

Ref	Author	Comment	Theme	Response
1	ECC	<p>Concern that the specific locations for education facilities are being fixed, in both the SPD and FMP, without the full assessment being undertaken, and agreed with the Education Authority to establish whether these locations are suitable for such uses.</p> <p>Any land that is intended for public use must be safe and fit for purpose, and consideration needs to be given to a number of factors including ground conditions, typography, contamination, flood risk, noise, air quality, utilities, and proximity of incompatible uses. Many of these are particularly relevant to the DHGV site given its typography, the presence of water bodies and powerlines on the site, and the site being bounded by two A roads and an elevated railway line.</p> <p>Until this process has been completed ECC as the Education Authority for BBC cannot confirm that the locations proposed to be fixed for education facilities in the SPD and FMP are appropriate for the provision of education facilities.</p> <p>2.1.9 Land Use - Revised sentence included in updated SPD – see comments on suggested amendments in end column.</p>	Schools	<p>Text in Para 2.1.9 revised:</p> <p>"The Land Use plan <del>explains the</del> <u>illustrates an indicative</u> spatial distribution of key land uses across the site. This includes requirements for land uses to be distributed appropriately and, in several cases, clustered within village centres, neighbourhood hubs, and an employment area. Some land uses are given more specific guidance <u>in the SPD</u> relating to their siting. <u>Any land that is intended for public use, such as schools, must be safe and fit for purpose.</u> <del> although a case could be build for locating schools elsewhere if all necessary criteria are fulfilled, for example, accessibility to key active travel routes and walking distance within homes.</del> <u>In finding a suitable location, the quality of land and designing the environment around it will require collation and analysis of matters such as ground conditions, sources of contamination, flood risks, and the proximity of incompatible land uses, as well as accessibility to key active travel routes and walking distances from homes. This information must be formalised and submitted with any planning application in the form of a Land Compliance Study. The ECC Developers' Guide to Infrastructure Contributions 2020, or as subsequently updated, provides guidance on this process."</u></p> <p>Wording change in 2.6.25 advising that locations on Key Spatial Plan are indicative.</p>
2	ECC	<p>ECC recommends that they are amended to ensure that there is consistency between the SPD and FMP in terms of the detailed description of such requirements, and that such consistency reflects the requirements of the Local Plan policy -</p> <ul style="list-style-type: none"> <li>a. land for one secondary school (Class F1) circa 7.9 hectares;</li> <li>b. land for three co-located primary schools and early years and childcare facilities (Class F1) circa 2.1 hectares each;</li> <li>c. the secondary school site (a) should be co-located with one of the three primary school/early years and childcare sites (b) to provide for the option of an all through school;</li> <li>d. land for one stand-alone early years and childcare facility (Class F1) circa 0.13 hectares.</li> </ul> <p>Reference is made within both the SPD and FMP to the potential of co-locating one of the primary schools with the secondary school, and to the potential for an all-through school, which is ECC's preference. However, the various layout plans in both the SPD and FMP clearly show the two schools within Dunton Waters as separated, this is particularly evident in sections 5.5.6 and 5.5.7 of the SPD. <u>The land indicated for the secondary school or potential co-located / all-through school is not large enough to accommodate the primary school and early years and childcare facility. It is therefore recommended that diagrams are amended to show the site as extended to the east to have the potential to accommodate this, and the separate primary school site to the south shown as removed / used for alternative uses.</u></p>		<p>Text updated to include Local Plan reference. See para 2.6.23 "a. ....nursery facility <u>(which require around an additional 2.1 hectares)</u> "</p>
3	ECC	<p>The preferred approach to providing Special Education Needs is to integrate such provision on-site to support the need generated from the DHGV site. It is recommended that reference is made to this within the relevant sections of the SPD and FMP as this could also have design and layout implications for development.</p>	Schools	<p>Text added to para 2.6.2</p> <p><u>Special Education Needs (SEND) provision should be integrated on-site and the associated design and layout implications need to be considered as part of the design process for the Primary, Secondary, and Early Years and Childcare facilities.</u></p>
4	ECC	<p>ECC recommends that the SPD and FMP specifically include the required land area for each education facility. This would be consistent with reference elsewhere in the documents to specific hectares for employment land. Furthermore, it is considered that more flexibility should be provided in the documents in relation to the education facilities footprints and marker buildings requirements. In some instances, such as sections 4.5.4, 5.5.6, 5.5.7, 6.5.5 of the SPD, ECC considers that the building footprints as illustrated are unrealistic and could have operational issues.</p>	Schools	<p>All parameter plans have been labeled as "illustrative"</p>

5	ECC	ECC supports in general the principles set out in sections 4.5.4, 5.5.6, 5.5.7 of the SPD that schools must be sustainable and minimise carbon emissions, however all the school buildings should be carbon neutral as a minimum not just BREEAM 'excellent'. It is recommended that this is reflected in all the above sections of the SPD, as well as sections 6.5.5 and 3.5. It should also be reflected in the renewable energy mandatory principles contained in the FMP. ECC would also draw attention to the Interim Report by the Essex Climate Action Commission (November 2020) which recommends that all new schools to be carbon zero by 2022 and carbon positive by 2030.	Schools	Guidance in FK4, WK6, WK7 and OK5 revised as follows:  Schools must be designed to be <del>sustainable and must minimise carbon emissions. A BREEAM 'excellent' rating must be achieved, or other equivalent standard</del> <u>carbon zero by 2022 and carbon positive by 2030.</u>
6	ECC	The detailed requirements for education buildings set out under sections 4.5.4, 4.6, 5.5.6, 5.5.7, 5.6, 6.5.5, 6.6 of the SPD, and building heights in section 2.8 of the SPD may impact on the capital cost of the school, as well as running and maintenance. High ceilings for example can add to heating costs and make it difficult to reach light fittings without specialist equipment, and building heights have implications for lift provision. Such additional requirements could also have implications on the design and layout of such facilities.	Schools	Guidance updated from "must" to "should" The definition of marker buildings has been revised to avoid reference to height
7	ECC	Bodies of water close to schools such as that referred to in section 5.2 of the SPD need to be suitably fenced to avoid danger to young children. It is therefore recommended that the SPD includes guidance on such matters given their implications on the design and layout of the development.	Blue Infrastructure	Guidance added to FK5. Village Centre: Primary School Square
8	ECC	Consideration also needs to be given to the implications on school construction and operation of the retained hedgerows shown running through the school site in section 5.3 of the SPD and layout plans in the FMP.	Schools	Text revised and hedgerows removed from Secondary School layout.
9	ECC	ECC welcomes reference in section 3.5 of the SPD to ensuring the security and privacy of education facilities is maintained at all times, and acknowledges that the SPD is seeking school fencing to respond to the character of each neighbourhood. However, ECC recommends that reference is also included to having consideration of the guidance set out in the ECC Developers' Guide to Infrastructure Contributions.	Schools	Additional wording to para 3.6.14:  <u>Further guidance on this matter can be found in the ECC Developers' Guide to Infrastructure Contributions.</u>
10	ECC	ECC notes the requirement for additional planting to the boundary with the Dunton Woods school (section 4.4.2 of SPD). It is recommended that the SPD makes it clear that this must be outside of the school boundary so as not to encroach on school site area or impose an additional maintenance cost on the school.	Schools	Guidance added - see point 3 in F12. School Interface
11	ECC	It should also be noted that if school buildings are used as part of the actual boundary, they cannot include windows, as this can cause a privacy and security risk. It is recommended that this is included in the SPD guidance	Schools	Guidance added to para 3.6.14: "3.6.14 All school fencing should also adhere to the neighbourhood character and ensure security and no overlooking is maintained at all times. It should also be noted that if school buildings are used as part of the actual boundary, they cannot include windows, as this can cause a privacy and security risk. Emergency access should be provided to school playgrounds. <u>Further guidance on this matter can be found in the ECC Developers' Guide to Infrastructure Contributions.</u> "
12	ECC	ECC supports the principle of car free environments around schools, which is referenced in both the SPD and FMP. However, it is considered that the site wide guidance set out in section 3.5 of the SPD and the mandatory principles in the FMP on this matter need to be strengthened. It is recommended that it states that pedestrian entrances will be from substantial traffic free 'squares' not directly bordered by any roads or car parking. Given that these (pedestrianised squares) areas do not form part of the school site areas such public realm must be well designed and connected with safe direct walking and cycling routes to the communities served. Any pedestrianised squares and surrounding areas should include public art, nature areas, play equipment, seating and local history information boards to create a sense of place and offer learning opportunities	Schools	Guidance added to FK5. Primary School Square, WK, WK, and OK5 WK6 WK7

13	ECC	It is considered that the text in section 3.5 specifically related to schools potentially contradicts the earlier guidance discussed above. Requiring school entrances, frontages, boundaries, and primary elevations to be designed to address streets can only be achieved if these streets are traffic free.	Schools	"illustrative layout" added added to school layouts in section 3.6 ( and FK4, FK5, WK6, WK7 and OK5)
14	ECC	The primary school square as set out in section 4.5.5 of the SPD is not considered to be a car free space. Pupils, and younger siblings waiting with parents at the start and end of the school day, should be able to run around the square in safety. Boundary hedges are noted but, if it is directly adjacent to roads, and it is considered that the square will form a honeypot for drop off by car and become an unpleasant arrival point which fails to make active travel the quickest and/or most pleasant option. It is not considered that school entrances will be opposite the neighbourhood hub as described in section 5.2 of the SPD as this would place it on the main spine road which is not car free.	Schools	FK5. Primary School Square revised to note that this area must be a car-free space, similar to other school sections.  "illustrative layout" added added to school layouts in section 3.6 ( and FK4, FK5, WK6, WK7 and OK5)
15	ECC	Both the primary and secondary schools in Dunton Waters as set out in section 5.5 of the SPD and in various layout maps in the FMP clearly show the spine road running alongside them in parts. It is considered that the car free zones shown in sections 5.5.6 and 5.5.7 of the SPD are inadequate, effectively being a wider footpath area adjacent to a road. It is recommended that the guidance in these sections of the SPD is stronger to ensure that an appropriate car free zone is provided in these locations and that drop off and pick up should be on foot and not by car.	Schools	"illustrative layout" added added to school layouts in section 3.6 ( and FK4, FK5, WK6, WK7 and OK5)
16	ECC	The car free zone proposed round the Dunton Woods school in section 6.5.5 of the SPD is also considered inadequate. The school entrance should face on to a substantial traffic free square which is not bordered by roads or car parking. The school is also bordered by roads on a number of its sides. Whilst it is acknowledged that road access is required for parking and deliveries, and separately for emergency access and grounds maintenance, these entrances must be away from where children will enter and exit the school site on foot.	Schools	"illustrative layout" added added to school layouts in section 3.6 ( and FK4, FK5, WK6, WK7 and OK5)
17	ECC	It is recommended that the guidance for car free zones around schools and their entrances is considered further in order to ensure that they are provided with a truly traffic free public realm, not just a wide path or square surrounded by road.	Schools	Following wording added to FK4 and FK5.  <b>"The Primary School Square must be vehicle free with the area around the main pupil entrances an attractive space that is entirely traffic free to facilitate social interaction and conneted by safe and direct walking and cycling routes to the community / neighbourhood they serve."</b>  "illustrative layout" added added to school layouts in section 3.6 ( and FK4, FK5, WK6, WK7 and OK5)
18	ECC	There is a need for all schools to have two separate vehicular entrances (away from the pedestrianised frontage). One will be for staff parking and deliveries and the other for emergency access and grounds maintenance. This should be reflected in section 3.5 of the SPD as well as the detailed sections relating to the individual schools within each neighbourhood, <b>as such matters should be part of the consideration of the design and layout of schools and their surrounding environment.</b>	Schools	Guidance added at 3.6 - Non-residential design. <b>3.6.11</b>

19	ECC	<p>Within the phasing and delivery sections of both the SPD and the FMP the secondary school is indicated to be located within Dunton Waters and would be in the second phase of the development. Until this time, pupils will need to access schools in Basildon and/or Brentwood. The provision of safe direct walking and cycling routes beyond the site boundary must be planned for and a school transport strategy developed which will not result in additional private car journeys or costs to the tax-payer.</p>	Schools	<p>Additional wording to the end of 1.3.16 could assist in making this connection –</p> <p><u><i>The provision of safe direct walking and cycling routes beyond the site boundary and school transport strategy are also essential to ensure pupils of the earlier phases of development can access schools in Basildon and/or Brentwood, until the secondary school is provided on site in later phases of the development.</i></u></p> <p>The same additional wording within para. 7.2.3 would also assist.</p> <p>In Table under para. 7.1.7 suggest moving second bullet (links through to Basildon – pedestrian/cycle and emergency access) under Phase 2 (2nd column) into Phase 1, and amend to <u><i>active and sustainable.</i></u></p>
20	ECC	<p>3.6 Non-Residential Design. Guidance and point b.</p> <p>This reads "Schools must be prominent buildings within the Garden Village, with clearly legible entrances, high quality internal spaces and child-friendly internal and external environments"</p> <p>This could be strengthened as the use of the words "prominant buildings" is considered ambiguous. They should be well designed first and foremost (prominent doesn't necessarily include a design element) but the critical feature is the environment around the school - attractive, facilitates social interaction, traffic/vehicle free and conneted by safe and direct walking and cycling routes. Again</p> <p>Suggest wording that is more aligned to that contained in WK6-7 and OK5 - with FK4 also reviewed to ensure consistency with WK6-7 and OK5. should be strengthened to read:</p> <p><u><i>"School buildings must be well designed, attractive, landmark buildings, with clearly legible entrances, high quality internal spaces and child friendly internal and external environments. Vehicle free "school zones" must be provided around schools with the area around the main pupil entrances attractive spaces that are entirely traffic free to facilitate social interaction and conneted by safe and direct walking and cycling routes to the community/neighbourhood they serve."</i></u> This would bring key</p>	Schools	<p>Text in green added to 3.6.</p> <p>WK6-7, OK5 and FK4 were reviewed for consistency</p>
21	ECC	<p>Word document - tracked changed version - 3.6.10 - last sentence - states "Cycle parking should be provided". This should be changed to "must" or "required". As worded there is conflict with T4 which requires cycle infrastrucutre and 3.2.49 (tracked word doc) which states "Non-residential uses will be required to inlcude cycle storage for both workers (internally) and visitors (which may be external)". Active travel to school is critical and cycle parking is required - must not "should".</p>	Schools	Text revised.

22		<p>WK6 and other policies where this is repeated - we note and support the point "A sports provision must be provided. This must be primarily for the use of the primary school, but should also be designed to support community uses, if needed in the future". Also see WK7 where "A sports provision must be provided. This is for the use of the Secondary School and the public."</p> <p>It needs to be made clear in the supporting text that the use of such facilities by the public will need to take place out of school hours and the school is not required to provide facilities that are over and above that required for the school, unless there is guaranteed funding/land from the developer and agreement with the school.</p> <p>Therefore ECC would also seek an amendment or consolidation with other points in WK7 which states "<i>Consideration should be given to how some spaces within the sports pitches could be used by the public during school hours, if needed. Separate entrances to supporting buildings/spaces could help facilitate this.</i>" The last point referring to funding arrangements is supported and would also apply to primary school "policies" to address the point raised above in WK6.</p>	Schools	Text added to WK6-7 and FK4
23	ECC	<p>Reference is made to community use of school facilities in sections 2.6, 3.9, 4.3, 4.5, 5.3, 5.5 and 6.3 of the SPD and within the Mandatory Spatial Principles set out in the FMP. ECC is supportive of this in principle, but it needs to be made clear, in both the SPD and FMP, that the detailed requirements need to be articulated and agreed, including the types of use and timings. If there are any financial costs or land implications these will need to be agreed in addition to the education contributions.</p> <p>Furthermore, the documents should consider referencing the need to also consider the implications for design and layout of additional requirements in respect of community use with school use, such as safeguarding, security, and out of hours use.</p>	Community Infrastructure	<p>The following guidance has been added to all school sections FK4, WK6 WK7 OK5.</p> <p><i>"Schools must act as key community facilities. Consideration should be given to how some spaces within the school, including the sports pitches, could be utilised for community uses both during off hours and during school hours, if needed. Separate entrances to supporting buildings/ spaces could help facilitate this."</i></p>
24	ECC	<p>The sports provision listed in section 5.5.7 of the SPD and within the mandatory spatial principles for play in the FMP are very specific and may not reflect what is required for such a site. Furthermore, it is unclear whether such facilities would require additional land to that specially required for the secondary school. Additional facilities beyond the specific school requirements will need a separate developer contribution including the extra land if necessary.</p>	Community Infrastructure	N/A
25	ECC	<p>It is recommended that the vision in the SPD includes reference to youth facilities. Children too old for play equipment but too young for paid community facilities are often forgotten. Such provision could include skate-board facilities; jam stands (where musicians can congregate and play), or outdoor gyms.</p>	Community Infrastructure	Guidance added in LD3- Play <a href="#">para 3.10.13</a>
26	ECC	<p>It is noted that in section 3.2 of the SPD there is reference to a controlled crossing for pedestrians / cyclists at the northern roundabout. ECC advises that a signalised crossing next to a roundabout is not particularly efficient, as this would result in there being effectively two junctions to negotiate not one, and this could have safety and capacity implications. If there is to be a controlled crossing, it will be necessary to review the access proposals as a whole. It is therefore recommended that this reference is amended to "crossing facilities, which are compatible with the access arrangement to the site, to be provided and to be agreed with the highway authority".</p>	Wording	Text added in D7. Pedestrian - Cycle Crossing (para 3.3.31)

27	ECC	<p>With regard to the eastern boundary of the site ECC has consistently advised that sustainable transport links are required to ensure the future onward connections to key service and employment destinations, including Basildon.</p> <p>It is noted from the plan in section 2.9 (and others) within the SPD and the mandatory masterplan layout plans in the FMP that future links to the east are indicated in general terms. It is considered that in order to secure such links the SPD and FMP need to be clear that such links should be safeguarded for pedestrian, cycling and passenger transport. These safeguarded routes should be shown on the relevant plans as up to the highway boundary without ransom strips. As currently drafted both the SPD and FMP do not make this position clear. Furthermore, it is noted that whilst three potential routes are shown to the northern and central parts of the eastern boundary, there are none shown to the southern part. The SPD and FMP should therefore include further sustainable links along the southern part of the eastern boundary.</p>	Sustainable Transport links	<p>Suggest following wording between paras. 2.9.10 as follows:</p> <p><u><a href="#">Future sustainable and active travel links along the eastern boundary of the site should be safeguarded, provided up to the highways boundary and without ransom strips.</a></u></p>
28	ECC	In respect of the northern boundary of the site, a connection to at least one of the existing Public Right of Way (PROW) via a bridge over the A127 or other options is crucial to connect the site to various PROW north of the A127 and provide necessary connectivity to the existing network for leisure purposes. This should be reflected in the SPD	Active Travel	Text added in D7. Pedestrian - Cycle Crossing (para 3.3.32)
29	ECC	The SPD and FMP in their phasing and delivery sections make reference to the mobility hub being provided within the first phase of development which is supported by ECC. However, in order to achieve the maximum behavioural change in travel the mobility hub should be provided from the outset of development. This should be explicitly referenced as one of the essential pieces of infrastructure to be delivered from the outset in 7.2.4 of SPD	Mobility Hub	<p>Text added to para 7.2.3</p> <p>7.2.3 Self-sufficiency and sustainable behaviours should be established early on during Phase 1, and it is to set the tone for the rest of the development. Attractive and safe active travel links and public transport to West Horndon Station must be planned in from the outset and completed before Phase 1 can be occupied. In addition to improved access to the A128 and north across the A127 for walking, cycling and bus stops, a new bus route must be provided through part of the site to give residents, workers and visitors realistic opportunities to make car-free journeys. The provision of safe direct walking and cycling routes beyond the site boundary and school transport strategy are also essential to ensure pupils of the earlier phases of development can access schools in Basildon and/or Brentwood, until the secondary school is provided on site in later phases of the development.</p>
30	ECC	Whilst it is acknowledged that the opening hours of the mobility hub may not be a level of detail that should be included in the SPD or FMP, matters such as 24hour service / security / lighting will have implications for its design and layout, and land take, and as such should be considered within the SPD.	Mobility Hub	<p>Sfety and lighting added to guidance of Mobility Hub:</p> <p><b>"5. The mobility hub must be well designed. The design must ensure that the mobility hub is safe and well-lit"</b></p>
31	ECC	It is recommended that paragraph 4 under Sustainable Movement of Section 1.3 of the SPD should read: 'The proposed road movement network will establish a sustainable hierarchy of transport modes...'. This is necessary to ensure that pedestrians and cyclists are considered first followed by public transport and then the private car.	Wording	Text updated in para 1.3.16
32	ECC	Furthermore, it is recommended that references to 'street hierarchy' in the SPD should be amended to 'movement hierarchy'. The emphasis of section 3.2.1 should be changed so that it is not "roads" that should provide a legible and permeable environment, rather it is the whole design of the development, with roads being the last consideration. Street Design is considered too traditional an approach and will lead to car dominated streets. This is also relevant to section 2.9 of the SPD with the emphasis also on the plan starting with a network of streets and that other infrastructure fits round that. The development instead should start by planning pedestrian and cycle connections between destinations within the development and work from there.	Wording	Bullets under 2.9 re-ordered to show emphasis on sustainable travel.

33	ECC	The last paragraph in the connected routes section of the SPD (under 2.9) refers to connecting to existing footpaths and bridleways (public rights of way, PROW). The wording here needs to be changed so that unless a PROW is to remain a very low key recreational route, it should be converted to an adopted pedestrian and cycle route, which is hard surfaced and lit.	Wording	Text updated. <a href="#">Para 2.9.11</a>
34	ECC	It is noted that a mobility strategy and sustainable movement strategy are referred to in the FMP. It needs to be made clear in the SPD that these documents are key to ensuring the behavioural change in travel patterns that the development is seeking to achieve are realised. The details of such documents are likely to have implications for the design and layout of development which is what the SPD is seeking to achieve.	Sustainable Transport links	Mobility strategy and sustainable movement strategy added to list at PD3
35	ECC	ECC supports locating specialist accommodation close to local facilities to avoid isolation, as set out in section 3.6 of the SPD, however 800m is probably too far for many people living with disabilities to walk unassisted. Therefore, ECC would support a more suitable target distance such as 400m.	Active Travel	Text updated. <a href="#">Para 3.7.4</a>
36	ECC	Under 'movement and circulation' in section 2.1 of the SPD the following change should be made '...various <b>moves modes</b> of transport...':	Wording	Text updated. <a href="#">Now 2.1.12</a>
37	ECC	ECC supports the provision of electric charging infrastructure within the site in principle, however it recommended that the guidance is strengthened to make it clear that the <b>design of such infrastructure should ensure that electric charging points are located off the highway and do not result in cables potentially trailing over a footway or cycle route obstructing the highway. The incorporation of charging points into highway adopted lamp columns will not be permitted by the Highway Authority.</b>  <b>The SPD also needs to include more detailed on the design and location of technology and infrastructure, to ensure that the site is futureproofed for advancements in technology. The design, location and requirement for maintenance, replacement, upgrades should be considered as part of the overall design and layout of development.</b>	Sustainable Transport	Guidance added to SD5 (para 3.8.28) and T5 (para 3.2.58)
38	ECC	All dwellings must be within 400m of a bus stop. It is unclear from the SPD and FMP whether this has been achieved.	Bus Route	Guidance added in para 1.3.15. It is already included as a bullet point under T3 (Bus Network)
39	ECC	ECC as the Highway Authority can confirm the required carriageway width for any bus route is 6.75m as set out in guidance no.1 in section 3.2.2 of the SPD. The drawing accompanying this section should be amended to reflect this, currently it is showing as 6.7m. All key bus routes within the site must also be of the appropriate specification to accommodate future rapid transit services. It is recommended that guidance no.1 in section 3.1.3 of the SPD is amended to include the following 'around the site, and to all key destinations outside the site. This is essential in ensuring that the services provide the appropriate travel choice for the residents of the development.	Bus Route	Text and drawing updated. <a href="#">Under D2 1st bullet &amp; T3 Guidance 1st bullet</a>
40	ECC	ECC reiterates its earlier comments in relation to the requirement for safeguarded sustainable routes along the eastern boundary of the site. This should be reflected in all relevant drawings / plans within both the SPD and FMP. This also applies to the PROW link at the northern boundary of the site.	Active Travel	Text added as suggested:  Future sustainable and active travel links along the eastern boundary of the site should be safeguarded, provided up to the highways boundary and without ransom strips.

41	ECC	It is considered that the movement and circulation plan in section 2.9 of the SPD shows limited pedestrian and cycle links. This should be amended to include a comprehensive network of pedestrian and cycle routes to ensure connectivity throughout the site, and enable the occupiers and users of the site to conveniently access the village centre, neighbourhood hubs, employment areas, and leisure and community facilities. The SPD should make it clear that such routes will need to be hard-surfaced and lit. For example, the majority of Byway no.67 would need to be converted to an adopted pedestrian and cycle route. Leisure routes for example around parks/lakes or dog walking routes can remain as PROW.	Active Travel	additional text in FP2 3rd & 4th bullets, WP2 5th & 6th bullets, OP2 bullet 2,
42	ECC	The design plan in section 4.2 of the SPD appears to show the Byway No.67 as a car-free route. This Byway is a byway open to all traffic and is protected as such. To make this a car-free route would require a change in designation.	Active Travel	Diagrams have been updated to "illustrative"
43	ECC	It is recommended that the SPD includes guidance which ensures that the design and layout of the development enables any remote footway/cycle route through a green corridor to have natural surveillance and be lit so that it is a safe route for pedestrians and cyclists.	Active Travel	Guidance added. See para 3.2.6.
44	ECC	However, the location of the parking needs to be considered. This cannot be implemented on its own, it has to be with a package of measures to prevent parking overspilling onto streets and public areas. Reducing parking at the "origin" has previously not resulted in lower car ownership, merely resulted in indiscriminate parking and congestion on the surrounding road network. <i>ECC is currently working on proposals for walkable neighbourhood where there is a central car free core around the village and neighbourhood centres. Access would be permitted for deliveries and drop off and pick up of goods, but parking would be the periphery of the car-free zone in parking areas with unallocated spaces. These parking areas could then be re-purposed in future years as mode share changes and there is less need/demand for private cars. It is recommended that these principles are appropriately and consistently reflected in the SPD</i>	Parking	Guidance updated to refer to Essex Design Guide in T5 (vehicular parking). <i>Guidance updated to refer to the emerging Essex Garden Village Parking Standard, or latest adopted document, has been added to section T5. Car Parking (para 3.2.54).</i>
45	ECC	Reference to "private parking levels to be reduced" in section 3.1.2 needs to be clarified.	Parking	Text updated <i>in para 3.2.20 and 3.21.</i>
46	ECC	The frontage guidance in sections 4.6, 5.6, and 6.6 of the SPD are noted. It is recommended that these should not be designed to be open hard-surfaced areas where cars could be parked and left.	Parking	Guidance in FA2, WA2 and OA2 updated:  All frontages must include some elements of soft landscape, in addition to well-designed hardscape, <i>and must be designed to discourage its use as parking for vehicles.</i>
47	ECC	Throughout the SPD it is recommended that it is made clear that cycling provision should comply with Local Transport Note LTN 1/20 cycle infrastructure design.	Active Travel	Guidance added in <i>3.2.46</i> and guidance box.
48	ECC	It is also recommended that the SPD makes it clear that when designing traffic calming measures regard should be had to the Traffic Calming Regulations.	Road Network	New para 3.3.7 which refers to locations where traffic calming is to be considered:  Calming measures at junctions with external roads and access routes to key places such as schools and the Innovation Park should be considered. <i>When designing such measures regard should be had to the Traffic Calming Regulations.</i>  This is also reflected in D6
49	ECC	Section 3.2.4 ( <i>now D4</i> ) of the SPD recommends a carriageway width of 4.5m. Past experience has shown that such a width is too narrow (unless remote parking is provided and no parking is permitted in any circumstance along the whole route), with difficulties for refuse and delivery vehicles using these routes, particularly if there is any on-street parking which is likely to occur if there is restricted on-plot parking (unless there are continuous parking bays all along the street).	Road Network	<b>Amended D4 (residential street) to 5.5 m</b>



50	ECC	The SPD provides site wide and neighbourhood area guidance on the provision of street trees and planting. Where and how such features are planted are important considerations, as they require suitable space and environments to establish, thrive and survive, and need to take into account the impact on the highway and properties such as root damage, visibility and safety. As currently drafted the SPD seeks to provide blanket guidance on the location and design of such planting, which is not considered to adequately cover the points raised above. It is therefore recommended that the SPD guidance on this matter is strengthened to make it clear that such matters need to be taken into consideration. It is also recommended that the SPD makes it clear that the provision of such street planting should be maintained through commuted sums.	Road Network	Guidance (as suggested by BBC) added to 3.10, FP1, WP1, and OP1 <b>2. The location of such features should be informed by the need for suitable space and environments to establish, thrive and survive, avoiding negative effects on the highway and properties from potential root damage, and visual impairment and safety compromise.</b>
51	ECC	<b>It is noted that a variety of surface materials are proposed within the detailed neighbourhood sections of the SPD, and it is acknowledged that this relates to designing to suit the character of each neighbourhood. The provision of such choice of materials will require provision through commuted sums, which should be set out in the relevant sections of the SPD.</b> In respect of the surface materials described in the public realm sections of the detailed neighbourhood guidance it is recommended that the wording is strengthened to make it clear that all paths which provide a key link between areas must be hard surfaced and lit. <b>Paths which are surfaced in self-binding gravel with no edging or unmachined log edging through to informal bark mulch paths through woodland areas must only be for lightly used leisure and recreational use.</b>	Road Network	Guidance added to sections FP2, WP2 and OP2 (Streetscape Materials)  Catch all phrase relating to commuted sums added to guidance in 7.3 guidance box  "Similarly, planning proposals should be able to demonstrate how their design and specification aligns with these stewardship arrangements and/or any supplementary arrangements (such as for highways and schools). In particular, this should have regard to suitable funding arrangements such as the associated provision of commuted sums to cover ongoing maintenance."
52	ECC	It is noted that the SPD provides detailed guidance on a range of street furniture (sections 4.7.3, 5.7.3 and 6.7.3). The adoption of such features will need to be agreed with the Highway Authority.	Road Network	Guidance added under FP3, WP3 and OP3:  <u><b>Engagement with the Highway Authority is required when designing and locating street furniture.</b></u>
53	ECC	However, it is recommended that no.4 of the guidance contained in section 2.7 of the SPD is amended to reflect the wording of the objective in this section as follows: 'Lower densities are required at the <b>other</b> edges of the development, to...'. As currently drafted it contradicts no.3, as the A128 is one of the edges of development.	Wording	Text updated.
54	ECC	Section 2.3 of the SPD on landscape-led development, and the landscape and green and blue infrastructure analysis set out in chapter 4 of the FMP and the mandatory landscape principles 12 and D set out in chapter 5 have sustainable drainage SuDS provision very generalised and focused on centralised attenuation features to serve multiple adjacent residential parcels. The SPD and FMP should allocate additional spaces for SuDS within land parcels to allow source control measures and water quality improvements. They should also address rainwater/storm water reuse as a potential option/solution to manage surface water flooding, as this is vital to support SuDS strategy and mitigate flood risk.	SUDS	Text added to para 2.3.6, 4.3.8 (FL2), F12 (general guidance on SUDS), 5.3.10, 5.4.4 and 6.3.9:  <b>Development should seek to provide not only centralised SUDS attenuation features to serve multiple adjacent residential parcels, but also additional spaces for SUDS within land parcels to allow source control measures and water quality improvements. They should also address rainwater/storm water reuse as a potential option/solution to manage surface water flooding. SUDS solutions may vary across the site depending on factors such as topography and infiltration.</b>
55	ECC	The LLFA recommends that reference to green/blue roofs, bioretention areas, and the encouragement of water reuse for irrigation, cleaning, or flushing toilets should be included in the new SuDS features text in section 3.9.4 of the SPD. Consideration should also be given to above ground feature when designing SuDS.	SUDS	Updated on 3.9.4 -59 (page 86) of PDF <a href="#">now 3.10.22</a>
56	ECC	Whilst the SPD and FMP identify a number of SuDs measures and mitigation there is limited detail or evidence to support whether they can be delivered and in certain locations. There may be issues such as with topography or infiltration that may make the measures impractical to deliver. It is therefore recommended that both the SPD and FMP provide some additional detail to support why the proposed features are feasible in these locations.	SUDS	added para 2.3.7 <b>Sustainable Drainage Systems should be designed in accordance with the "Sustainable Drainage Systems Design Guide" (Essex County Council. February 2020)</b>
57	ECC	The LLFA welcomes the SPD guidance in section 4.5.5 of the SPD which seeks to retain the existing pond, however further details should be included in this section to address issues related to public health and safety.	Blue Infrastructure	Text updated - see para 3.10.23 (LD4. Sustainable Drainage), <b>including reference to health and safety.</b>

58	ECC	SuDS design should also work with SuDS drainage hierarchy. Rainwater and storm water reuse helps to control discharge volumes, helps to mitigate water scarcity, and reduce portable water demand. These elements should be addressed appropriately while designing SuDS and the LLFA recommends that this is included in the relevant sections of the SPD (4.3, 5.3, and 6.3), together with reference to the ECC SuDS Design Guide.	SUDS	covered off above. Guidance relating to the drainage hierarchy and referencing the ECC SuDS Design Guide has been made in section LD4. Sustainable Drainage (this is sitewide guidance, and note siite specific) - para 3.10.22
59	ECC	It is also recommended that the landscape design sections of the SPD and chapter 4 of the FMP should consider more opportunities to incorporate SUDS at the northern part of the site.	SUDS	Simialr point to row 55 above, already addressed.
60	ECC	Rainwater harvesting for non-residential development and mixed use areas should also be considered wherever possible.	SUDS	Added as guidance in para 3.11.19 Now 3.10.24
61	ECC	Along with the Brentwood Local Plan, the Development Plan in Brentwood also comprises of the Essex Minerals Local Plan 2014 (MLP) and the Essex and Southend-on-Sea Waste Local Plan 2017 (WLP). When determining a planning application, decision makers must also consider the policies within these two plans, as relevant. It is therefore recommended that this is referenced within section 1.1.2 'Planning Policy Background' of the SPD. The emerging SPD must also demonstrate conformity with these two documents. It is recommended that this is set out in section 1.2 of the SPD.	Wording	Text added to para 1.1.15:  "The Development Plan in Brentwood also comprises of the Essex Minerals Local Plan 2014 (MLP) and the Essex and Southend-on-Sea Waste Local Plan 2017 (WLP). Development proposals will need to comply with the policies set out in both documents."
62	ECC	Reference should also be made in the SPD that the MWPA requires applicants to undertake a Mineral Supply Audit and to prepare an appropriately detailed waste management strategy through a Site Waste Management Plan (SWMP) to address waste management issues.	Wording	SWMP and Mineral Audit List added to List (PD3)
63	ECC	ECC welcomes the inclusion of an Employment Hub in Dunton Fanns, the first neighbourhood to be developed. However, concerns remain about Dunton Waters and Dunton Woods looking away from Basildon to the east in terms of sustainable travel to employment opportunities. It is not considered that the mobility strategy enhances access to significant employment opportunities / amenities in Basildon urban area. ECC does however welcome improved access to employment at East Horndon Hall and to West Horndon railway station.	Employment Hub	All points allready considered above
64	ECC	The developable area plan in section 2.2 of the SPD and the land use plan in section 2.6 are considered to be unclear. The dedicated employment hub now appearing to have a residential element to it, which is not replicated on other plans. This is also the case with of the FMP. Furthermore, the FMP proposes that these non-residential units would attenuate noise for residential units further south and west, so this requires further explanation.	Employment Hub	Diagrams have been updated, and residential areas added.  The layouts are indicative.
65	ECC	No land use budget is provided within section 2.6 of the SPD. It is recommended that this is included in order to be able to confirm whether the equivalent of 5.5ha of employment land will be achieved.	Employment Hub	Guidance on the mix of employment uses added to para 2.6.20  An area of employment units is shown on the Key Spatial Plan in the north west corner of the site, within Dunton Fanns. It is described as an Innovation Park, where multiple employment types can be provided together to provide a wide range of new jobs and business opportunities within the village. Within the Innovation Park, where uses are supported by appropriate servicing and facilities, and would not harm the amenities of the nearby residents, a greater mix of employment uses will be permitted within Use Class E (Commercial, Business and Service), B2 (General Industry) and B8 (Storage and Distribution). These may take the form of offices, industrial units, research & development facilities, or hybrid workspaces. This area may also include some supporting uses for example small unit food and drink provision.

66	ECC	The land use plan in section 2.6 of the SPD also refers to two innovation Parks and the text within this section makes reference to employment areas elsewhere on the site. It is recommended that the SPD provides clarity on what characteristics and support they will have to foster innovation, such matters can have implications for the design and layout of development. The location of one of the areas is questioned given it appears to be along a service road.	Employment Hub	There is only one innovation hub (north west of the site) although there are other opportunities for employment areas within the local centre's. Characteristics of the main hub are provided in Section 4.5 FK9.
67	ECC	It is considered that the service road is an effective solution for avoiding goods vehicle movements through residential areas; however, the SPD does not provide sufficient guidance on how negative impacts of service roads on the environment and amenity for residential uses can be mitigated by good design, particularly given the land use plan is indicating employment and residential uses along part of this route.	Employment Hub	Guidance added to FK9 Innovation Hub:  8. The Innovation Park must be serviced through a separate route to the rear which must allow for all movement of larger vehicles at all times <b>without impact to homes, front entrances to business and without threat to cyclists and pedestrians.</b> 9. <b>Negative impacts of service roads on the environment and amenity for residential uses must be mitigated by good design, and addressed in detailed proposals</b>
68	ECC	It is suggested that additional wording could be added to section 3.3 and 3.6 of the SPD making reference in more detail to ensure the provision of flexible and adaptable spaces to support homeworking is suitably considered as part of the design process. For example, in larger properties, a dedicated study may be provided, or bedrooms and garages may be designed to facilitate conversion. In smaller properties, partitions on landings or in bedrooms could provide quiet space away from other household activities.	Housing Design	Text added in para 3.4.19 <b>now 3.4.18</b>
69	ECC	With regards to the text under 'community and employment buildings' in section 3.5 of the SPD it is recommended that this is expanded to include reference to the fact that applicants should engage with the local community to consider whether community assets can provide touchdown space for remote workers – offering desk space, broadband connectivity, refreshments, meeting rooms and printing facilities. Business plans should be prepared early in the design process, to ensure ongoing financial sustainability. Transferring assets to the third sector may give service providers collateral for borrowing to support expansion and improved outcomes in future.	Community and Employment buildings	Text added in Para 3.6.17 <b>"Applicants are advised to engage with end users during the design process for community buildings, to build a comprehensive understanding of their needs to inform the proposals."</b>
70	ECC	ECC welcomes the commentary on flexible and adaptable ground floor uses in section 3.5 of the SPD. It is recommended that additional relevant design measures are included such as unit sizes and construction should facilitate subdivision, broad spans between columns with consolidation of mechanical and electrical services, floor-to-floor heights that allow a variety of economic activity and provide potential for mezzanine floorspace, floors with higher specifications for loading and vibration, doors / lifts that facilitate loading and unloading of goods and plant, and security measures conducive to storage of high value stock and plant. It should also be noted that not all floorspace needs to have the same level of flexibility.	Community and Employment buildings	Guidance added to para 3.6.2: <b>"It is recommended that these spaces should have unit sizes which would facilitate subdivision, broad spans between columns with consolidation of mechanical and electrical services, floor-to-ceiling heights that allow a variety of uses and potential for mezzanine floorspace, floors with higher specifications for loading and vibration, doors / lifts that facilitate loading and unloading of goods and plant, and security measures conducive to storage of high value stock and plant. It should also be noted that not all floorspace needs to have the same level of flexibility."</b>
71	ECC	ECC welcomes the commitment for high quality broadband connectivity to be provided serving all homes, employment/commercial areas and community buildings within the FMP. However, this is not built upon with the SPD, which only references broadband in relation to homes. It is recommended that the SPD is strengthened to ensure that it is clear that designing in high quality broadband applies to all buildings.	Broadband	Wording added in guidance box under 3.6 (non-residential design) to cover this point:  <b><u>All buildings (including residential, commercial, community etc) must be designed and provided with Full Fibre to the Property (FFTP).</u></b>  Bullets in 3.7 guidance box (adaptable and connected communities) revised to make this point:  <b><u>All buildings (including residential, commercial, community etc) must be designed and provided with Full Fibre to the Property (FFTP) <del>Homes should have fast broadband connections-</del></u></b>  <b><u>All homes should have <del>fast broadband connections and</del> internal space to enable home working.</u></b>
72	ECC	Concerns remain around the impact of village squares / greens on footfall for non-residential occupiers. There does not appear to be any outdoor table and chair areas space for cafés, bars and restaurants.	Village Centre	Added to section 3.5 - Non-Residential Design <b>Also in 3.6.6</b>

73	ECC	It is considered that the wording relating to “warehouse-style” buildings in section 3.5 of the SPD needs refining. It is recommended that the guidance clarifies that double-height spaces may be acceptable if the façade / entrance is at a human scale. <a href="#">It is also considered that further clarification is required in relation to the guidance in section 3.5 in relation to embedded frontage and legible entrances, as this can become somewhat contradictory.</a>	Architectural Design	Text updated - see para 3.6.19 <a href="#">now 3.6.20</a>
74	ECC	Section 7.1 of the SPD indicates that up to 1,500 homes could be delivered before the innovation hub. The ECC Developers' Guide to Infrastructure Contributions requires occupation of housing for each phase to be tied to successful delivery of employment floorspace (rather than simply marketing employment land). It is recommended that this is included within the SPD and FMP and they are underpinned by a local industrial strategy in order to demonstrate how a realistic target level of self-containment will be achieved. This is particularly important at DHGV to avoid reliance on other local employment areas, where delivery timescales are uncertain, to provide employment opportunities (e.g. West Horndon Industrial Estate, East Horndon Hall and Brentwood Enterprise Park). It is recommended that occupation of housing for each phase should be tied to successful delivery of employment floorspace.	Employment	Reference to these requirements added to the list in PD3.
75	ECC	ECC welcomes the consideration of land ownerships; however, the Phasing and Delivery Strategy should be underpinned by long-term financial modelling and taking account of land ownership / development agreement boundaries. Development agreements need to be in place to ensure land value equalisation. This should be provided at the earliest opportunity.  There is currently no detailed commentary on delivery of employment uses in the FMP and SPD. Any delivery strategy will be dependent on evidence of viability of employment uses on a standalone basis and/or through cross-subsidy between uses. It is therefore recommended that clarification on how the equivalent of 5.5ha of employment, including the mix of uses, will be achieved on site.	Employment	Additional guidance added to PD2 Phasing and Delivery Strategy guidance box:  <a href="#">The PDS should include long-term financial modelling, land ownership / development agreement boundaries, development agreements for land value equalisation, evidence of viability of employment uses (standalone basis and/or through cross-subsidy between uses), how the equivalent of 5.5ha of employment, including the mix of uses, will be achieved on site.</a>
76	ECC	<a href="#">ECC supports in general the principles set out in section 3.7.2 – low carbon development of the SPD. Such measures must be designed from the outset to reduce as far as possible all emissions so as not to further add to the challenge of becoming net zero later as all emissions add to the lifetime emissions of the development.</a> Furthermore, consideration should be given to setting a more ambitious target for Net Zero Carbon in the SPD. The Interim Report by the Essex Climate Action Commission (November 2020) recommends that all new homes and commercial buildings to be carbon zero by 2025 and carbon positive by 2030.	Sustainability	Point already addressed above - Same point as earlier regarding ECC cabinet approval of ECAC recommendations.
77	ECC	ECC supports in general the principles set out in section 3.7.3 – adaptation to climate change of the SPD. Sustainable energy systems and supplies should be designed into the layout of developments and homes. Consideration should also be given to including guidance in section 3.7 of the SPD on renewable energy at a wider site level.	Sustainability	Guidance added to SD3 Adaptation Climate Change  <a href="#">The overall design and layout of development must incorporate measures to adapt to climate change and give consideration to how wider site level renewable energy is integrated.</a>

78	ECC	ECC welcomes reference in section 3.7.2 of the SPD to the provision of battery storage and centralised heating systems. Further consideration should also be given to including guidance within section 3.7 of the SPD to how smart infrastructure and renewable sources of energy can be integrated into the communal areas, such measures should be incorporated at the design stage and accommodate the related infrastructure not only inside and on individual buildings, but within the wider community layout.	Sustainability	Text added to para 3.2.40:  Creating an attractive, modern bus network means minimising waiting time and inconvenience for users. Real-time information systems should be included in buses to provide passengers with estimated arrival times across a range of different platforms. The information should be driven by location-based systems, for example, GPS tracking devices on vehicles, which are increasingly utilised by bus operators. This information should be available for individual users in their homes (for example through display panels or mobile phone apps) and at the Mobility Hub. <b>Consideration during the design stages should be given to how smart infrastructure could be integrated not only into individual buildings but also within communal areas and the wider community layout.</b> Buses should also be equipped with charging points for smartphones and Wi- Fi. This will minimise “down time” and allow commuters to be productive whilst travelling, which will result in public transport an attractive and time-saving option for commuters compared to private car use.
79	ECC	Furthermore, whilst it is acknowledged that section 3.7.2 of the SPD makes reference to designing from the outset to take advantage of new fossil fuel free heating systems, it is recommended that its wording is also strengthened in this regard, and makes reference to the preparation of an energy statement as set out in the FMP.	Sustainability	Additional wording to paras 3.8.9 and 3.8.11 - it shouldn't be ' <del>consideration ...</del> ', it should be ' <b><u>the development must be designed to be completely fossil free from the outset</u></b> '.
80	ECC	ECC has no objections to the principles and guidance in respect of green infrastructure as set out in section 2.3 of the SPD, and as set out in the relevant sections on each of the neighbourhoods. However, it is noted that the associated plan in section 2 does not appear to be a true representation of what is to be delivered, as the landscape plans set out later in the document provide further details of habitats and typologies.	Green Infrastructure	<b>Para 2.3.14 added "2.3.14 The adjacent indicative masterplan illustrates the sitewide general landscape features. For more detailed landscape guidance, please refer to sections 4, 5, and 6."</b>
81	ECC	ECC supports in principle the use of street trees and planting within the street scene as described in section 3.2 of the SPD. However, it is recommended that the SPD makes clear that such provision should be maintained through commuted sums. It is recommended that the use of amenity grass (low biodiversity value) should be avoided and replaced by features with high biodiversity value (e.g. amenity grassland with bulbs/naturalised grassland and flowering lawns). Flowering lawns provide visual interest, improve biodiversity value, establish quickly and are easy to maintain long-term.	Green Infrastructure	Guidance added to section 7.3 <b>"Similarly, planning proposals should be able to demonstrate how their design and specification aligns with these stewardship arrangements and/or any supplementary arrangements (such as for highways and schools). In particular, this should have regard to suitable funding arrangements such as the associated provision of commuted sums to cover ongoing maintenance."</b>
82	ECC	Given the guidance note of 'accentuating and complimenting the existing site features' ECC welcomes the additional areas of woodland proposed and other new habitat types that will ensure a rich matrix is provided. The guidance notes are considered flexible in their approach, though ECC would recommend that reference to tree loss 'losses must be mitigated' (section 3.9.1) should also include "to plant at least two new native trees for every tree removed" or similar. Furthermore, where reference to hedgerow loss 'losses must be mitigated' is made in this section of the SPD it should also include "to plant the same length of native hedgerow" or similar.	Green Infrastructure	Guidance added to LD1 Biodiversity  <b>2. Ancient and broadleaved woodlands and veteran trees within the site must be retained. Existing grade A and B trees must be retained wherever practical. Losses must be mitigated, including the planting of at least two native trees for every tree removed</b> <b>3. Existing hedgerows must be retained wherever practical. Losses must be mitigated, including the planting of two native hedgerows for every hedgerow removed.</b>
83	ECC	ECC generally supports the guidance set out in section 4.4 of the SPD. However, it is noted that proposals in section 4.4.2 - School Interface include "tall evergreen shrub planting" outside the boundary. Though the shrub planting is supported, this should be a mix of evergreen and deciduous planting to ensure the scheme is sympathetic to the surrounding landscape character. Furthermore, such additional planting must be outside of school boundary so as not to encroach on the school site area or impose an additional maintenance cost on the school.	Green Infrastructure & Schools	Guidance added to FI2 (School Interface)  <b>3. The outside of the boundary must be heavily planted with a mix of evergreen and deciduous planting.</b> The additional planting must be outside of the school boundary so as not to encroach on the school site area.

84	ECC	ECC seeks clarification on how the ancient woodland has been assessed. The objectives in section 6.3.1 of the SPD include a requirement for a 15m buffer of new woodland planting either side of the woodland corridor. 15m is a national guidance (Ancient woodland, ancient trees and veteran trees: protecting them from development) minimum to avoid root damage. Therefore, where an assessment shows other impacts are likely to extend beyond this distance it may be necessary to need a larger buffer zone.	Green Infrastructure	Text added to para 6.3.2:  "A 15m minimum buffer of new woodland planting should be established to either side of woodland corridor. The exact width of the planting buffer will need to be informed by detailed surveys and must be agreed with planning officers during the planning stage."
85	ECC	Both the SPD and FMP need to be clearer on ensuring that housing and communities are accessible and inclusive over the life course and enable people to age in place and age well.	Specialist Accommodation	this is now covered under 3.7.4 to 3.7.8
86	ECC	ECC recommends explicit reference in the SPD to the importance of the developer and BBC working with ECC to ensure specialist accommodation is provided at the right scale, location, and design within the Garden Village.	Specialist Accommodation	Text added to para 3.7.9:  <u>Engagement with ECC is required to ensure specialist accommodation is provided at the right scale, location, and design.</u>
87	ECC	ECC welcomes the inclusion in section 3.6 of the SPD to dwellings being wheelchair accessible (Part M4 Category 3 of the Building Regulations), but recommends that reference is also be made to giving consideration to standards such as the Lifetime Home Standards, Building Regulations Part M4 Category 2 (Accessible and Adaptable Dwellings).	Specialist Accommodation	Additional wording added to para.3.7.8:  A range of house types should be provided, including single storey homes, <del>and</del> M4(3) housing with wheelchair accessibility, <u>and Building Regulations Part M4 Category 2 (Accessible and Adaptable Dwellings)</u> .
88	ECC	Being close to neighbourhood centres is not just about access to services and facilities but also to allow residents to feel like they are part of the community rather than living separately. ECC consider that the SPD should encourage the co-location of specialist accommodation with market housing. Specialist accommodation with communal facilities can also be designed to share spaces with other services such as community centres. Ideally all neighbourhoods should be designed to ensure that people with physical or sensory impairments are able to freely move around safely and with confidence.	Specialist Accommodation	Updated in section 3.6. Inclusive design covered in 3.8 <del>now</del> 3.7.5
89	ECC	ECC considers that the guidance in the SPD and the mandatory principles could be strengthened in places and recommends a number of matters to be added. These include guidance on how the design of accessibility should be considered for those with mobility and sensory impairment. Reference to the provision of healthcare facilities should make it clear to applicants and decision makers that discussion on design and location of such facilities should include NHS estates teams and other public sector organisations, and the sharing of community facilities should include the ability to explore / include uses such as education and learning opportunities.	Inclusive Design	Text added to 3.9 - Inclusive Design
90	ECC	ECC recommend that the SPD and FMP make it clear that ECC as an infrastructure and service provider for Brentwood borough, as well as other relevant infrastructure providers, must be party to any discussions and agreements regarding the delivery and phasing of relevant infrastructure.	Phasing & Delivery	Section 7.2 - reference to all relevant infrastructure providers including ECC inserted into para 7.2.40 'The Master Developer will be expected to prepare an Infrastructure Delivery Statement <u>'in consultation with all relevant infrastructure providers'</u> which....' The bullets under 7.2.35 should also contain similar references - <u>'working with all relevant infrastructure providers to ensure provision of the right infrastructure, in the right locations, at the right times'</u>
91	ECC	Para 7.2.7 - check with colleagues on additional wording - as above SPD needs to be clear on ECC, as an infrastructure and service provider for Brentwood borough, must be party to any discussions and agreements regarding the delivery and phasing of relevant infrastructure		Wording of para 7.2.27 amended
92	ECC	PD3 list - should include Land Compliance Study (for all education facilities), SUDS Strategy, Mineral Supply Audit, Site Waste Management Plan, Land Use Budget, Phasing and Delivery Plan, Local Industrial Strategy		Documents added to PD3 List Text added "The list below sets out some of the key documents/information to be submitted in support of applications. This list is not exhaustive and further requirements may be identified during the pre-application stage, whereas SOME OF THESE documents might not be required, depending on the scope of the application. "

93	CEG	Length and Structure: The SPD needs to be considerably cut down in length to make it more user friendly, focused, and effective. There is too much guidance (it currently has 666 specific points of guidance) that is often repeated between sections.	SPD Format	The design team has tried to compress some of the text and eliminate repetition, where possible.
94	CEG	The primary reason for the length of the SPD appears to be as a result of repetitive and unnecessary guidance. This duplication is unnecessary and has had led to some inconsistency in what is required. For example, Sections 2.0 and 3.0 details site wide guidance and is supported by Sections 4.0 to 6.0 which go on to detail specific requirements for each of the three neighbourhoods. However, much of the text and guidance in Sections 4.0 to 6.0 is repetitive and essentially repeats much of the guidance in Section 3.0 as shown, for example, in Table 2.1. In this case, there is only the need for the guidance points in Section 3.0. A better approach here would be to combine many of the guiding design principles and apply them to all three neighbourhoods (i.e. combining much of Section 3.0 with Sections 4.0 to 6.0); highlighting any specific or unique architectural design guidance as appropriate.	SPD Format	Paragraphs have been numbered in the SPD and repetitive sections were removed/ revised where possible.
95	CEG	Overall, a shorter SPD that uses more visual material and local examples, combines many existing sections, and reduces the number of guidance points would create a far more focused document. This in turn would improve its effectiveness as a piece of guidance.	SPD Format	Choice of imagery has been revised to better reflect the context of Brentwood.
96	CEG	The SPD is in places disjointed and needs to better cross reference and explain its contents. For example, a simple improvement would be to have paragraph numbers to enable cross referencing.	SPD Format	Paragraphs have been numbered in the SPD.
97	CEG	The language used is far too rigid in places and the guidance too prescriptive. There will be a need to respond to changing circumstances over the prolonged delivery time of DHGV.	Prescriptive Guidance	Wording was reviewed where possible
98	CEG	The language used need to be more precise and consistent throughout the SPD. Some of the drafting issues may be because different people have written different sections. As a result, the draft SPD does not read as one comprehensive document and it makes it difficult to navigate and respond to.		Wording was reviewed where possible
99	CEG	1. The phrase 'planning application' is used throughout the draft document in multiple contexts. The SPD needs to be updated to be clear what type of application is being referred to. In the view of CEG the SPD guidance is to be very much directed at detailed applications with the principles for an outline application established by the FMD;	Wording	A reserved matters application is a type of planning application. The text does not note "full planning application". This also provides the SPD with some flexibility, should a full planning application be put forward in the future.
100	CEG	2. The plans in the SPD are not appropriately titled or referenced. This issue particularly effects Section 2.0 and 3.0. Plans are sometimes referred to in the text as 'Key Spatial Plans', 'Spatial Plans', or are sometimes noted as a specific plan such as 'The Developable Areas plan'1. The plans and diagrams themselves however are not titled. It is therefore not clear when reading the SPD which plan the text refers to and it is also not clear on the status of each plan. Clarity on these matter would enable more effective cross referencing. For example, if a plan is a 'Key Spatial Plan' it would hold more weight when considering detailed applications than an illustrative diagram. Parts of the text also refer to specific parts of the plans – for example key views2 – but these are then not labelled on the plans themselves. In addition, most of the plans need to be noted as illustrative as they could be subject to change due to further detailed work;	SPD Format	All captions reviewed
101	CEG	3. Linked to the above point, it is not clear which images and diagrams are illustrative as they are not labelled as such;	SPD Format	Captions updated to reflect indicative layouts
102	CEG	4. Section 7.2.4 requires the submission of a 'Infrastructure Delivery Plan' but later on the page it is referred to as an 'Infrastructure Delivery Strategy'. For the CEG outline application a Delivery Statement is required and this is what will be provided;	Wording	Text updated.



103	CEG	5. As shown in Table 2.1, in some of the repeated guidance the word 'must' is used but section 5.0 'should' is used instead; and	Wording	Text updated to must
104	CEG	6. Paragraphs should be numbered.	SPD Format	Paragraphs have been numbered.
105	CEG	There is not a clear enough link throughout Section 2.0 how the SPD takes on the FMD design and other mandatory principles and turns them into more detailed guidance and how/where it differs. A simple table might be a useful approach here. Finally, it is not clearly explained how detailed applications will be determined against both the FMD and SPD as material considerations. It currently reads as if the FMD has little future role as a material consideration and this was not the stated intention of the Council. Indeed, it may be that a modified policy R01 will require a masterplan to be approved which will not be the SPD.	FMD and SPD relationship	Text added to para 1.1.17: <b>The masterplan shall be submitted to the Council for its approval as part of the initial application for planning permission"</b>
106	CEG	<b>Land ownership/control</b> – To help the public understand the different ownerships a broad map should be included. This would make it clear that CEG is the principal promoter among a number of other developers with land interests.	Land ownership	It is considered that this is not relevant to the contents of the SPD.
107	CEG	<b>Outline applications</b> – The SPD does not appropriately acknowledge that CEG will be submitting an outline application for the majority of DHGV supported by other planning applications (of whatever type) by other developers/landowners. For the public it should therefore explain what an outline application is, that parameter plans will be approved as part of this type of application (using the principles of the FMD - as updated), and that future detailed applications will be made reflecting the SPD's guidance.	Application Process	Not specifically covered because the SPD is meant to address universal requirements regardless of submitting party and its chosen format
108	CEG	<b>Validation requirements</b> – For developers, the SPD needs to be clear the validation requirements are those approved by the Council and included on the Validation Checklist. Indeed, the documents to support CEG's outline application have been agreed. Currently, the SPD refers to a large number of other documents, plan and strategies which it says should accompany a 'planning application'; many of which are beyond the list already agreed. These documents will instead be covered by the agreed validation documents or are capable of being subject to an appropriate condition (see also comments to point 5.0 below).	Application Process	A new section PD3. Planning Applications - has been added. This section includes an indicative validation list.
109	CEG	<b>Glossary:</b> the SPD should include a glossary to explain what key terms and technical jargon mean, in order to bring greater clarity for the benefit of the public and other users of the SPD. For example, what is meant by a 'planning application' (i.e. is it an outline application; a reserved matters submission; or a detailed application – a member of the public might not know); 'self-contained', 'neighbourhood hubs', 'mobility hubs', 'design code for self-build', 'fully accessible', 'village centre', 'innovative play space' etc.	Glossary	The language used throughout the SPD has been designed to be accessible to a range of different users.
110	CEG	The SPD also sets out very detailed guidance on the materials, trees, and street furniture to be used. Will these elements still be appropriate in 5, 10 or 15 years' time? Linking to the clarity point above, it is not clear from the text or the labelling of images where specific materials or street furniture shown should be used or whether they are simply illustrative. To be more flexible, the images shown should all be labelled as 'illustrative'. There is the further point that one of the guiding principles is 'future proofing' so that there is flexibility to enable DHGV to evolve and adapt as it is developed out over a long period of time. If the SPD is too prescriptive then this principle cannot be achieved.	Prescriptive Guidance	The guidance for the most part is indicative. Images of material samples are necessary to portray the different character areas
111	CEG	Key to this issue is the use of language that unnecessarily limits the flexibility that developers quite reasonably require to deliver this type of development and enable it to adapt to change in the future. For example:		Explanation and more detailed guidance have been provided to allow a level of flexibility. It is also noted that any deviation from the SPD would be weighed against its benefits, as set out in the NPPF.
112	CEG	1. Throughout the report the word 'must' is overused (a total of 864 times). In some cases, this is justified to translate the mandatory principles contained in the FMD into the detailed guidance but, in many cases, it could greatly restrict what will be acceptable in future detailed applications;	Wording	Rely on general explanation elsewhere in the SPD



113	CEG	<p>2. At Page 13 (Section 1.2.4) it is stated:          "This guidance sets out benchmarks for planning applications, and should be followed. In cases where it is not strictly followed, planning applications will need to robustly justify an alternative approach to achieving a similar standard or quality development." (our emphasis);</p> <p>By stating that guidance should be strictly followed, it potentially creates inflexible rules. Guidance should guide and be required to be taken into account in determining appropriate outcomes.</p>	Wording	Rely on general explanation elsewhere in the SPD
114	CEG	<p>3. At Page 166 (Section 7.1.1) it is stated:          "All future planning applications for the site need to meet the requirements set out within this SPD and accord with the Framework Masterplan for the site." (our emphasis).</p> <p>The above implies that future detailed applications must meet all the requirements of guidance, the number and nature of which makes this virtually impossible. As we will come on to, it also needs to be kept in mind that the SPD is not part of the development plan and cannot establish additional policy requirements beyond those in the local plan.</p>	Wording	<p>Rely on general explanation elsewhere in the SPD</p> <p>Text in para 7.1.15 amended to "are expected to"</p>
115	CEG	<p>At page 73 reference is made to the development considering a 'path to Net Zero Carbon' from the beginning. However, this will be influenced by emerging local plan and national policy and also updated building regulations at the relevant time. Page 133 also refers to the school being built to BREEAM standards, but this may not be the right standard when construction occurs. This particular topic, and sustainability standards, is constantly evolving with more flexibility required and reference to adhere to national legislation and policy on the matter should instead be included.</p>	Sustainability	<p>Text suggests "The development as a whole must aim to be Net Zero Carbon for buildings on completion of the development. "</p> <p>Added guidance that reflects the local plan expectations.-          "BREEAM excellent , or other equivalent standard"</p>
116	CEG	<p>However, this SPD – mainly as a result of its inflexibility and use of the word 'must' – strays into the realms of policy. The SPD is guidance only, and as such it must adhere to national planning policy and the local plan (on adoption) and not introduce new metrics or cut across the expectations of policy.</p>	Wording	<p>This might be a question as to the application / use of the SPD rather than the wording. Agree with CEG but no need to update the wording.</p>
117	CEG	<p>In addition, it is not clear on what basis the Heritage Impact Assessment prepared by HTA needs to be considered in future detailed applications. Separate Heritage Impact Assessments will be submitted to support planning applications (outline or detailed) that will consider the specific impact of a proposal on heritage assets in accordance with national and local policy. The HTA assessment is just one interpretation based upon an assumption at that time and it is for each planning application to consider its impact on its own merits.</p>	Heritage Impact Assessment	<p>2.4.7 achieves this: "2.4.7 Policy R(01) of the Local Plan has been informed by a Heritage Impact Assessment (HIA) which was carried out by HTA Design LLP to assess the impacts of potential development on heritage assets within Dunton Hills and in the vicinity. The initial assessments and recommendations for mitigation in of the HIA should be used to guide development with further assessment against detailed proposals for type and form of development expected. ..."</p>
118	CEG	<p>Section 2.3 of the SPD (Page 29) requires that "Archaeological investigations must be carried out prior to any proposal within Dunton Hills." This statement therefore goes beyond the requirements of policy. It is also not clear what 'investigations' (i.e. desktop or trail trenching) are required so this statement is not clear.</p>	Heritage Impact Assessment	<p>R01 refers to "archaeological evaluation", while BE16 talks about "an assessment of the impact of the development". Updated SPD text now refers to "impact assessment"</p>
119	CEG	<p>Nationally Described Space Standards (March 2015) require ceiling heights to be at least 2.3m for at least 75% of the GIA. This requirement is translated into the emerging local plan (policy HP06 and Paragraph 6.43). However, the SPD at Section 3.3 page 65 requires all the ceiling height to be a minimum of 2.5m. This increase is not justified and goes beyond policy;</p>	Housing Design	<p>Guidance updated to 2.3m for 75% of internal net area (para 3.4.20)</p>
120	CEG	<p>Page 170 considers the delivery of affordable housing and viability across the site. This includes reference to a long-term strategy of taking account of upfront investments and later returns to avoid reduced affordable housing provision in early phases. However, viability and upfront costs are legitimate considerations when determining planning applications. The submission of viability appraisals to explain why some contributions may not be paid or a full level of affordable housing might not be initially delivered is recognised in the policies of the emerging local plan. The SPD should remove this reference as this is an issue for local plan policy rather than the SPD.</p>	Delivery	<p>Wording has been updated.</p>

121	CEG	Section 7.1.1 of the SPD requires "All future planning applications for the site need to meet the requirements set out within this SPD." However, the SPD is not part of the development plan and it is only guidance. There may be other material considerations which form part of the planning balance alongside the SPD. A better phrase would be that all detailed applications should have 'consideration' to the guidance contained in the SPD. – i.e. reflect the fact the SPD is a material consideration.	Application Process	Text in para 7.1.15 amended to "are expected to"
122	CEG	The SPD also includes a number of requirements that add unnecessary financial burden on the development or are potentially undeliverable:		See below
123	CEG	1. Section 7.2.3 requires that five Gypsy and Traveller Sites must be delivered in the first five-years of development. This is overly prescriptive, and the reference should be made to the site being delivered as part of the Dunton Fanns neighbourhood;	Gypsy and Traveller Sites	Updated to "must be delivered within the Local Plan period (i.e. by 2033)"
124	CEG	2. Section 6.5 requires that roof designs must change every three to four houses. This is overly prescriptive, and a better design may be achieved in places with more uniform roof forms. It will be for a future detailed application to justify its design;	Housing Design	Rely on general explanation elsewhere in the SPD (about how SPD relates to decision making / DM)
125	CEG	3. The SPD over specifies a range of materials, trees, and other design points. Section 3.3 dictates the height of letterboxes: this guidance is not a planning issue and limits the exact doors that can be purchased. Section 4.5 (guidance point 6) dictates the minimum sizes of trees and the minimum size of planting pots. Section 4.7.1 also dictates the minimum girth of different trees in certain areas. Finally, various sections require specific materials, trees, or differing street furniture that must be used in different areas. Over specification – especially surfacing materials and trees – has a major cost and viability implication, may not be appropriate as the design evolves and may not be available in 5, 10 or 15 years' time; and	Delivery	Rely on general explanation elsewhere in the SPD (about how SPD relates to decision making / DM)
126	CEG	4. Section 7.2.2 requires a yearly Phasing and Delivery Strategy to be submitted to and reviewed by the Council and regularly reviewed. But it does not state whose responsibility it is to prepare this. If it is developers, then this requirement does not recognise that the parcels will likely be sold off to individual house builders. Reference is made later to the Community Trust assuming responsibility for this type of monitoring and updating.	Delivery	Added to para 7.2.7 pf PD2. A Phasing and Delivery Strategy. Subsequent responsibility to be confirmed via s106 agreements.
127	CEG	The imagery used throughout the document is largely taken from contemporary schemes from across the country – including very urban examples – with very few local schemes from Essex. This is at odds with the numerous references made to taking design cues from Brentwood's villages. This also makes it harder to convey the architectural style desired in each of the three different character areas. In addition, a lot of the images are very car dominant (i.e. top image on page 63) and this does not reflect the type of development that DHGV aims to be.	Precedents used in the SPD	Choice of imagery has been revised
128	CEG	The image on Page 13 also needs updating. It has a line leading to 'local plan policy' but the image does not itself include any local plan references.	SPD Format	Choice of imagery has been revised
129	CEG	In addition to the need to title and appropriately reference plans (see above), some of the plans need updating as they are incorrect or unclear. For example: <ul style="list-style-type: none"> <li>• The plan on Page 23 should show residential areas and be updated to correctly show the employment area (i.e. no mixed-use area is proposed along the A128);</li> <li>• The heritage assets are mislabelled on the Plan on Page 25;</li> <li>• The hatching colours for the plan on Page 31 are wrong for Dunton Fanns; and</li> <li>• The map on Page 43 does not include all the items on the key.</li> </ul>	Plans	Choice of imagery has been revised

130	CEG	<b>Application Validation requirements:</b> Reference is made throughout the SPD to different reports, strategies and other documents which are expected to be submitted with an application, most of which are not on the Council's validation checklist. CEG rejects the need to submit further document with its outline application beyond those already agreed and question whether they are all necessary in any event.	Application Process	Wording added: <b>7.2.22 The list below sets out some of the key documents/ information to be submitted in support of applications. This list is not exhaustive and further requirements may be identified during the (pre-) application stage, whereas some documents may not be required, depending on the scope of the applications.</b>
131	CEG	<b>Application Validation requirements:</b> Requests are made for a Land Use Assessment (page 34) Assessments of Community Needs (page 34), a Lettings Strategy (page 35) and a Risk Assessment for Overheating (page 74). It is not clear what these assessments and strategies actually mean, or what the scope should be, so explanation is required so that the justification for their provision is clear, and cross referenced to a glossary. In any event, these types of reports, strategies and other documents are detailed in their content and can be the subject of suitable conditions.	Application Process	Guidance updated - <b>land use assessment and Community needs assessment (p.29), Letting Strategy (page 31), Risk Assessment for overheating (p.70)</b>
132	CEG	Page 16 of the SPD refers to an exemplar self-contained community, but the community cannot be 'self-contained'. There will be a reliance upon employment opportunities and facilities at other settlements and locations such as West Horndon, Brentwood and Basildon. The village still needs to be integrated into the wider area, for example, the secondary school will serve pupils from the local area. This should be appropriately re-worded.	Wording	Revised wording to "self-sustaining"
133	CEG	Page 30 of the SPD refers to "Development is expected to follow the three neighbourhood approach and deliver each neighbourhood as a complete, self-sustaining place, before the development of the next neighbourhood can commence." We disagree with this wording, the concept for the Garden Village is that the whole village will be self-sustaining (as far as reasonably possible), but not the individual neighbourhoods. Only one neighbourhood contains the Village Centre and Employment Hub for example. Furthermore, to achieve the build rates envisaged, it will be necessary for two neighbourhoods to be building out simultaneously at some point, i.e. not once completing before the next begins.	Wording	Now reads as: "2.5.7 <b>Development is expected to follow the three-neighbourhood approach and deliver each neighbourhood as a complete and distinct neighbourhood"</b>
134	CEG	Policy R01 requires that green and blue infrastructure should be a minimum of 50% of the total land area. The SPD should be clear on what does/ does not count towards this figure. CEG propose that the TCPA definition is specifically referenced here in order to provide clarity and certainty. The SPD also needs to be clear this figure relates to the whole Garden Village.	Green and Blue Infrastructure	TCPA definition added as a footnote to para 2.2.2.
135	CEG	In addition, there needs to be greater clarity in places as to why certain materials and/or design requirements have been specified. For example, Section 6.6.5 requires the use of dark brick tones. This may not be appropriate when considering visual impact, especially along the Dunton Woods ridgeline.	Housing Design	The guidance for the most part is indicative. Images of material samples are necessary to portray the different character areas
136	CEG	Whilst the emerging local plan seeks 5% self-build on sites of 500+ dwellings (policy HP01), CEG has objected to this fixed percentage. Page 67 notes this 5% requirement and should be updated to reference self-build provision being in accordance with prevailing local plan policy. Furthermore, the provision would presumably be for the provision of serviced plots, and not self-build homes.	Self-Build Homes	Text was updated in line with LP i.e. " <b>Objective: A minimum of 5% of homes must be provided as self-build homes, which are designed to the same standards as other housing and reflect the design characteristics of their neighbourhood.</b> "

137	CEG	<p>The SPD cannot include guidance on matters that are outside of the control of the landowners and beyond both the physical extent of the site and the boundary of the Borough. For example, page 145 states that "In the future, this area will be connected to the edge of Basildon". However, land between the site and Basildon is within another local planning authority's area and so is not in the 'gift' of the Council, landowners and developers to deliver. On a related point, page 168 refers to the need for a detailed delivery and phasing (including any sub-phases) diagram and plans to accompany the hybrid/outline planning application and each subsequent reserved matter phase. However, whilst collaboration with landowners/developers can inform delivery and phasing material (as was the case in drafting the FMD), there is no way of ensuring it is adhered to by other landowners/developers.</p>	Delivery	<p>The SPD does not relate to land outside the site, but requires safeguarded routes to allow for future connections - it does not require delivery outside the borough.</p>
138	CEG	<p>The SPD at page 166 makes reference to a landowner Memorandum of Understanding and that the proposed development is expected to adhere to it. However, this overestimates what such a document can be expected to do; it is not a legally binding document but a statement of intent.</p>	Delivery	<p>Noted. This refers to the MOU already agreed by CEG and uses similar wording. No actions required.</p>
139	CEG	<p>There are a number of requirements that do not reflect the reality of and/or practicalities associated with delivering this project:</p> <ul style="list-style-type: none"> <li>• Page 171 states that "The construction of new homes at the Garden Village should not be commenced until the package of initial infrastructure works has been completed." However, what package of infrastructure and when certain elements are delivered are the subject of further consideration, including establishing infrastructure priorities, viability and other available funding. This sentence should be deleted.</li> <li>• Page 172 states that "Post Occupancy Evaluation will be required to inform the later phases of development." It should be explained that this is a responsibility of the Community Trust.</li> <li>• At page 175, not all the items listed will be community assets, including the commercial premises/land and SuDS (may be LLFA). In addition, service charges and community events are not assets.</li> </ul>	Delivery	<p>P. 171 - ammended (para 7.2.37) P.172 - not ammended as suggested p.175 - title ammended to "Asset Management"</p> <p>This is also covered in general explanation elsewhere in the SPD (about how SPD relates to decision making / DM)</p>
140	CEG	<p>The draft SPD largely aligns with the developable areas proposed within the FMD (original and as updated) which CEG support. However, there are several areas which do not accord with the updated FMD and to which we object. These are:</p>	Developable Areas	<p>Response as below:</p>
141	CEG	<p>1. The removal of the development parcels to the immediate north of the Grade II listed farmstead and to the south of the new Village Green. These areas have been removed following a number of principles proposed in the Heritage Impact Assessment (prepared by HTA). This document suggests buffer zones of a nominal 100m in width should be provided around key heritage features within the site. We have a number of objections to this:</p>	Developable Areas	<p>Response as below:</p>

142	CEG	<p><b>a. Heritage</b> – there is no heritage justification for the width of such buffers. The buffers zones should be determined based upon their own merit having regard to the context of the heritage asset and its setting (informed by a Heritage Impact Assessment supporting a planning application) and the proper masterplanning/placemaking of DHGV. From a planning perspective, there will inevitably be a need for the balancing of the less than substantial harm which might be caused to the significance of a designated heritage asset's setting and the public benefits of DHGV. This is a matter of planning judgement and not for prescription in a SPD (also see previous comments on heritage requirements).</p> <p><b>b. Design/Sense of place</b> – the farmstead in the draft SPD plan effectively "floats" in a sea of open space. The stakeholder design process (which involved a number of Design Review Panels with Design South East) that shaped the masterplan in the FMD sought to put the Village Green and the farmstead at the very heart of the development to give DHGV a unique sense of place and identity. The changes to the masterplan, set out in the draft SPD, dilute this important design principle.</p>	Developable Areas	<p>Text was amended: "View corridors are shown at a nominal 30m width and 100m width, subject to findings of detailed assessment of form and type of development, which may indicate that wider or narrower zones are more appropriate. Similarly, buffer zones are shown at a nominal 100m wide with the expectation detailed assessment once form and type of development are known may find wider or narrower zones appropriate in mitigation."</p> <p>b. The location of the Farmstead has been placed in the parameter plans following multiple discussions with BBC. This is a point of departure from the FMD . Any differences between the SPD and the outline planning application will be assessed on their own merit during the planning process.</p> <p>Farmstead setting was "buffered" as a precautionary approach subject to detailed assessment at application stage.</p>
143	CEG	<p>2. The draft SPD shows large development buffers along Nightingale Lane (approximately 100m) and development is pulled back from the edge of the woodland. This is largely based, again, on HTA's Heritage Impact Assessment. Whilst the FMD ensures that development is set back appropriately from the Ancient Woodland further east, we believe the buffers set out in the SPD are excessive and unnecessary around an area of woodland that has no ecological protection requirement. Indeed, we consider that this area would actually benefit from greater elements of closer surveillance overlooking both the woodland and Nightingale Lane. Walking along Nightingale Lane with its boundary vegetation means that the visual or physical difference between development being closer than 100 metres when compared to being over 100 metre away would be minimal.</p>	Developable Areas	<p>Text was amended: "View corridors are shown at a nominal 30m width and 100m width, subject to findings of detailed assessment of form and type of development, which may indicate that wider or narrower zones are more appropriate. Similarly, buffer zones are shown at a nominal 100m wide with the expectation detailed assessment once form and type of development are known may find wider or narrower zones appropriate in mitigation."</p>
144	CEG	<p>3. The plan on Page 23 needs to correctly reflect the proposal for the employment area. For example, an employment area (rather than mixed use) adjacent to the A128 is now proposed. This employment area is intended to deliver noise benefits to the occupiers of residential properties.</p>	Developable Areas	<p>The key has been updated to reflect an "employment area". Diagram is now labelled as "Illustrative". In any case: Rely on general explanation elsewhere in the SPD (about how SPD relates to decision making / DM)</p>
145	CEG	<p>4. CEG also consider that further thought is given to the interpretation of HTA's Heritage Impact Assessment to avoid conflating protecting the setting of designated heritage assets with maintain visual connection and recognising them as features in the landscape (e.g. views towards the Churches). This clarification is required to avoid such views inappropriately becoming part of the heritage considerations.</p>	Developable Areas	<p>The wording in para 2.4.21 notes that "A buffer zone from the medieval village near the Church of Saint Mary should be maintained to ensure the openness of nearer views towards the Church, its setting, and any remains of the lost village. The breadth of the buffer zone should be determined following archaeological investigations impact assessments and should be tested against the proposed development to determine heritage impact."</p>
146	CEG	<p>Heritage (Section 2.3) is numbered incorrectly in the SPD and should be Section 2.4</p>	SPD Format	<p>Numbering updated in SPD</p>
147	CEG	<p>However, we object to any such corridor having to be 100m wide and suggest a corridor of between 30-60m is more appropriate if such prescriptive guidance needs to be given at all. The key point here is that the guidance should require a green corridor which allows view towards the spire of the former Church.</p>	Heritage Impact Assessment	<p>Text updated in para 2.4.8 Similarly, buffer zones are shown at a nominal 100m wide with the expectation detailed assessment once form and type of development are known may find wider or narrower zones appropriate in mitigation.</p>

148	CEG	<p>We also object to the southern view corridor from the A128 at Station Road. This was not a mandatory spatial principle in the FMD. The view suggested cannot be achieved in the masterplan framework set out in the FMD and the SPD itself as:</p> <ol style="list-style-type: none"> <li>1. The road alignments do not make this view possible. The Mobility Corridor runs from the A128/Station Road junction towards the Market Square, thus ensuring that the view of the farmhouse is blocked by buildings. This design approach, agreed through the Design Review Process, was deliberate to ensure a sense of surprise as one arrives in Market Square and has a framed view of the farmstead across the Market Square and Village Green.</li> <li>2. Even limiting building heights to just three storeys fronting the A128 would not render views of the farmstead possible from the road. Even a one-story building would block views from the A128 because the farmhouse is not elevated to such a height so as to be clearly seen above a one storey building. (see building heights response below).</li> </ol>	Heritage Impact Assessment	2.4.7 achieves this: "2.4.7 Policy R(01) of the Local Plan has been informed by a Heritage Impact Assessment (HIA) which was carried out by HTA Design LLP to assess the impacts of potential development on heritage assets within Dunton Hills and in the vicinity. The initial assessments and recommendations for mitigation in of the HIA should be used to guide development with further assessment against detailed proposals for type and form of development expected. ..."
149	CEG	<p>There are several areas where the design principles have departed from the FMD which we object to. These are:</p> <ol style="list-style-type: none"> <li>1. Mixed use development is spread along the Mobility Corridor between Market Square and the A128 junction with Station Road. This does not accord with the principles set out in the FMD and we question whether commercial use along the corridor would be economically viable and sustainable. We are also concerned that locating commercial uses along this corridor would dilute the retail and other offer in the Market Square area and other neighbourhood hubs. We do note, however, that the key to this plan does include Use Class C3 allowing residential uses here which would accord with the FMD.</li> <li>2. The secondary school has been expanded towards the west and a row of dwellings is shown along its southern edge. We object to this as it impacts on one of the key mandatory spatial principles set out in the FMD (Vista Access and Movement Principle 06) which connects the Village Green with the secondary school and the wetlands in the south.</li> </ol>	FMD and SPD relationship	No amendment required: SPD configuration already allows for CEG's intended outcome to concentrate non-residential uses around the village square.
150	CEG	<p>We object to the reduction in building heights in the Dunton Fanns neighbourhood. A key mandatory spatial principle of the FMD was to allow flexibility for a range of taller apartment buildings along the western A128 edge. This will encourage a strong edge to the Garden Village and also help act as noise mitigation from the traffic on this A-road. The FMD, therefore, allowed up to four stories in height and the SPD should be consistent with this.</p> <p>The draft SPD only allows up to three stories in height across the whole of this neighbourhood, save the mixed-use employment area in the north. The supporting text on page 38 states that "Building heights and roof shapes should not obstruct or visually compete with the heritage assets in key view corridors. These are particularly the views from the A128 towards the Grade II listed Dunton Hills ...". If this comment relates to the view along the boulevard toward the farmhouse then there are no differences between the FMD and the SPD. However, if it is a wider point about views along the A128 then there are differences.</p>	Building Heights	Building heights plan is marked as illustrative.

151	CEG	In addition, the FMD allows up to five storeys in height around the Market Square to both frame this space and to allow for flexibility of uses at ground and first floor level. Limiting this area to three storeys would not allow such flexibility and we object to the height cap placed on this area in the SPD. The areas in and around the two neighbourhood hubs at Dunton Woods and Dunton Waters are also limited to three storeys in height in the draft SPD and again we seek more flexibility here for the reasons given above and, therefore object again to the cap. The height of the buildings can be a matter for detailed design if the concern relates to the viewing corridor towards All Saints Church.	Building Heights	Building heights plan is marked as illustrative.
152	CEG	A new service road has been shown in the draft SPD, running from the Farmstead View Avenue up to the employment area. This makes good sense by separating employment traffic from residential vehicular movements. We support this approach albeit as an all-purpose road given HTA must have agreed the junction location with the relevant stakeholders through the co-design process, including the Highway Authority.	Road Network	N/A
153	CEG	A detailed list of specific changes to wording is set out in Appendix 2 of the CEG document, saved here: \\Yogi\sm\b\BBC-DGV\3-UD Planning Guidance\8-Planning\210601-Formal Consultation Responses\01-Formal Responses\CEG\Detailed CEG Comments-extract from main document.pdf	Wording	N/A
154	Landowner	Access to the employment hub through a residential area compromises the nature of the employment uses substantially and is likely to undermine its viability. Would welcome the idea of a dedicated service road serving the employment hub proposed.	Employment Hub	A separate service road is already proposed.
155	Landowner	Could provide some reference to economic viability of employment hub and village centre. Raised concern that proposed uses in the Innovation Hub are not viable.	Economic Viability	The SPD does not restrict uses appropriate to a village location, nor does it propose particular uses. Instead it provides guidance on how these uses should be designed to facilitate efficient use of land and contribute to delivering sufficient benefits.
156	Landowner	The term innovation hub might lead to some confusion. Employment hub should be more flexible to allow for a mix of uses that would respond to the local context (not R&D).	Employment Hub	No amendment necessary. The SPD provides a range of employment generating uses, but does not dictate size proportions between these options e.g. between high or low job density, which should provide flexibility to allow economically viable proposals to come forward.
157	Landowner	Design of the employment hub (buildings around a central square) is too prescriptive and could limit what is financially viable. Proposed design predicated around business/science and innovation parks. Design which relates to these uses are not by their nature compatible with other industrial uses.	Employment Hub	A key requirement for the proposed employment hub is that it is compatible with the residential nature of its surroundings. There are plenty of examples of business parks where industrial uses sit alongside non-industrial uses.
158	Sport England	The provision of outdoor sports facilities is focused on school sites, informal football pitches and small scale provision in community parks. This is not an approach in Sport England's view that would be appropriate for meeting the formal outdoor sports needs. A more strategic approach is required which provides a small number of larger multi-pitch sites supported by the necessary ancillary facilities. Without this, there is a concern that the proposed approach to outdoor sports provision	Sports Facilities	Outdoor sports facility distribution is conveyed through a diagram in section 3.9. We have explored co-location opportunities throughout the site and have relocated the football pitches to partner with the school provision.
159	Sport England	There is no specific reference in the guidance to how formal and informal sports facilities should be planned across the development. The preparation of a sport and recreation strategy to support an outline planning application would allow a strategic approach to be taken to sport/recreation provision which would assess the needs of the development and provide a framework for meeting these needs across the development that could guide development over a long term period.	Sports Facilities	Text added to para 6.3.7:  <b>An informal sports facility would help provide attractive open space for the nearby community; however it will not contribute to meeting the development's needs for formal football facilities. Proposals will need to provide formal football pitches elsewhere in the development. Informal sports provision should be detailed during the application stage.</b>

160	Sport England	Facilities should also be sited and designed to provide the opportunity for wider community access during school hours if potential conflicts between school and community use can be managed. For example, some school sports halls and fitness suites are made available for community use at lunchtimes when not required for school needs but this is only effective where the facilities are sited and designed to separate school and community users.	Sports Facilities	Guidance on separate entrances / changing facilities etc. for school facilities, added in <b>FK4, WK6, WK,7 and OK5</b> .
161	Sport England	Provision should be made for exploring a small scale sports centre which could be provided as part of another community facility. Provision for a small swimming pool and supporting health/fitness suite and an activity studio provision should be considered. The need to explore swimming pool provision is particularly important given the closest facilities to the site are in neighbouring local authority areas and are understood to be already operating at capacity at peak times.	Sports Facilities	Added to section 3.6 (Non-Residential Design) - see para 3.6.4
162	Sport England	A new section should be included on Active Design which provides guidance on how the development should be designed to provide environments which support active lifestyles.	Active Travel	There 10 principles of active design are: 1. Activity for all 2. Walkable communities 3. Connected walking & cycling routes 4. Co-location of community facilities 5. Network of multifunctional open space 6. High quality streets and spaces 7. Appropriate infrastructure (landscape too) 8. Active buildings 9. Management, maintenance, monitoring & evaluation 10. Activity promotion & local champions  We felt that these principles have been covered throughout the SPD and reiterating them in an 'Active Design' section would be repetitive. <b>These principles have been referenced in section 3.9 Inclusive Design (para 3.9.6)</b>
163	Sport England	While the proposals (page 49) for providing safe and convenient access to West Horndon station and cycle routes to Basildon are welcomed, there is no reference in this section to providing pedestrian/cycle connections to the wider countryside beyond the site for leisure purposes.	Connections beyond the site	Guidance added to T2 - Connections beyond the site:  <b>"Proposals should consider connectivity with pedestrian and cycle routes around the site"</b>
164	Sport England	The principle of community use of school facilities is welcomed. However these facilities will be limited by their design and layout as they will be designed for educational use in accordance with DfE guidance unless the development can enhance them to a standard suitable for community use.  If community use of such facilities is to be realised in practice, the development will need to explore providing funding to upgrade the facilities and for suitable management arrangements to be put in place as well as securing formal community use agreements. This should therefore be referenced in the SPD to provide clarity on what the expectations will be of the development as this is not a matter that the school, local education authority or DfE will address.	Sports Facilities	Guidance added to 5.5.7 - Secondary School
165	Sport England	<b>details should be included in this section to address issues related to</b>	Wording	Guidance updated in sections 4.5.4 (village centre Primary School) and 5.5.6 (Dunton Waters Primary School)
166	Sport England	The village green should provide an area that can be used for informal sport/games as this would contribute to meeting its multi-functional objectives. An area such as the community events space should therefore be designed to support this i.e. it should be relatively flat and not obstructed by trees, water features and other constraints. It is requested that this is made explicit in the SPD.	Sports Facilities	layout updated in section 4.5.3 (page 101 of spd) to show a flexible community space.  Guidance added in para 4.5.8.



167	Sport England	The cricket pitch should be planned so that the cricket square is at least 80 metres away from sensitive uses such as residential and roads in order to avoid ball strike risk which would necessitate unsightly netting around the perimeter of the cricket pitch. The cricket pitch will need to be supported by a clubhouse, practice nets and car/cycle parking to ensure that it is fit for purpose and responsive to user needs. A ball strike risk assessment should be prepared to inform the masterplan for this area;	Sports Facilities	Guidance added to section 5.3.2 - Play Strategy and LD3
168	Sport England	The guidance (point 2) should clarify whether the sports pitch and MUGA referred to is in addition to the sports pitches and MUGA in the school (point 5) and if so where these facilities should be located (the community park?). Sport England would be concerned about a single formal sports pitch or a formal sports MUGA being located in a community park as such facilities would not be responsive to needs and would be difficult to manage. However, informal facilities may be appropriate.	Sports Facilities	Information updated to ensure that it is clear that the only formal sports pitch in this area is the cricket pitch and the aspiration is that the MUGA is an informal facility Please see para 5.5.2 and 5.5.3.
169	Sport England	Dunton Waters - Secondary School: Point 8 should be removed as it would appear to have been included by mistake and would not be consistent with point 15.	Wording	Point 8 in section 5.5.7 (Secondary School) removed.
170	Sport England	More clarity is required over the proposal (page 146) for providing space for informal football matches. While no objection would be made to creating an area of multi-functional open space that could be used for informal sport such as football, such a facility would not be able to contribute to meeting the development's needs for formal football facilities and would therefore needed to be provided elsewhere in the development.	Sports Facilities	Added in supporting text of OL2 (Play) - para 6.3.7
171	Sport England	The stewardship model should engage the existing community in the surrounding area especially during the early phases of the development as this will help establish links and relationships between the existing and new communities and also help the establishment of services especially those that depend on volunteers.	Community Stewardship	Added in supporting text of 7.3.9 - The Stewardship Model at Dunton Hills
172	Bloor Homes	The SPD states that "at the time of adoption, this document [the DHSPD] should be read alongside other up-to-date planning policy guidance, including the draft Local Plan and its evidence base, and the Draft Framework Masterplan Document." We are of the view that the adoption of the DHSPD must be pursuant to the formal local plan process and dependent upon the site's allocation through the development plan. It cannot be adopted based on draft policies and a draft framework masterplan process. We are of the view that clarity is required regarding the relationship between the DHSPD and the Draft Framework Masterplan Document, and the formal status of the latter.	Wording	updated refereres to draft LP to LP and draft FMD to FMD - and to LP policy references.
173	Bloor Homes	We agree that the SPD should set out objectives, broad principles and guidance. However, given the scale of development planned over an extensive period of development, we would caution against setting detailed and prescriptive requirements which may not stand the test of time.	Prescriptive Guidance	SPD guidance has been written to be as flexible as possible
174	Bloor Homes	Given the identified priority to work collaboratively and the acknowledgement that multiple developers and groups of professionals are anticipated to be involved in the development of the new village, it is important that the DHSPD showcases a variety of design examples. We feel that the DHSPD is dominated by examples from developments by HTA Design. The DHSPD should not be a showcase for previous HTA developments but should be a more balanced overview of good designs which meet with the Council's aspirations in accord with its draft policies.	Precedents used in the SPD	Design team has diversified the precedent images, including projects from Essex and taking inspiration from the surrounding villages

175	Bloor Homes	<p>We are concerned that some of the illustrations and plans are not clearly identified, or do not correlate with the actual guidance and are inconsistent. Examples include the 'Key Spatial Plan' which is mentioned several times on page 22 but appears (although not clearly labelled as such) on page 42.</p> <p>In terms of inconsistencies, a 'Marker Gateway Building' is included opposite the gypsy and traveller site on the on the 'Dunton Fanns Neighbourhood Design Plan' on page 91, but no such marker building is included on the 'Building Heights Plan' on page 39. Similarly in terms of illustrations, the red brick example within Dunton Woods (Section 6.6.2 – Frontages), appears to show a relatively high density form of development that while overlooking the street; an image of the same area appears to have been used in section 4.6.2 in respect of Dunton Fanns – this leaves some ambiguity between what the difference in character is intended to be between the neighbourhoods.</p>	Consistency	<p>The Design team has reviewed the marker buildings and made this consistent across the document. Plans have been labelled as 'illustrative', and can be referred to as diagram ##.</p> <p>Regarding imagery, the context of the image should be taking into considering, as the images are selected for specific aspects. So when considering material to material section should be referenced</p>
176	Bloor Homes	<p>We are of the view that the DHSPD is overly prescriptive in some aspects of design, setting out a number of requirements such as:</p> <ul style="list-style-type: none"> <li>• Homes with 3 or more bedrooms must have at least 2 toilets;</li> <li>• Homes must be capable of providing kitchens and living spaces which can be joined and separated;</li> <li>• 85% of homes to be dual aspect;</li> <li>• All houses should have at least 40sqm of private garden space with a minimum depth of 8m, and ground floor flats minimum 10sqm; and</li> <li>• Architectural detailing such as porches and recessed zones must be utilised to further emphasise entryways.</li> </ul> <p>The DHSPD should be redrafted to focus on the intended outcomes that need to be demonstrated across the development. While instructive design solution examples may be provided to help steer discussion, the DHSPD should remain open in each case to alternative design solutions put forward within proposals in achieving such outcomes. Such an alternative approach would also improve the deliverability of the scheme, allowing more developers to come forward with a greater choice of suitable house type products that could be offered.</p>	Prescriptive Guidance	<ul style="list-style-type: none"> <li>• Homes with 3 or more bedrooms must have at least 2 toilets; <b>Best practice - updated to "should"</b></li> <li>• Homes must be capable of providing kitchens and living spaces which can be joined and separated; <b>this is best practice and helps create WFH spaces</b></li> <li>• 85% of homes to be dual aspect - <b>Housing Design Quality and Standards states that ALL new homes should be dual aspect - Updated to a minimum of 85%;</b></li> <li>• All houses should have at least 40sqm of private garden space with a minimum depth of 8m, and ground floor flats minimum 10sqm - <b>Essex Design Code suggests 50sqm as a minimum</b></li> <li>• Architectural detailing such as porches and recessed zones must be utilised to further emphasise entryways. - <b>Best practice. This has been updated to "should".</b></li> </ul>
177	Bloor Homes	<p>The DHSPD includes detailed layouts relating to each of the three neighbourhood areas, for example on pages 104, 126, 128 and 150 of the draft consultation document.</p> <p>We are concerned that such images should be identified as indicative, illustrative layouts rather than being presented as detailed design blueprints. The layouts shown are quite uniform and predominantly of a regimented layout, even within the lower density areas. For example, the 'Edge of Woods' detailed layout (page 152) shows a very uniform approach to housing type and mix, and a lack of car parking provision.</p>	Prescriptive Guidance	<p>Drawing have been labelled as illustrative, especially all the layouts and employment area layouts.</p>
178	Bloor Homes	<p>The DHSPD is therefore drafted in such a way as to be reliant on the emerging BLP evidence base to demonstrate justification for the required provision of 200 self-build plots. The evidence supporting draft Policy HP01 will not only be outdated in the very near future, but has not yet been adopted. Additionally, it provides no justification for the DHSPD to require the prescribed level of provision, with only two people on the register at the time and a statement that demand is accepted as being "quite low".</p>	Self-Build Homes	<p>The SPD doesn't set out a required quantum, but explains how to deal with the LP requirement by requiring submission of details with planning applications. To review against validation list.</p> <p>Reference to LP also updated.</p>
179	Bloor Homes	<p>Section 3.1.1 – Sustainable Movement – requires planning applications at the site to provide at least one car club space within 400m of each home. The justification for this requirement is unclear and why the distance of 400m has been chosen. Furthermore, this requirement may potentially have a significant impact on the design and layout of a development in finding suitable places across each neighbourhood for such spaces.</p>	Car Clubs	<p>Updated to "5 min walk" in T1 Sustainable Movement - para 3.2.8</p> <p>This is more flexible than requiring a 400m max distance, whilst ensuring that car clubs remain accessible to different users.</p>

180	Bloor Homes	From a design perspective, all accesses to the site from the A128 are primary roads with marker buildings ('gateway') located either side, with the exception of where the gypsy and traveller site is located. This will be a prominent location upon entry to the site where a marker building should be located to be in keeping with the design approach of the site, and to enhance to legibility, transition into the site as focal point buildings. there are more suitable alternative locations slightly further east within the site area.	Gypsy and Traveller Sites	Marker buildings have been updated, and landscape marker added by the gypsy and traveller site entry.
181	Bloor Homes	There is limited justification given as to why the parking standards for the development should be lower than that required through the emerging BLP. We are of the view that the document should simply refer to the most up-to-date Essex Parking Standards, for consistency with draft Policy B17, incorporating flexibility over the time of delivery of the development, and so that the requirement is based on the most up-to-date adopted policy as opposed to a draft policy which may yet not be adopted.	Parking	Supported by LP evidence base.
182	Bloor Homes	There are currently no draft options for the locations of key pieces of infrastructure (of various forms) that are either required or are optional considerations for the development, such as the following: <ul style="list-style-type: none"> <li>• Public Art;</li> <li>• Which are the 'optional sites' for residential or educational use;</li> <li>• Places of worship; and</li> <li>• Wayfinder point locations.</li> </ul>	Community Infrastructure	This will be resolved during the DM process.
183	Crest Nicholson	The draft SPD includes a 'Development Zones' map setting out the proposed developable areas. The supporting text states (our emphasis added): <i>"Planning applications for development <b>should demonstrate that they will comply with the strategy for developable and non-developable areas shown on the Key Spatial Plan</b> ...The non-developable areas on the plan cover less than 50% of the site area. Protecting those areas from development will contribute to the provision of green and blue infrastructure, and will also need to be supported alongside new green and blue infrastructure within built-up areas. Planning applications will need to demonstrate how the development would provide sufficient green and blue infrastructure in built-up areas..."</i> We request the removal of the word 'comply' and propose the below amendment: <i>"Planning applications for development should demonstrate that they will <b>comply be in general conformity</b> with the strategy for developable and non-developable areas shown on the Key Spatial Plan"</i>	Housing Design	Disclaimer/caveat at the front page.
184	Crest Nicholson	As set out in the introduction of the consultation draft, the SPD cannot introduce new statutory policy over and above the emerging policies in the Local Plan. Emerging policies R01 (I) 6f and R01 (II) 3f (as amended by Local Plan examination document F9A Main Modifications2) provide the statutory policy basis for the developable area of Dunton Hills Garden Village and green infrastructure buffer for the eastern boundary.	Housing Design	Text revised where necessary.
185	Crest Nicholson	We support the inclusion of east-west links between Dunton Hills Garden Village and Basildon on the Movement and Circulation map. However, the x3 dotted arrows on the eastern boundary are not defined in the key and would benefit from the inclusion of these items. We assume that these arrows denote active mode links and our client would support this clarification.	Format	Arrows have been marked on the keys, and PROWs added to make clearly the desired connections

186	Crest Nicholson	Section 6.4.1 (Interface at the Plateau Scrubland and Site Boundary) includes a cross section setting out how development should come forward. As per our earlier comments, we broadly agree with the developable areas, however, the SPD should recognise that in some locations applicants can propose development beyond the illustrative development plots where sustainable development can be achieved in accordance with R01 and the SPD's principles and objectives. For example, the eastern boundary of Dunton Woods includes a large expanse of open space identified for enhanced lowland meadows/plateau scrublands. Site investigations (ecology, landscape etc.) conducted by Crest Nicholson's consultant team has identified a slightly larger developable area to the east and south east of The Edge of the Woods (6.5.3 - Detailed layout of Edge of Woods) location.	Developable Areas	Wording updated where possible.
187	Crest Nicholson	It would be helpful to include more local Essex examples and to feature a wider selection of architectural styles e.g. precedent images from schemes delivered by the landowners and housebuilders with landholdings in Dunton Hills Garden Village.	Precedents used in the SPD	Precedents images have been updated to reflect Essex projects
188	Basildon Council	The Council's view is that suitable eastward public transport links to Basildon (and to nearby destinations in Thurrock district) are likely to be needed much earlier than is envisaged by the SPD, as opposed to the emphasis currently placed on providing links to and from West Horndon station. This will be necessary for air quality reasons, as well as encouraging modal shift. Any failure to do this is likely to increase car use, and will risk exacerbating the existing air quality issues affecting the area and along the A127.	Connections beyond the site	Guidance added where possible.
189	Basildon Council	Section 2.8 'Building Heights' notes that the planned maximum heights for solely residential buildings are four storeys, but that these are 'not intended to be fully maximised everywhere'. This may, or may not be linked to the production of a future design code. However, with the qualified support which appears to be offered to changes of use through the SPD, and the Government's expansion of rules on permitted development – noting that a further two storeys can now be added either to two storey dwellings or to commercial buildings, what guarantees can be offered that any buildings would remain at four storeys? Would this not risk undermining any future Masterplan.	Building Heights	Government guidance states that PD can be removed if necessary - that guidance does not need to be repeated in the SPD.
190	Basildon Council	Council would suggest that Brentwood BC needs to ensure that the respective developers should be working together from the start of the application process to assess the full infrastructure demands. This will ensure that such provision is delivered in a timely manner rather than working on individual applications in isolation. Importantly, Section 7.2.4 on "Delivering Key Infrastructure" of the SPD does not note a situation where phases may be developed simultaneously.	Delivery	Guidance added in PD4. Delivering Key Infrastructure Master Developer (or other appropriate coordinating party) has been amended in PD5. Delivering Key Infrastructure previously PD4).
191	Basildon Council	The Council would express its concerns that, in the event that any phases are developed together, this would result in a greater number of construction vehicles travelling to and from the site multiple times each day, along with the associated effects of noise and dust pollution from construction activities. Such activity is likely to have cross-boundary impacts, particularly affecting the amenity of residents in the west of Basildon borough given the proximity of DHGV to the A127, which already suffers from poor air quality.	Delivery	Not relevant to Design Guidance, dealt with through environmental mitigation DM
192	Thurrock Council	Thurrock considers that the Draft SPD does not provide appropriate guidance to meet the quantity of development proposed on the Dunton Hills site.	Developable Areas	The SPD reflects the guidance set out in the Local Plan - in relation to quantity of development.
193	Thurrock Council	Thurrock considers that the location of building, hard surfacing and SUD features presented are unlikely to successfully manage the increase in the surface water volume, speed and water quality impacts of the development. In light of large surface water flow path and the extent of "Very significant constraints" for Infiltrated Sustainable Urban Drainage: ECC Brentwood Surface Water Management Plan: Appendix K, sub catchment surface water modelling is considered to be essential to inform the SPD.	SUDS	The principles for flood risk management including SUDS are already a policy requirement of LP Policy BE8. Full compliance will need to be demonstrated through the DM process.

194	Essex Police DOCO	Essex Police would recommend early engagement with the DOCO and Roads Policing team to discuss the more detailed aspects with the individual developers to ensure the safety of all users.	Designing Out Crime	Guidance added to 3.7.13, and updated to a recommendation.
195	Essex Police DOCO	Essex Police would recommend early engagement with the DOCO and Roads Policing team to discuss the more detailed aspects with the individual developers to ensure the safety of all users.	Designing Out Crime	See above
196	Essex Police DOCO	Consideration into the layout, orientation, and positioning of dwellings abutting PROW and accessible routes; increasing the opportunity for natural surveillance, community interaction, engagement, participation, and environmental control.	Designing Out Crime	Text added to par 3.7.15 - Adaptable and connected communities.
197	Essex Police DOCO	Essex Police would welcome consideration of adopting the 'Safer Bus Station Scheme' and consider safe and secure cycle storage.	Designing Out Crime	Guidance added in T3. Bus Network (para 3.2.42) which references the "Safer Bus Station Scheme".  The SPD includes guidance in section T4. Cycle Parking which requires that cycle storage must be safe and secure.
198	Essex Police DOCO	Regarding the lighting provision for proposed pedestrian and cycle routes, Essex Police would encourage discussion with the DOCO to ensure that the lighting proposals provide suitable illumination whilst mitigating the fear of crime that could incur within these spaces.	Designing Out Crime	Guidance added in 2.9 Movement and Circulation (para 2.9.11)
199	Essex Police DOCO	Essex Police welcome the inclusion within the SPD that throughout the entirety of the development all new homes, schools, and retail provision achieve the applicable Secured by Design accreditation. As a means to mitigate crime and perception of crime, Essex Police support this requirement as SBD ensures that minimum security standards are adhered to, whilst supporting sustainability and carbon reduction agendas.	Designing Out Crime	No change needed.
200	Essex Wildlife Trust	We wish to emphasise that there will be considerable potential at the construction phase to integrate features to benefit swifts, house sparrows, bats, and pollinators - with well- considered areas of planting for pollinators in urban areas, habitat panels, bee posts and suitable areas of substrate for burrowing bees, etc.	Biodiversity	Guidance added in LD1. Biodiversity (para 3.10.4)
201	Essex Wildlife Trust	<b>Management of wildlife features/areas following construction</b> - we note the suggestion of a stewardship model and would wish to see more detail regarding this, such as how long this will run for and how it will ensure long-term management plans are in place for the lifetime of the development	Community Stewardship	It is considered that this level of detail is not remit of SPD but coverable by the DM process.
202	Essex Wildlife Trust	There should be full engagement with stakeholders, including Essex Wildlife Trust, in implementing, monitoring, and evaluating the net gain approach to the scheme.  All potential risks to achieving net gain must be mitigated and contingency applied when calculating losses and gains to account for remaining risks, including timelapse between losses occurring and gains being fully realised.  Net gain for the Dunton Hills scheme should contribute directly towards nature conservation priorities and should provide enhanced ecological connectivity between Langdon Ridge SSSI and Thorndon Park SSSI.  Net gain must be secured in perpetuity, which is taken to mean that it must be secured for at least the lifetime of the development (30 years minimum), with the expectation that net gain management will continue into the future. Forward planning for adaptive management of all net gain habitats will be essential, with secured dedicated funding for long-term management.  Net gain protocols and activities should be communicated to all stakeholders in a transparent and timely manner.	Biodiversity	It is considered that this level of detail is not remit of SPD but coverable by the DM process.
203	Highways England	Would request that Highways England are consulted on each development proposal and accompanying planning documents.	Application Process	Noted. No change needed.

204	Highways England	Additionally, we note that the SPD states that a Phasing and Delivery Strategy must be submitted in support of an outline planning application to demonstrate how the various development parcels will be delivered, and when. The SPD notes that, it is anticipated that one outline planning application will be submitted for the majority of the site, with various phases and sub-phases being delivered in partnership with other developers. Furthermore, the SPD states that an Infrastructure Delivery Plan (IDP) must be provided for the development which demonstrates how the infrastructure required in the draft Local Plan Site Allocation will be provided. As above, we would request to be consulted on both of these documents.	Application Process	Noted. No change needed.
205	TFL	A particular concern will be to limit cross boundary car travel into London by providing good active travel and local bus links to strategic public transport options which can cater for longer journeys.	-	Noted. No change needed.
206	National Grid	Following a review of the above Development Plan Document, we have identified that one or more proposed development sites are crossed or in close proximity to National Grid assets. A plan showing details of the site locations and details of National Grid's assets is attached to this letter. Please note that this plan is illustrative only. Please also see attached information outlining further guidance on development close to National Grid assets. Please remember to consult National Grid on any Development Plan Document (DPD) or site-specific proposals that could affect National Grid's assets.	Gas Transmission Pipeline	Noted. No change needed.
207	Natural England	(from Main Mods consultation response dated 10/11/2021: The following points should be added into the SPD as specific numbered points in the 'guidance' boxes on the appropriate pages: (i) GI screening adjacent to A127, A128 and rail tracks (ii) A green infrastructure buffer / wedge on the eastern boundary		Guidance set out in section FI3. Key interfaces covers this.
208	Local Resident	This is green belt land and should not be built on. This development will cause more cars in the area which the local roads cannot take. This will also cause more noise and air pollution.	Green Belt	The Brentwood Local Plan has removed the Green Belt designation from the Site. The Council of Brentwood must provide a number of new homes to keep up with the increasing population and the need for new homes in Brentwood. However with much of the borough falling within the Metropolitan Green Belt of London (89%), the Council had to make some difficult decisions about the most suitable sites to provide the much needed new homes. The Council then underwent a rigorous process to determine the best locations to provide homes in well-connected areas, while minimising the impact on the Green Belt. This process found that locations in South Brentwood would be most suitable.  Dunton Hills was considered an excellent location to create new homes, and to meet the majority of Brentwood's housing needs, for several reasons. Its proximity to the A127 and to West Horndon Station will mean that the new village will be more sustainable. The size of the site will allow the new village to include all of the requirements necessary to create a self-sustaining, independent village. In other words, Dunton Hills will provide the new residents with job opportunities, retail, community centres, schools, nurseries, health facilities and transportation facilities. Moreover, the site is bound by the A127, A128, the C2C railway and strong field boundaries. This will allow the village to remain contained within the site boundary and will not allow it to spill over. Furthermore, the site is mostly represented by one land promoter with a small

209	Local Resident	Will there be enough parking? The people living in this remote "village" need to have more cars due to distance from other settlements.	Parking	<p>Homes will be provided with a sufficient amount of parking to avoid parking in inappropriate locations. The majority of parking spaces will be provided with charging points for electric vehicles. In addition to resident car parking, some visitor spaces will be provided.</p> <p>However, car-free travel will highly be encouraged at Dunton Hills. Residents will have easy access to high quality public transportation. Active travel will be supported at the village. Residents will be provided with a well designed cycle route network and a significant number of cycle parking. Dunton Hills will also have wide, safe and pleasant footpaths which will allow residents to walk to their destinations. Provisions for active travel will be provided at the early stages of the development to encourage residents to adopt and maintain healthy habits.</p>
210	Local Resident	Doesn't appear to have much left when 4000 properties are being built. This seems to be a town more than a village. Is this just phase 1 of buildings?	Density	<p>An important principle for this development is that a minimum land area of 50% should be used for Green and Blue Infrastructure. Dunton Hills Garden Village will have a range of densities that are appropriate to the rural context and similar to the nearby villages in Brentwood. The total proposed number of homes (up to 4,000) will be split over three phases.</p> <p>The Village Centre, neighbourhood hubs and the areas near the A128 will have higher densities while areas located at the edge of the village will have lower densities. This will allow the Village Centre and neighbourhood hubs to become vibrant and active spaces with access to a range of facilities. This will also help decrease car dependency, as residents living in these areas will be able to walk to their key destinations. This will help create a more sustainable and environmentally friendly village. This approach will also help preserve the natural assets of Dunton Hills and will allow a larger number of open spaces that can be enjoyed by the community.</p> <p>As development moves towards the edges of the village, to a more rural setting, densities will gradually decrease until homes become sporadic and distanced from each other. This will ensure that Dunton Hills is sensitive to the natural setting. These areas will also have well-designed sidewalks and cycle routes to help decrease dependency on cars.</p>
211	Local Resident	You don't find flats in villages, all else is OK.	Housing	<p>Homes provided at Dunton Hills will have a healthy mix of sizes in order to ensure that the village will have a mixed and vibrant community. A range of family sized homes in addition to some smaller homes will be provided.</p> <p>The range of homes provided, in terms of size, typology and tenure will reflect the needs of Brentwood. Overall, all homes will be of a high quality, adaptable and will be beautiful places that people are proud to live in.</p>
212	Local Resident	No response noted in survey.	N/A	Noted.

213	Local Resident	Eco efficiency, solar panels, brown water and decent sized gardens, maybe allotments.	Sustainability	<p>A space dedicated to food growing will be provided near the Historic Farmstead and near the Village Centre. This space will include beehives, self growing and community growing spaces. Allotment plots will allow the resident to grow their own produce. These will also help foster a sense of community and will help improve the health and wellbeing of residents</p> <p>A number of other measures are set out in the SPD to ensure that Dunton Hills will adopt the latest technologies which will reduce its carbon footprint and increase the use of renewable energy resources. The development as a whole is aiming to be Net Zero Carbon for buildings upon completion. This means that upon completion, an equivalent amount of energy is produced on the site as is used on the site in an average year.</p> <p>Buildings will be required to incorporate renewable energy systems such as solar panels and to reduce the emissions of CO2. Moreover, the use of battery storage to recover excess renewable energy for later use will be encouraged. Energy monitoring systems will be found in building to help reduce the use of energy.</p>
214	Local Resident	Its too large, will there be doctors and dentists. Basildon Hospital currently struggles the additional load will be horrendous	Services	As indicated in the Brentwood Local Plan, Dunton Hills will be a self-sustaining garden village. This means that the new village will have all of the necessary facilities to support a new community. These include schools, nurseries, health facilities (including doctors' surgeries). The exception will be facilities that would cover a much larger population than the proposed village alone and therefore, the required hospital space would be expanded outside the Site.
215	Local business owner or employee	Friends groups and natural history groups can provide stewardship, especially biodiversity. But there is little funding for non profit groups. Earmarked funds from Dev Contributions are essential this day in age ring fenced for long term maintenance.	Stewardship	A community-led organisation will be set up to govern the management and maintenance of public spaces and community assets at Dunton Hills. That organisation will be run for the benefit of the community, will be empowered to make long-term decisions, and will have real influence on the way that the development is managed. Importantly, the stewardship body be set up within Phase 1 of the development so that it can influence the development of neighbourhoods over time. It will also be properly resourced so that it can be self-sufficient and be empowered to make the right choices for its members.
216	Local business owner or employee	Some provisions for co housing or live / work units are really missing in the area. Opportunities for communal living arrangements for people of all ages. I feel like generations are moving away from nuclear family model and is viable to prevent loneliness	Housing	Homes provided at Dunton Hills Garden Village seek to be attractive places that people will want to live in. A mix of housing typologies will be provided, to ensure that the housing stock is as inclusive as possible. These include flats (in the Village Centre), terraced houses, detached and semi-detached homes. All of the buildings built in Dunton Hills will follow the unique character of the neighbourhood they are in. They will be suitable to the rural context of Dunton Hills whilst also remaining suitable to the 21st century.
217	Local business owner or employee	Creative affordable spaces. Artists and designers will never compete with commercial businesses but are good to have around. Affordable workspace policy needed from the outset.	Workspace	<p>Approximately 5.5 hectares of land for employment must be provided to accommodate a mix of businesses, either within an Innovation Park at the north of the site, or within smaller workspaces in the neighbourhood hubs. These will include provision for affordable workspace that is both healthy and productive.</p> <p>A mix of employment uses will be encouraged within Use Class E (Commercial, Business and Service), B2 (General Industry) and B8 (Storage and Distribution). These may take the form of offices, industrial units, research &amp; development facilities, or hybrid/ creative workspaces.</p>



218		<p>As b4, too concentrated on the nuclear family model / heterosexual partnership model. Some options for communal living for those not interested in having a family but want to share living space. There is no reason why a mix of density can not be in the woodlands area eg sheltered accommodation? The use of the word beauty is troubling as had become a by word for pastiche / conservatism with recent political language. The garden village concept originated from ideal much more utopian than just beauty, danger of this becoming a toy town / not visionary enough. As no community is in situation how can the needs be determined? 50% affordable would be a good benchmark to prevent it becoming a commuter enclave / make it sustainable for low income families to stay and work (especially key workers at Basildon Hospital). Some provision must be made for low income residents from surrounding Boroughs and viability insisted on from the outset from developers - as can will just be kicked down the road. Serious consideration needed for plot homes or self build as an option towards affordability (Plotland model?)</p>		<p>Homes provided at Dunton Hills Garden Village seek to be attractive places that people will want to live in. A mix of housing typologies will be provided, to ensure that the housing stock is as inclusive as possible. These include flats (in the Village Centre), terraced houses, detached and semi-detached homes. All of the building built in Dunton Hills will follow the unique character of the neighbourhood they are in. They will be suitable to the rural context of Dunton Hills whilst also remaining suitable to the 21st century.</p> <p>A design guidance, or Supplementary Planning Document, has been produced to ensure that the homes coming forward will be well-designed and that residents will be proud to live in them</p>
219	Developer	No response noted in survey.	N/A	Noted.
220	Developer	No response noted in survey.	N/A	Noted.
221	Local Resident	Expert knowledge is needed for maintenance and organisation, community volunteers may not have this expertise	Stewardship	<p>A community-led organisation will be set up to govern the management and maintenance of public spaces and community assets at Dunton Hills. That organisation will be run for the benefit of the community, will be empowered to make long-term decisions, and will have real influence on the way that the development is managed. Importantly, the stewardship body be set up within Phase 1 of the development so that it can influence the development of neighbourhoods over time. It will also be properly resourced so that it can be self-sufficient and be empowered to make the right choices for its members.</p>
222	Local Resident	Technology is moving fast so the latest ideas which are affordable should be incorporated , such as ground source heat pumps	A Forward Thinking Village	<p>One of the key ambitions of the new village is that it will adopt the latest technologies which will reduce its carbon footprint and increase the use of renewable energy resources. The development as a whole is aiming to be Net Zero Carbon for buildings upon completion. This means that upon completion, an equivalent amount of energy is produced on the site as is used on the site in an average year.</p> <p>Buildings will be required to incorporate renewable energy systems such as solar panels and to reduce the emissions of CO2. Moreover, the use of battery storage to recover excess renewable energy for later use will be encouraged. Energy monitoring systems will be found in building to help reduce the use of energy.</p> <p>Buildings at Dunton Hills will also be designed to be as flexible as possible and to accommodate changes in usage. This will allow buildings to be retrofitted for new uses or to adapt to the changing needs of their users. Combined with the use of high quality and durable materials, this will help prolong the lifetime and usability of buildings and will assist in creating a more sustainable village. Buildings will also include provision to incorporate new technologies as they arise. For example, built in voids for cable work will be provided.</p> <p>New homes will also be designed using flexible floorplans to adapt to the changing needs and abilities of their residents.</p>

223	Local Resident	What height are the developments in dunton fans if preserving views ?	Building Heights	<p>Much work has been carried out to ensure that the existing built heritage assets will be preserved and that the new village will be respectful towards them. These assets include the Historic Farmstead, St Mary's Church, East Horndon Hall and the cottages at the entrance of the site. Development will be sufficiently distanced from these assets, and heights would be limited.</p> <p>The village has also been designed so that the Historic Farmstead can be seen from different points of the village in order to highlight its importance. Dunton Hills Garden Village will also respect and highlight heritage assets in the surrounding context. View corridors to nearby heritage assets, such as the Church of All Saints and Church of Saint Marry, will allow residents to clearly see these sites.</p> <p>Building heights and roof shapes will not obstruct or visually compete with the heritage assets in key view corridors.</p>
224	Local Resident	Could you tell me the timescale between the three phases please	Delivery	<p>As set out in the Brentwood Local Plan, Dunton Hills Garden Village will provide up to 4,000 new homes which will be delivered in subsequent phases.</p> <p>It is anticipated that this will be delivered through three phases over a period of approximately 20 years - broadly split across that time.</p>
225	Local Resident	Will the new village have facilities for the elderly? Specific residential area for elderly	Housing	<p>Dunton Hills will include a range of facilities for the elderly including specialist accommodation such as Independent Living schemes for the frail elderly that are within a short walk from the village centre or one of the neighbourhood hubs, and with easy access to the recreational facilities such as the wellness trail.</p> <p>This type of accommodation will be located within residential neighbourhoods to avoid isolation and loneliness. This will also allow older residents to live independently and play a role within a vibrant community.</p> <p>The public realm, such as parks and streets, has been designed to suit the needs of a range of abilities. People with disabilities and mobility limitations will be able to easily enjoy public spaces with ample seating and easy access. Principles of inclusive design, which ensure that public spaces can be easily accessed and enjoyed by everyone, regardless of their limitations, will be implemented at Dunton Hills. This will help create a more inclusive public realm which will promote greater social cohesion and will reduce loneliness.</p> <p>Getting around the village will also be as easy as possible to a range of people. This will be insured by the design of the village which will include principles of Dementia Friendly Design. These include clear and legible signage, scent trails provided by plants, easy wayfinding and coloured front doors, all of which support the freedom of people living with</p>
226	Local Resident	Any infrastructure for electric vehicle charging?	EV Charging	<p>The new village will provide electric vehicle charging provision in all parking spaces. This applies to both on street and on-site parking. The majority of parking spaces will also include electric charging infrastructure.</p> <p>Communal cycle stores will also include facilities for charging electric bicycles.</p>

227	Local Resident	What facilities are you designing other than playgrounds for teenagers? Most teens don't use school facilities in the evening and what are you providing for their leisure to keep youth engaged? Kayaking is a growing pastime - particularly during the pandemic and the youth are keen to participate. I feel teens should feature more in the design to help minimise anti-social behaviour.	Play	<p>Dunton Hills Garden Village will include a significant number of interactive and well designed outdoor play spaces. These will be provided at a local and neighbourhood scale.</p> <p>Play spaces will be designed to create play opportunities to children of all ages and will encourage them to interact with nature and to learn about the environment. Play spaces will also be integrated within nature to strengthen the bond between children and nature.</p> <p>Open spaces such as the woodlands, wetlands and natural trails will also include occasional play elements like boardwalks and bird watching screens to help children learn, play and interact with nature.</p> <p>Finally the new village will have a number of sports facilities, including football and cricket pitches. Residents will also have access to a number of community spaces which will be locally managed, meaning that they could be used to host a number of activities for people of all ages.</p>
228	Local Resident	Cycling provision within the village looks promising but what specific onwads links are proposed to West Horndon, Laindon, Brentwood and Thurrock?	Links outside the site	The SPD sets out that pedestrian and cycle routes should be provided to link parts of the development and allow for sustainable and active travel links along the eastern boundary of the site. The development will also safeguard provision for future east-west links to Basildon and beyond by cycles and public transport points.
229	Developer	No response noted in survey.	N/A	Noted.