on plan adoption, due to the significant rolling deficit that needs to be delivered within the forecast 5-year delivery period. Work is currently progressing looking at the Liverpool approach to 5 YHLS calculations (backlog / shortfall is applied over the whole plan period) and 'split trajectory' approaches to move the local authority closer to a positive 5 YHLS position. One of the critical factors in this calculation, will be the number and types of allocations which are deliverable within the first five years of the plan. A mixed portfolio of sites, including smaller greenfield / Green Belt sites may form part of this approach, rather than an overreliance on large scale strategic sites with longer delivery lead in periods and complex brownfield sites, potentially requiring remediation and site clearance.
35. A balanced and sustainable approach to housing delivery is required, which supports strong housing supply early and throughout the plan period but also maintains a strong Green Belt and minimises environmental impact. Government is also keen through the Housing White Paper for local authorities to identify smaller housing sites (potentially 10% of sites), which can be delivered quickly and help support local builders.

Brownfield Register

36. Regulation 3 of the Town and Country Planning (Brownfield Land Register) Regulations 2017 requires local planning authorities in England to prepare, maintain and publish registers of previously developed (brownfield) land by 31 December 2017. Officers are currently undertaking work on this register which will be available before the deadline. The register is divided into two parts: part 1 – all brownfield sites appropriate for residential development; and part 2 – those sites granted permission in principle. All brownfield sites that meet the relevant criteria (the land has an area of at least 0.25 ha or is capable of supporting at least five dwellings, the land is suitable and available for residential development and development of the land is achievable), must be entered in Part 1 of brownfield registers.

³ Housing White Paper – Fixing our broken housing market (February 2017)

37. Part 2 of the brownfield register includes those sites granted permission in principle. The Council can trigger a grant of permission in principle by following the required publicity, notification, consultation and technical procedures. The permission in principle consent route is an alternative way of obtaining planning permission which separates the consideration of matters of principle for proposed development from the technical detail of the development. The permission in principle consent route has two stages: the first stage (or permission in principle stage) establishes whether a site is suitable in-principle for residential development (ie development in which the residential use occupies the majority of the floorspace), and the second ('technical details consent') stage is when the detailed development proposals are assessed.⁴

Pulling the Analysis Together

38. Updated work on the OAN has indicated a annual baseline housing need of 380 units per annum, which equates to 7,600 dwellings across the plan period (2013-33). This is a total increase of 360 units from Draft Local Plan baseline in 2016. The increase in need is driven primarily by the upwards market signal adjustment to address considerable local housing affordability issues. With the increase in housing requirements and decrease in yield from the previously considered proposed allocations (reduction by 230 units), this has left officers with the need to consider a wider range of housing site options. At this stage, it would be wise for the Council to consider a mix of sites which deliver in excess of 380 dpa, to provide a degree of flexibility for under-delivery and to test options should the higher standardised methodology figure apply at the time of plan submission. The Council will also need to make sufficient provision to meet specialist accommodation needs, although this will be monitored separately to standard dwelling need. This will require further Regulation 18 consultation on this issue of housing need and site allocations to meet it, as well as other development needs.

ECONOMIC PROSPERITY

Local Plans and Economic Growth

39. The National Planning Policy Framework (NPPF) provides a clear position on the need to build a strong competitive economy. In respect of local plans, it states at paragraph 21 of the guidance that the Plan should *'set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth'*.
40. There is a need to strike the right balance of location and scale of employment sites to ensure integrated strategies with housing and other land uses, support for sustainable travel modes and a portfolio of sites which meet the development needs of business and the wider economy for the 21st Century. The plan has an overriding role to set the key strategic priorities for the area, including policies to deliver the jobs needed, allocation of key employment sites, and infrastructure to support delivery. The plan should aim to improve and build communities, not just be focused on the allocation of land. The NPPF is also clear that planning policies should

⁴ NPPG Paragraph: 001 Reference ID: 58-001-20170728

avoid the long-term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.

Brentwood Economic Futures Report: 2013-33

41. Officers commissioned Lichfields in 2017 to prepare an up to date economic evidence report to support the plan. The previous Economic Futures Study covered the period 2015-2030 and therefore required updating to align with the updated Local Plan period – 2013-2033. Work on housing need and employment land need and supply have also been run in parallel to ensure that any cross-over issues are considered and addressed in both the SHMA and Economic Futures update report.
42. The Draft Economic Futures Report is attached as Appendix D to this report, and covers the following main updates:
 - a) defines for the first time Brentwood Borough’s Functional Economic Market Area (FEMA);
 - b) prepares new baseline economic forecasts for the Borough from 2013 to 2033 based upon the Experian employment forecasts as used in the latest SHMA; East of England Forecasting Model (EEFM) employment forecasts; past B class development rates; and an Objectively Assessed Housing Need (OAN) of 380 dwellings per annum.
 - c) provides an assessment of future employment land and site requirements in the context of the updated economic forecasts;
 - d) prepares an analysis of the employment capacity of potential employment sites;
 - e) establishes an employment land trajectory and an updated assessment of the overall employment land and supply balance for the Borough.
43. This report is subject to further reviews and revisions and should be treated as a draft document at this stage.

Brentwood’s Functional Economic Market Area

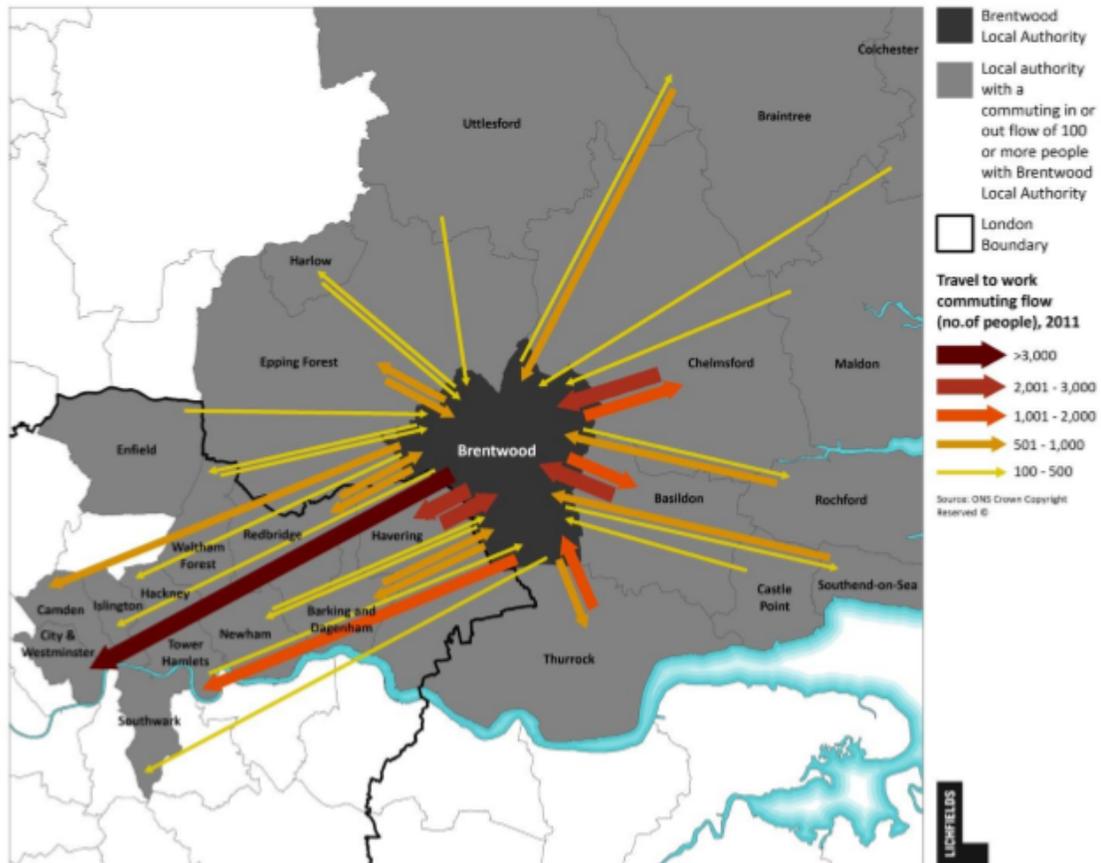
44. National Planning Policy Guidance indicates that the geography of commercial property markets should be thought of in terms of the requirements and location of premises, and the spatial factors used in analysing demand and supply – often referred to as the functional economic market area⁵. Since patterns of economic activity vary from place to place, there is no standard approach to defining a FEMA. However, it is possible to define them taking account of factors, including:
 - a) extent of any Local Enterprise Partnership within the area;
 - b) travel to work areas;
 - c) housing market area;
 - d) flow of goods, services and information within the local economy;
 - e) service market for consumers;

⁵ NPPG - Paragraph: 012 Reference ID: 2a-012-20140306

- f) administrative area;
 - g) catchment areas of facilities providing cultural and social well-being;
 - h) transport network.
45. There are a number of key variables underpinning the Brentwood FEMA, which include the Borough's unique locational advantages including its proximity to major highways including the M25, A12 and A127 corridors and connectivity to railway lines, including the Crossrail Elizabeth Line and C2C Fenchurch Street line from West Horndon. Census 2011 data indicates that Brentwood now forms part of the Chelmsford Travel to Work Area (TTWA) – a move from the Southend and Brentwood TTWA in 2001. In simple terms, TTWAs are a statistical geography created to approximate labour market areas.⁶
46. Located within the extensive South East Local Enterprise Partnership (LEP) area, statistics on Brentwood commuting patterns also indicate that the main destinations for out-commuters include Westminster, the City of London, Chelmsford and Tower Hamlets, while in-commuters mainly come from Basildon, Havering, Chelmsford and Thurrock. The destinations show that Brentwood has strong outward commuting connections with London and much of the Borough's in-commuting workforce comes from the surrounding local authorities. The data shows the Borough is a net exporter of labour, in 2011, with 20,060 commuted out of Brentwood, while 17,750 commuted in from the surrounding local authorities. Brentwood has both strong local and sub-regional commuting patterns, as illustrated in Figure 2 below.

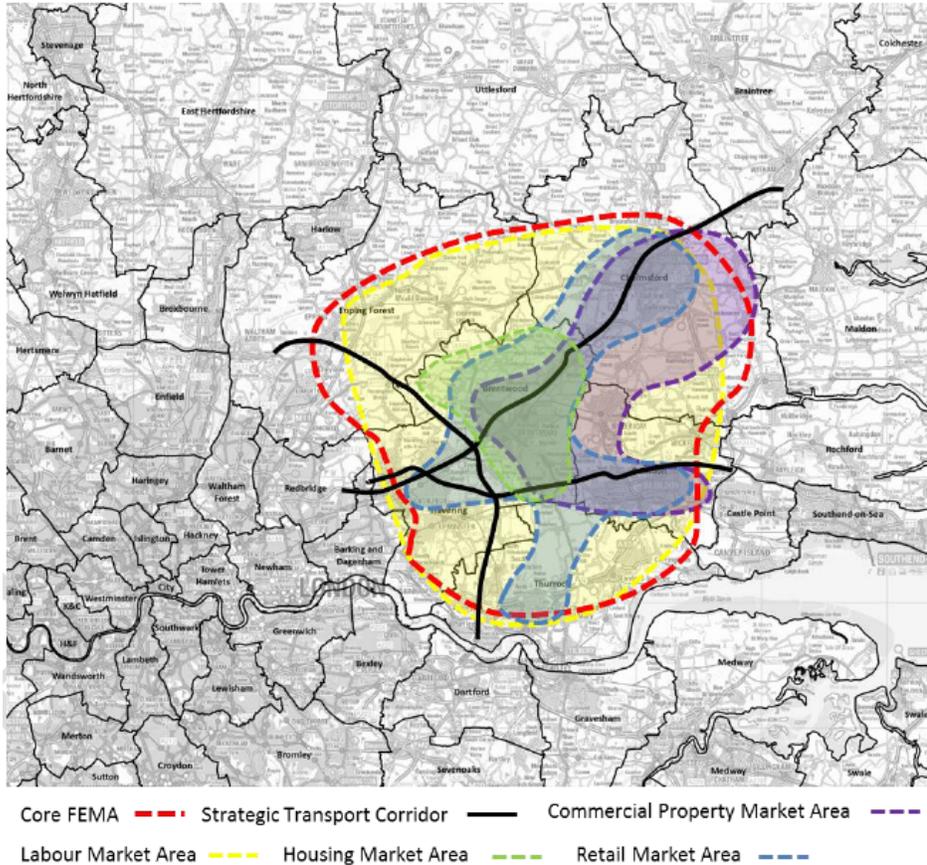
Figure 2: Commuting Patterns (2011 Census)

⁶ The current criteria for defining TTWAs are that at least 75% of the area's resident workforce work in the area and at least 75% of the people who work in the area also live in the area. The area must also have an economically active population of at least 3,500.



47. In establishing the FEMA attention has also been given to the Housing Market Area (HMA) (which is considered self-contained for Brentwood Borough); the flow of goods, services and information and the character of the local commercial market, which suggests that Brentwood has a relatively strong presence in the office market and less so as a location for industrial uses. While it is not an exact science, Figure 3 below attempts to synthesise the various data sources to present an outline Functional Economic Area.

Figure 3: Brentwood Functional Economic Area

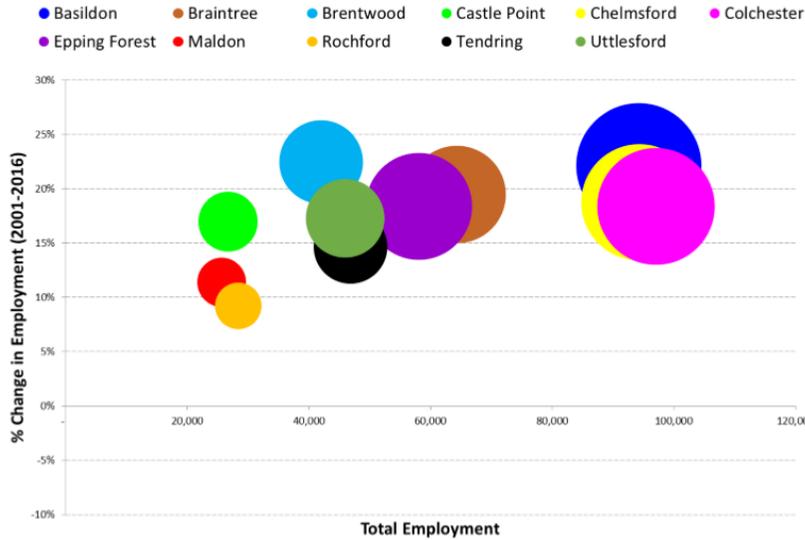


48. At the time of drafting no information has been published on the new South Essex Functional Economic Market Area (covering Basildon, Thurrock and other local authority areas). It is recognised that FEMAs change over time and as part of monitoring the plan it will be useful to consider the extent of change in the Brentwood FEMA as new potential employment allocations, such as Brentwood Enterprise Park, come on stream through the plan period. Or indeed the economic geography changes through developments in neighbouring authorities.

Economic Base and Forecasts

49. At a macro level, Brentwood has witnessed a strong positive percentage change in employment from 2001 to 2016 and is only second to Basildon in Essex for percentage change. This positive position on employment change is illustrated below in Figure 4, although it is also recognised that the total quantum of employment (just over 40,000) is not as high as some other Essex authorities.

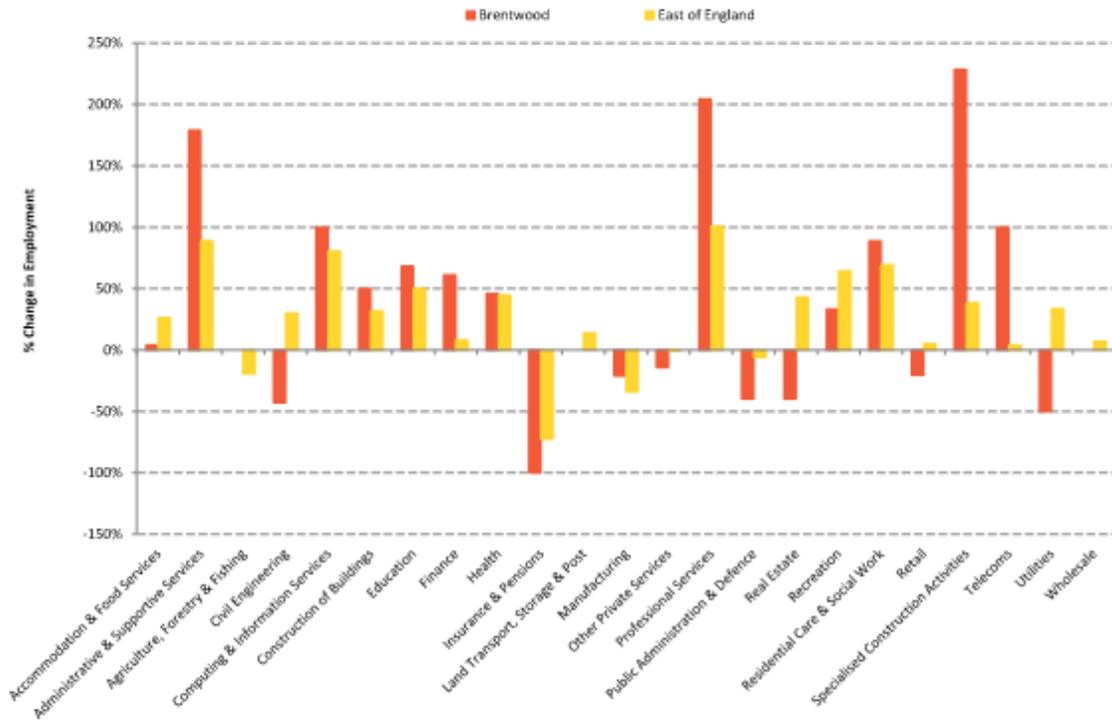
Figure 4: Employment Change 2000-2016



Source: EEFM 2016 Note: Harlow excluded due to negative employment change over the time period.

50. When looking at the changes and trends in the economy over the last 15-20 years, job growth in office-based sectors (B1a/b) have tended to be the main driver of change, with sectors such as specialised construction activities, telecoms and computing and IT outperforming East of England averages for the same period. The highest proportional job losses in Brentwood have been insurance and pensions; utilities; public administration and defence, and real estate. Figure 5 below an overview of sectoral changes from 1997 to 2016.

Figure 5: Change in Sector Employment (1997-2016)



51. Econometrical forecasting is not an exact science (particularly in a period of macro-economic uncertainty) and Lichfields has spread some of the 'risk' of forecasting by using four baseline economic forecasts / scenarios for the Borough from 2013-2033, and undertaken the forecasting in line with national planning policy guidance. The scenarios are:
- a) **Scenario A** - the Experian employment forecasts as used in the latest SHMA;
 - b) **Scenario B**- the East of England Forecasting Model (EEFM) employment forecasts;
 - c) **Scenario C** - an Objectively Assessed Housing Need (OAN) of 380 dwellings per annum; and
 - d) **Scenario D** - past B class development rates.
52. The number of jobs headlines from each of the forecast scenarios are detailed below in Table 3.

Table 3: Economic Forecast Scenarios

Uses	Scenario A - Experian			Scenario B - EEFM			Scenario C – OAN (380)			Scenario D – Past Rates		
	2013	2033	%	2013	2033	%	2013	2033	%	2013	2033	%
Manufacturing (B1c/B2)	3,416	3,640	6.6	3,778	3,513	-7	3,416	3,525	3.2			
Warehousing (B8)	2,119	2,336	10.2	2,068	1,922	-7.1	2,119	2,226	5.0			
Offices (B1a/b)	11,566	15,258	31.9	16,255	19,097	17.5	11,566	13,416	16			
Total B Class Jobs	17,101	21,234	24.2	22,101	24,531	11.0	17,101	19,167	12.1			
Jobs in All Sectors	39,400	48,900	24.1	40,644	45,757	12.6	39,400	44,148	12			
Net Floorspace Forecasts		77,513			28,426			38,556			4,442	
Total Gross Floorspace Forecasts		106,376			54,386			67,418			33,305	
Manufacturing (B1c/B2)		17,635			335			12,202			13,925	
Warehousing (B8)		25,893			2,898			17,706			16,840	
Offices (B1a/b)		62,848			51,153			37,511			2,539	

53. It can be noted in Scenario A (Experian) the overall positive growth forecasts in the model across all B classes, with a total percentage growth of 24.2% between 2013 and 2033. The EEFM is more cautious with reductions in B1c/B2 and B8 sectors while the OAN base model is forecasting growth in each B sector but at a reduced scale to Scenario A. Scenario D (past rates) generally forecasts very low growth rates in total. All scenarios predict an increase in employment land requirements. The above analysis provides officers with a range of job forecasts which can then be converted into net floorspace requirements of between 4,442 m² (Scenario D), 28,426 m² (Scenario B), 38,556 m² for Scenario C and 77,513 m² for Scenario A. Adding a safety allowance for such factors as delays to site delivery and a conversion factor from net to gross floorspace completes the calculation for gross floorspace by scenario requirements as detailed in the final four rows of Table 3.

54. Using a series of standardised site plot ratios it is then possible to calculate the estimated gross employment land requirement (hectares) for the new Local Plan, which is detailed below in Table 4. Total new gross employment land requirements therefore range from 8.1ha to 20.3ha.

Table 4: Gross Employment Land Requirements (2013-33)

Employment Land (ha)				
Uses	Scenario A - Experian	Scenario B - EEFM	Scenario C – OAN (380)	Scenario D – Past rates
Manufacturing (B1c/B2)	4.4	0.1	3.1	3.5
Warehousing (B8)	6.5	0.7	4.4	4.2
Offices (B1a/b)	9.4	7.7	5.6	0.4
	20.3	8.5	13.1	8.1

55. In addition to the forecast gross employment land requirements detailed above, it is important to note that the Council also proposed to allocate a number of existing employment sites in the plan for residential / mixed-use redevelopment. Examples include:

- a) Wates Way Industrial Estate – 0.99ha
- b) All or part of the Council Depot, Warley – 2.98ha
- c) West Horndon Industrial Estate – 16.45ha

56. This loss of existing employment land totals 20.42 ha and should be added to the forecast new employment land requirement.

Employment Land Supply and Balance

57. In the Draft Local Plan (2016) the Council consulted on a range of potential employment allocations including a major new strategic employment site at M25 Junction 29 – Brentwood Enterprise Park. As with the housing sites referred to earlier in the report, officers have undertaken further work on the scale, planning status, capacity and deliverability of potential employment allocations, existing employment sites (not previously allocated) and existing allocated employment land. Table 5 below replicates figure 8.3 from the Draft Local Plan (2016) and adds some additional commentary next to each site.

Table 5: Draft Local Plan (2016) Original Employment Allocations

Site Ref	Site Name	Area (ha)	Comments	Updated Figures
New Employment Land Allocations				
101A	Brentwood Enterprise Park (M25 Junction 29 works)	23.41	The originally assessed developable area for this site was 23.5ha, however further work on site analysis reassessing levels, fill and edges has confirmed some potential for limited additional developable area capacity within the gross site area (35.4ha) for this site. Importantly this limited potential increase (up to 10%) of the developable area continues to maintain a landscape buffer, with no increase in the overall gross site area land take. This position will be reviewed further through ongoing masterplan work and in light of other emerging local plan evidence material including landscape and green belt analysis.	Up to 25.85ha

079C	Land adjacent to Ingatestone bypass (part bounded by Roman Road)	2.06	Slight increase following re-measurement of the site.	2.6ha
12D	Childerditch Industrial Estate (the range)	2.34	No change	2.34ha
200	Dunton Hills Garden Village Strategic Allocation	5.0	Slight increase in capacity.	5.5ha
	<i>Sub Totals:</i>	<i>32.81</i>		<i>36.29</i>
Existing Employment Sites Not Previously Allocated				
101B	Brentwood Enterprise Park (land at Codham Hall)	6.64	No change	6.64
108	The Old Pump Works, Great Warley Street	0.79	No change	0.79
111	Upminster Trading Park	2.6	No change	2.6
228	Peri Site, Warley Street, Great Warley	5.36	No change	5.36
	<i>Sub-Totals:</i>	<i>15.39</i>		<i>15.39</i>
Existing Allocated Employment Land				
110	Town Hall Brentwood	1.09	Permitted development linked to mixed use re-development	0
112	Childerditch Industrial Estate	11.25	No change	11.25
113	Hallsford Bridge Industrial Estate	3.41	No change	3.41
114	Hubert Road Industrial Estate	4.76	Slight reduction in capacity	3.8
045	Hutton Industrial Estate	10.48	No change	10.48
115	Brook Street Employment Area	1.25	No change	1.25
116	Warley Business Park	3.22	No change	3.22
117	Ford Offices, Eagle Way, Warley	5.45	Potential redevelopment for residential uses	0.00
118	BT Offices, London Road, Brentwood	3.5	No change	3.5
119	Canon Offices, London Road, Brentwood	0.45	Slight rounding up on site area	0.5
120	47-57 Crown Street	0.12	Lower than 0.5ha allocation threshold	0
121	Mellon House, Berkley House, and 1-28 Moores Place, Brentwood	0.52	Permitted development for residential in part which reduces remaining employment element to less than allocation threshold of 0.5ha	0
122	1-7 & 16-26 St. Thomas Road, Brentwood	0.22	Lower than 0.5ha allocation threshold	0
123	7-9 Shenfield Road, Brentwood	0.06	Lower than 0.5ha allocation threshold	0
124	38 Ingrave Road, Brentwood (adjacent to town hall)	0.07	Lower than 0.5ha allocation threshold	0
125	North House, Ongar Road, Brentwood	0.18	Lower than 0.5ha allocation threshold	0
	<i>Sub-Totals:</i>	<i>46.03</i>		<i>37.41</i>

58. Further work on the employment allocations considered in 2016, has yielded an increase in potential new employment land of circa 3.48ha (up to 36.29ha with over 70% of growth associated with Brentwood Enterprise Park). In addition to the sites considered as part of the Draft Local Plan (2016) consultation, a small number of new strategically located employment site options are being considered for allocation and are detailed in the Economic Futures Report. These include the further limited extension of the existing employment allocation at Childerditch (2.3ha), additional land near Codham Hall, but not associated with current employment operations (2.8ha); land at East Horndon – to the immediate north west of Dunton Hills Garden Village (5.5ha) and a small potential, allocation north of the A1023 (2.0ha). In total, combining the updated original employment allocations from 2016 (36.29ha) and the new potential allocation sites (12.6ha), this produces a potential new employment allocation of circa 48.89ha. Importantly, further work is ongoing on the detailed assessment of each potential employment site allocation, before the Draft Economic Futures Report can be finalised.

59. The existing employment sites in the Borough which have not historically been specifically allocated for employment uses will be ‘regularised’ as part of the plan. This list of sites is likely to be extended to include operations within the farm area of Childerditch Industrial Estate (1.9ha) and McColls Headquarters on Ongar Road (1.6ha). As this list of sites contains existing employment uses it does not add to the overall new employment land supply.
60. Since the list of existing allocated land was drafted in 2016, there has been a change in the size or threshold of sites for employment land allocations, which has been directed by the new work by officers on the HELAA. It is proposed that only sites above 0.5ha (gross) will be allocated through the local plan process. This change in methodology partly explains the drop in existing allocated employment land, down from 46.03ha to 37.41ha. Other drivers of change include the potential redevelopment of the Ford site in Warley to residential uses and the introduction within England of permitted development rights for office to residential conversions, which has started to gain some traction in the local commercial market within Brentwood. One future option to protect larger office led employment sites allocations may be to introduce Article 4 directions to remove permitted development rights.
61. Table 6 pulls the analysis together and considers at a macro level the overall employment land need and supply. It illustrates that at a high-level that the level 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 allocations and structural change)⁷. It is also recognised that the future restructuring of employment sites and businesses may change floorspace requirements.

Table 6: Employment Land Need and Supply

Land	
New Requirements	
Forecast Requirement for Employment Land (B Class Uses)	8.1ha to 20.3ha
Forecast Loss of Employment Land by Re-allocations for other uses	20.42ha
Forecast Loss of Existing Employment Allocations (above new 0.5ha threshold) through structural change and permitted development	8.62ha
Combined Requirement	37.14ha to 49.34ha
New Supply	
Updated Original Set of Allocations	36.29ha
Potential new allocations (under review)	12.6ha

⁷ It should also be noted that part of the calculation for the forecast reduction in employment land is linked to the new allocation threshold and not necessarily the physical loss of smaller sites.

Combined New Supply	48.89ha
Initial Surplus / Shortfall	-0.45

Qualitative Issues, Market Feedback and Strategy Conclusions

62. It is important to take into account qualitative employment land supply factors as well as quantitative forecasts. The Borough may have sufficient new employment land to meet future requirements based upon the forecast. However, other qualitative factors introduce variables that require more bespoke solutions than just providing an adequate supply of land. Important qualitative factors can include:
- a) The locational needs of different occupiers and employment spaces;
 - b) Gaps in supply of particular land uses;
 - c) The quality of premises and land to attract more occupiers; and
 - d) Improving and modernising existing premises to meet new business needs.
63. The need for providing the right balance of sites in Brentwood is pertinent as the forecast increase in the working-age population will expand the Borough's workforce, which will require a variety of jobs at different skill levels. The employment land report indicates that the employment site mix of b-class uses is broadly able to meet the scenario forecasts.
64. The current list of new employment allocations includes eight sites mainly along the A127. Brentwood Enterprise Park is the largest single allocation, making up over 50% of the total new employment land supply included in the plan. Without Brentwood Enterprise Park coming forward, future employment land supply would be significantly diminished. Consultations with commercial property agents indicate that there is likely demand for new commercial floor space at Brentwood Enterprise Park. Recent developments along the A127 have been successful in drawing in occupiers and the close proximity of Brentwood Enterprise Park to London could make it an attractive location for firms requiring B1c/B2 and B8 floor space to locate.
65. The report also highlights the current accessibility issues with the Brentwood Enterprise Park allocation, in terms of public transport and active travel options. The site is also considered to have a significant build out period and the Council may need to bring forward other allocated employment sites to fill the supply gap that could arise. The report also highlights that the Council should consider how quickly new employment sites could come forward as businesses displaced by housing development (such as West Horndon Industrial Estate) will need new premises at the same time. Otherwise, businesses could relocate from the Borough and shift the centre of economic growth away from Brentwood to neighbouring local authorities. As a high proportion of the new employment land is located at Brentwood Enterprise Park, the Council could consider how it might coordinate delivering the site alongside the redevelopment of existing employment clusters.
66. Also raised in the representations submitted on the Draft Local Plan (2016) is the extent to which the Council will need to provide new employment land on a like for like basis, in consideration of the loss of employment land at West Horndon. Using new employment land

more intensively, rationalising existing sites and how businesses use premises can have an effect on how much land is actually required to support economic growth. These factors mean that the Council will need to plan for a flexible employment land supply.

ENVIRONMENTAL PROTECTION AND ENHANCEMENT

67. Brentwood's natural environment is one of the Borough's greatest assets and provides not only attractive locations for residents and visitors but also helps physically frame Brentwood Town and its Borough of distinct villages. It was recognised in the Draft Local Plan (2016) that a balance needs to be struck between protecting and enhancing our natural assets while also providing scope for growth throughout the plan period.

Green Belt

68. The extent of the Green Belt which totals 89% of the Borough's land mass is often quoted as one of the defining characteristics of the Borough. Green Belt is a policy designation which keeps land permanently open to prevent urban sprawl. The historical development of Brentwood has led to the current central, urban areas of Brentwood and Shenfield, separated by green wedges of Green Belt. The majority of the Borough lies within the Green Belt and comprises a mix of villages (often inset within the Green Belt), residential properties, agricultural land and other uses. 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.
69. In order for Brentwood Borough to grow economically and to provide sufficient housing, land must be made available for such growth. While brownfield sites within established settlement boundaries can meet some of Brentwood's housing need (approximately 25%), the plan will need to propose growth in the Green Belt to help meet the Borough's objectively assessed housing need and employment land requirements. Being an authority wholly within Green Belt is not sufficient reason alone to not meet local housing requirements.
70. Within the NPPF, the Government places great importance on Green Belts, with their essential characteristics being openness and their permanence. NPPF Paragraph 80 sets out the five key purposes of Green Belt:
- a) to check the unrestricted sprawl of large built-up areas;
 - b) to prevent neighbouring towns merging into one another;
 - c) to assist in safeguarding the countryside from encroachment;
 - d) to preserve the setting and special character of historic towns; and
 - e) to assist in urban regeneration, by encouraging the recycling of derelict and other urban land
71. Government is also clear that once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the local plan. At this time, authorities should consider the Green Belt boundaries having regard to their intended

permanence in the long term, so that they should be capable of enduring beyond the plan period⁸. Importantly, when reviewing Green Belt boundaries, local planning authorities should also take account of the need to promote sustainable patterns of development.

72. When defining new boundaries, local planning authorities should:
- a) ensure consistency with the local plan strategy for meeting identified requirements for sustainable development;
 - b) not include land which it is unnecessary to keep permanently open;
 - c) where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
 - d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a local plan review which proposes the development;
 - e) satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and
 - f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.⁹
73. Given the growth pressures and physical extent of the Green Belt in the Borough plus consideration of representations raised during the consultation on the Draft Local Plan (2016), officers have commissioned Crestwood Environmental to undertake a full Green Belt review as part the current plan-making process. This builds upon work originally undertaken by Crestwood to independently assess potential housing sites in the Green Belt, submitted as part of the Strategic Housing Land Availability Assessment (SHLAA) from 2013/14. This assessment originally focused upon the relative contribution of the sites to the purposes of the Green Belt and was published alongside other evidence material as part of the Draft Local Plan (2016) consultation.
74. The full Green Belt review will independently assess the Borough-wide Green Belt and integrate the most up to date information on housing and employment sites which have been collated following a call for sites in 2017 to produce a new Housing and Employment Land Availability Assessment (HELAA). The Green Belt review is split into four distinct but inter-related parts:
- a) Part 1: Brentwood Green Belt in Context – High level historic and functional review of the Brentwood Borough within the context of the overall London Metropolitan Green Belt;
 - b) Part 2: Green Belt Parcels Assessment - Borough-wide definition and assessment of Green Belt parcels against the five purposes of the Green Belt noted above;
 - c) Part 3: Sites Assessment (HELAA sites, lesser performing GB parcels and other identified sites) – with the assessment split into two sections, the first considering individual sites

⁸ NPPF Para 83.

⁹ NPPG para 85

and the second reflecting on cumulative impacts of potential allocations (clustered sites along settlement edges and corridors);

- d) Part 4: Partial review of Settlement Boundaries and Green Belt edge – focused review of settlement boundaries using study evidence.
75. This report includes the Part 1 study in full and a brief summary of Part 2. For the first time the Part 2 study will include a Borough wide map of Green Belt ‘parcels’ including their assessment against the five purposes of the Green Belt. An early working draft copy of this Borough wide parcel map is included with the Part 2 summary paper. Part 1 and Part 2 (summary) of the Green Belt review can be viewed under Appendices E-G.
76. In addition to sites submitted by site promoters and landowners during the HELAA and call for site process, officers are currently reviewing a small number of Green Belt parcels which have been evaluated as contributing less to the purposes of the Green Belt. Further work is also planned to take place with neighbouring authorities through Duty to Co-operate in defining the ‘outer edge’ of a number of parcels which lie towards the Borough’s administrative boundary.

Landscape Studies

77. Often confused with Green Belt assessments, landscape studies have their own distinct methodology and content, mainly structured around assessment guidance established in conjunction with the Landscape Institute. Crestwood has been commissioned to provide an assessment of landscape capacity to accommodate growth to help inform local plan site selections. This study is detailed and wide-ranging and is running in parallel to the detailed site assessments currently being undertaken by Council officers. This work will be published alongside the next Regulation 18 consultation.

Green Infrastructure

78. The Council published a strategic green infrastructure document alongside the Draft Local Plan (2016). Following this publication, additional work is being undertaken by officers on creating a comprehensive Green Infrastructure database to facilitate detailed GIS mapping and provide a classification of different types of Green Infrastructure to inform policy drafting and site development considerations. The Green Infrastructure database also has a cross-over themes with the ongoing update to the Sport and Recreation Study, which is progressing with Sport England and Active Essex. Both studies will be published alongside the next Regulation 18 consultation.
79. The work undertaken by Essex Ecology Services Ltd on Local Wildlife sites in December 2012 was very comprehensive. Discussions are ongoing with Essex Local Wildlife Trust over the extent of any update to this piece of work. It is generally recognised that 2017 has been a challenging year for site surveying, due in part to the extremely dry spring and summer weather conditions which has limited the ability to undertake comprehensive grassland surveys. While there may not be any significant updates required in relation to woodland sites, grasslands can be more sensitive to change.

Flood Risk and Water Infrastructure

80. The Council has commissioned an update to the Strategic Flood Risk Assessment (SFRA) and Water Cycle Study (WCS) (2011) in order to comprehensively assess water supply, water quality, watercourses, ecology, sewerage and flooding. This is being undertaken in accordance with the Environment Agency's water cycle study guidance and new flood assessment modelling levels.
81. The Water Cycle Study will bring together the necessary information and views of the relevant stakeholders to identify constraints to, and opportunities for, the strategic delivery of water resources, water treatment, maintenance and improvement of water quality, flood risk management, integrated water management and sustainable drainage systems for Brentwood. The overall aim of the study is to identify a programme of water services infrastructure and other related measures needed to support planned development in the Borough up to 2033. This information will feed into the development of the Infrastructure Delivery Plan and the Brentwood Plan.
82. Updates on the SFRA and WCS will be available at the next formal stage of consultation on the plan.

TRANSPORT, MOVEMENT AND CONNECTIVITY

83. While Brentwood Borough is relatively small in geographical terms, the Borough is located only 30 minutes by train to London and has some major transport infrastructure within its administrative boundaries, including the M25 (J.28 and J.29), A12 and A127 road transport corridors and four railway stations, including two new Crossrail (Elizabeth Line) stations (Shenfield and Brentwood). At peak commute times and around school-run times the built-up area is often heavily congested with traffic. Due to the nature of the current built form, there are considered to be limited options to introduce major new road infrastructure or increase junction capacity within the Brentwood Urban Area. Highways England has recently consulted upon improving the operation of J.28 M25 (Brook Street roundabout) with a proposed scheme, which may lead to some improvements in reducing congestion at this critical junction with the A12. In addition, the Lower Thames Crossing, a new road connection and tunnel, has recently been confirmed. Although this does not physically affect the administrative boundary of the Borough the wider highway capacity benefits and new links will both benefit and impact local roads.
84. The Draft Local Plan (2016) was accompanied by a 'Development Options – Highways Modelling' report by Peter Brett Associates (PBA), who were commissioned to assess the impact of site allocation options over the coming years. PBA adopted a hybrid model approach where trip generation and distribution for development options were estimated utilising spreadsheets for trip generation and Omnitrans for trip distribution. This produced traffic flows for both the baseline and the option tests, which then fed into the junction modelling. The methodology for the model was first set out in 2014 and discussed with both Essex County Council and Highways England.

85. The model and outputs have been subject to extensive and detailed local plan representations in 2016 by a number of parties including the County Council and Highways England, and since the publication of the Draft Plan a number of meetings have taken place to progress the transport work programme including attempting to agree a baseline traffic model with its various technical assumptions.
86. Traffic and transport modelling are technically challenging and often costly areas of work for local authorities without the traditional inhouse expertise of highways authorities. Officers have recently taken the opportunity to review progress on this work stream and appoint a transport expert to expediate the traffic modelling and also refocus the range and ambition for transport planning for Brentwood. The Borough needs a 'step change' in sustainable transport provision to ensure that new developments such as Dunton Hills Garden Village and Brentwood Enterprise Park are well connected to transport means other than private car. The garden village also provides a clear opportunity to prioritise walking and cycling within its movement framework to ensure that opportunities for health and wellbeing are central to the masterplan for this new settlement.
87. In other locations across the Borough there are opportunities to support active travel and public transport provision, with clear strategies required to address pollution in air quality management areas and create the right transport and movement strategy for Brentwood over the next 20 years. This will include looking at future infrastructure provision on housing and employment sites (such as improved cycling, walking and public transport infrastructure) and ensuring that development schemes are future proofed for the move away from combustion engine technology to electric and hybrid vehicles.
88. Further updates on the transport work programme and technical reporting will be available at the next formal stage of consultation on the plan.

OTHER EVIDENCE MATERIAL

Sport and Recreation Study

89. As part of the evidence base for the plan a needs assessment was completed in August 2016 to identify current and future provision required to meet the sports facility needs of Borough residents. This work was completed with a view towards applying the needs assessment, as advocated by Sport England (Assessing Needs and Opportunities Guidance (2014)), to form the basis of producing an authority wide facility strategy for indoor and outdoor sport.
90. However, subsequent evidence (Draft Value for Money Review and Management Options Appraisal (2017)) brought to the Council's attention Sport England's advice that further work be completed to provide the Council with a more robust evidence base in which to inform future decision on new facilities. As such 4Global, in partnership with Strategic Leisure Limited and Active Essex, were commissioned by the Council in May 2017, to update the 2016 Assessment

by producing an Indoor Facility Strategy and Playing Pitch Strategy with sign off by Sport England. The projected timeline for completion of this work is:

- a) Indoor Facility Strategy - Final report to be issued December 2017
- b) Playing Pitch Strategy - Final report to be issued February 2018

91. The completion of the playing pitch evaluation is determined by established guidance on the right time of year to assess the condition of sports pitches.

Infrastructure Delivery Plan (IDP)

92. A full Infrastructure Delivery Plan (IDP) is being developed to accompany the local plan through to 2033. Work started on the IDP in July 2016 and a draft IDP will be prepared to accompany the next formal stage of consultation on the plan. The IDP is a working document and is also being developed as a web-resource, similar to the Government's approach to planning practice guidance.

93. The development of the IDP is closely aligned to final site allocations, but it is possible to highlight a number of key emerging strategic priorities and themes. The strategic infrastructure priorities include:

- a) **Delivering the right infrastructure at the right time** - The planning system has an important role to play in co-ordinating development and ensuring that the provision of infrastructure to support new housing and employment development such as schools, health facilities and transport is delivered at an appropriate scale and in a timely manner.
- b) **Enhancing green infrastructure Networks** - The Borough is fortunate in having a rich tapestry of natural assets, including two County Parks, 15 SSSI units, and 147 Local Wildlife Sites. However, there are still substantial opportunities to improve the quality, range and connectiveness of the Borough's Green Infrastructure.
- c) **Supporting high quality design** - Promoting a sense of place is considered a key local priority in infrastructure planning – helping minimise the impact of new infrastructure on local character and enhancing areas through innovative design which positively responds to local heritage and environments.
- d) **Supporting strategic growth through sustainable infrastructure planning** – The plan proposes significant growth within its main urban centre and along transport corridors. There will be a need to fully integrate strategic growth sites (such as Dunton Hills and Brentwood Enterprise Park) with a network of supporting infrastructure including public transport and active travel. Individual strategic development sites will also need to be supported by tailored infrastructure plans.
- e) **Forward thinking and innovation-led** – thinking ahead to Brentwood in 2040/50 and the changing dynamics of technological innovation and infrastructure, from smart homes, e-vehicles to the use of meta data to better understand work, movement and society.

94. In terms of more specific detail, Table 7 below indicates emerging key infrastructure issues and potential local priorities.

Table 7: Emerging Infrastructure Issues and Priorities

Infrastructure Theme	Commentary
Physical Infrastructure	
Public Realm Improvements	<p>Brentwood Town - enhancements to key sites in line with the emerging Town Centre Design Plan and Guide.</p> <p>Shenfield – enhancement to the railway station forecourt and surrounds.</p> <p>West Horndon - Redevelopment of industrial estate creating new village facilities and better connections to the Railway Station.</p>
Transport – work stream under review	<p>Rail Infrastructure - Accessibility and public realm improvements for both Brentwood and Shenfield Stations. New bus interchange facilities at Brentwood and Shenfield Stations. Cycle parking improvements at Brentwood and Shenfield Station. Improved car park connections at Shenfield. New taxi rank facilities at Brentwood and Shenfield stations. Baby change facilities and other internal customer facility improvements at Shenfield Station. Internal customer facility improvements at West Horndon Station. Platform access improvements at West Horndon. Additional cycle parking facilities and new bus interchange facilities at West Horndon Station. Additional car parking capacity at West Horndon Station. Increased gateline at West Horndon. Internal customer facility improvements at Ingatestone Station. Impaired mobility set down area. Taxi and bus facilities at the station. Car park layout and surfacing improvements.</p> <p>Bus Infrastructure - Brentwood Urban Area – Strategic Allocations - Increased frequency and re-routed provision to include new development locations. Brentwood and Shenfield Railway Station Transport Hubs - Interchange facilities and revised timetabling to take into consideration Crossrail investment. Requirement to increase times of services and improve Shenfield Station services to link across the Borough and beyond. South East of the Borough (West Horndon and Dunton Hills) - Significantly enhanced bus services and new bus infrastructure to connect West Dunton to Brentwood and other locations (including West Horndon Railway) and inter-connect the new settlement with Brentwood Borough public transport and active travel infrastructure and beyond. South of the Borough (Brentwood Enterprise Park) - New bus infrastructure to support workers accessing the development and linked through to other public transport / active travel options. Infrastructure connections / investment may also be required outside the Borough to potential worker hotspot locations. North West of the Borough (villages and rural areas) - Evaluate scope for further community transport infrastructure to enhance bus services. Sunday and Evening Services - Evaluate demand and options for Sunday and Evening services (potentially seasonal) to support evening economy and visitor / tourist sectors.</p> <p>Cycling – implementation of cycling and walking infrastructure</p>

	<p>priorities as detailed in emerging cycling action plan.</p> <p>Highways – Brentwood Urban Area - Junction improvements: - Wilson's Corner Junction A1023/A128, Junction High Street A1023, King's Road B185 and Kings Road B185 High Street to Brentwood Rail Station; strategic sites and new junction access points and highways infrastructure; J.28 M25 and Brook Street access improvements; A127 and Dunton Hills – new bridge infrastructure</p> <p>Transport innovation – community transport and car clubs</p>
Energy	District heating options to be explored and renewable energy innovation on all strategic scale sites, including Dunton Hills.
Water and Drainage	SUDS and comprehensive water management strategies for West Horndon Industrial Estate, Brentwood Town Centre brownfield sites, major urban extensions and strategic sites including Brentwood Enterprise Park and Dunton Hills. Water recycling centre and foul sewage network Infrastructure and/or treatment upgrades required to serve a number of potential sites or diversion of assets may be required.
Waste	<p>Composting facilities – there is no major specialist facility in the Borough</p> <p>Commercial waste recycling – while there are a number of commercial collection services and waste transfer sites, there is potentially a deficit in an easy to access 'turn up' or permit access site for businesses depositing small levels of commercial waste. The Borough continues to witness regular fly-tipping and this may help alleviate some of these problems.</p> <ul style="list-style-type: none"> • Potential lack of innovative thinking in end solutions for waste – recognising the increasing limitations of land fill. Opportunities to explore incineration, and waste to energy thermal and non-thermal technologies at a local level. • Growth and capacity constraints for current RCHW operations.
Telecommunications	The main gaps in broadband coverage include: Rural north and north east of the Borough; Rural north west of the Borough; West of A12 to the south west of the Brentwood Urban Area; Rural east / south east of the Borough; Extreme south of the Borough. Mobile coverage - weaker mobile coverage is concentrated within the Borough's rural or green field areas
Social and Community Infrastructure	
Education – under review	Additional early years provision linked to key development areas, including major employment developments. Additional primary school provision required in a number of locations across the borough – particular hotspots include Brentwood Urban Area, Shenfield and West Horndon. Potential pressures emerging on secondary school provision within the Brentwood Urban Area. Expansion of specialist school provision also identified as a priority, especially for 6 th form provision. Provision of full education infrastructure for Dunton Hills, to potentially include new all-through school academy, additional primary school provision and multiple early years provision.
Health – under review	Further enhancement of the range of services delivered at Brentwood Community Hospital to potentially include GP services . Effectively manage the additional pressure on GP services within Brentwood Town. There may also be a requirement for further

	healthcare infrastructure resources to support services within Shenfield and Doddinghurst. Investment in new health facilities within the south of the borough is a major priority to support growth at West Horndon and Dunton Hills. Potential additional capacity required in dentist practices providing services for NHS clients. Potential investment in care support services.
Sport – under review	Updated evidence is currently in development – potential need for a range of indoor and outdoor facilities across the Borough. Dunton Hills will also need to be supported by new sports infrastructure possibly linked to new school provision.
Community Services and Facilities – under review	Maximise use of existing community assets, including community halls. Increased provision of youth services and facilities. Potential need for new multi-use community facilities (potentially integrating library facilities), particularly linked to strategic growth areas including Dunton Hills – could be provided at co-hosted locations (schools / healthcare sites). Potential need for investment in social services, voluntary sector and carer support network.
Rural Services and Facilities - under review	Strategic priorities identified through the Essex Rural Partnership – supporting prosperity, well-being, connection (particularly transportation and IT) and innovation. Parish plan and parish council priorities to be detailed. Support for retaining local villages services, including post offices and rural bus connections.
Culture and Heritage	Conservation area improvement plans and local listings support programme. Maximising heritage interpretation and protection and where possible integration of heritage features across key development areas.
Emergency Services – under review	Discussions on-going linked to service restructuring.
Green Infrastructure	
Green Infrastructure (GI) – under review	Multiple improvement options across public parks and gardens, ecological assets, green and blue corridors, outdoor sports areas, amenity spaces, allotments, cemeteries and churchyards. Cope for significant enhancement of GI connected to A127 corridor growth sites including Dunton Hills.

SPATIAL STRATEGY

95. The Draft Local Plan (2016) set out a clear spatial vision and strategy for the Borough, with an emphasis upon protecting and enhancing local character while fostering sustainable communities by concentrating new development on land within the Borough’s Transport Corridors. Brentwood and Shenfield were the main focus for development in the A12 Corridor supported by two strategic allocations in the A127 Corridor, bringing forward new homes, businesses and employment.
96. The current work on the plan continues to support corridor led growth but also more closely links the current settlement hierarchy to the spatial strategy to ensure that opportunities for sustainable development are maximised. The strategy also continues to focus upon the

Borough of villages concept, with strategic housing growth to include Dunton Hills Garden Village.

Delivering Sustainable Development

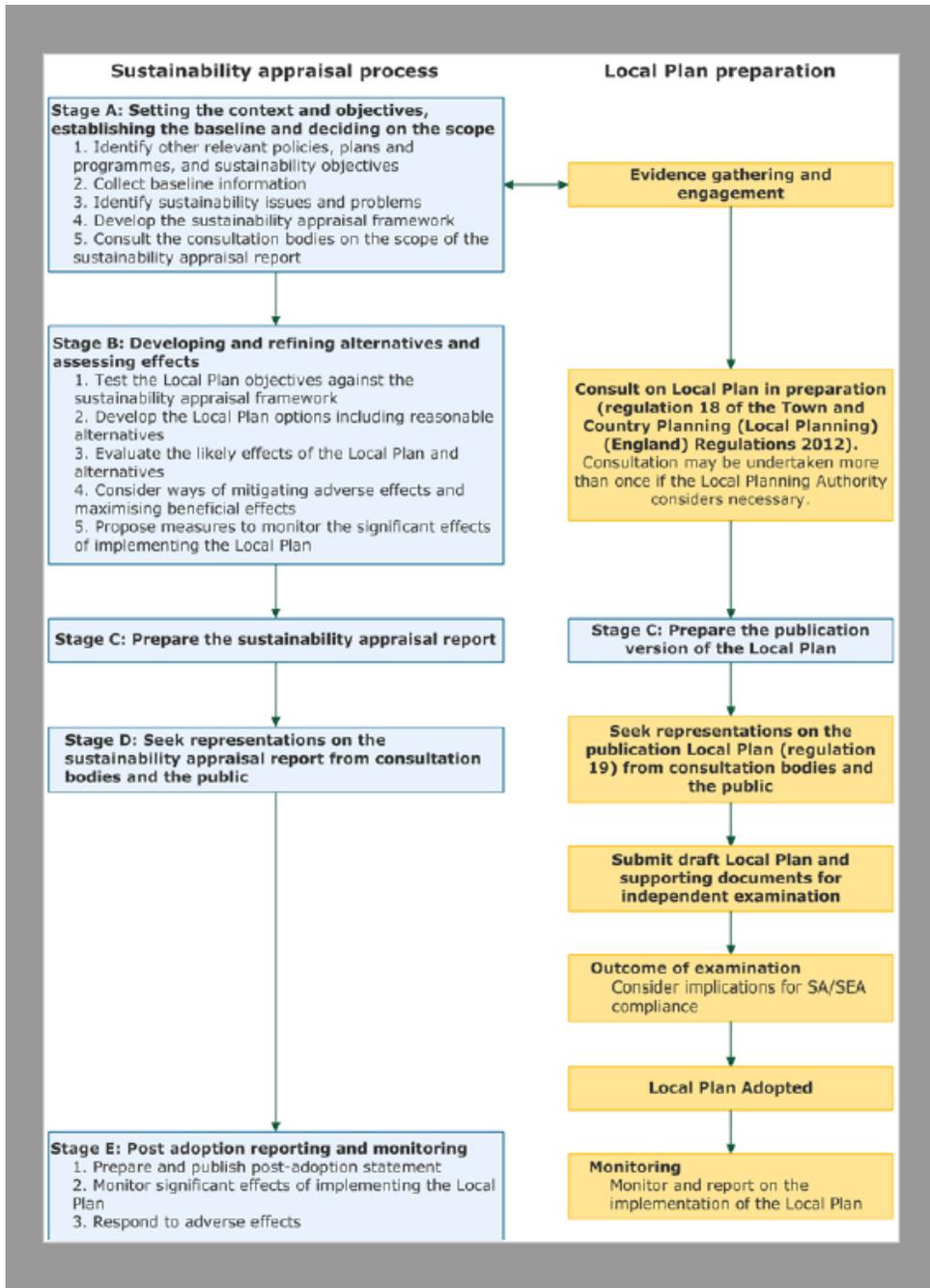
97. One of the key evidence documents to accompany the local plan is the sustainability appraisal. A sustainability appraisal (SA) is a systematic process that must be carried out during the preparation of a Local Plan.¹⁰ Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.¹¹ The SA allows the Council to consider opportunities through plan-making to contribute towards improving environmental, social and economic conditions in the local area and identifying and mitigating the impact of the plan and related development proposals. The SA is generally applied as an iterative learning process running parallel to the plan as it progresses.
98. AECOM has been working closely with the Council on the production of the SA and recent work has concentrated upon more closely aligning the spatial strategy to the current settlement hierarchy – which is the Council’s currently established breakdown of settlements across the Borough with an assessment of their sustainability in terms of services, facilities and features. Representations were raised during the consultation on the plan in 2016 questioning how the spatial strategy had been developed by the Council and what underpinned the selection of the location for strategic growth options, including Dunton Hills Garden Village. The SA work programme includes an enhanced focus on the current settlement hierarchy and a clearer narrative on the development and assessment of reasonable growth alternatives (and indeed what it not considered reasonable alternatives) in arriving at the currently proposed spatial strategy.
99. The general process for undertaking a Sustainability Appraisal is detailed below in Figure 6.¹²

Figure 6: Sustainability Appraisal Process

¹⁰ Under the Planning and Compulsory Purchase Act 2004, SA must be undertaken for all Development Plan Documents (DPDs). The basis for Strategic Environmental Assessment legislation is European Directive 2001/42/EC, which was transposed into English law by the Environmental Assessment of Plans and Programmes Regulations 2004, or SEA Regulations.

¹¹ NPPG Paragraph: 001 Reference ID: 11-001-20140306

¹² Figure reproduced from Strategic Environmental Assessment and Sustainability Appraisal Guidance (February 2015) - Paragraph: 013 Reference ID: 11-013-20140306



Sequential Land Use and Settlement Hierarchy

100. The proposed spatial strategy continues to focus upon the sequential use of land, which prioritises using brownfield land first and then considers growth in settlements in terms of their relative sustainability linked to services and facilities. Table 8, below sets out the framework to this approach, which in essence combines elements of Figure 5.4 (Sequential Selection of Sites) in the Draft Local Plan (2016) with the original 'Hierarchy of Place' analysis. The table includes information on the currently estimated dwelling numbers and percentage of need being met through the various steps linked to the settlement hierarchy. It can be noted that prior to allocations approximately 25% of the objectively assessed housing need (OAHN) has been met by completions and forecast non-allocation 'pipeline supply', including planning permissions (based upon an OAHN of 380 dwellings per annum). The table also includes a column for completing information on meeting specialist accommodation needs which is in addition to the OAHN. Finally, the table includes a provisional assessment of the percentage of OAHN met should the Government's standardised methodology to calculating housing need be applied.
101. At the end of the table 8 is can also be noted that prior to the allocation of an agreed strategic growth option (Dunton Hills), there is a dwelling need remaining of circa 1800 units (with an OAHN of 380 dpa) or 3312 units based upon the new standardised housing need methodology, as interpreted on current information. Options are currently being considered for how Dunton Hills Garden Village can deliver additional homes at an accelerated rate. Figures in table 8 are provisional and draft as work continues to fully understand capacity and delivery rates.

Table 8: Integrated Sequential Land Use and Settlement Hierarchy (provisional figures)

Step 1	Dwelling Completions, Planning Permissions and Windfall Allowance	Approximate Percentage of OAHN Met (Running Total) (380 dpa) (7600)	Standardised Methodology (454 dpa) (9080)	Specialist Accommodation	Estimated Headline Dwellings (Running Total)
	<ul style="list-style-type: none"> Development completed from 1st April 2013 to 31st March 2017. Development considered 'permitted' (planning permissions, resolved to grant applications and prior approvals) but not yet completed at 31st March 2017, including non-implementation discount of 10%. Forecast allowance for completions and permissions from 1st April 2017 to 31st March 2018. Windfall allowance for small sites (1-4 dwellings) - Small scale development within development boundaries and brownfield sites. (13 years at 39 units) 				527
					917 – 10% = 825
					120
					507
		26.04%	21.80%		1979
	Remaining to allocate (OAHN at 380 dwellings per annum)				5621
Step 2	Consider sites within the context of the settlement hierarchy which details settlements in terms of their relative sustainability in terms of services and facilities.	Approximate Percentage of OAHN Met (Running Total)			
	Settlement Hierarchy 1 – Main Town – Brentwood Urban Area, made up of connected local centres such as Brentwood, Shenfield, Hutton, Hutton, Warley, Brook Street and Pilgrims Hatch <ul style="list-style-type: none"> Prioritise brownfield sites within established settlement boundaries Consider non- 				1285+108

	Settlement Hierarchy 2 – Village Service Centres – Ingatestone	brownfield land within established settlement boundaries				9
	Settlement Hierarchy 3 – Larger Villages – Blackmore, Doddinghurst, Herongate, Ingrave, Kelvedon Hatch, Mountnessing and West Horndon					580
	Running Total		52.12%	43.62%		1982
Step 3	Development needs cannot be fully met through steps 1 + 2 outlined above - consideration is given to whether neighbouring Local Authorities can accommodate our remaining growth in non Green Belt locations		Approximate Percentage of OAHN Met (Running Total)			
	Neighbouring Authorities and Non-Green Belt Areas	a) Basildon b) Thurrock c) Chelmsford d) Epping Forest e) Havering				0
	Running Total		52.12%	43.62%		3961
Step 4	Development needs cannot be fully met through Steps 1-3 (within Brentwood non-Green Belt areas and no options are available with neighbouring authorities to take our remaining housing need in non-Green Belt locations). Need to consider appropriate sustainable locations for growth outside of development boundaries and in the Green Belt.		Approximate Percentage of OAHN Met (Running Total)			
	Settlement Hierarchy 1 – Main Town – Brentwood Urban Area , made up of connected local centres such as Brentwood, Shenfield, Hutton, Hutton, Warley, Brook Street and Pilgrims Hatch	Small, medium and large sites on the edge of the urban area which: a) do not have significant development constraints; b) can provide high quality development c) minimise development impact and / or can provide significant infrastructure benefits d) are deliverable and e) can provide a defensible redefined Green Belt Boundary.				1374
	Running Total		70.20%	58.76%		5335
Step 5	Development needs cannot be fully met by consideration of growth options outlined above in steps 1-4.		Approximate Percentage of OAHN Met (Running Total)			
	Settlement Hierarchy 2 – Village Service Centres - Ingatestone	Small to medium sites on the edge of the village service centre which: a) do not have significant development constraints; b) can provide high quality development c) minimise development impact and / or can provide significant infrastructure benefits				257

		d) are deliverable and e) can provide a defensible redefined Green Belt Boundary.				
			73.58%	61.59%		5592
Step 6	Development needs cannot be fully met by consideration of growth options outlined above in steps 1-5.		Approximate Percentage of OAHN Met (Running Total)			
	Settlement Hierarchy 3 – Larger Villages – Blackmore, Doddinghurst, Herongate, Ingrave, Kelvedon Hatch, Mountnessing and West Horndon	Small sites on the edge of the village service centre which: a) do not have significant development constraints; b) can provide high quality development c) minimise development impact and / or can provide significant infrastructure benefits d) are deliverable and e) can provide a defensible redefined Green Belt Boundary.				176
	Running Total		75.90%	63.52%		5768
Step 7	Development needs cannot be fully met by consideration of growth options outlined above in steps 1-6. Need to consider additional strategic growth options and establish a set of reasonable alternatives.		Approximate Percentage of OAHN Met (Running Total)			
	Various strategic growth options considered with allocation taken forward in Step 8.					
			75.90%	63.52%		5768
	Prior to allocating strategic growth option – short by		1832 dwellings	3312 dwellings		
Step 8	Establish a set of reasonable alternatives. Development needs cannot be met by North Brentwood extension which is not considered deliverable / developable within the plan period. The West Horndon extension provides only for a limited level of growth (1000 units maximum) and below the housing target. Dunton Hills provides for the full level of growth within the plan period and a sustainable location for growth.					
	Review of Reasonable Alternatives a) North of Brentwood/Shenfield (Urban Extension) b) West Horndon (Village Extension) c) Dunton Hills (New Settlement)					
	Dunton Hills Allocation		3500	3500		9268
	Dwellings above (+) / below (-) OAHN		+1668 (+22%)	+188 (+2%)		

103. This integrated approach to sequential land Use and the settlement hierarchy, includes a new limited housing focus within and on the edge of larger village settlements. The larger villages in the Borough are generally served by local shopping and school facilities, community and health services, local jobs and a variable bus services. These larger villages provide the opportunity to release small edge of settlement sites to support limited housing growth. This approach will

help improve the range and size of the local housing stock (including affordable housing) and support and retain local services and facilities (core sustainable development issues).

104. The release of small edge of village Green Belt sites are also forecast to positively support the early delivery of housing in the Borough (assisting housing delivery within the first five years of the plan) and due to their modest physical scale, provide opportunities for smaller potentially local builders / businesses - which is a Government ambition towards a more inclusive and locally responsive approach to housing construction.
105. The updated approach also includes a re-calculated contribution and classification of windfall. The large windfall allowance highlighted in the Draft Local Plan (2016) (circa 1,000 units) has been reduced to a small windfall allowance consisting of 1-4 dwellings only (about 39 units a year). This helps avoid double counting windfalls and allocations (as it is below the site allocation threshold of 5 dwellings) and aligns with further research by officers on the nature and extent of historic windfall patterns. This approach also supports a plan-led strategy to housing through allocations rather than an over-reliance on large windfall delivery which could be difficult to defend at public examination. In pragmatic terms, and although difficult to forecast, large windfalls (5 dwellings and over) will continue to come forward in Brentwood and will continue to support housing supply, but they will not be relied upon to boost housing delivery figures.
106. The position in table 8 displays provisional site delivery rates against meeting OAHN only. If Government guidance is followed regarding the need to show supply in addition to OAHN (10% to 20%+) for flexibility, and security in case certain sites do not come forward, the Council may need to identify more sites and/or homes.

Reviewing Reasonable Alternatives

107. The Draft Local Plan Interim SA (February 2016) was published at the last formal stage of public consultation on the local plan. This document set out a staged or stepped process to develop a set of reasonable alternative spatial allocations. This approach is set out below in Table 9, (columns 1 and 2), with some links back to the settlement hierarchy table set out above (table 8). Table 9 also includes (column 4) an update to the development of the reasonable alternatives work programme, which reflects current work with AECOM on the next update to the SA.

Table 9: Development of Reasonable Alternatives

Interim SA Report (2016)	Detail	Links to Updated SA Approach	Current SA Work Programme
Stage 1 - Establish how much land needs to be allocated	OAHN minus completions, permissions and windfall	Step 1 in Table 8 above.	Finalising completions, permissions and windfall data.
Stage 2 – Establish the ‘givens’ for site allocations	Brownfield land first	Step 2 in Table 8 above.	Brownfield land first focus across all sustainable locations as defined by the settlement hierarchy. Also

			review non-Brownfield site release options within the boundaries of established sustainable settlement locations.
	Residual housing needs (about 50% of housing need outstanding) must be met through a combination of A12 urban extensions and one or more strategic allocations	Part of Steps 3-6 in Table 8 above	After exploring all non-Green Belt site options (including with neighbouring authorities), review settlement edge green belt site options aligned to the existing settlement hierarchy (Brentwood Urban Area, Village Service Centre and Larger Villages)
	The Council determined the preferred locations for A12 urban extension allocations	Part of Steps 4-6 in Table 8 above	Focus extended beyond A12 focus to larger villages.
			OAHN still not met, with circa 1800 min remaining dwellings to be allocated.
Stage 3 – Establish the variables or strategic choices	Two strategic choices – 1) the approach to strategic allocation(s) and 2) the windfall assumption.	Stage superseded by updated position on windfall	
Stage 4 – Establish a set of strategic site allocation options	<p>Option 1 - homes at Dunton Hills Garden Village</p> <p>Option 2 - homes through an extension of West Horndon</p> <p>Option 3 - homes at land to the north of Brentwood (this would encompass one of the preferred A12 urban extension allocations).</p> <p>Option 4 - homes at land to the East of Running Waters, Hutton</p> <p>Option 5 - homes at Dunton Hills Garden Village and land north of Brentwood</p> <p>Option 6 - homes through an extension of West Horndon and at land north of Brentwood</p>	Link to Stage 7 in Table 8.	Further narrative is being drafted on strategic site options and clear separation into discounted and reasonable alternatives. Approach also informed by representations made to the Draft Local Plan (2016). Strategic Options include: Options 1 & 2 - Development of West Brentwood and Pilgrims Hatch (Discounted) Option 3 – Expansion of Shenfield (Discounted) Option 4 - Land north East of Hutton (Discounted); Option 5 – Land to the east of Running Waters (Discounted); Option 6 – Land West of Warley (Discounted); Option 8 – Land to the north of Brentwood (not discounted) Option 9 - Development and expansion of Ingatestone (Discounted) Option 10 – Development to encompass northern villages (Discounted); Option 11 – Development to further expand West Horndon (not discounted), Option 12 Dunton Hill

			New Settlement (not discounted). Option 13 – Hybrid Options (not discounted)
Stage 5 – Establish a final set of reasonable alternatives	As above options but with ‘givens’ added.		Reasonable alternatives established for further review through the SA: Land north of Brentwood Expansion of West Horndon Dunton Hills new settlement Hybrid options

Strategic Options Assessment and Finalising Reasonable Alternatives

108. A strategic options assessment as part of the SA considers the housing target and broad spatial priorities/options, examining each ‘spatial tier’ in turn (e.g. brownfield, urban greenfield, urban area and village extensions, strategic sites), concluding on whether the approach for each tier should be taken as a given/constant or a choice/variable, for the purposes of establishing reasonable alternatives. The next step is then to identify the options for each variable, and then the final step is to pull all the options together into a single set of district-wide reasonable alternatives. The development of reasonable alternatives is underpinned by sustainable development considerations and informed by top down growth demands and bottom up site considerations.
109. It can be noted from Table 9 that a wide range of strategic housing options have been considered as part of the SA and plan-making process to identify and finalise a list of reasonable alternatives. These reasonable alternatives will be set out in further detail in the upcoming SA to accompany the next stage of local plan consultation. It is important to note that the consideration of alternatives is required in order to make sound decisions about growth locations and importantly ensure that the eventual plan put forward to the Secretary of State is positively prepared, justified and will delivery sustainable development. Reasonable alternatives are just that – reasonable in planning terms but an alternative option to the proposed/chosen strategy, and therefore not selected for development.

STRATEGIC GROWTH

110. The overall strategic approach to delivering growth is focused upon the Brentwood Urban Area and the Council’s approach to maximising brownfield site delivery options through the new Brentwood Town Centre Design Plan and corporate asset development programme, as well as a strong focus upon growth within the A127 corridor through the delivery of both large-scale housing and employment opportunities. This is all consistent with a commitment to best use brownfield land and ensure growth is consistent with the Borough’s village character.

A127 Growth Corridor

111. The nature of historic development patterns in the Borough has seen Brentwood Town, it's surrounding urban areas such as Shenfield, and villages like Ingatestone, fill much of the space contained within the A12 Corridor. Development opportunities exist to maximise brownfield land and create sustainable urban extensions that will provide for just over half of the Borough's development needs. The Brentwood urban area, Mountnessing and Ingatestone are settlements along the A12 Corridor that are inset within the wider Green Belt, the combination of these settlements make-up a considerable proportion of the land within the Corridor area.
112. By contrast, the A127 Corridor in the south of the Borough is largely undeveloped, other than the small village of West Horndon, which is inset within the wider Green Belt. As indicated in the spatial strategy for the plan, this area provides an opportunity to deliver new growth that meets the Borough's remaining needs in sustainable locations and consistent with local character – our "borough of villages".
113. Development is being considered of various scales within a relatively short distance along the A127 corridor, including a 3,500 dwelling garden settlement (2,500 dwellings within the plan period as proposed in 2016, with ongoing work to consider whether accelerated additional growth can be brought forward) with a new village service centre and employment land at Dunton Hills, extensions to Childerditch Industrial Estate and potential new employment allocations at East Horndon and a major strategic employment site at M25 Junction 29 (Brentwood Enterprise Park). The distance from the M25 to the A127 Junction for the Ford Dunton Technical Centre is about 4.5 miles. In addition, development is being planned across the wider area outside Brentwood Borough in adjoining authorities, such as Thurrock, Basildon Borough and the London Borough of Havering. How future development is planned across this wider area is equally important.
114. The prospect of growth in previously undeveloped locations presents the need to consider how new development relates to its surroundings – whether other new development, existing communities, or the wider surrounding environment. Specific new plan evidence is required to consider the development capacity of the Borough's A127 Corridor. Development locations are being assessed within the area (including masterplanning for Dunton Hills Garden Village) and this work will join up thinking so far as to how proposals relate to their wider surroundings.
115. This new evidence will inform both the strategic content and policy wording for the plan covering this part of the Borough and eventually either the production of an Urban Design Framework or Supplementary Planning Document to provide additional planning policy direction. The current study area measures about 14 square miles and is detailed below in Figure 7.

Figure 7: A127 Corridor Study Area



The key outputs from this work will include:

- a) **Services and facilities** - Benchmarking and better understanding how the local area currently works in terms of connections to key transport nodes (including West Horndon Station), schooling and access to services. What options are there to effectively and efficiently plan for new infrastructure to support the various developments including (but not exclusively) public transport, active travel options, social infrastructure and education?
- b) **Movement and Highways** - The A127 is a strong transport corridor but also a problematic 'barrier' to connectivity north and south - what options exist to improve linkages - north / south, including active travel and habitat corridors? What practical improvements can be made to the A127 within the lifespan of the plan and what is the cumulative impact of development and key mitigation measures?
- c) **Green Infrastructure** - Plan effectively for green infrastructure networks and key habitat corridors at a strategic level and at a scale significantly larger than individual development sites.
- d) **Landscape and Green Belt** - While much of the development options are quite distinct there is a need to potentially reinforce the visual separation of the new growth areas

and support the integration of high quality landscape features and ensure the Green Belt boundaries are clearly defined and will endure beyond the plan period.

- e) **Heritage** – consider heritage connections, impacts and mitigation in the round through the study area.
 - f) **Planning and design** - Framework for informing key planning and design principles for the corridor area. What is the appropriate scale and massing of development to strike the right balance between creating places and environments of distinct character and enhancing the quality of the wider landscape?
 - g) **Site masterplanning** - Links and relationship between sites and what are the implications for detailed masterplanning?
 - h) **Long term growth options** – what are the opportunities for the next plan period and what are the implications now for safeguarding Green Belt land and comprehensive planning?
 - i) **Duty to Co-operate** - Focused joint working with duty to cooperate partners and site sponsors on site planning and infrastructure development.
 - j) **Community Engagement** – mechanisms and opportunities for community engagement, including links to neighbourhood and community planning.
116. It is intended to finalise the key aspects of the consultant brief through a workshop with duty to co-operate partners towards the end of November 2017 and commission the work early January 2018 to be complete by the end of March 2018. This will be a critical piece to inform the local plan.

Dunton Hills Garden Village

117. The proposed Dunton Hills Garden Village is the most significant housing-led development scheme in the emerging plan, and is a once in a lifetime opportunity to create a new settlement, which not only delivers substantial housing growth, but will be a major new service centre in its own right, with shops, facilities, schools and employment opportunities. The inhouse project team for Dunton Hills is also clear on the need for this new village to be a ‘class leader’ in design terms and ensure the social, environmental and economic principles of garden villages are fully applied.
118. Since the official ‘Garden Village’ status was announced in January 2017, officers have been working with the site promoter (CEG), the Homes and Communities Agency (HCA) and Design Council Cabe to explore how the garden village principles could be practically applied to the development of a masterplan for the site. Government has provided some financial assistance to the Council to assist with supporting the development if the masterplan and to progress other related workstreams.
119. The key current work streams led by the project team include:
- a) **Engraining Garden Village Principles and Masterplanning** – portfolio of projects focused around fully aligning garden village principles to the core of the development.

Masterplanning process externally facilitated by Design Council Cabe. Key projects include: a full masterplan development programme, design competition for the new Dunton Hills Academy and specialist landscape support on considering development within the site ridgeline. The main focus for this work programme is upon place-making and design quality, although there is a clear brief upon maximising housing options and challenging assumptions about physical restrictions on growth (onsite infrastructure such as electricity pylons and avoiding development on the site ridgeline). A programme of scheme viability analysis is running parallel to the design work.

- b) **Embedding heritage** – the historic Dunton Hills farmhouse and barns are at the centre of the site and provide connections to the wider historic landscape. There are clear opportunities to ensure that this important asset plays a key role in connecting the site to its past and creating opportunities in the future for conservation and potentially informing some of the potential physical character of the new settlement. Key projects include: a farmstead heritage assessment, the development of an innovative Heritage Partnership Agreement, Conservation Management Plan with cost programme and site interpretation programme. Again, the focus is upon high quality place-making and creating a sense of distinctiveness.
- c) **Demographics, Intelligence and Market Positioning** – broadly better understanding the surrounding communities and potential new residents on the site. Key role in informing housing types and mixes of development, plus identifying emerging and unidentified to date infrastructure requirements. Key projects: adaption and modification of existing forecasting population tools and commissioning of new Community profiling tools. Focus around the right housing in the right place.
- d) **Governance, Taking a Stake and Creating Community** – currently research and scoping reports on improving the current project management, considering options for local governance, including parish council arrangements and trust structures and options for the local authority to directly support housing delivery. The outputs from this research may play a key role in speeding housing delivery, particularly if the local authority takes a collaborative or direct stake in affordable housing delivery.
- e) **Future Casting and Technological Innovation** – key theme on technological innovation and thinking about the village of the future now. Key projects include: research papers on smart infrastructure (on-site and within properties); the application of learning from the key sectors actively engaged in future casting (such as retail and entertainment) to the future direction of new settlements and importantly how can the scheme benefit from off-site production and modular construction. The implementation of offsite produced housing units would potentially significantly increase delivery rates for Dunton Hills.
- f) **Housing and New Communities – Adapting for Change and Sustainability** – wide ranging work programme concentrating upon fully understanding the wider spatial context to Dunton Hills; getting ‘under the skin’ of affordable housing options, understanding the importance of adaptable housing design and engraining eco-design and high quality green infrastructure, including native planting and ecology promotion within the development. Mixture of research, case studies and commissions. Outputs focused upon high quality place-making and innovative design.

- g) **Thinking Radically and Future Proofing – Transport and Movement** – generally challenging the traditional movement hierarchy and ensuring active travel, public transport and new technology (e-charging, driverless vehicle infrastructure etc) is central to the scheme. Range of research and commissions plus the appointment of a transport expert / specialist within the project team. Drive for the work programme around distinctive place-making, public health and sustainable development.
- h) **People, Skills and Future Work** – there are real opportunities through Dunton Hills to improve the skills, prospects and opportunities of many people. There are also clear opportunities to engage the residents of tomorrow through effective engagement with local schools. The current projects under this work programme include: research papers on education engagement; project champions and lifestyle changers; scoping study on skills, training and apprenticeships and the research on the changing nature of workplaces. The focus is very much upon leaving a positive legacy for Dunton Hills.
- i) **Creating a Culture of Innovation** – it is one of our key cross cutting themes. How can we create the right environment to encourage innovation and creative thinking about place-making, overcoming challenges, challenging assumptions and creating an exciting vibrant community? Key current projects include: DH Network 24 – online and face-to face networking group; Pop-hub project / community hub and research linking early community engagement to place ownership and community structures. Real focus around quality of place.
- j) **Working smart** – it is often easy to overlook ensuring that the project team has the right resources to work effectively and efficiently and create an on-line vision and community for Dunton Hills. Deliverables include new website and enhanced software / hardware.

120. The project team is starting to roll out an engagement programme across Brentwood’s communities, stakeholders and with neighbouring areas. This is including a schools’ engagement programme - thinking about Dunton Hills in 2050 and the types of issues planners need to think about in creating new communities. A major stakeholder event is also programmed to kick start detailed project input. Work has also progressed on the format to a new project specific website. The current work programme on school engagement could be referred to Government by the HCA as good practice. Attention is also being given to formalising the governance structure for the project and considering options for wider community engagement.

Brentwood Enterprise Park

121. As noted above in the section on employment land supply, a new enterprise park at M25 Junction 29 is being promoted through the plan process by St. Modwen PLC on a 35ha site (gross). A masterplan is being developed for the site which deliver over 2000 jobs (excluding construction) and include land for a range of traditional b class employment uses plus ancillary uses. Officers are keen to ensure that the site is developed to a high design standard and becomes well connected through public transport and active infrastructure to minimise unnecessary private car journeys.

DUTY TO CO-OPERATE

122. The Council has and continues to engage constructively with other local planning authorities and other public bodies on the preparation of the Local Plan following the approach set out in the NPPF. A summary of the mechanisms for and evidence of cooperation and engagement is set out below in Table 10.

Table 10: Duty to Cooperate – Engagement Undertaken

Cross Boundary Consultee	How We Are Cooperating so far	Strategic Issue
Basildon	<p>Joint consultation on an urban extension to Basildon – Dunton Hills Garden Suburb. Basildon politically withdrew support.</p> <p>Thames Gateway South Essex SHMA 12/03/2015 23/09/2015</p> <p>EPOA Officer Meetings Bi-monthly (5-6 per annum)</p> <p>Officer meetings 14/12/2016</p> <p>SHMA Part 2 workshop 15/03/2017</p> <p>Jointly commissioned Green Corridor evidence: March 2017 onwards.</p> <p>South Essex Strategic Planning Officers Group (from Oct 2017) (Includes Basildon; Thurrock; Rochford; Southend; Castle Point and ECC).</p>	<p>DHGV development impacts</p> <p>Green Infrastructure & landscape</p> <p>Highways</p> <p>Education</p> <p>Brentwood Draft Local Plan (2016) consultation response requested Brentwood borough considers taking part of G&T but not followed up after this.</p> <p>No formal request for Brentwood to take housing from South Essex SHMA.</p>
Thurrock	<p>EPOA Officer Meetings Bi-monthly (5-6 per annum)</p> <p>Officer Meetings 05/10/2016 03/05/2017</p> <p>SHMA Part 2 workshop 15/03/2017</p> <p>Green Belt 26/11/2015</p>	<p>2016 objected to development proposals in A127 corridor</p> <p>Position changing but way forward for Thurrock unknown.</p> <p>No formal request for Brentwood to take housing from Thurrock SHMA.</p>

LB Havering	<p>Duty to Cooperate Events 02/08/2016 28/11/2016 22/03/2017</p> <p>SHMA Part 2 workshop 15/03/2017</p> <p>A127 Growth Corridor Aspirations & Coordination of work 27/04/2017</p>	<p>Highways – impacts of development on A127.</p> <p>No formal request for Brentwood to take housing from Havering.</p>
Epping Forest	<p>EFDC Co-op Officer Working Group monthly (Includes Epping Forest DC; Harlow; Uttlesford; East Herts; and: Chelmsford; Broxbourne; Redbridge; Enfield; Waltham Forest, ECC; FLA; TFL);</p> <p>13/04/2017 18/05/2017</p> <p>SHMA Part 2 workshop 15/03/2017</p>	<p>Currently no identified issues.</p> <p>Brentwood on-going consideration process of potential impact of new development on Epping Forest SPA/SAP through HRA</p> <p>No formal request for Brentwood to take housing from Havering.</p>
Chelmsford	<p>EPOA Officer Meetings</p> <p>Bi-monthly (5-6 per annum)</p> <p>SHMA Part 2 workshop 15/03/2017</p>	<p>Currently no identified issues</p> <p>No formal request for Brentwood to take housing from Havering.</p>
Parish Councils	<p>Parish Council Workshop – IDP 17/11/2016</p> <p>Meeting Neighbourhood Plan Parishes for updates. Attendance at joint Parish Council group meetings.</p>	<p>DHGV is in a Neighbourhood Plan area and the Parish Council strongly object to it and the concept of new development in the area.</p>
Essex County Council	<p>EPOA Officer Meetings</p> <p>Bi-monthly (5-6 per annum)</p> <p>SHMA Part 2 workshop 15/03/2017</p> <p>Separate Issue Meetings:</p> <p>Highways (see below)</p> <p>IDP research 2016-2017 – Education; Early Years facilities, highways; surface water flooding and alleviation projects, broadband</p>	<p>Highway impacts</p> <p>Education infrastructure need</p>

	infrastructure	
South East LEP	IDP research 2016-2017	Plan delivery
DCLG	Dunton Hills Garden Village expression of interest Summer 2016 Implementation meeting 29/03/2017	N/A
GLA	A127 Growth Corridor Aspirations & Coordination of work 27/04/2017	N/A
Environment Agency	IDP research 2016-2017	Flood
Natural England	IDP research 2016-2017	Biodiversity
Water Companies	IDP research 2016-2017	Flooding, sewage, drainage and water treatment
Train Companies	IDP research 2016-2017	Railway and transport infrastructure
Civil Aviation Authority	IDP research 2016-2017	N/A
Diocese	IDP research 2016-2017	Community facilities
Historic England	IDP research 2016-2017	Historic assets and their settings
The Homes and Community Agency (HCA)	IDP research 2016-2017 Dunton Hills Garden Village – 20/04/2017 and subsequent 2017 meetings/events	DHGV Housing
Care Commissioning Group (s)	IDP research 2016-2017 Healthcare summit with Basildon and NHS England 19/01/17	Health
Office of Rail Regulation	IDP research 2016-2017	
ECC highway authority	IDP research 2016-2017 Highways modelling – methodology discussion A127 Growth Corridor Aspirations & Coordination of work 27/04/2017 IDP research 2016-2017 Dunton Hills Garden Suburb Dunton Hills Garden Village Site specific discussion including	Highways

	pre-app Preferred Site discussion	
Highways England	Highways modelling – methodology discussion	Highways
TfL highway authority	IDP research 2016-2017 A127 Growth Corridor Aspirations & Coordination of work 27/04/2017	Highways
South Essex Authorities Group / South Essex 2050 initiative	Fortnightly meetings focusing upon strategic growth issues – leadership provided by Leaders and chief execs of each authority	Strategic growth strategy
Marine Management Organisation (MMO)	Consultation via Local Plan Reg 18 only. Not applicable.	N/A

PROJECT MANAGEMENT

123. At an officer level the management of the plan includes quarterly roundtable ‘conference’ sessions with legal counsel on key issues. The sessions also actively involve the plan’s key consultants on various evidence work streams.
124. The Local Development Plan (LDP) Members Working Group (MWG) meets to discuss elements of the plan-making process. This was recently added to with the creation of Scrutiny working groups to scrutinise certain aspects of key corporate projects, including the local plan. Meetings for 2017/18 have now been diarised with the group membership being similar for both the LDP MWG and Scrutiny LDP MWG, albeit with separate agendas and approved scopes.
125. On strategic projects officers have regular discussions and work session with the Homes and Communities Agency on the development and delivery of Dunton Hills and a project delivery group which consists of the site promoter (CEG), various professional support team and dedicated resources from the Council. A formal governance structure for Dunton Hills is shortly to be agreed and implemented.

NEXT STEPS

126. Following completion of outstanding evidence to inform the next stage of the plan, most significantly the Housing and Employment Land Availability Assessment (HELAA) and the latest stage of site assessment work, further consultation on Regulation 18 stage is expected on the local plan in early 2018 (January). Depending on the level of response and full consideration of this, it is anticipated that the Council would be able to consult on Regulation 19 stage (pre-submission consultation) in summer 2018. Following this the plan will be submitted to the Secretary of State for an examination in public to be held by the Planning Inspectorate.

127. A timetable will be prepared taking into account related documents, such as work on supplementary planning documents (or similar); the Town Centre project (Brentwood Town Centre Design Guide and future development briefs); and other dependencies such as locally prepared Neighbourhood Plans.

ADDITIONAL APPENDICES

Appendix B: Strategic Housing Market Assessment Summary, PBA (September 2017)

Appendix C: Gypsy and Traveller Accommodation Assessment (Draft), ORS (November 2017)

Appendix D: Brentwood Economic Futures 2013-2033 – Final Draft Report, Lichfields (November 2017)

Appendices E, F & G: Green Belt Review Working Drafts – Part 1 and 2 (Summary) plus map of parcels, Crestwood Environmental (November 2017)