

19 March 2019

Planning Policy Team,
Brentwood Borough Council,
Town Hall,
Brentwood,
Essex
CM15 8AY
Electronic copy sent by email

Dear Sir/Madam,

Brentwood Regulation 19 Pre-Submission Local Plan (February 2019)

On behalf of Crest Nicholson and Bellway Homes, AECOM enclose herein representations relating to the Brentwood Regulation 19 Pre-Submission Local Plan (February 2019) Public Consultation. A completed comment form is provided overleaf.

Appendix 1 shows the extent of our client's landholdings - part of site reference 200 of the *Housing and Economic Land Availability Assessment (HELAA)* and allocated under Policy R01 (I): Dunton Hills Garden Village Strategic Allocation in the draft plan. The borough boundary currently forms the edge of the allocation in the Brentwood Local Plan, our client's landholdings also extend to the west of Basildon within the adjacent borough of Basildon.

Our clients request attendance at the relevant hearing sessions to make verbal submissions in response to matters and questions related to: the Duty to Cooperate; housing numbers and the spatial strategy, landscape, transport, infrastructure, deliverability and the strategic allocations.

Yours sincerely,

David Carlisle
AECOM Limited, on behalf of Bellway Homes and Crest Nicholson
E: David.carlisle@aecom.com



**BRENTWOOD
BOROUGH COUNCIL**

Brentwood Pre-Submission Local Plan (Regulation 19)

January 2019

COMMENT FORM

Section A: Personal Details

Title	Mr
First Name	David
Last Name	Carlisle
Organisation (if applicable)	AECOM on behalf of Bellway Homes and Crest Nicholson
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Section B: Your Representation

Full Name	David Carlisle
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Question 1: Please indicate which consultation document this representation relates to?

The Local Plan

Sustainability Appraisal

Habitat Regulations Assessment

Question 2: Please indicate which section of the indicated document identified above that you are commenting on (where applicable please clearly state the section / heading or paragraph number).

Policy SP02: Managing Growth

Policies BE11 – BE17

Policy NE13: Site Allocations in Green Belt

Policy HP18: Designing Landscape and the Public Realm

Policy R01 (i): Dunton Hills Garden Village Strategic Allocation

Policy R01 (ii): Spatial Design of Dunton Hills Garden Village

Policy R01 (iii): Scheme Delivery and Management

Question 3: Do you consider the Local Plan is:

Sound?*

YES

NO

Legally Compliant?

YES

NO

Compliant with the Duty to Cooperate?

YES

NO

Question 4: If you consider the Local Plan unsound, please indicate your reasons below (please tick all that apply):

The Local Plan has not been positively prepared

The Local Plan is not justified*

The Local Plan is not effective*

The Local Plan is not consistent with national planning policy

**The Local Plan is mostly sound, some amendments are required in advance of submission – see appended representations.*

Question 5: Please provide details of either:

See – appended representations.

Question 6: Please set out what modification(s) you consider necessary to make the Local Plan sound or legally compliant, having regard to the matters that you identified above.

See – appended representations.

Question 7: If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the Examination in Public (EiP)?

NO, I do not wish to participate in the oral part of the EiP

YES, I wish to participate in the oral part of the EiP

Question 8: If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary.

Our clients request attendance at the relevant hearing sessions to make verbal submissions in response to matters and questions related to: the Duty to Cooperate; housing numbers and the spatial strategy, landscape, transport, infrastructure, deliverability and the strategic allocations. We reserve the right to make further representations at the examination hearing sessions, should work on Brentwood's Community Infrastructure Levy evolve in respect of any implications on strategic sites and their ability to deliver policy compliant schemes.

Bellway Homes and Crest Nicholson representations Brentwood Regulation 19 Pre-Submission Local Plan (February 2019)

Merits of our client's landholdings and the Dunton Hills Garden Village

Bellway Homes and Crest Nicholson's landholdings (part of allocation R01) are unconstrained, suitable, deliverable and available. As such the landholding can be brought forward as part of the wider Dunton Hills Garden Village allocation.

Our clients are housebuilders, not land promoters, and are seeking delivery at the earliest opportunity pending suitable access. Crest Nicholson and Bellway Homes will continue to work with officers and Councillors (and other landowners/developers) to help bring forward this key site for meeting local housing needs in South Essex. It is absolutely right that the allocation should not be anchored to the work that will be carried out as part of the Association of South Essex Local Authorities (ASELA) and the emerging Joint Strategic Plan (JSP).

The identification of strategic scale sites to meet Brentwood's housing needs is supported, as is the principle of a new settlement via the Dunton Hills Garden Village Strategic Allocation (Policy R01) and its ambition for the delivery of additional homes beyond the plan period. The allocation represents an efficient use of greenfield land adjudged to be sustainable. Similarly we commend the Council for taking the decision to bring forward strategic greenbelt release alongside a comprehensively planned new settlement.

Our clients would support improved integration with Basildon alongside a landscape solution/approach agreed via a Statement of Common Ground and complementary policy positions (and/or supporting text) in both the Brentwood and Basildon Local Plans. This would help to deliver Dunton Hills Garden Village and the future expansion of West Basildon whilst maintaining separation physically through the provision of publicly accessible green infrastructure and improving connectivity for new and existing residents. Our clients do not support the position taken by Basildon Borough Council and have submitted representations objecting to the draft Basildon Local Plan.

Policy SP02: Managing Growth

Paragraphs 4.11 – 4.21 of the draft plan set out Brentwood's housing need position based upon the application of the standard methodology for calculating a minimum Local Housing Need figure; and the identification of a 20% buffer of housing sites for the first five years of the plan. The plan, at paragraph 1.38, also states that:

"..it may be necessary to review the Brentwood Local Plan, at least in parts, to ensure any opportunities for further growth and infrastructure provision in the Borough identified in the Joint Strategic Plan can be realised."

Our clients support this approach. Brentwood is seeking to meet their identified housing needs in full plus a sufficient buffer in the early part of the plan period. Crucially the draft plan is not using the JSP as a reason for deferring difficult planning decisions. As such, the draft plan is not reliant upon the emerging JSP to meet Brentwood's needs up to 2033. There has been no consultation to date on the JSP (as at March 2019) and it would be wholly unsound to rely upon a future JSP to meet identified needs up to 2033. Our clients support the pragmatic approach set out by Brentwood which is in accordance with the National Planning Policy Framework (paragraphs 11, 16 and 26 – a 'positively' prepared plan that seeks 'opportunities to meet the development needs' of their area and is 'sufficiently flexible to adapt to rapid change').

Our clients would advocate delaying submission of the publication plan until the 2018 affordability ratio data is released by the Office for National Statistics (the data used in the standard methodology for calculating housing need), due for publication in March/April 2019. This would allow time for factual updates to be made to Policy SP02 and housing target. Should submission come before the publication of the affordability ratio data, Brentwood should consider over allocating sites to increase the buffer of sites over for the whole plan period – sufficient to provide flexibility in respect of any increases brought about by the new affordability data published prior to or shortly after submission.

The recent release of the Housing Delivery Test (HDT) in February 2019 confirmed that Brentwood and all the other ASELAs (with the exception of Thurrock) have to identify a 20% buffer to their five year housing land supply and prepare a HDT Action Plan by August 2019. The minimum Local Housing Need figure (produced by the new standard methodology) will be applied to all authorities from 2018/19 for the purposes of the HDT (unless there is a plan that is less than 5 years old). As such Brentwood (and Basildon) will both be subject to HDT assessment on the basis of the minimum Local Housing Need figures until such time that their plans are adopted.

Table 1 (below) shows the HDT results published by MHCLG (19th February 2019) for all Councils that make up the ASELAs. This shows housing delivery has only been achieved in one of the past three monitoring years (2016/17) for Basildon and it was never achieved by Brentwood. The HDT results evidence a persistent under delivery of housing in the South Essex region. Brentwood and Basildon are at risk of failing the HDT thresholds in 2019 and 2020. At present, Brentwood is in danger of falling below the 45% threshold this November 2019. This would leave the authority open to the presumption in favour of sustainable development (the ‘tilted balance’) and susceptible to speculative applications outside of the identified draft allocations. For Basildon there is a real risk that they will also be captured by the presumption in favour of sustainable development (75% threshold) as early as November 2020. Basildon’s position is even more precarious given that they have not identified sufficient land to meet their minimum Local Housing Need, let alone a 20% buffer for the first five years, in their previous consultation draft plan.

Table 1 South Essex HDT results (MHCLG, February 2019)

Area Name	Number of homes required			Total number of homes required	Number of homes delivered			Total number of homes delivered	Housing Delivery Test: 2018	Housing Delivery Test: 2018 consequence
	2015-16	2016-17	2017-18		2015-16	2016-17	2017-18			
Basildon	660	657	773	2,089	816	412	341	1,569	75%	Buffer
Brentwood	302	305	325	933	111	150	213	474	51%	Buffer
Castle Point	285	287	249	821	118	114	163	395	48%	Buffer
Rochford	251	255	259	764	159	116	299	574	75%	Buffer
Southend-on-Sea	824	824	847	2,495	222	480	521	1,223	49%	Buffer
Thurrock	814	815	851	2,480	711	603	857	2,171	88%	Action plan

This illustrates the severity of the housing crisis in South Essex and the pressing requirement for all ASELAs authorities to identify sufficient land supply (to meet their needs and a 20% buffer for the first five years) and maintain the plan-led approach. Basildon’s failure to allocate sufficient sites to meet housing needs will impact the other ASELAs partners (e.g. increased unmet needs in the region).

Duty to Cooperate

The above issues should be addressed as a matter of urgency through Brentwood and Basildon’s Duty to Cooperate Statements of Common Ground. A Duty to Cooperate position statement is welcome, although the MOU with the ASELAs is insufficient to evidence the detailed Duty to Cooperate matters that need to be addressed with Basildon. A Statement of Common Ground that outlines areas of uncommon ground would be just as valuable in advance of submission of both plans and the forthcoming examinations.

This will help to avoid creating inconsistencies or prejudice any future plan making as part of the ASLEA JSP. If Basildon and Brentwood both wish to avoid the appearance of sprawl along the A127, this can be achieved through a simple Statement of Common Ground and via identical high-level policies (or supporting guidance) in each Local Plan. At present the current policy position does not ensure an integrated approach to delivery of the Garden Village and adjacent sites to the West of Basildon. It is our client’s view that a failure to tackle this issue head-on now could stall delivery on

Dunton Hills Garden Village. The JSP is not the appropriate vehicle for resolving a planning issue within the emerging Basildon and Brentwood plans; this matter must be resolved prior to submission, of both Local Plans (ideally via a Statement of Common Ground).

Policy NE13: Site Allocations in Green Belt / Policy HP18: Designing Landscape and the Public Realm

Our clients support the strategic release of greenbelt sites in sustainable locations. Dunton Hills Garden Village has followed a robust Green Belt review; Sustainability Appraisal; and site selection process. The draft plan does not allocate land between Dunton Hills Garden Village and West Horndon; therefore it maintains physical separation and avoids the coalescence of the new settlement and existing built up area of West Horndon. To date there is no evidence that it would be possible to meet the Borough’s acute housing needs without amending the Green Belt boundaries as proposed in the draft plan.

The Stage III Green Belt Review January 2019 (GBR3) continues the work of the previous two stages. Again the methodology used appears sound and has been consistently applied. GBR3 assesses the DHGV site, Parcel 200, as being Not Contained, exhibiting Significant Separation Reduction between settlements, as being Functional Countryside and of Limited Relationship to Historic Towns. This results in an overall conclusion of Parcel 200 making a moderate to high contribution to the Green Belt. As with the LSCA the scale of DHGV inevitably results in elevated scores.

The Dunton Hills Garden Village allocation (shaded yellow) and wider Green Belt parcel incorporating land West of Basildon in Basildon Borough (shaded red) shown on **Figure 1** (below) is an area bounded by the A127, the A128, a railway line and the western edge of Basildon – there are few (if any) examples nationally of more contained and defensible boundary in Green Belt terms.

Figure 1 Green Belt Context: Land West of Basildon (red) and Dunton Hills Garden Village (yellow)



There would be clear separation maintained between Dunton Hills Garden Village and West Horndon in Brentwood Borough. Paragraph 9.12 is also supported as it recognises that “The B148 (West Mayne) is the eastern road beyond the borough boundary separating the site from the built-up area of Basildon”. If Dunton Hills Garden Village and the land West of Basildon (in Basildon Borough) are both allocated it is only logical to remove all of this land from the Green Belt based upon the strong defensible boundaries that exist for both areas. Landscape approach, design principles and physical separation can (as previously discussed) be dealt with via a Statement of Common Ground and complementary Local Plan policies (and guidance) in the respective plans. Policy R01 includes a detailed statutory policy to ensure the new settlement is comprehensively planned via landscape-led approach. This will ensure the development is not simply ribbon development along the A127 and instead an autonomous Settlement Category 2 Garden Village that will complement the existing settlement hierarchy and is well related to the existing communities of Basildon and Laindon and West Horndon.

The Landscape Sensitivity and Landscape Capacity Study: Potential and Strategic Allocation Options October 2018 (LSCA) assigns a landscape capacity to the potential allocations. The methodology used appears sound and has been consistently applied. The LSCA identifies the DHGV site, Parcel 200, as being of high landscape sensitivity, medium – low landscape value and medium – medium low landscape capacity. It is noted that the scale of the strategic options considered make comparison with smaller sites difficult. The scale of DHGV inevitably results in elevated scores.

The site is not the subject of any landscape quality designations that would prevent development. Our clients consider that Policy HP18: Designing Landscape and the Public Realm, in combination with Policy R01(I) clause C, provide an adequate policy framework for guiding a future landscape scheme - including the provision of green infrastructure between R01 and the development of the West of Basildon.

Policy R01: Dunton Hills Garden Village Strategic Allocation

The policy would benefit from being shortened and simplified. Much of the detail could instead be covered in the supporting text. Our clients would recommend a less prescriptive policy in favour of a series of development principles. The policy also recognises the appropriate phasing of infrastructure and mechanisms for delivery. However, our clients have a number of detailed comments to help enhance the clarity and utility of the draft policy.

R01(I)

- Clause B uses the term “self-sustaining” – this is currently an undefined term in the context of the facilities that may be required by future residents. It is likely that services and schooling would also be accessed in Basildon and so the policy should also recognise the importance with connectivity to nearby allocations and settlements in Basildon Borough. Whilst appreciating the need for a garden village to be separate, it should also be appropriately connected and complimentary to nearby settlements.
- There is a slight inconsistency between policy clauses A and D in the use of “around 2,700 homes” and “at least 2,700 homes” in the plan period. Our clients would favour the more positive “at least” in light of the pressing housing needs in the area.
- Policy clause D(c) currently expresses a requirement for employment land as 5.5ha. An alternative approach would be to also reference a jobs figure, employment densities are not fixed and the policy will need to remain flexible to provide the optimum employment solution on the site up to 2033.
- Policy clause D(d) references a co-located Secondary school, but this term is not defined in terms of what facilities could be appropriately co-located or any indication on forms of entry etc. This clause could cross reference to the Infrastructure Delivery Plan that shall remain a living document capable of being updated as the development of the site evolves.
- Policy clause D(h) states 50% of the “total land area”, this term is not defined and may have implications for the net developable area. Without the benefit of a detailed masterplan and Environment Statement supporting an application this requirement appears needlessly onerous and will make the allocation less flexible. We would suggest removal of a specific percentage in advance of further masterplanning and consultation.

R01 (II)

- Policy clause C(f) states: “a green infrastructure buffer / wedge on the eastern boundary with Basildon Borough to achieve visual separation to help significantly improve the landscaped and habitat value thus reinforcing the beneficial purpose and use of the green belt in that zone.” This matter needs careful consideration in advance of submission in light of Basildon’s representations and their erroneous position on Green Belt coalescence and countryside encroachment in their draft plan (which fails to allocate sufficient land to meet needs). Brentwood should provide further clarity that this separation can be achieved without

sterilising large tracts of the allocation. A modest multifunctional green gap running north-south in close proximity to the Borough boundary would be a proportionate response in this location.

- Policy clause D(c) states “pathways through the green and blue infrastructure (GBI) network will be made of permeable material and follow a coherent treatment throughout the village. The pathways will all connect into a circular walk, with interconnected shortcut routes and be signposted offering directions to key destination points”. It is premature at this stage to place overly restrictive pathway design where they may be sound place-making reasons for not following this approach in all areas.
- Policy clause I(a) states that emphasis will be given to: “incorporating car sharing clubs and electric vehicle only development”. Whilst the principle is supported, this may not be appropriate for all areas of this large allocation and would be overly restrictive.
- Policy clause L(b) includes a small typo for BREEAM. This clause should make clear that BREEAM is for certain types of building only.

R01 (III)

- Clause B states: “The development and phased delivery of DHGV must ensure the timely delivery of the required on-site and off-site infrastructure to address the impact of the new garden village”. Whilst supported and the timely delivery on infrastructure is essential in the creation of a sense of community, off-site infrastructure may be beyond the control of the primary land owners/promoter, and risks stalling development if a Grampian condition is envisaged.

An explicit policy clause is urgently required to ensure for a no ransom position. The primary developer must build roads up to the boundary of Crest Nicholson and Bellway Homes landholding. Without this added clause the allocation would be ineffective based upon the tests of soundness.

The Site benefits from the involvement of volume housebuilders which, according to the Letwin Review (2018), leads to a variety in product and higher build out rates. An extensive analysis of national house builder annual reports, conducted by Turley on behalf of Bellway Homes, demonstrates that average delivery rates (per outlet) range from between 40-58 units pa¹. There is potential for sites (normally larger sites) to see a number of outlets building new homes at any one time. Additional outlets are sometimes in the form of a different house builder, but it can also be in the form of different products sold from different marketing suites by the same house builder. Crest Nicholson and Bellway Home’s landholdings are jointly promoted in order to deliver high quality sustainable developments at pace and will help to achieve the housing trajectory set out in Appendix 1 of the draft plan.

The plan’s delivery trajectory relies on increased delivery in the later part of the plan period (partly reliant on infrastructure investment). This emphasises the importance of infrastructure equalisation and removing any ransom scenarios as far as practically possible through statutory policy. In addition, it would be prudent for the ASELA authorities to work together to lever in external funding for reinforcements such as the gas pipeline to enable an alternative access arrangements and internal connectivity that would release more development land for housing and public open space later in the plan period.

R01 Supporting text comments:

- Paragraph 9.30 includes a reference to ‘Medium’ density- but this is not defined. The allocation location is in close proximity to Basildon and West Horndon and the potential for sustainable modes of transport lends itself to higher densities in district and local centres.

¹ Based upon 2017 House builder Annual Reports for Barratt/David Wilson, Persimmon, Taylor Wimpey, Bellway, Bovis, Crest Nicholson, Redrow and Galliford Try (Linden Homes).

Transport policies B11 – B17

The general approach taken to transport within the Local Plan with the Built Environment policies (BE11 to BE17) is supported and it can be seen that these policies are feeding through into the policies for the site specific allocations.

The evidence base for the Local Plan includes Brentwood Borough Local Plan Transport Assessment (Local Plan TA) dated (October 2018) prepared by PBA and the Infrastructure Delivery Plan (IDP) prepared by the Council. These documents together provides the transport element of the evidence base and support the Council's proposed development strategy including the proposed development at Dunton Hills. They are essential elements of the evidence base and their soundness is not questioned in these representation, however, the conclusions of the Local Plan TA and the IDP need to be better reflected in the Local Plan.

The Local Plan TA sets out the approach to the modelling work, results of modelling and junction assessment, highlights those worse performing junctions that may require mitigations, the sustainable measure proposed and the impact this has on the junction assessment to enable the development sites to come forward. The assessment covers key 27 junctions within Brentwood planning authority.

The assessment assumed that DHGV would provide 2,500 new homes in the Local Plan period along with 5.5ha of employment land. In addition, number of sites located within Basildon Borough Council and Havering Borough Council were included within the reference case scenario in order to accurately assess the impact of Brentwood Local Plan. The West Basildon Urban Extension was included within the reference case assuming provision of 1000 new homes as per 2016 Basildon Local Plan publication.

The Local Plan TA identifies a number of junctions that would need to be improved across the Borough to support the development proposed in the Local Plan. However, the Local Plan Submission Version does not include reference to these. As an example, the following table contains the identified improvements in the surrounding roads to Dunton Hills Garden Village.

Table 2 Results of PBA capacity assessment, Brentwood Local Plan Evidence Base

Junction ID	Location	Junction Type	Mitigations Proposed
13	A127/ A128 Brentwood Road/ A128 Tilbury Road	Roundabout	Installation of signals at the end of the A127 westbound off-slip
14	A127/ Childerditch Lane	Priority Junction	Operates below capacity - No mitigation required
15	A128 Ingrave Road/ The Avenue	Double Mini Roundabout	Widening of exit taper onto A128 Ingrave Road, Widening to three lanes between Junction 15 and 16
16	A128 Brentwood Road/ Running Waters	Double Mini Roundabout	Widening of A128 Brentwood Road to increase stacking capacity up to the roundabout.
19	B186 Warley Street / A127 eastbound	Priority Junction	Funded ECC Scheme Provides adequate capacity
20	B186 Warley Street/ A127 westbound	Priority Junction	Funded ECC Scheme Provides adequate capacity
26	M25 Junction 29	Grade Separated Roundabout	Further work required with HE and other authorities
27	A128 Tilbury Road/Station Road	Priority Junction	Station Road widening to provide dedicated left and right turn lanes.

While it is clear that some of these improvements would be provided via Essex County Council (ECC) or Highways England as the relevant highway authorities there is no reference made in the Local Plan to them. It would be expected that the evidence base would transfer through to the IDP to be clear on how and when these identified infrastructure improvements would be provided.

As each identified allocated site comes forward to a planning application stage it will define what highway improvements are needed through the Transport Assessment associated with the individual site. However, guidance should be given on what improvements have been identified as part of the Local Plan TA to ensure that the need for them is considered and if they are required then how would they be funded i.e. guidance is needed on the scope for any future Transport Assessments to support developments.

The IDP contains a similar table for highway infrastructure improvements and those relevant to Dunton Hills Garden Village are listed in Table 3 below:

Table 3 IDP Schedule extract

Ref	Infrastructure requirements	Detail
T4	New E-charging Infrastructure	Introduce electrical parking points to encourage use of such vehicles and plan and deliver other IT infrastructure redundancy to allow future implementation of emerging SMART systems. All new residential and commercial developments should include e-charging spaces for car clubs using e-vehicles and charging hubs for e-bikes. Important to facilitate sustainable north/ south movements from DHGV to Central Brentwood.
T16	West Horndon Public Realm Improvements	Public Realm - New village centres/ civic square at West Horndon industrial estate redevelopment. Subject to detailed masterplanning there will be a need to provide high quality public realm or civic square associated with the redevelopment.
T17	A127 Corridor Strategic Cycle Route	Strategic Cycle Route – Connecting major development sites along the southern growth corridor. Mixed environment cycle route with supporting infrastructure connecting DHGV, West Horndon, Childerditch Industrial Estate and Brentwood Enterprise Park.
T18	A127 Bus Infrastructure	New Bus Route Infrastructure – new linked bus route serving key new developments within the southern growth corridor. Early adoption of bus infrastructure within DHGV and other key extension / development sites supported with appropriate infrastructure with connection via West Horndon Transport Interchange. Also review changes to NHS hospital services and transport implications
T19	West Horndon Station - New Transport Interchange	West Horndon New Transport Interchange - Create through phases a new multi-modal interchange at West Horndon Station. This interchange will serve the DHGV, Childerditch, West Horndon and Enterprise Development sites, plus any future Northern Thurrock developments.
T20	DHGV - Widening Connectivity	Feasibility studies into green bridge (A127) and pedestrian underpass (A128). Options to be explored looking at feasibility of providing additional connectivity to surrounding areas. Capital costs headline estimate only
T21	DHGV - Sustainable Transport Hub	Cycle Hub and Charging Points - Dunton Hills e-bike/ cycle hub – integrated cycle hub with supporting facilities. Opportunity to engrain enhanced cycle facilities within the scheme to promote and support the uptake of e-cycles and conventional bikes/ possible link to e-charging infrastructure.
T22	DHGV - Sustainable Transport Hub	Cycle Hub and Charging Points - Dunton Hills e-bike/ cycle hub – integrated cycle hub with supporting facilities. Opportunity to engrain enhanced cycle facilities within the scheme to promote and support the uptake of e-cycles and conventional bikes / possible link to e-charging infrastructure.
T23	DHGV - Public Realm and Village Square	Village Square Public Realm - New pedestrian focused village centres/ civic square at DHGV. Subject to detailed masterplanning there will be a need to provide high quality public realm or civic square associated with the garden village.
T24	Local Highways Network Improvements	Various junction improvement measures - junction widening/ prioritised lanes/ road realignments. Headline estimate only.

T25	M25 J.29 Improvements	Costs/ exact project unknown at this stage
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In addition to four infrastructure requirements relating specifically to DHGV a number of requirements are set out in the IDP for new developments and site allocations coming forward in the Local Plan period. Key improvements to be delivered as part of DHGV development are:

- DHGV: Widening Connectivity – further feasibility studies required to improvements of pedestrian connectivity across the A127 and A128;
- DHGV: Walkways/ Cycleways – provision of a good footway and cycle way network;
- DHGV: Sustainable Transport Infrastructure – provision of cycle hub within the DHGV site; and
- DHGV: Public Realm and Village Square – subject to detailed masterplanning good quality pedestrian centres should be provided.

It is acknowledged within the proposed policy for Dunton Hills Garden Village that reference is made for the need for a Transport Assessment report to be undertaken and this is where the detailed assessment can be made of the highway infrastructure needed to support the proposed allocation. However, there should be some reference to the published evidence base to guide the scope of this work. This is not to say that the identified improvements will be needed, but they should be considered as they have been identified within the evidence base.

Attendance at the examination hearing sessions

Our clients request attendance at the relevant hearing sessions to make verbal submissions in response to matters and questions related to: the Duty to Cooperate; housing numbers and the spatial strategy, landscape, transport, infrastructure, deliverability and the strategic allocations. We reserve the right to make further representations at the examination hearing sessions, should work on Brentwood's Community Infrastructure Levy evolve in respect of any implications on strategic sites and their ability to deliver policy compliant schemes.

Appendix 1 Bellway Homes and Crest Nicholson Landholdings

