

JM/GR/CAM.0114/REV A

23th March 2016

Planning Policy Team
Brentwood Borough Council
Town Hall
Brentwood
Essex
CM15 8AY

Dear Sir/Madam,

Brentwood Draft Local Plan Pre-Submission Consultation Representations on behalf of Martin Grant Homes

I write in response to Brentwood Borough Council's Draft Local Plan [2013-2033] Pre-Submission Consultation (January 2016). These representations are submitted on behalf of Martin Grant Homes who have land interests in Herongate, located between Heron Court and Billericay Road.

The Pre-Submission Consultation to which these latest representations relate follow earlier consultations, with the Strategic Growth Options consultation in February 2015 and the Preferred Options consultation in July 2013. Both previous sets of representations should be read in conjunction with these latest representations hereby submitted. Together the representations demonstrate the ongoing support Martin Grant Homes has for this sustainable site to deliver necessary housing within the early part of the Plan period.

The Site Allocation Maps Document accompanying the latest draft of the Brentwood Local Plan includes a list of the sites that have been considered and not allocated. Our client's land is listed under reference 244 'Land between Billericay Road and Heron Court, Herongate'. As submitted to the Strategic Growth Options consultation, the site comprises 1.03 hectares for residential development. These representations hereby submitted relate to this same parcel of land and this is indicated on the attached site plan. It has been previously stated that in addition to the developable area, our client also controls a large area of adjoining woodland to the east and it is proposed that this could provide an enhanced community area as part of the overall scheme.

Housing Growth

Policy 5.2 of the Draft Local Plan relates to 'Housing Growth' and the Draft Plan has based its housing growth requirement on the objectively assessed housing need for the Borough of 362 new dwellings per year. Paragraph 5.37 of the supporting text states that this is the "*starting point (emphasis added) to meet housing need*". In total, and as set out in Policy 5.2, this equates to 7,240 new dwellings to be built in the Borough over the Plan period 2013-2033. It is agreed that 362 dwellings per annum over the plan period should be the 'starting point' for housing growth. However, this should be reflected in Policy 5.2 by stating that the 7,240 new residential dwellings will be the minimum over the Plan period. As it is currently worded, Policy 5.2 is considered to be too restrictive and does not actively encourage housing growth as required by paragraph 47 of the National Planning Policy Framework (Framework) to "*boost significantly the supply of housing*". Whilst it is

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positive that Brentwood Borough is now seeking to meet their OAN, there needs to be flexibility in the approach in order for it to be achievable.

Martin Grant Homes remain concerned with the strategy for housing growth across the Borough and the heavy reliance on the proposed Strategic Site at Dunton Garden Village for 2,500 units, which comprises 35% of the total housing growth for the Borough across the Plan period. Policy 5.2 also allocates 1,292 dwellings within greenfield urban extensions in the Green Belt (18% of the total housing growth). It is welcomed that the Draft Plan is more realistic than the previous iteration by allocating necessary greenfield sites within the Green Belt to help meet the identified housing need. However, our client has concerns with the approach that has been taken to allocating greenfield sites.

In the Site Allocation Maps (January 2016) that accompany the Draft Plan, these greenfield allocations are comprised of five sites (all of considerable size except one moderate allocation for 42 units at Ingatestone). Therefore, the current strategy for housing growth across the Borough is to release a small number of very large sites from the Green Belt to meet the identified housing need. The Council state at 5.41 of the supporting text to Policy 5.2 that a proportionate approach has been taken to allocating greenfield sites in the Green Belt, *"focussing on transport corridors...where clear defensible boundaries are in place to avoid further urban sprawl"*.

The principle concern with this approach is the heavy reliance on a small number of large sites. If any of the sites are not delivered or are developed for less housing than currently envisaged, it would likely have a significant impact on the overall housing delivery in the Borough over the Plan period and the housing growth requirement set out in Policy 5.2 of the Draft Plan. No alternatives have been provided in the Plan to accommodate the non-delivery of any sites and therefore the Plan is restrictive in its approach.

Our client also has concerns with the heavy reliance on windfall sites in the Draft Plan with an allowance of 928 dwellings, equating to 14% of the total housing growth over the Plan period. There is no certainty that sites will come forward during the Plan period to fulfil this windfall allowance. As the Plan in its current form does not encourage growth beyond the baseline identified housing need, this heavy reliance on windfall sites adds to the concern that the Borough may encounter difficulties in delivering the required housing. It is considered that the windfall allowance in the Plan is overly optimistic (especially with the high level of Green Belt land) and therefore the reliance on windfall should be reduced and instead additional appropriate and deliverable sites be released from the Green Belt to provide a more robust approach to meeting the Borough's identified housing need.

The Borough is not meeting its current windfall allowance, demonstrated by the current shortfall in housing delivery. Therefore, it is considered unrealistic to expect such high windfall allowance during the Plan period and the Council is urged to review this.

Five-year Land Supply

Our representations to the Strategic Growth Options in February 2015 identified that the Borough was only able to demonstrate 4.29 years of deliverable housing sites. This was evidenced in the Council's Interim Five Year Housing Supply 2013-2018 (June 2014) and this remains the most recent assessment undertaken by the Council.

The latest Annual Monitoring Report 2014/2015 states that a total of 159 net additional dwellings were completed in the monitoring period April 2014 to March 2015. This is

significantly below the identified OAN for 362 new homes per year and therefore the existing shortfall in housing delivery has increased, demonstrating ongoing difficulty with the Council being able to demonstrate a five-year supply of deliverable housing sites.

The housing trajectory at Appendix 3 of the Draft Plan does not provide any confidence in this shortfall being made up within the five-year period.

There has been a continued shortfall in housing delivery since 2013 with no evidence that the Council can demonstrate a five-year supply of deliverable housing sites. There are also concerns over the deliverability of many of the sites in the Draft Plan and therefore, Martin Grant Homes remain of the view that it is imperative for a wider range of sites to be considered and included in the Plan, including a greater allocation of appropriate greenfield sites in order to be able to accommodate the required growth and provide a more flexible, and indeed realistic, approach to delivery.

Dunton Garden Suburb Proposals

In January 2015 Brentwood Borough Council and Basildon Council published a joint consultation document for Dunton Garden Suburb. It was stated in the consultation document that the new settlement would straddle the boundary between both the boroughs. As stated above, the Dunton Garden Suburb now constitutes a greenfield allocation in the Draft Brentwood Local Plan for a strategic site of 2,500 new dwellings.

A consultation on the Basildon Borough Draft Local Plan is currently being undertaken at the same time as this consultation on the Brentwood Draft Plan. Basildon Borough Council has released a letter (see attached) which states that the Basildon Borough Draft Local Plan does not currently include proposals for Dunton Garden Suburb because *"at the time it (the Basildon Draft Local Plan) was prepared, Brentwood Borough Council had not provided sufficient information to show it was the best location for new housing provision in the Brentwood Borough"*. Basildon Council state that they will be responding to the consultation on the Brentwood Local Plan in relation to the Dunton Garden Suburb allocation.

Basildon's Draft Plan is structured setting out each Policy followed by Alternative Options. Policy H10 of the Draft Basildon Plan relates to an allocation for West Basildon Urban Extension and Alternative Option 3 relates to Dunton Garden Suburb. Basildon Council states that the Dunton Garden Suburb has the potential to provide more housing for the Basildon Borough and could result in the loss of less Green Belt land than the West Basildon Urban Extension. This would therefore clearly be favourable to Basildon Council in meeting their housing needs. However, Basildon Council states in the Alternative Option 3 (page 138 of Basildon Borough Draft Local Plan) that *"Brentwood Borough Council have not however carried out Green Belt, ecology, landscape and infrastructure assessments for their proportion of the site, and consequently it is not known if the proposal is the most appropriate option for their area"*. In addition, Basildon Council state that there are *"unknown issues as to how the delivery of a larger site could be phased and whether the plan can rely on it to deliver its housing need"*.

The fact that Basildon Council has chosen not to currently work jointly with Brentwood Council to include the Dunton Garden Suburb as an allocation in their Draft Local Plan at this stage, creates considerable concern regarding the deliverability of the site as allocated in the Brentwood Draft Plan, particularly within the Plan period. The uncertainty surrounding the extent of the future Garden Suburb proposal and whether this will include

Basildon Council creates uncertainty in the deliverability of the site within the Plan period in itself and joint working will need to be undertaken between the two authorities to identify the parameters of any future development before any confidence can be had. The consequences of Basildon Council deciding not to include the site as an allocation in their final Plan needs to be understood. The Dunton Hills Garden Suburb was originally identified as between 4,000-6,000 residential units. However, without working jointly with Basildon, the allocation in the Brentwood Draft Plan is for 2,500 units, and the implications of reducing the size of the allocation need to be understood as to whether this could still provide the self-sufficient and sustainable community envisaged in the Brentwood Draft Plan.

The process of two authorities working together is complex and naturally leads to delays in the process, as is already being demonstrated. There reasons why Basildon Council have chosen not to allocate the site in their Plan at this stage cause concern for the overall deliverability of the allocation.

The Dunton Hills Garden Suburb was a new idea introduced at the previous round of consultation on the Draft Plan, and it has changed the whole strategy to development in Brentwood Borough by focusing the majority of development in one new settlement. This has implications on the robustness of the allocation as there does not appear to be any considerable background to the appropriateness of this location for the development proposed, particularly given the lack of background work undertaken by Brentwood, as identified by Basildon Council.

Dunton Hills Garden Village is not included in the housing trajectory at Appendix 3 of the Draft Plan and therefore there is no identification in the Plan of when the site is expected to deliver. It was identified by our client in their February 2015 representations that if approved, any development is likely to take a minimum of 8 years before anything could happen on the site and likely to be a further 10-15 years before the development is completed. This correlates with the phasing estimate for the site contained within Appendix 2 of the Plan, which states that the development is expected to be phased over 5-15 years. There is no new information to suggest this site could be delivered any sooner than this and, in fact, all evidence points to delivery even later. Indeed, Basildon Council raised concern regarding the phasing of the development and whether the allocation could be relied upon to deliver housing need.

Furthermore, delivery of the Dunton Hills Garden Suburb could be affected by the final location of the Lower Thames Crossing to connect Kent and Essex, which Highways England are currently consulting upon. A number of different route options are included in the consultation material and route 4 would include a new road extending to West Horndon, through the proposed Dunton Hills Garden Suburb allocation. Whilst this is not the preferred route in the consultation material, it is anticipated that government will decide upon the final route for the crossing later in 2016 following the consultation. Therefore, whilst it remains unconfirmed which the final route will be, this needs to be a consideration in the deliverability of the Garden Suburb.

Therefore, it remains the view of Martin Grant Homes that relying so heavily on the Dunton Hills Garden Village allocation could be detrimental to the Borough in meeting its OAN.

Land at Herongate, Brentwood

There are clearly considerable concerns with the robustness of the approach taken in the Draft Plan to meeting the identified housing need in the Borough. The Plan must be realistic and provide confidence that sites will be delivered. Our client's site will provide a small modest sustainable development of approximately 10-15 dwellings that can be delivered in the short-term and would assist in addressing the Borough's lack of a five-year housing land supply as identified above.

The site adheres to the Draft Plan's own requirements for considering appropriate and sustainable locations within the Green Belt. Paragraph 5.41 of the supporting text states that *"a proportionate approach has been taken, focussing on transport corridors and limited release of Green Belt to meet local needs where clear defensible boundaries are in place to prevent further urban sprawl"*. Our client's site would provide a development proportionate to the existing large village of Herongate. The site is well located to existing transport corridors and benefits from an existing good and regular public transport network with further improvements anticipated to be made as set out in the Draft Plan.

There are also clear defensible boundaries to the site and development of the site would provide new defensible boundaries, as required by Policy 9.12 of the Draft Plan 'Site Allocations in the Green Belt'. To the north is existing residential dwellings with Billericay Road beyond. To the west is the residential units of Heron Chase and there is also existing residential units to the south. To the east of the developable area is existing mature woodland and it is proposed that this would become an enhanced community area as part of the proposal. Development of the site would therefore provide a modest and appropriate infill development in a highly sought after location. Release of this part of the Green Belt would therefore be appropriate and in accordance with criteria set out in Brentwood's emerging Plan at Policy 9.8 'Green Belt'. Development of the site would provide significant community benefit, including the enhanced woodland area, and therefore is in accordance with emerging Policy 9.12. Land release from the Green Belt in this location would not conflict with the purposes of the Green Belt as set out at paragraph 80 of the Framework.

The appropriateness of the site for the development proposed is demonstrated through the high sustainability characteristics of the site which are summarised below. There are also no complex ownership requirements with the site that could impact on the site's delivery.

Sustainability of the Site

The attached illustrative concept plan shows how our client's site in Herongate could be appropriately developed. This demonstrates that the site could be developed for a modest residential proposal in keeping with the surrounding character whilst retaining existing mature trees and vegetation. Adequate land has been included for the provision of public open space and sustainable urban drainage systems (SUDS), as well as the opportunity to provide an enhanced community area to the east of the site which could provide a valuable resource to both existing and new residents.

Herongate falls within Settlement Category 3 'Larger Villages' in the Draft Local Plan. Paragraph 5.31 of the Draft Plan states that *"Larger villages in the Borough are served by a local shopping parade and a primary school. They generally have limited community and health facilities, local jobs and a variable bus service."*

Herongate is located approximately 2.5 miles to the south of Brentwood and is considered to be a sustainable Larger Village with a range of services and facilities of its own as well as being in close proximity and easy access to a wider range of services and facilities. The table below provides a summary of the services and facilities in Herongate within a mile of the site, and their distances from the site via existing routes, all of which are within walking distance.

Facility	Address	Distance from site
Nursery and Infants School	Tiddles Child Care 168 Brentwood Road, Herongate	0.3 miles
Primary School	Ingrave Johnstone C of E Aided Primary School, Brentwood Road, Ingrave	0.6 miles
Football Club	Herongate Football Club	0.3 miles
Cricket Club	Ingrave Cricket Club The Cricket Common, Brentwood Road	0.4 miles
Golf Club	South Essex Golf Centre	0.9 miles
Country Park	Thorndon Country Park South	1 mile
Convenience Store	Herongate Village Stores and Post Office 156 Brentwood Road	0.3 miles
Other Shops	Herongate Cycles The Old Stockyard, Cricketers Lane	0.2 miles
	The Final Touch Oak and Pine The Old Stockyard, Cricketers Lane	0.2 miles
Petrol Station	Esso 130 Brentwood Road	
Public House	Boars Head, Billericay Road	190 ft
	Green Man Shepard Neame, 11 Cricketers Lane	0.2 miles
Place of Worship	Saint Andrews Methodist Church, Billericay Road	0.1 miles
Hairdressers	Studio One 8 Meadows Close, Ingrave	0.9 miles
Industrial Estate (including diverse range of companies such as printers, fencing, van hire and food catering)	Cockridden Farm Industrial Estate, Brentwood Road	0.6 miles

The table demonstrates that there are a wide range of services and facilities available in Herongate and this further improves the sustainability of our client’s site. As well as being a sustainable village in its own right, Herongate is also in close proximity to Brentwood (3 miles to town centre), Billericay (4.5 miles to town centre) and Basildon (6 miles to town

centre). There are a considerable number of services and facilities available in these towns, which can be accessed via public transport.

A facilities map is attached to these representations which clearly shows the close location of these services and public transport links to the site, demonstrating the site's sustainability.

Sustainable Transport

The site is well located being close to existing bus links. The closest existing bus stop is located 0.2 miles (5-minute walk) to the north of the site on Brentwood Road. There are existing public footpaths linking the site to the bus stop. Regular bus services are provided to Brentwood, West Horndon, Basildon and Grays.

These bus services also provide a good connection to the nearby railway stations including Brentwood (3.3 miles), West Horndon (2.6 miles) and Basildon (6.4 miles). Regular train services are provided into London Liverpool Street from Brentwood and into London Fenchurch Street from West Horndon and Basildon.

Shenfield Station is 3.6 miles to the north of the site. When the full Crossrail service commences in 2019, there will be 12 trains per hour from and towards central London in peak periods. The site is therefore in an ideal location for easy access into London.

The Key Diagram in the Draft Local Plan shows a new public transport link and new green infrastructure links from the south of the Borough, through Herongate and into Brentwood. This will only improve the sustainable location of the site further, strengthening the already good public transport links.

There are no Public Rights of Way running through the site. There is an existing footpath to the west of the site, which provides a sustainable link from the site to the facilities available in the village centre to the north and also to the wider public footpath network.

The location of the site and its existing and proposed footpath, bus and rail links make the site accessible, helping to reduce the need to travel. The site therefore adheres to the Council's aim to facilitate and promote sustainable transport, as set out in emerging Policy 10.1 of the Draft Local Plan.

Designations

The site is located outside of the Herongate Conservation Area, abutting it on its southern boundary.

The site is located in Flood Zone 1 and therefore is considered to be at the lowest risk from flooding. The only flood mitigation that would be required would be that resulting directly from the development of the site and will be fully managed as part of any proposal.

Summary

To summarise, Martin Grant Homes fully support growth within the A12 corridor and specifically the ability of the land between Heron Court and Billericay Road, Herongate to deliver a modest and sustainable development that would not be in conflict with draft Green Belt policies in the emerging Brentwood Local Plan or the purposes of the Green Belt as identified at paragraph 80 of the Framework.

The nature of the proposed allocations and limiting the housing requirement to 7,240 new dwellings prevents sustainable sites such as our clients that are available now coming forward within the plan period. The current approach is therefore considered limiting to sustainable development opportunities.

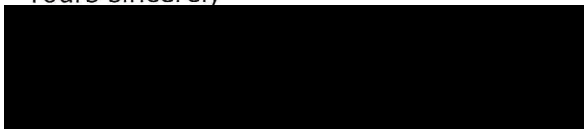
It is considered that more modest development in sustainable locations such as our client's site would be a more appropriate solution to meeting the identified housing needs across the Borough and would not lead to the loss of large areas of the Green Belt in concentrated locations.

The inclusion of sites such as land between Heron Court and Billericay Road will provide Brentwood Borough with a range of sites that enable a flexible approach to housing delivery and ensure that land comes forward within the plan period. Brentwood's current strategy to largely rely on the Dunton Hills Garden Suburb, large-scale greenfield allocations and windfall allocations could result in issues with delivery which prevent the Borough meeting its identified housing need and result in the Borough continuing to be unable to demonstrate a five-year supply of deliverable housing sites.

Please could you ensure that your consultation database is kept up-to-date and contains the contact details at the end of this letter to enable my clients the opportunity to comment on any further iterations of the Plan and to keep up to date with the Plan's progress.

We trust that these comments are useful and should there be any queries relating to this letter please do not hesitate to contact me as per the details set out below.

Yours sincerely



Gabrielle Rowan
Associate Director

Direct Dial: 

Email: 

cc. Martin Grant Homes

enc. Basildon Local Plan Letter
Concept Plan (reference M.0403_D1)
Facilities Plan (reference CAM.0114)

Frequently Asked Questions (FAQ)

1. What is a Local Plan?

All councils must prepare a Development Plan which forms the policy framework for their local planning authority area. The Local Plan is one document within the Development Plan, and sets out planning policies which determine which sites or areas can be developed and which should be protected over a long period of time, typically 15 to 20 years.

The Council has prepared a *Draft Local Plan* which sets out the proposed overall framework for development of the Borough up to 2034. The *Draft Local Plan* includes strategic policies setting out the overall approach to development, infrastructure provision and environmental protection within Basildon Borough. It also includes policies which propose to allocate land for development and propose to designate land for protection. Finally, it includes new development management policies which are proposed to be used to assess planning applications as they come forward until 2034 to ensure that they are appropriate and deliver high standard development.

2. Why is it important for the Council to prepare a Local Plan?

The Local Plan is necessary to provide a robust planning framework to support the regeneration and development of the Borough. Without it the Council would lose the ability to secure and co-ordinate the development and infrastructure that is needed to do this. The Government has made it clear that if we do not prepare a plan by early 2017 they will do it for us, and re-charge the Council the costs. It has also indicated that it will hold back various grants the Council receives from Government, affecting our ability to provide existing council services.

3. How does the Draft Local Plan affect me?

The Council has prepared a *Draft Local Plan* which plans for development in the Borough up to 2034 by setting standards and targets for development. The *Draft Local Plan* identifies that the Borough should provide 15,260 new homes and 49ha of employment land up to 2034. It also identifies the particular sites that will be built on to accommodate this. As the *Draft Local Plan* sets out policies which may affect your neighbourhood, it is important for you to consider them and have your say.

4. Where has the housing target come from?

The *National Planning Policy Framework (NPPF)* produced by the Government in March 2012 requires all local authorities to help significantly boost the supply of housing in England. Local authorities are required to use evidence based studies to ensure that all Local Plans meet '*full, objectively assessed needs for market and affordable housing in their housing market area...*'.

It also expects that any potential barriers to investment in the local economy are addressed through the local plan, including amongst other things a lack of housing provision. The provision of housing is linked to the labour supply (how many people are available for local employers to fill jobs) available to support economic growth. Insufficient housing provision could therefore constrain the ability of businesses to grow and innovate. Whilst it is not realistic to expect everyone to live and work in the same place, the movement of jobs to other competitive areas and the growth of businesses in other locations if land is not available locally has implications for congestion on the road and rail network if more workers have to commute into another area to work.

The Borough's 'objectively assessed need' has been established through independent research carried out with the other Councils in the South Essex Housing Market Area. The evidence used to support the housing figures set out in the *Draft Local Plan* can be found in the *Emerging South Essex Strategic Housing Market Assessment Topic Paper for Basildon Borough Council 2016*. This sets out a comprehensive extract of the Basildon findings from the emerging South Essex *Strategic Housing Market Assessment Review*. The research which underpins this work has evaluated the diverse factors that are influencing housing needs such as population change, economic growth and housing affordability.

The *Emerging South Essex Strategic Housing Market Assessment Topic Paper for Basildon Borough Council 2016* presents a range for the 'full, objectively assessed needs' for housing. It identifies a range of 15,260 and 16,740 homes over a 20 year period, reflecting varying assumptions regarding the labour supply requirements of

the local economy. The *Draft Local Plan* is making provision for the lower end of this range. The scope to look beyond this range, in particular at a target which is less than 15,260 is limited, as the proposals in the *Draft Local Plan* must be based on evidence in order to withstand scrutiny of the Planning Inspectorate.

5. How is the Council providing for the ageing population?

The *Emerging South Essex Strategic Housing Market Assessment Topic Paper for Basildon Borough Council 2016* identifies that Basildon Borough should provide approximately 1,620 units of specialist accommodation for older people up to 2034. This figure has been encompassed within the overall housing target of 15,260 homes set out in the *Draft Local Plan* (Policy SD1) and will be delivered by the application of other policies within the *Draft Local Plan*, primarily Policy H2 – Specialist Accommodation Strategy and Policy H33 – The Size and Types of Homes. The Council, acknowledge that need and the type of specialist accommodation can change and may need to respond to the aspirations for more independent living and diverse types of social care which allows for this, thus enabling people to continue living in their own homes for as long as possible.

It is however recognised that some older people will require specialist residential/nursing care provision. The *Emerging South Essex Strategic Housing Market Assessment Topic Paper for Basildon Borough Council 2016* identifies a requirement for around 720 additional residential/nursing care beds by 2034. Policy H2 – Specialist Accommodation Strategy sets out the approach to delivering this requirement alongside other housing in the Borough.

6. What about social housing?

The *Draft Local Plan* seeks to secure 25% affordable housing on development sites of 11 or more homes, or on land of 0.2ha or more. This amounts to around 3,300 homes of the 15,260 being built as affordable homes for the Council or Housing Associations to rent, or new Starter Homes for sale. This figure is based upon the findings set out in the *Emerging South Essex Strategic Housing Market Assessment Topic Paper for Basildon Borough Council 2016*. This figure represents the objectively assessed affordable housing need for the Borough over the plan period of 2014-2034 and is set out in more detail under Policies H1 - Housing Strategy and H34 – Affordable Housing Provision.

7. Will there be enough work for people?

In 2013, the Council commissioned consultants to carry out an *Employment Land and Premises Study* for the Borough which looked at the current employment and businesses within the Borough and considered what would need to be done to retain and improve economic vitality for the future. Policy E1 – Economic Growth Strategy is central to securing employment prospects and opportunities for residents of the Borough and to attract businesses into the area. Through policy E1, the Council sets out the intention to provide approximately 8,600 jobs across the plan period and provide 49ha of land for new employment development. 38ha of this is within existing employment areas, including the A127 Enterprise Corridor, and two new areas at Dunton and at Burnt Mills, Basildon will provide 5.5ha of employment land each. The Council are also encouraging apprenticeships and training opportunities for local residents to maintain a thriving local economy and provide different employment options.

8. How can the area's existing infrastructure cope with further development?

The Council recognises that new housing, employment and other forms of development will need to be supported by relevant infrastructure including utilities, transport, education, recreation and health services. The Council engaged with infrastructure service providers *before the Draft Local Plan was finalised* to establish the infrastructure which will be necessary to balance the growth in the Borough in a sustainable way. This has been used to establish a baseline position for infrastructure within Basildon Borough and to determine the future requirements for infrastructure having regard to growth and the locations of growth within the Borough.

This information has been used to develop an initial *Infrastructure Delivery Plan (IDP)*, which looks at existing infrastructure/service deficits and identifies how they will be overcome and who will be responsible for doing so. The *IDP* will be updated regularly to inform the production of a Community Infrastructure Levy (CIL) charging schedule, and to respond to opportunities for infrastructure funding. The Council will use the *IDP* to ensure that development is aligned to infrastructure provision and to ensure new development contributes to the funding of upgrades to necessary local and strategic infrastructure.

9. How do you know that the drainage systems can cope with more housing?

All sites identified within the *Draft Local Plan* have been located away from obvious sources of flood risk such as flood plains. Furthermore, Policies CC1 to CC4 set out the Council's approach to flood risk management, including the measures that will be applied when applications for new housing are considered in order to minimise flood risk to new and existing properties. The locations of development and the policies within the *Draft Local Plan* related to flood risk management have been informed by the *South Essex Surface Water Management Plan*, the *South Essex Strategic Flood Risk Assessment*, and the *South Essex Water Cycle Study*.

The Council have and will continue, to work with the Environment Agency and Essex County Council, which is the Lead Local Flood Authority, as appropriate and will seek mitigation works and/or financial contributions towards drainage, flood prevention etc. from developments, in consultation with the relevant bodies. Furthermore, the Council will work in partnership with Anglian Water to determine what improvements are needed to the drainage network and elaborate on these in the *Infrastructure Delivery Plan (IDP)*.

10. What about localism?

The Council recognises the changes the Government has made and the responsibility that has been placed on local authorities to determine housing targets at a local level. This consultation is an opportunity for local people to have their say. The *Localism Act 2011* also enables Neighbourhood Plans to be prepared by local communities, but they must be in accordance with up to date Local Plans.

11. What happened to my site that I submitted through the Housing and Economic Land Availability Assessment (HELAA)/ Strategic Housing Land Availability Assessment (SHLAA)/Call for Sites?

All of the areas of land submitted to the Council for development consideration before April 2015 have been subject to the Housing and Economic Land Availability Assessment (HELAA), formerly known as the Strategic Housing Land Availability Assessment (SHLAA). The HELAA has been reviewed to assess whether each site is in a suitable location, is available for development, and would be viable to be developed for development purposes. The *HELAA Review 2015* forms part of the evidence base for the Local Plan.

The allocations for housing set out in chapter 11 of the *Draft Local Plan* has been informed by the *HELAA Review 2015*, alongside other evidence as specified in the supporting text. This ensures that the sites identified in the *Draft Local Plan* are suitable, available and achievable, consistent with the requirements of the *National Planning Policy Framework*.

12. What is Green Belt?

Green Belt is a special planning policy designation intended to keep land open, and prevent urban sprawl by unregulated development which causes neighbouring towns to merge with one another.

The Green Belt in Basildon Borough is the London Metropolitan Green Belt. The objective of the London Metropolitan Green Belt is to contain the growth of London.

Land which is designated as Green Belt is not:

- Always accessible to the public. Most of the land in the Green Belt is privately owned and not accessible for public use;
- Always of a high landscape value. Land in the Green Belt is designated for its openness, not for any particular landscape quality;
- Always open greenfield land. Green Belts were originally designated in the late 1940s. In most cases they include whole villages or individual houses or farmsteads. The Plotland areas in Billericay, Wickford and Basildon are an example of this. They are all in the Green Belt, but are home to over 3,000 people;
- All of our parks and open spaces. Whilst these are green areas, they are not always in the Green Belt.
- Protected from indefinite change. Day-to-day, Green Belts are protected by strict planning policies which affect how land and buildings within them can be used or changed. However, the boundaries of Green Belts can be reviewed when Local Plans are updated, which is typically every 15-20 years. The borough's last Green Belt review was completed in 1998 – 18 years ago.

13. How will the Plan affect the Green Belt?

In the *Draft Local Plan*, the development potential of the Borough's existing urban settlements, the number of homes that have been built since 2014 and those that have been granted planning permission have been considered in the first instance to limit the loss of Green Belt land. Based on the evidence this amounts to 7,329 homes. The Borough's finite urban land availability, however, means that the Borough's Green Belt will therefore need to be considered as the source of the remaining 7,931 units to meet the Borough's objectively assessed housing need, securing a robust and defensible Green Belt boundary beyond the plan period.

The proposals in the *Draft Local Plan* include the retention of 6,470ha of land within the Green Belt. This covers 58% of the borough's land area. This is a reduction of 475ha compared to the current extent of the Green Belt. Currently, the Green Belt covers 6,745ha.

14. What about Plotland infill?

In response to earlier consultations and the *National Planning Policy Framework*, the *Draft Local Plan* does propose to allow for limited infilling within parts of the Plotland settlements that are identified as Plotland Infill Areas. Not all parts of the Plotlands are included and specific criteria for determining planning applications for infilling are set out in Policy GB3 - Plotland Infill.

15. Is the Nethermayne/ Dry Street site within the Draft Local Plan?

The Council's aspirations for land north of Dry Street, Basildon are set out in Policy H8 – Land North of Dry Street, Basildon within the *Draft Local Plan*. The 725 homes identified in the policy obtained planning consent in December 2013 and preparations for construction work on site has now started. It has been included in the *Draft Local Plan* to ensure the onsite infrastructure and off site highway works are delivered and to enable it to contribute towards meeting the 15,260 housing target.

16. Is the Dunton Garden Suburb proposal within the Draft Local Plan?

In the period from January to March 2015, the Council and Brentwood Borough Council jointly consulted on a proposal known as Dunton Garden Suburb. This was a proposal for a community comprising 4,000 to 6,000 new homes and associated employment provision and community facilities, straddling the boundary between the two boroughs.

Having considered the outcomes of this consultation, the Basildon Borough *Draft Local Plan* does not include proposals for Dunton Garden Suburb, as at the time the Local Plan was prepared Brentwood Borough Council had not provided sufficient information to show it was the best location for new housing provision in the Brentwood borough. The Draft Local Plan has, however, identified land within the Basildon Borough, around the current village of Dunton Wayletts to help meet local housing and employment needs until 2034. It includes proposals for onsite infrastructure including a new primary school and pre-school, a new open space, as well as a local centre providing opportunity for local shopping. It also proposes a new road link from West Mayne, near the existing Toomey roundabout to serve the development and existing village. These are included in Basildon Borough's new housing and employment figures.

On the 27 January 2016, Brentwood Borough Council agreed to consult on their own Draft Local Plan for a six-week period from the 10 February 2016. This includes proposals for "Dunton Hills Garden Village" which Brentwood is proposing would be a new self-contained village in the vicinity of Dunton and the A128, but within the Brentwood borough area, comprising 2,500 homes and associated community facilities. Basildon Council will be considering the implications of this new proposal and responding to Brentwood Borough Council's consultation on this matter by the closing date. If Basildon Borough residents wish to comment on the Dunton Hill Garden Village proposals within Brentwood borough they must respond separately to Brentwood Borough Council once their consultation starts. Comments will not be valid on this proposal if submitted to Basildon Borough Council. To find out more about the proposals in Brentwood visit: www.brentwood.gov.uk/localplan or phone 01277 312500.

17. Will there be development on areas of open space under the Draft Local Plan?

There are three housing site allocations within the *Draft Local Plan* which have been identified for development on land that currently contain open space and recreation. However the Draft Local Plan proposals do not result in a net loss of open space, as there is a requirement for open space and formal playing pitches to be relocated nearby. This is in accordance with Policy H7 - Mixed Use Development Site - Land West of Gardiners Lane South,

Basildon, Policy H13 - Housing Development Site - Land East of Basildon, and Policy H16 – Housing Development Site – Land East and South of Barn Hall, Wickford.

The *Draft Local Plan* seeks to retain all other public open space within residential areas and encourage their improvement where possible through contributions from nearby development. This is set out in Policy HC5 – Public Open Spaces. Some poor quality open spaces located within and adjacent to employment areas will however be reallocated for employment purposes to bring them into effective use.

18. What about providing for the needs of Gypsies and Travellers?

The *National Planning Policy Framework* supplementary policy document *Planning Policy for Traveller Sites* requires local planning authorities to meet local objectively assessed need for all communities in the Borough, including Gypsies and Travellers. The Council commissioned independent consultants to undertake a *Gypsy & Traveller Local Needs Accommodation Assessment (GTLNAA)* to identify the accommodation need for the travelling community. The study has identified a requirement arising from population growth on existing authorised sites, existing temporary sites and small scale unauthorised sites of 104 pitches by 2033 and this is set out in Policy H3 – Gypsy, Traveller and Travelling Showpeople Accommodation Strategy. The study also identified a need arising from the former large scale unauthorised site at Dale Farm of an additional 136 pitches.

The *Gypsy, Traveller and Travelling Showpeople Site Provision Study (PPSPS)* was completed in 2015 and evaluated whether there were suitable and available locations or specific land parcels available to meet the Gypsy and Traveller accommodation provision within the Borough. This concluded that there was only the potential to provide in the order of 98 and 109 pitches. This is closely aligned to the 104 pitches required for population growth on existing authorised sites, existing temporary sites and small scale unauthorised sites. As such there is insufficient land available to meet the pitch provision arising from the former large scale unauthorised site at Dale Farm and the Council is seeking cooperation from other Essex authorities to help meet this unmet need in the rest of Essex.

19. When do you need my comments by?

The consultation starts on Thursday 28th January 2016 and will run for eight weeks closing at **23:59 on Thursday 24th March 2016**. The eight week consultation period is in accordance with the national Regulations and the Council's adopted *Statement of Community Involvement (February 2012)* and gives anyone interested a chance to read the background documents and ask questions of clarification if they want to, before making their formal comment submission.

20. How do I make comments?

If you wish to comment by email or post, please ensure that you include your name, email address and your postal address including postcode, and identify which policies or sections of the *Draft Local Plan* on which you are commenting.

Any email responses should be sent to: planningpolicy@basildon.gov.uk

Comments may be submitted by post to the following Freepost (no stamp required) address:

Draft Local Plan Consultation 2016, Policy and Democratic Services, Basildon Borough Council,
FREEPOST ANG 11276, St Martin's Square, Basildon, Essex, SS14 1ZZ.

All comments submitted by email or post must be received by **23:59** on the **24 March 2016**. Any comments received after this date and time will not be accepted, so please ensure you have accounted for their postage time.

Please Note: All comments provided are done so in the knowledge that they will become a public record and cannot be kept anonymous. The Council will not accept or consider comments which are unlawful or use discriminatory or offensive language. Any comments of this nature will be invalid and may be referred onto other authorities for further action.

21. Where can I get more information?

You can view all the consultation documents, plus background papers and full references to our evidence base on the Council's website at www.basildon.gov.uk/localplan. Hard copies of the relevant documents will also be available to view at The Basildon Centre, St Martin's Square, Basildon, Essex, SS14 1DL on request from Customer Services, at the main libraries in the Borough, or at any of the public exhibition events.

There will be ten public exhibitions around the Borough between 13 February and 16 March 2016. Council Planning Officers will be on hand to help you understand the proposals in the *Draft Local Plan* and answer your questions. There will also be summary leaflets, including comment forms for you to take away. All exhibitions are the same and you can visit the one which is most convenient to you.

The exhibitions details are:

Area	Date	Time	Venue
Pitsea	Saturday 13 February 2016	10.30am – 4.30pm	The Place: Pitsea Leisure Centre, Northlands Pavement, Pitsea
	Monday 29 February 2016	2:00pm – 8:00pm	
Basildon	Wednesday 17 February 2016	10.00am – 4.30pm	Upper Mall, Eastgate Centre, Southernhay, Basildon
	Saturday 5 March 2016	10.00am – 4.30pm	
Laindon	Saturday 20 February 2016	10.30am – 4.30pm	President's Community Centre, Hoover Drive, Laindon
	Monday 7 March 2016	2.00pm – 8.00pm	Womens' Institute Hall, Samuel Road, Langdon Hills
Billericay	Monday 22 February 2016	2.00pm – 8.00pm	Billericay Day Centre, Chantry Way, Billericay
	Saturday 12 March 2016	10.30am – 4.30pm	
Wickford	Saturday 27 February 2016	10.30am – 4.30pm	Wickford Community Centre, Market Road, Wickford
	Wednesday 16 March 2016	2.00pm – 8.00pm	

22. Can I purchase a copy of the Draft Local Plan and/or Policies Map?

Hard copies of the Draft Local Plan are available to purchase for £10.00 each. If you also require a copy of the associated Policies Map this will cost an additional £10.00. Cheques should be made payable to Basildon Borough Council or arrangements to pay by debit/credit card payments can be made by calling us on 01268 533333 (Option 6). Please remember to tell us your contact details when making a payment so we can send your documents out to you swiftly.

23. Can I get a copy of the document in an alternative format?

Yes. If you need copies of any of the documents in audio, large print or Braille, please contact us on 01268 207955 or email planningpolicy@basildon.gov.uk. Customers with a hearing or speech impairment can contact us using the Text Relay service. Dial 18001 followed by the full telephone number of the service you require. Calls are charged at your telecommunications provider's standard rate.

24. I have a disability and am unable to come to the Council Offices or to any of the public exhibitions.

The Council will be sending to residents a copy of the Borough Diary – Local Plan Special Edition which provides a summary of Draft Local Plan and a detachable copy of the Comment Form for you to write down your comments. If you haven't received a copy of the Borough Diary – Local Plan Special Edition it can be downloaded online at (www.basildon.gov.uk/localplan) or alternatively, we can email or post you a copy if you contact us on 01268 533333 (Option 6).

25. What happens next?

All comments received by 23.59 on the 24th March 2016 will be taken into consideration when the Council prepares the next version of the Local Plan for submission. A Statement of Consultation will be prepared and

reported back to the Council's Cabinet to ensure it can consider the comments made and understand the main issues raised and how they could be addressed if appropriate.

Following the consultation the Local Plan will be redrafted to take into account the comments made on the Draft Local Plan and the findings of any outstanding studies. There will be at least one further opportunity to comment on the Local Plan before it is submitted to the Secretary of State, together with its Sustainability Appraisal and supporting documentation. A Planning Inspector will then be appointed to carry out an "Examination in Public" into the soundness of the Local Plan. The Inspector will issue a report and subject to the findings of that report and any modifications which are necessary, the Council will then adopt the final version of the Local Plan.

26. When will the Local Plan be adopted?

The Council are aiming to submit the Local Plan to the Secretary of State for independent examination early 2017 with the intention for it to be adopted early 2018.

27. What would it mean if someone put a planning application in at the moment?

All planning applications at the present time will be assessed against existing Basildon District Local Plan Saved Policies (September 2007) and the 1998 Proposals Map which can be found on the Council's website.

Land between Heron Court and Billericay Road

