

12 March 2018

By Email: planning.policy@brentwood.gov.uk

Dear Sir/Madam,

CONSULTATION RESPONSE TO BRENTWOOD BOROUGH COUNCIL'S DRAFT LOCAL PLAN: PREFERRED SITE ALLOCATIONS; THE INTERIM SUSTAINABILITY APPRAISAL (SA); AND THE HABITATS REGULATIONS ASSESSMENT 2018

Thank you for inviting Basildon Borough Council to provide comments as part of Brentwood Borough Council's consultation on its Regulation 18 Draft Local Plan: Preferred Site Allocations; the Interim Sustainability Appraisal (SA) of the Brentwood Local Plan; and the Habitats Regulations Assessment. Please accept this letter as the response of Basildon Borough Council to the consultation.

A number of Regulation 18 consultations have taken place in the past, including the Brentwood Borough Draft Local Plan Consultation in 2016. Brentwood Borough Council has now published its preferred land allocations for a focused consultation on sites, with an update to Brentwood Council's vision, strategic objectives and spatial strategy, to reflect progress made on the technical evidence and review of representations to date. This is in accordance with the Planning and Compulsory Purchase Act 2004.

Basildon Borough Council acknowledges that this focused consultation does not provide any further information on detailed planning policies consulted upon in the Brentwood Draft Local Plan 2016. It is however expected that the policies consulted upon in the Brentwood Draft Local Plan (2016) will be reviewed and updated, considering those consultation representations which have been received to date. In light of this, Basildon Borough Council has considered the consultation documentation, its role as a neighbouring planning authority, and strategic and cross boundary matters which are covered by the Duty to Cooperate, and wishes to make a series of observations which Brentwood Council should take into consideration when it prepares the publication version of its Local Plan.

Part 1 – Strategy for Growth

Housing Need

Consideration has been given to the approach Brentwood Borough Council has taken in

determining its Objectively Assessed Housing Need (OAHN). It is clear from the evidence that the need identified within the Preferred Site Allocations 2018 document reflects more up-to-date national household projections, as required by the Planning Practice Guidance (PPG), taking into account matters such as economic growth and the need for affordable housing.

The Brentwood Strategic Housing Market Assessment (SHMA) Part One (January 2018) undertaken by Peter Brett Associates, suggests that Brentwood Borough has an Objectively Assessed Housing Need (OAHN) of 380 dwellings per annum or 7,600 dwellings across the plan period (2013-33). Brentwood's housing need could however rise up to 454 dwellings per annum, or a total of 9,080 dwellings across the plan period (2013-2033) if DCLG's proposed methodology for a standardised approach to calculating local housing need in England, were to be adopted. Brentwood Council has therefore stated that it regards that it is prudent at this stage, to plan for housing numbers slightly above the 380 dwellings per annum figure, to create some degree of flexibility and contingency should some housing sites fail to come forward as expected.

Although Brentwood Council has stated that it intends to plan for housing numbers above the 380 dwellings per annum indicated by the Brentwood SHMA; the degree of flexibility is unknown. In relation to meeting its OAHN, it is also unclear within the consultation document, whether Brentwood Borough Council fully intends, or is able to meet its OAHN within the Brentwood Borough boundary. Brentwood Borough Council should therefore clearly indicate the number of new homes requirement proposed over the plan period, and specify whether it fully intends to meet the objectively assessed housing need within the Brentwood Borough boundary.

Basildon Council welcomes the recognition within the Brentwood SHMA that the Brentwood Borough may need to consider whether it is a sustainable location for unmet cross-boundary needs, should the matter arise and in the event housing need cannot be met within other housing market areas it borders. Given that the current Brentwood Borough SHMA does confirm that there are strong links shared between the Brentwood HMA and a number of neighbouring HMAs, albeit contextually different, this needs to be given further consideration as the Brentwood Local Plan is progressed towards submission.

In light of this, attention is drawn to the emerging Basildon Borough Local Plan. Since the Basildon Borough Draft Local Plan consultation in 2016, significant matters of principle in relation to the Basildon Local Plan have been considered and resolved. As a consequence, Basildon Council through several decision making processes, has taken the position that some changes should be made to either the Local Plan, or the process of preparing the Local Plan, in order to ensure it is sound. One of these changes arises from the fact that the suite of sites identified for inclusion in the Basildon Borough Local Plan does not meet the identified need for housing of between 19,440 and 19,720 homes. This gives rise to an unmet housing need, which when delivery issues are taken into account is around 4,500 homes for the plan period up to 2034. Following Basildon Borough Council's Infrastructure Growth and Development (IGD) Committee Meeting on the 16 January



2018, and in order to ensure that the Basildon Borough Local Plan is sound in regard to this matter, it has been recommended that assistance is formally sought from other Local Planning Authorities (LPAs) in the Housing Market Area (HMA), to determine whether they are able to assist Basildon Borough meet its unmet housing need by 2034. Whilst Brentwood Borough is not in the same HMA, it is a neighbouring borough, and should be aware that there could be a future need in line with the Essex Planning Officers Association - Protocol for Unmet Housing Need 2017, for it to consider meeting unmet needs from other HMAs, if options within those HMAs become exhausted. Basildon Borough Council therefore formally requests that Brentwood Borough Council considers whether it can assist in meeting some of Basildon Borough's unmet need in the Brentwood Borough Local Plan.

Furthermore, as the proposals within the Brentwood Draft Local Plan propose a strategic housing site (Dunton Hills Garden Village) for 2,500 homes that has the potential for it to increase up to 3,500 homes in the plan period via 'accelerated growth', within close proximity of the joint borough boundary, there may be implications for the future geographical extent of both the Brentwood and South Essex HMAs. Therefore, Basildon Borough Council should remain engaged in such work in order to understand the implications this proposal could have for both the Brentwood and South Essex HMAs and therefore, the extent to which development in this location would meet the needs arising from both housing market areas should it continue to progress.

Finally it is noted that the affordable need calculations for Brentwood Borough are presented in a separate Brentwood SHMA Part Two (2016), and is expected to be updated in summer 2018. It is therefore expected that Brentwood Borough Council will carry out further work to re-assess the affordable housing needs, and should the need for housing change in light of this, Brentwood Borough Council should seek to revise the target accordingly, to continue to fully meet its OAHN.

Housing Supply

Brentwood Council has stated that the site selection process for the housing allocations has been based upon the spatial strategy, and a sequential approach to selecting sites for development. This approach is intended to maximise brownfield redevelopment opportunities and support growth within sustainable locations. Basildon Borough Council supports this approach in principle to housing supply.

The Brentwood SHMA Part One (January 2018) suggests that Brentwood Borough has an Objectively Assessed Housing Need (OAHN) of 380 dwellings per annum; or 7,600 dwellings across the plan period (2013-33). However, the housing allocations proposed within the Preferred Site Allocations 2018 amount to 6,151 dwellings, or just over 74% of the total housing growth. Brentwood Borough Council has not stated within the Preferred Site Allocations 2018 consultation document that it does not intend to meet its OAHN within the Brentwood Borough boundary. It is therefore not clear where all of the proposed housing needs would be located, and further evidence of this should be provided to demonstrate an appropriate level of housing supply.

In relation to the identified housing land supply, it would appear from the evidence base that Brentwood Borough Council has still not completed a Strategic Housing Land Availability Assessment (SHLAA) since 2011. Although Brentwood Borough have indicated that it is currently updating the Housing and Economic Land Availability Assessment (HELAA) for the Borough, Basildon Borough Council has consistently made it clear in its previous responses to Brentwood Borough Council's Local Plan (Strategic Growth Options, 2015 and the Brentwood Draft Local Plan 2016), that as a minimum it would expect the SHLAA to be updated before a Local Plan for Brentwood is progressed, otherwise there is less evidenced justification for proposing to allocate the sites it is suggesting.

Brentwood Borough Council should therefore update its SHLAA by undertaking land availability assessments to help inform the emerging Local Plan, and review this on an annual basis. These assessments must review whether sites are suitable, available and achievable in both planning and viability terms, otherwise they cannot be relied upon to make up Brentwood's development land supply. It is not clear how any of the proposed housing allocations included in the Draft Local Plan: Preferred Site Allocations 2018 have been put forward, and how the sites are justified as being suitable, without the availability of crucial supporting evidence including land supply, Green Belt, landscape, ecology and infrastructure.

Overall, it would appear that there are currently some deficiencies in the strategic approach to delivering growth in Brentwood Borough, as set out in the Preferred Site Allocations 2018 document. The above matters have therefore been raised to ensure the Brentwood Borough Local Plan can be progressed to Regulation 19 submission, in line with the timetable Brentwood Council has set itself in its Local Development Scheme. Basildon Borough Council would be pleased to be engaged in this where appropriate, and would like to be kept informed of progress, in the event of any strategic, cross boundary issues that are a matter for the Duty to Cooperate.

Specialist Accommodation Needs: Gypsy, Travellers and Travelling Showpeople Provision

The assessed need for Gypsy and Traveller pitches in Brentwood Borough up to 2033 is calculated to be 12 pitches for Gypsy and Travellers which meet the planning definition, and 66 pitches for the Gypsy and Travellers that do not meeting the planning definition. The overall level of additional need arising from Gypsy and Traveller households in Brentwood Borough therefore, regardless of whether or not they meet the planning definition of a Gypsy or Traveller is for 78 net additional pitches until 2033. There were no Travelling Showpeople identified as living in the Brentwood Borough, so there are no current or future accommodation needs assessed.

A sequential approach has been undertaken to identify sites for both Travelling and non-Travelling Gypsies and Travellers, which identifies potential for 78 pitches within Brentwood Borough. The identified sites for pitches would theoretically be sufficient in meeting the assessed need for Gypsy and Traveller pitches in Brentwood Borough up to



2033. This means that Brentwood Borough can demonstrate a supply for all Gypsy and Traveller households within the borough, regardless of whether they meet the 2015 Planning Policy for Traveller Sites (PPTS) definition or not. Basildon Borough Council supports the approach Brentwood Council is taking in ensuring that their evidence base is up-to-date, and the principle that it intends to meet its own Gypsy and Traveller accommodation needs.

It is however noted that within the proposal for Dunton Hills Garden Village, a requirement for a 30 pitch site is included. It remains good practice that sites should comprise no more than 15 pitches in size, in order to ensure a comfortable environment for its residents and the nearby communities. At this size they remain easier to manage and this has certainly been the experience in Basildon Borough in the past. Brentwood Borough Council should therefore reconsider whether such a large single site allocation is the most appropriate having considered alternative ways of meeting needs, including from smaller sites and how the need could sustainably be located within Brentwood Borough.

There is also a concern that no acknowledgement has been made of the fact that there may be unmet needs arising from Greater Essex authorities for the provision of accommodation for Gypsies, Travellers & Travelling Showpeople within the Brentwood Preferred Site Allocations Report, which is considered to be a shortcoming that could be rectified with appropriate wording. . As Brentwood Borough will be aware, Basildon Borough Council has agreed to work with Chelmsford City Council, Harlow District Council and Colchester Borough Council on behalf of the Essex Planning Officers' Association to develop a protocol for how unmet Gypsy, Traveller and Travelling Showpeople need should be managed in Greater Essex. It is envisaged that this work will be carried out in 2018. Brentwood Borough Council should therefore recognise and support the principle of this approach going forward, to ensure that there will be a technical approach in place to support any neighbouring authorities with any potential unmet Gypsy, Traveller and Travelling Showpeople need in the future. This is to ensure that a fair process is applied throughout Essex, and ensures better compliance with the Duty to Cooperate.

Infrastructure Planning

An updated Brentwood Borough Infrastructure Delivery Plan (IDP) accompanying the Preferred Site Allocations 2018 consultation document, includes extensive information on the current levels of infrastructure provision and forecasts needs linked to development pressures, across a number of key topic areas. The IDP provides information on infrastructure, such as schools, healthcare and transport to support housing and employment growth across Brentwood Borough, as set out in Brentwood Council's new Local Plan to 2033. The IDP is intended to be a 'live' working document which would be updated regularly. This is the same principle and approach to the Basildon Borough IDP, and is supported by Basildon Borough Council.

As stated within the consultation document, the proposed Dunton Hills Garden Village settlement is not covered within Brentwood Council's initial assessment of primary school pupil capacity and provisional pupil forecasts, although the development is forecast to



require significant investment in education infrastructure. Brentwood Council have stated that different options are still being explored through ongoing master planning for the site. Brentwood Council also state it is working with Essex County Council (ECC) and other stakeholders to define the exact minimum scale of the secondary school infrastructure provision for Dunton Hills Garden Village, as well as exploring opportunities to deliver new integrated health facilities. It considers that this will improve the sustainability of the new settlement and provide a strategically well-positioned location for wider healthcare provision, potentially integrated with other community or commercial uses.

Given that Brentwood Borough Council are proposing development adjacent and possibly up to, the joint borough boundary, and considering some existing services are already shared between the Boroughs, e.g. healthcare and schools, it is considered essential for Brentwood Borough Council to work more closely with Basildon Borough Council to determine the impacts such development proposals may have on infrastructure and services in the Basildon Borough and how development options of this nature may need to support the upgrade of services and facilities in Basildon Borough, should Brentwood Borough Council continue to include Dunton Hills Garden Village in its Local Plan. At this time, Basildon Council stresses that it does not believe that enough work has been carried out to determine the relevant infrastructure requirements for the Brentwood Borough growth and this could negatively affect the Brentwood Borough Local Plan's soundness and delivery.

Furthermore, the A127 is well documented to experience capacity challenges, particularly in peak periods, which is critical for all south Essex boroughs. Further joint working, through the principle agreed in the A127 Statement of Common Ground, developed for the London Borough of Havering Local Plan with all Highway Authorities, Local Planning Authorities and Highways England should continue, in order to understand capacity issues and required improvements, bearing in mind the scale of Brentwood Borough's growth being planned within the A127 Corridor. Without this work, Brentwood Borough could find its ability to unlock the capacity to deliver new communities and homes, particularly at an accelerated pace as suggested, is hindered by a lack of local infrastructure capacity and solutions to overcome it.

Employment Land - Need and Supply

Basildon Borough Council is generally supportive of the approach Brentwood Borough has taken, in identifying its employment land and job requirements, as informed by the Brentwood Economic Futures 2013-2033. It is noted that the evidence base on employment land need and supply (Economic Futures Report 2013-2033) has been updated to ensure that the right level and range of employment land is available to support a dynamic local economy, and that the economic forecasts are as up to date as possible and align to the current plan period.

Brentwood Borough Council has identified a range of potential employment allocations, including new employment development at Brentwood Enterprise Park, land adjacent to

Ingatestone by-pass, Childerditch Industrial Estate, Codham Hall, East Horndon Hall, North of A1023 and within Dunton Hills Garden Village. Whilst it appears that at a high-level, the level of employment land allocations is broadly sufficient to ensure that the Council meets its overall forecast employment land needs, which is supported, Basildon Borough Council does not unconditionally support the proposed location of new employment within the Dunton Hills Garden Village. There remains no evidence that this area of land was put forward in the Call for Sites, and how it is compatible with the 'moderate-high' rating in Brentwood's working draft of the Green Belt Study Part II: Green Belt Parcel Definition and Review 2018, when considering the purposes of land within the Green Belt. Such an allocation would, as currently understood, be in conflict with Brentwood Borough's own evidence base, and it is not clear as to how it would be able to justify it and mitigate any harm.

Brentwood Borough Council have also set out the principle that it would like to locate its employment land close to the strategic highway network. As stated previously, a SHLAA does not appear to have been completed since 2011, therefore the required changes to review economic land as part of the process have not been recently assessed, along with any other form of assessment for suitable, available and achievable employment land. Consequently, there has not been any evidence produced to inform the selection of employment locations or sites for inclusion in the Local Plan. The suitability and availability of such sites is not therefore not currently justified by the evidence available. As a result, further evidence to justify the planning rationale for the proposed Dunton Hills Garden Village's employment location, amongst others, is urgently required to avoid it negatively affecting the soundness of the Local Plan.

Part Two – Preferred Site Allocations

Dunton Hills Garden Village

Brentwood Borough's strategy for delivering its housing growth remains the same as was published within the Brentwood Draft Local Plan in 2016, which is to create sustainable urban extensions around Brentwood's main towns and villages and a new settlement to be called Dunton Hills Garden Village, between West Horndon and Laindon. The strategic allocation at Dunton Hills Garden Village is stated as being able to accommodate 2,500-3,500 homes, and currently accounts for over 30% of the identified housing growth within the plan period.

In addition, consideration is being given by Brentwood Borough Council as to whether the delivery of Dunton Hills Garden Village could be accelerated to increase its dwelling yield within the plan period. This is in response to the Government's proposed standardised objectively assessed housing needs methodology (set out in the Housing White Paper 2017 and consulted on in 2017), which indicates a need for Brentwood to deliver a capped figure of 454 dwellings per annum, or a total of 9,080 dwellings across the plan period (2013-2033). This equates to a difference of 1,480 dwellings to that initially proposed within the current draft Local Plan. Should Brentwood Council need to accommodate this increase in housing need, it is envisaged in the consultation document that Dunton Hills

has the capacity to deliver 2,500 dwellings within the plan period, but has a possible total dwelling yield in excess of 3,500 dwellings. This is at least another 1,000 dwellings and it is not clear the spatial extent or mitigation required to offset any negative impacts an increase in the dwelling size of the development would cause.

It is noted that Brentwood Council is in the process of developing a comprehensive masterplan for the new Dunton Hills Garden Village to engrain the core garden village design principles, and that it is intended that the final outcomes of the master planning work will inform the final submission local plan.

Basildon Council objected to the proposal to create a standalone new village to the west of the joint administrative boundary in February 2016. Basildon Council maintains the view that there currently remains a lack of credible and robust technical evidence to justify that a new village in this Green Belt location is the best option for meeting Brentwood Borough's housing needs, and continues to have doubts whether this allocation would be found sound at Examination in Public. In giving this view, Basildon Council is apprehensive that the scale of development proposed, which amounts to over a third of the borough's entire housing provision for the plan period, could be supported by infrastructure in the absence of a clear delivery plan. It remains unclear, if the proposal is approved, how it will relate in terms of access and connectivity to the Basildon urban area given the nearest town centre and acute healthcare facilities are all within Basildon Borough.

As detailed above, a SHLAA has not been completed since 2011. Whilst it is reassuring that the Interim SA states that it has been informed by an updated HELAA, this has not been published as part of the consultation and is considered to be a significant shortcoming in the 'working-out' of how the Brentwood Local Plan is coming together. As it stands, there is therefore no robust and credible evidence available publicly to demonstrate that the land required to provide the Dunton Hills Garden Village is available or suitable for the purpose to which it is proposed, or whether development in this location is achievable. In the absence of such evidence, the proposals for Dunton Hills Garden Village are currently not supported by Brentwood's own evidence, and it is not clear that they are deliverable. Consequently, Basildon Council considers that without any further evidence to support this proposal, Brentwood Borough's Local Plan is unlikely to be found sound on the basis of justification and effectiveness, and makes objections on these grounds. It is noted that this evidence identified as currently missing could be in the process of being prepared. However, Basildon Council remains concerned as to what would happen if the evidence reveals anything which is contrary to the emerging Brentwood Local Plan, and would therefore continue to monitor this.

Despite the difference of opinion on the area's development potential, the Council still has a legal Duty to Cooperate with Brentwood Borough Council (and vice versa) on strategic and cross boundary matters and it must continue to do so to ensure compliance for its own planning responsibilities. In 2016, Basildon and Brentwood Councils commissioned joint evidence under the Duty to Cooperate to establish how a landscape buffer could be set aside between the proposed areas for housing growth in Brentwood and Basildon

Boroughs, to create a visual separation between the edge of Basildon, if extended by Draft Local Plan allocation H10, and the new Garden Village and also provide a more attractive setting for these two communities. Essex Place Services was commissioned by both Councils to undertake this work, entitled the Dunton Area Landscape Corridor Design Options 2017. This document was prepared in order to inform any Development Frameworks/ Masterplans that could guide the embedding of green infrastructure between the development areas. This was to ensure that the desired objectives could be better achieved and that the settlements become desirable places to live, with connections to surrounding green space and recreational routes.

Basildon Council however notes that no reference has been made to this joint evidence within the 2018 Preferred Site Allocations consultation document, neither has it been listed within the Brentwood Local Plan Evidence Base Update. It is important that this evidence of landscape opportunity, informs the plan-making process in preparing the Brentwood Local Plan, just as it is informing the choices being made in the Basildon Borough. Basildon Borough Council therefore recommends that further consideration be given to the findings of this joint landscape evidence prior to the finalisation of the Brentwood Local Plan.

Having regard to the absence of evidence regarding the consideration of this site within a SHLAA, and also the evidence regarding infrastructure, Green Belt and landscape impacts, Basildon Borough Council does not support the proposals for Dunton Hills Garden Village as the proposals are not completely justified, could result in unplanned impacts being caused to services in the Basildon Borough and present a high risk of the Brentwood Local Plan being found unsound.

General Observations

Duty to Co-Operate

In order for the Brentwood Borough Local Plan to be found procedurally sound, it will need to take account of a broader range of issues and opportunities affecting neighbouring areas and the wider region, considering and addressing strategic cross-boundary issues.

Basildon Borough Council and Brentwood Borough Council have been working together on cross boundary strategic matters at an officer and member level. In November 2014, the Council's signed a Memorandum of Understanding (MoU) to explore whether development to the west of Laindon in Basildon and east of West Horndon in Brentwood had any potential of meeting some of the development needs of both Boroughs through a cross-boundary development opportunity in the form of a Garden Suburb. The Dunton Garden Suburb Statement of Consultation was published in December 2015. The MoU expired on 4 February 2016 and was not renewed.

Since the Brentwood Draft Local Plan 2016 consultation, several Duty to Cooperate meetings have been held in order to establish an effective relationship to ensure that the duty is being met. Both Councils have engaged in other shared pieces of work such as the

Dunton Area Landscape Corridor Design Options; the A127 Growth Corridor Study; A127 Statement of Common Ground; the Essex-wide Gypsy and Traveller Accommodation Assessment and the Essex Coast Recreational Disturbance Avoidance Mitigation Strategy (RAMS). Basildon Council remains broadly satisfied with the degree of engagement, noting the specific exceptions set out in this response, and will encourage that ongoing discussions on the content of the new Local Plan and its approach to cross-boundary matters such as housing growth, employment growth, and infrastructure provision should continue to be taken forward with all the relevant stakeholders.

Attention is drawn to the joint-working that is underway in South Essex, which aims to deliver a more coordinated planning, regeneration and investment agenda to benefit the combined local communities. It is expected that the development of a Joint Strategic Planning and Infrastructure Framework (SPIF) would set the strategic growth objectives for South Essex and provide the “effective mechanism” required to determine how unmet development needs from individual local authority areas would be met. Building on this foundation, it is also relevant to mention the South Essex 2050 which is a unified long-term place vision for the South Essex area, with the addition of Brentwood Borough Council. This work, due to conclude in early 2018, is expected to determine how the work on the Joint SPIF and its inter-relationships to South Essex Local Plans will be prepared and managed in the future, and could accelerate the conditions needed to deliver the shared housing & job ambitions, enabled by significant improvements to transport & other infrastructure. This commitment is important when making bids for funding and seeking fulfilment of the Duty to Co-operate and is welcomed as a way in which more coordinated planning can occur for the benefits of South Essex communities.

It is however considered that further engagement remains necessary to understand the extent of the impacts of the proposed Dunton Hills Garden Village on landscape, education, healthcare and highways infrastructure in the Basildon Borough, and the mitigation required. The proposals in Basildon and Brentwood Boroughs could, without careful planning and site allocation choices lead to settlement coalescence and inadequate access to appropriate infrastructure, which in turn could have implications on the quantum of development that can be brought forward in this location on both sides of the boundary.

Infrastructure is of considerable importance within the Basildon Borough, and the delivery of new and improved infrastructure to support new development will be a key factor in determining whether or not the Council will be able to meet its objectively assessed needs for housing and economic development. In light of this, it is recommended that Brentwood and Basildon Councils should continue together under the Duty to Cooperate, to determine a suitable way forward for this area, so as to prevent coalescence of place, and address any infrastructure concerns in a more joined up manner.

Brentwood Borough’s Reasonable Alternatives

Basildon Borough Council has previously commented on the Brentwood Draft Local Plan 2016 in relation to identifying and considering reasonable alternatives when developing



the Local Plan's spatial strategy, growth options, specific sites and policies to ensure compliance with national policy and Strategic Environmental Assessment legislation. As stipulated in paragraph 182 of the NPPF, for a Local Plan to be found "sound" it should have been positively prepared, be effective including the plan's deliverability, be consistent with national policy and be justified insofar as being the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence. It is not currently clear from the published evidence how Brentwood Borough Council can demonstrate this and a technical comment is being raised that the Brentwood Local Plan could be procedurally unsound as a result of this.

Evidence Base

The NPPF at paragraph 158 requires that each local planning authority should ensure that the Local Plan is based on adequate, up-to-date and relevant evidence about the economic, social and environmental characteristics and prospects of the area.

It is noted that some of the evidence base which will inform and support Brentwood Borough Council's emerging Local Plan are still underway, including key supporting evidence such as Green Belt, landscape, ecology, transportation and infrastructure evidence. In the absence of this evidence base, it is not possible for Basildon Council to comment on whether the forthcoming evidence will be comprehensive and appropriate for what the Local Plan will cover.

Basildon Borough Council therefore continues to express its disappointment that there is still a significant evidence base gap which has not been addressed following previous consultation responses to Brentwood Borough Council. The lack of up-to-date and sufficient evidence is seen to be a fundamental flaw to the Brentwood Borough Draft Local Plan. Basildon Borough Council therefore considers that the Brentwood Borough Draft Local Plan requires further work and refinement, and that it remains premature of a clear appreciation and understanding of the baseline context in the Brentwood Borough and the wider Essex area. It is difficult to see how the Draft Local Plan can be taken forward without the necessary evidence base being significantly advanced to demonstrate it has informed its development, and urgent work is required to rectify this.

Interim Sustainability Appraisal of the Brentwood Draft Local Plan: Preferred Site Allocations

The content of the Interim Sustainability Appraisal (SA) of the Brentwood Local Plan has been reviewed. It is acknowledged that it is an Interim SA Report and is therefore a 'work-in-progress'.

In reviewing what has been evaluated at the SA's baseline and the judgements that it makes through the report, the following observations have been made which Brentwood Borough Council should ensure its SA consultants, AECOM, review and address before the Local Plan is advanced:

1. The Interim SA highlights the importance of functional linkages to the Basildon Borough as part of the appraisal of options, however, in practice, the proposals emerging from the Local Plan currently fail to address this linkage in a planned fashion.
2. It is concerning that in the Interim SA, the level of local support appears to have been factored into the SA. Whilst this may be a legitimate consideration for the Council, should it judge it to be a valid issue, this is considered inappropriate for the SA, which should maintain as much objectivity as possible in order to inform plan-making.
3. Section 7.2.1 covers Air Quality and incorrectly informs the Local Plan that there are no air quality issues on the A127. On the contrary, the approach to the A127 Fortune of War junction, 1-1.5km to the east of the edge of the location for Dunton Hills Garden Village is identified within the UK Plan for Tackling Roadside Nitrogen Dioxide Concentrations (July 2017). As a result of this, air quality on the A127 is a sustainability issue for the Basildon Borough Local Plan and is already assumed will affect the phasing of development on proposed development sites in the vicinity. Section 8.2.1 assumes that Dunton Hills will have no delayed delivery. It is considered that this does not factor this issue into this conclusion and that this could therefore, in turn, affect the phasing of growth coming forward at Dunton Hills, which the Brentwood Local Plan SA should recognise and take account of given the proximity and potential implications on development.

Habitats Regulations Assessment of the Brentwood Draft Local Plan: Preferred Site Allocations

Basildon Borough Council has reviewed the content of the Brentwood Draft Local Plan: Preferred Site Allocations Habitats Regulations Assessment, and no issues have been identified on which to raise an objection.

It should however be noted that the assessment does identify the potential for growth in Brentwood Borough to cause recreational disturbance to European sites on the Essex Coast. Brentwood Borough Council, like Basildon Borough Council, has signed the Memorandum of Understanding for the Essex Recreational Disturbance Avoidance and Mitigation Strategy (RAMS), and is therefore actively engaged in the Essex wide project to address this issue. Basildon Borough Council welcomes the positive working arrangement that now exists in relation to the Essex Coast RAMS.

Yours sincerely,

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