

## **ANNEX 1: ESSEX COUNTY COUNCIL RESPONSE TO BRENTWOOD BOROUGH LOCAL PLAN – STRATEGIC GROWTH OPTIOSN CONSULTATION (JANUARY 2015-March 2015)**

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ECC response dated 16<sup>th</sup> February 2015.

### **1. INTRODUCTION**

Essex County Council (ECC) supports the preparation of the Brentwood Local Plan. A Local Plan by setting out a vision and policies for the long-term planning and development of the borough should provide a platform from which to secure a sustainable economic, social and environmental future to the benefit of its residents, businesses and visitors. A robust long-term strategy will provide a reliable basis on which ECC may plan future service provision and required community infrastructure for which it is responsible. ECC will also use its best endeavours to assist Brentwood BC on strategic and cross-boundary matters under the Duty to Cooperate, including engagement and co-operation with other organisations for which those issues may have relevance.

In accordance with the duty to cooperate, as established in the Localism Act 2011, ECC will contribute cooperatively to the preparation of the Brentwood Local Plan, particularly within the following broad subject areas,

- ECC assets and services. Where relevant, advice on current status of assets and services and the likely impact and implications of proposals in emerging Local Plans for the future operation and delivery of ECC services.
- Evidence base. Guidance with assembly and interpretation of the evidence base both for strategic/cross-boundary projects, for example, education provision and transport studies and modelling.
- Policy development. ‘Critical friend’ contributions on the relationship of the evidence base to structure and content of emerging policies and proposals.
- Sub-regional and broader context. Assistance with identification of relevant information and its fit with broader strategic initiatives, for example, the Economic Plan for Essex, the South East Local Enterprise Partnership Growth Deal and Strategic Economic Plan, and assessments of how emerging proposals for the borough may impact on areas beyond and vice-versa.
- Inter-relationship between Local Plans. Including the Essex Minerals Local Plan and Essex and Southend-on-Sea Waste Local Plan.

ECC welcomes the preparation and publication of updated and additional evidence base documents to inform and justify and positively prepare a Local Plan.

### **2: ECC INTEREST IN THE BRENTWOOD BOROUGH – Strategic Growth Options Consultation, 2015-2030**

ECC is keen to influence and shape future spatial development strategies and policies delivered by Local Planning Authorities throughout Essex. ECC also aims to ensure that local strategies and policies will provide the greatest benefit to deliver a buoyant economy for existing and future persons that live, work, visit and invest in Essex. Involvement is necessary because of the ECC role as,

- a key partner within Essex promoting economic development, regeneration, infrastructure delivery and new development throughout the County; and
- the strategic highway and transport authority, including responsibility for the delivery of the Essex Local Transport Plan and as the local highway authority; local education

authority; Minerals and Waste Planning Authority; and major provider of a wide range of local government services throughout the county of Essex.

### **Strategic context and strategies**

A range of strategies produced solely or in collaboration with the Essex borough, city and district councils and Greater Essex unitary authorities Thurrock and Southend-on-Sea provide the strategic context for our response to the Local Plan Consultation. The relevant strategies are set out below –

#### Vision for Essex 2013-2017

The Vision for Essex sets out the principles that will support the community of Essex. A key principle is to 'work in partnership' to deliver the best outcomes for service users. ECC works collaboratively with partners including local planning authorities. We assist all Essex and relevant neighbouring planning authorities in developing emerging spatial and planning policies to ensure that positive impacts for Essex are delivered and mitigation measures minimise potential negative impacts.

The Vision for Essex sets out the Cabinet's vision and priorities for the next four years and will inform the development of a revised corporate strategy designed to,

- increase educational achievement and enhance skills
- develop and maintain the infrastructure that enables our residents to travel and our businesses to grow
- support employment and entrepreneurship across our economy
- improve public health and wellbeing across Essex
- safeguard vulnerable people of all ages
- keep our communities safe and build community resilience and
- respect Essex's environment.

The vision for Essex is based on the following principles,

- We will spend taxpayers' money wisely
- Our focus will be on what works best, not who does it
- We will put residents at the heart of the decisions we make
- We will empower communities to help themselves
- We will reduce dependency
- We will work in partnership
- We will continue to be open and transparent.

The ECC response to the consultation is consistent with these principles because it aims to facilitate working in partnership to deliver the best outcomes for service users.

#### Council's Outcomes Framework (2014 – 2018)

In February 2014 ECC adopted the Outcomes Framework for Essex - a statement of seven outcomes that set out its ambition based on its Vision for Essex 2013-17. The commissioning strategies provide a focus for the Council and partners in targeting resources and shaping service delivery.

The Outcome that are specifically relevant to this Local Plan consultation include -

- Children in Essex get the best start in life;
- People in Essex enjoy good health and wellbeing;
- People have aspirations and achieve their ambitions through education, training and lifelong-learning;
- People in Essex live in safe communities and are protected from harm;

- Sustainable economic growth for Essex communities and businesses
- People in Essex experience a high quality and sustainable environment; and
- People in Essex can live independently and exercise control over their lives.

The Outcomes reflect ECC aspirations for Essex residents and communities, guiding action in the short, medium and long term hence the importance of ensuring the outcomes inform emerging spatial policy.

Through the development of the Essex Economic Growth Strategy; the Essex Transport Strategy (Local Transport Plan for Essex) and, more recently, the combined Economic Plan for Essex, four growth corridors have been identified. The most relevant to Brentwood BC are

- A12 / Greater Eastern Main line – Heart of Essex Corridor; and
- A13 / A127 South Essex Corridor

The relevant outcomes support employment and housing growth and ensure that growth is sustainable and impacts directly on the communities of Essex.

To enable growth ECC will focus on a number of strategic actions:

- Generating a stronger skills base
- Ensuring relevant physical infrastructure is in place and improving local, national and international connectivity
- Delivering quality new homes to meet local need
- Maintaining a relevant business support offer and structures
- Raising aspirations for growth locally
- Improving the inward investment offer and developing our global brand
- Improving partnership working

To embed growth we will focus on the following strategic actions:

- Ongoing improvement of business space
- Improving international competitiveness and developing effective innovation capacity
- Establish effective supply chain networks
- Improving the quality of the environment
- Increasing economic participation and reducing worklessness
- Together these actions form the Commissioning Strategy framework.

The ECC response to the Strategic Growth Options consultation support both the enabling and embedding strategic actions.

#### Economic Plan for Essex (April 2014) (EPfE)

The Economic Plan for Essex is based on the collective ambitions of all local authorities in Essex. It identifies the steps that local partners will take together, alongside the private sector and HM Government to accelerate local growth over the next seven years (2014-2021) and lays the foundation for long-term sustainable growth in the years to follow. The key issues that have some relevance to this consultation include,

- **Issue 1: Enhancing the Essex workforce** – To ensure Essex can compete, the workforce should be developed to ensure there are the right skills to support existing and future employers as well as the needs of businesses in Essex's key growth sectors.

- **Issue 4: The reputation of Essex** - If Essex is to attract businesses into the county, and attract investment from the UK and overseas, it needs to develop and maintain the right reputation. Research from KPMG suggests that investors focus on a small number of basic criteria when selecting locations: political stability, economic growth, the accessibility of skilled human resources, the quality of education and the availability (and cost) of real estate.
  - **Issue 6: Public sector partners' capacity to support growth** - If partners are to enable the ambition development programme outlined in this document, they will need to work together to consider new delivery mechanisms, new agreements and working practices that support delivery at pace.
- 4.17 The EPfE identifies a range of projects which require co-investment with Government to securing sustainable growth across the county. ECC is therefore looking to Ministers to shape national policy and practice to help enable local government and in so doing, secure an economic return for the UK as a whole.
- 4.18 In relation to the borough of Brentwood and surrounds following projects are identified to bring forward transport investments, with HM Government seeking firm commitments to deliver the following specific national rail network, motorway, and national trunk road investments by agreed dates. These are funded through Network Rail, Highways Agency and other national budgets, including:
- the **Lower Thames Crossing**;
  - a comprehensive solution to the lack of capacity at **Junction 30/31 of the M25**;
  - corridor improvements on the **A12, A120 and M11 (including Junction 7a)**;
  - works at Brentwood and Shenfield Stations to support **Crossrail** development;
  - capacity improvements and integrated transport initiatives on the **Great Eastern Mainline (GEML)**.
- 4.19 **A12 and Great Eastern mainline Heart of Essex corridor for growth** runs through the centre of Essex, linking London to the Haven ports, and onwards to Norfolk and Suffolk. The A12 and the Great Eastern Main Line (GEML) rail services link the key urban centres of Brentwood, Chelmsford, Colchester and Maldon. The corridor has strong links with the London labour market, supporting substantial commuter flows to and from the capital. These links will grow and strengthen as Crossrail is completed, when new services will stop at Brentwood and Shenfield, both of which will benefit from planned improvement works to facilitate these new services.
- 4.20 Additional investment in rail and road infrastructure is essential for unlocking the full economic potential of the Corridor, and a package of investment is proposed to address bottlenecks on the A12 to support growth.
- 4.21 The identified investment opportunities in the Heart of Essex Growth Corridor, along with key transport infrastructure improvements, will help to realise the economic potential across this area. This will enable an additional 15,514 homes and 19,104 jobs by 2021. To unlock this growth potential, local authorities will invest £23.8m, matched with £15.7m of external funding. We are requesting £79m of SLGF to match this investment. Together, this will leverage in approximately £59.1m of private sector investment. (EPfE #123-124)
- 4.22 The two key transport improvements in Brentwood are Shenfield Station and Brentwood Station improvements as part of Crossrail
- 4.23 **A13/A127 – South Essex Growth Corridor:** The A127 travels through the south of Brentwood borough and is a major artery of the South Essex Growth Corridor. Within

this growth corridor the districts of Basildon, Castle Point and Rochford, along with the unitary authorities of Thurrock and Southend, form South Essex; part of Thames Gateway, the largest regeneration opportunity in Europe. Along this corridor the A13 links the key port infrastructure of Tilbury and London Gateway with London, while the A127 corridor connects the capital to the manufacturing hub of Basildon, and to Rochford, Southend, London Southend Airport and surrounding employment areas.

The area is home to the Basildon Enterprise Corridor, the largest concentration of employment in Essex and one of the largest concentrations of advanced manufacturing in the South of England. Basildon has ambitious plans to redevelop the town centre and railway station, including the relocation of South Essex College's Basildon Campus from Nethermayne to Basildon town centre which is expected to bring a range of significant economic impacts.

At Southend and Rochford, the new Saxon Business Park will host one of Med Tech campuses, adjacent to London Southend Airport. London Southend Airport has undergone a transformational regeneration programme and is now an award-winning international gateway. The £130m development of the airport has been privately funded by the Stobart Group with support from Southend, Rochford and Essex Councils and local businesses. The land on which the airport and the surrounding commercial estates are located spans the political boundary between Southend and Rochford. Accordingly, the authorities have jointly commissioned a Joint Area Action Plan (JAAP) which contains detailed proposals for the development of London Southend Airport and surrounding area to deliver more than 7,380 new jobs within 99,000sqm of commercial floorspace together with a high end business park. The transport package supporting the JAAP area includes site access, junction improvements and a range of sustainable transport measures.(EPfE #135)

Currently, development is constrained by the limited capacity of the strategic road network, particularly J30/31 of the M25 and the dual carriageway stretch of the A13. The A127 also carries a volume of traffic comparable to a motorway in other parts of the country and has significant capacity issues which need to be addressed, particularly around Basildon, London Southend Airport and the Southend Central Area. Southend Borough Council and Essex County Council have developed a joint "A127 Corridor for Growth" economic plan to identify, plan and coordinate investment decisions and manage the asset. Furthermore, the potential impact of the additional Thames River crossing would be significant on transport routes in this corridor, with one of the two short-listed options being to connect the M2 in Kent with the A13 and the M25 between junctions 29 and 30.

Within the South Essex Growth Corridor, the EPfE has the potential to enable an additional 13,253 homes and 9,574 jobs by 2021. To unlock this growth potential, local authorities will invest £13.5m, matched with £26m of external funding. We are requesting £66m of Single Local Growth Fund to match this investment. Together, this will leverage in approximately £224.8m of private sector investment. Alongside this complementary investment programmes are being developed in the neighbouring areas of Southend-on-Sea and Thurrock. (EPfE #138)

#### Essex Economic Growth Strategy (2012) (EGS)

The Economic Growth Strategy (EGS) for Essex sets out ECC's economic vision and how this may be delivered. The proposals in the EGS are designed to achieve five objectives all of which are relevant to the consultation.

- Essex businesses are enabled and supported to be more productive, innovate and grow, creating jobs for the local economy;
- Essex businesses are enabled to compete and trade internationally;
- individuals are equipped and able to access better paid jobs through an education and skills offer that meets the needs of businesses;
- the life chances of people in our most deprived areas are improved by ensuring that residents are able to access jobs and public services; and
- securing the highways, infrastructure and environment to enable businesses to grow.

The EGS states that future improvements in the Essex transport network will be assessed to ensure that all schemes will represent good value for money based upon the whole life cost of the scheme. Investment will be focused on:

- principal **urban areas** – Basildon, Chelmsford, Colchester, Harlow, Southend and Thurrock – as these are the main locations for growth; and the
- key **interurban corridors** serving the principal towns, airports and seaports in Essex – the A12, the A120, the A127 / A13, our three rail lines, and the M-11 in due course (EGS # 8.12 – 8.18).

The EGS identifies potential Growth Sectors, of relevance to Brentwood these are: Advanced Manufacturing and Technology (AMT) and Transport, Ports and Logistics, as outlined below:

- **AMT** – knowledge intensive engineering, engineering, automotive, aerospace, electronics, defence and ICT, which tend to result in high value products which contribute to growth and increased competitiveness. This also includes medical technologies. There are established clusters of advanced manufacturing businesses in Basildon, Harlow and Brentwood, with leading names such as Ford and Raytheon Ltd

There are just under 300 firms in Life Sciences (pharmaceutical, medical biotech and medical technology companies) in Essex employing just under 5,000 people with an annual turnover of almost £1.9bn. Strengths are in scientific research and development, manufacture of medical and dental equipment, pharmaceutical and optical products. There are clusters of Life Science companies in Harlow (the Med Tech Campus), Southend, Uttlesford (the proximity to Cambridge) and Brentwood. (EGS #3.36)

- **Transport, Ports and Logistics** building on Essex's seaport and airport strengths, access to South East markets and Europe, this sector includes cargo handling, sea, road and rail freight and warehousing and storage. Essex is the site of the largest combined deep sea container port and logistics park project in Europe (DP World/London Gateway). Key locations are Thurrock, Southend, Stansted and Harwich. Ports and logistics account for more than 1 in 10 jobs in Thurrock and Uttlesford. (EGS #3.37-3.38)

#### Essex Transport Strategy, the Local Transport Plan for Essex

The Essex Transport Strategy, the Local Transport Plan for Essex (June 2011) states that good transport is a vital factor in building strong and sustainable local communities and a successful economy. The strategy sets the vision for transport, the outcomes we aim to achieve over a 15 year period, our policies for transport and the broad approach to implementing the policies. The strategy includes specific priorities for the Heart of Essex of which Brentwood Borough is located, and South of Essex which adjoins the

borough to the South and the A127 is an identified corridor for growth. There is also a separate ECC and Southend on Sea- Borough Council joint report the “A127 Corridor for Growth- An Economic Plan”).

#### Strategic transport priorities

- Identifying an agreed and deliverable solution to address congestion at the Thames Crossing and adjacent M25 junction 30/31;
- Lobbying Government for enhancements to the A12;
- Lobbying Government for enhancements to the A120 to access Harwich port and between the A12 and Braintree;
- Lobbying Government for additional capacity on the Great Eastern Main Line and West Anglia mainline to accommodate growing commuter demand, the provision of competitive journey times for Essex Thameside services, and an enhanced local role in the rail franchise process.

#### Countywide priorities

- Working with partners to promote a safe and secure travelling environment;
- Maintaining the Essex highway network and other transport assets;
- Keeping the transport network safe and operational;
- Managing the impact of planned works on the highway network.

The relevant priorities for the heart of Essex include,

- Delivering transport improvements to support growth, including the North Chelmsford railway station;
- Providing for, and promoting, sustainable forms of travel;
- Maintaining and improving public transport links;
- Tackling congestion and improving journey-time reliability;
- Improving access to railway stations and improving station facilities;
- Extending and upgrading the Chelmsford cycle network and promoting its use
- Improving the attractiveness of streets and public spaces;
- Improving journey time reliability on key routes including the A130;
- Developing long-term solutions to resolving gaps within the strategic network.

The priorities for the south of Essex are also relevant

- Providing for and promoting access by sustainable modes of travel to new development areas;
- Improving public transport links within and between the South Essex towns (including the A13 Passenger Transport Corridor and sers schemes);
- Improving the availability of sustainable travel choices and raising public awareness of these through travel planning;
- Addressing maintenance, signing and broken links in the cycle network to improve conditions for cyclists and create a safer atmosphere for cycling.
- Improving the attractiveness and ease of use of public spaces to support regeneration;
- Improving journey time reliability on strategic inter-urban routes including the A127, A129, A130 and the A13;
- Improving access to London Gateway port and London Southend Airport.

The Essex Transport Strategy applies the four growth corridors of which the A12 / Greater Eastern Main line – Heart of Essex Corridor; and A13 / A127 South Essex Corridor are most relevant to the borough of Brentwood.

ECC welcomes working collaboratively with BBC and other relevant stakeholders to deliver joint transport priorities, and we aim to ensure that emerging plans and strategies remain consistent.

#### A127 Corridor for Growth - An Economic Plan March 2014

The A127 corridor is an absolutely vital artery to economic competitiveness of the South Essex sub-region and indeed to the economy of the County of Essex and beyond. However, the route is not without its issues. This document makes a case for the corridor, demonstrating its essential economic importance and the measures which have to be implemented to ensure that South Essex remains a thriving economic engine of growth.

This joint strategy between ECC and Southend-on-Sea BC has been adopted to provide greater journey time reliability along the length of the corridor to sustain the economic advantage of the A127, as well as to facilitate future growth and prosperity in the region.

### **3. SUMMARY OF PROPOSED ECC RESPONSE THE BRENTWOOD LOCAL PLAN – STRATEGIC GROWTH OPTIONS CONSULTATION JANUARY 2015**

The following is a summary of the key issues raised in the ECC response to the Local Plan consultation.

The formal response by ECC to the Brentwood Local Plan – Strategic Growth Options Consultation is set out Section 4 below. As part of the internal consultation process relevant functional areas within ECC have been consulted to consider if there are any implications on their services. It is generally supportive of the need for Brentwood BC to re-consider their position to progress the Local Plan given the identified key changes since 2013 (including ECC's consultation response).

There is a concern regarding the omission of essential evidence to inform the Strategic Growth Options. To assist the preparation of the Local Plan ECC has identified further issues, information and evidence considered necessary to inform and shape the Local Plan based on proportionate evidence. The key issues raised are set out below under the headings of general and specific comments. Overall ECC welcome the opportunity for early engagement and dialogue with Brentwood BC, once more information is known about the reasonable alternative options available, the likely emerging strategy and especially regarding the size and distribution of potential growth.

#### A) ECC General Comments

The Strategic Growth Options consultation is of interest to ECC with regards the potential impact on the delivery of key ECC services and other areas of statutory responsibility. In order for a Local Plan to be found 'sound' it is required to be based on a strategy which seeks to meet the full objectively assessed needs for market and affordable housing, in the housing market area (NPPF, para 47), provision of necessary infrastructure (NPPF, para 162) and based on proportionate evidence (NPPF, para 158). The Preferred Option consultation proposed a level of housing, which was lower than the 'objectively assessed need' of the Borough, and adjoining authorities were not prepared to accommodate any shortfall within their administrative area.

ECC continues to support the preparation of a Local Plan for Brentwood BC. A Local Plan, by setting out a vision and policies for the long-term planning and development of



the borough should provide a platform from which to secure a sustainable economic, social and environmental future to the benefit of its residents, businesses and visitors. A robust long-term strategy will provide a reliable basis on which ECC may plan future service provision and required community infrastructure for which it is responsible.

ECC will use its best endeavours to assist Brentwood BC on strategic and cross-boundary matters under the Duty to Cooperate, including engagement and co-operation with other organisations for which those issues may have relevance.

ECC supports the statements and requirements for the preparation and publication of updated and additional evidence base documents to inform, justify and positively prepare a Local Plan, in line with the NPPF. However, for the reasons outlined below there is a concern regarding the omission of essential evidence base to inform the Strategic Growth Options in this consultation and future Spatial Strategy, most notably:

- Transport Evidence: Crossrail and highways modelling (forthcoming)
- Objectively Assessed Need for Housing (not available at the start of the consultation)
- Surface Water Management Plan (forthcoming)
- Housing viability (forthcoming)
- Review of the Metropolitan Green Belt Boundary (not proposed)
- Other forthcoming technical evidence (eg Landscape Character Assessment)

In the absence of the supporting evidence, ECC withholds its support for any of the Strategic Growth Options until key pieces of evidence are publicly available for consideration.

ECC anticipate that any strategy and alternative strategies to be considered and presented at the next consultation stage would consider the need for some development in all three broad areas of the Spatial Growth Options. Given the level of housing required to meet the 'objectively assessed need' and the requirement to evidence alternative options any spatial strategy may consider a combination of the following; a new Garden Suburb, urban extensions, key development sites in the main settlements, and some development at the rural villages. In progressing any spatial strategy ECC considers it imperative to ensure a range of development sites are included to meet the long term growth requirements, and to ensure the delivery of a 5 year housing supply of specific deliverable sites.

## B) Specific Comments

The high level nature of the Strategic Growth Options Report, raises a range of further issues for consideration and it is recommended that the ECC response includes reference to these issues to be considered further. The comments are intended to assist Brentwood BC to progress from the Strategic Growth Options to an informed spatial strategy with a range of all reasonable alternatives having evidenced, to positively inform and shape the Local Plan. The comments are as follows:

1. Duty to Cooperate ECC supports paragraph 1.17 of the consultation document identifying the need to cooperate with Essex ECC. In accordance with the provisions of the Localism Act 2011 ECC offers to contribute cooperatively with Brentwood Borough Council in the preparation of the New Local Plan through to examination. It is considered that this will include assisting with assessment of the impact on the transport and highway network, and the need for additional school places, amongst other matters, in the identification of a preferred spatial strategy.

Given the proximity of key transport interchanges on the M25 and A12 it is also considered essential that the Highways Agency are actively engaged to ensure that any strategic impacts arising from growth in the LDP are fully considered. A specific concern includes reference to new junctions on the strategic road network, for example the new junction promoted on the A12 as part of the suggested site at the Brentwood Centre (ref 089) within Figure 10, in the absence of supporting evidence.

2. Evidence Base ECC has specific concerns regarding the lack of available evidence base to inform and shape the Spatial Growth Options report. The report has been published in the absence of supporting evidence contrary to the statements within Paragraphs 1.11 to 1.13 emphasising the NPPF requirements on the importance of positively prepared plans, informed by robust up to date evidence.

We note Brentwood BC seek to meet its local housing need of approximately 5,500 new homes, a significant uplift of some 2,000 dwellings from the Preferred Options Local Plan. Unfortunately this evidence has not been available for comment from the outset and other important evidence including highway modelling have not been completed. The following key information, which is considered 'forthcoming', but not presently available for consideration:

- Green Infrastructure Study
- Landscape Capacity Assessment
- Housing Viability Study
- Objectively Assessed Housing Needs (published 10 February)
- Crossrail Economic Impacts
- Highways Modelling
- Open Spaces Study
- Sports Strategy

The NPPF makes it clear that evidence or 'objectively assessed development needs' should underpin the overall strategy and each policy in the local plan. It is imperative that evidence should inform what is in the plan, rather than being collected retrospectively in an attempt to justify the plan. The preparation of any spatial strategy needs to be based on a proportionate evidence base.

Any proposed strategy is of particular importance to ECC as it will need to be satisfied that the impact of any planned scale and distribution of growth can be accommodated by ECC areas of responsibility, or identify what additional facilities or mitigation is required to make the strategy sustainable in social, economic and environmental grounds.

3. Strategic Objectives: ECC agrees the following Strategic Objectives (para 1.24) and that these should be a key component of any emerging strategy. ECC welcomes reference to the following:
  - Manage development growth to that capable of being accommodated by existing or proposed infrastructure, services and facilities
  - Safeguard the Green Belt and protect and enhance valuable landscapes and the natural and historic environment
  - Foster a prosperous, vibrant and divers local economy by attracting new commercial investment in order to maintain high and stable levels of economic and employment growth
  - Optimise the social and economic benefits that arise from Crossrail for the benefits of residents and visitors to the Borough
  - Improve public transport, cycling and walking facilities and encourage sustainable transport choices

- Secure the delivery of essential infrastructure, including transportation schemes and community facilities in order to support new development growth throughout its delivery
4. Metropolitan Green Belt: ECC is committed to working closely with its local authorities to meet the increasing demand for housing and infrastructure that meets the needs of residents, drives economic prosperity and protects and enhances the local environment. It is important that the development of a Local Plans includes an appropriate assessment to protect the Green Belt from inappropriate development, whilst ensuring that housing does not occur where there is insufficient infrastructure provision.

ECC's preference is for any implications of development on the Metropolitan Green Belt to be progressed through the local plan process, to ensure the release of land is based on a consistent, sound and robust approach in accordance with the NPPF.

ECC recommended that a comprehensive review of Brentwood's Green Belt boundaries should be carried out to ensure the most appropriate long term strategy is progressed. Any review should cover all three broad areas within the Strategic Growth Options so all appropriate options for growth are considered in terms of the scale of development, be it large scale strategic allocations; urban extensions to existing settlements or individual site releases.

5. Highway & Transportation: The Strategic Growth Options identifies two options within the strategies that are likely to have an impact on key transport corridors in the Borough, namely the A12 Corridor and A127 Corridor. These Options contain key strategic junctions and transport corridors, which need to be considered in any modelling, namely M25 junctions 28 and 29, the A12 junction 12 (Mountnessing), the unsubstantiated new junction suggested on the A12, as well as the A127 Corridor. Despite recent improvements there are still a number of locations on the local strategic road network where journeys are unreliable or improvements will be required to support significant numbers of new homes. ECC will continue to identify measures to tackle the causes of unreliable journeys and work with local planning authorities to identify investment needs to support growth.

ECC, as highway authority, will need to be satisfied with the approach to highway modelling and the necessary mitigation required on the overall network and key junctions before support can be given to any future strategy and strategic development sites. Any modelling work should assist in identifying particular areas within Brentwood urban area which experience unacceptable periods of congestion and key pinch points (eg Wilsons Corner, Brentwood). It is noted that some 2500 dwellings are likely to be provided in urban areas and it will be necessary to ascertain the potential cumulative impact of these sites on the network.

The highways modelling should also have regard to a number of other national, sub—regional and local highway infrastructure projects and investment commitments within and surrounding the borough including:

- **A12 M25 to Chelmsford (D17)** – raising section from M25 to Chelmsford to 3 lanes to help address congestion problems and inconsistent standards in the next road period (next 5 years)
- **M25 Junction 28 improvement (E12)** – upgrading the interchange with the A12 to provide dedicated left turn slip lanes and improvement of gyratory system – Late Road Period (2021).
- **Lower Thames Crossing**

- **A127 Corridor for Growth** as outlined in the “A127 corridor for Growth – an Economic Plan “**local roads**” such as the A128.

As part of any highway modelling it will be necessary to involve the Highways Agency given the proximity to the A12 and M25, and to ensure their support for any underlying parameters to modelling, and their views of the impact of strategic sites on their network.

6. Crossrail & Economic Growth & Development: ECC maintains its previous comments seeking further evidence and investigation on the impacts of Crossrail and other related infrastructure projects on the scale and distribution of the growth options within the Local Plan. Consideration should be given to the implications of options arising from Crossrail to accommodate some of the uplift in housing, as well as the relationship with the potential growth options to the south of the borough.
7. Community Infrastructure: ECC requires the emerging local plan and supporting evidence to clearly address the viability and deliverability of the Local Plan, including the provision, commitment and timing of infrastructure. It is imperative that the costs of providing infrastructure as a direct result of development proposals, particularly those related to early years and childcare, primary and secondary schools, and highways, for which ECC has a statutory responsibility, are included in the viability assessment from the outset, to ensure provision is guaranteed. It would not be acceptable to only secure land for education purposes without the necessary and full financial contributions as it is deemed unviable. The mitigation should not be at the cost of ECC as a service provider.
8. Education Requirements: ECC will continue to work with Brentwood BC to ensure education needs are appropriate and adequately assessed as preparation of the Local Plan continues.

Reference is made to education requirements in paragraph 6.4 regarding the potential need for new primary school (s), along with the remodelling and expansion of existing schools and early years and childcare facilities.

A high level view has been provided with regards the current capacity at existing primary and secondary schools with regards the three Options. The more detailed requirements for additional primary; secondary school and early years and childcare places that would be required to accommodate pupils from future growth will be ascertained at the point that there was an indication of the number of dwellings to be built and the likely housing mix i.e. the proportion of 1, 2, 3 etc. bed properties. ECC will seek to use Section 106 agreements/ the Community Infrastructure Levy with the Borough Council to provide the additional sites required for new schools and the full funding to provide the additional primary and secondary school places that would be generated by future growth.

9. Early Years and childcare: ECC will continue to work with Brentwood BC to ensure that there is sufficient childcare to provide advice regarding the current provision of early years and childcare provision and future requirements once a preferred strategy has been identified.
10. Adult Social Care and Extra Care Provision: ECC will continue to work with Brentwood BC to ensure that there is sufficient consideration and provision for extra care provision within the Local Plan, in line with the NPPF and requirements to promote healthy communities (NPPF paragraphs: 23 (6<sup>th</sup> bullet), 28 (4<sup>th</sup> bullet) and 70). Current projections for the demand for Extra Care accommodation using

nationally accepted benchmarks indicates an existing shortfall in Brentwood Borough of circa 150 units; this information is captured in the published Housing for People with Additional Needs Strategy 2013-2016.

ECC is concerned that from the list of suggested sites in Appendix 1, that it appears no sites have been identified for Extra Care accommodation and therefore delivery of this essential care provision could be put at risk. Extra Care schemes meet the needs of all adults with additional care needs, which include those with physical and learning difficulties, poor mental health or older people. Extra care schemes are located close to town centres and have good transport links.

11. Brentwood Surface Waste Management Plan: ECC as the Lead Local Flood Authority (LLFA) will continue to work with Brentwood BC to ensure the Local Plan and proposals are in compliance with and contribute positively towards delivering the aims and objectives of water management plans affecting the area such as a Surface Water Management Plan.

The emerging Brentwood Surface Water Management Plan does not appear to be referenced in the Local Plan (other than forthcoming evidence) as being considered in the determination of any spatial strategy. The emerging draft, highlights a number of areas to be at a higher risk than others to surface water flooding, namely West Horndon, Ingatestone and Brentwood Town Centre. Such areas should not be precluded from development but will lead to additional work to identify appropriate mitigation and amelioration work.

ECC welcome the opportunity to provide advice should any sites in the borough come forward where there may be opportunities to alleviate existing flooding.

12. Historic Environment: ECC will continue to work with Brentwood BC to protect and promote the Historic Environment. It is noted that Paragraph 1.13 refers to the need for the Local Plan to be informed by robust and up to date evidence, as required by the NPPF, however it is unfortunate that Question 11 does not seek views on the historic environment of the Borough.

The consultation refers to the Essex Historic Environment Record, which includes details of all listed buildings, scheduled monuments, designated and other non-designated heritage assets it does not provide an assessment of the significance of those heritage assets, in the form of a Historic Environment Characterisation, it only refers to designated assets. ECC recommend that further consideration and evidence should be given to all the historic assets across the borough as recorded in the Essex Historic Environment Records.

13. Minerals safeguarding Areas and Consultation: ECC as Minerals Planning Authority will continue to work with Brentwood BC to address the requirements of defined Mineral Safeguarding Areas (MSAs) and Mineral Consultation Areas (MCA's) within the Local Plan in accordance with policy S8 of the Adopted Essex Replacement Minerals Local Plan. The aim is to ensure that known locations of specific minerals are not needlessly sterilised by other forms of development, whilst not creating a presumption that the defined resources will ever be worked.
14. Waste Planning: ECC as Waste Planning Authority will continue to work with Brentwood BC to ensure closer working between local planning authorities to integrate the need for waste management with other spatial concerns in the preparation of Local Plans, in accordance with the National Planning Policy for Waste (October 2014). The aim is to ensure that there are sufficient opportunities to

meet the identified needs of an area for the management of waste and to apply and promote the waste management hierarchy within sustainable development.

15. Sustainability Appraisal (SA): ECC support the Interim SA report as a useful document and approach to appraise the various options / alternatives. There are specific concerns regarding “Reasonable Alternatives and Historic Environment as follows:

- the status of the evidence base available and whether sufficient evidence exists to suggest that the sites explored at this stage represents all the “reasonable” alternatives for strategic growth; and
- The Sustainability Appraisal fails to assess the Historic Environment to an appropriate level.

### Conclusions

ECC consider this consultation to be a starting point and that the evidence still to be undertaken and published is required to enable full consideration of all reasonable alternative growth options to take place and to inform a preferred spatial strategy. ECC is concerned that the Strategic Growth Options have been prepared in advance of this evidence base and until the evidence is in place and publicly available, it is not possible for ECC to support any of the Strategic Growth Options.

## **4) ECC FORMAL RESPONSE TO THE BRENTWOOD LOCAL PLAN – STRATEGIC GROWTH OPTIONS CONSULTATION JANUARY 2015**

### ECC General Response

ECC welcomes the production of Strategic Growth Options Consultation by Brentwood Borough Council (BBC). We welcome the opportunity to continue to work with BBC in the preparation of their Local Plan and enclose our consultation response, supported by specific consultation comments.

In addition ECC confirms that our previous comments in response to the Preferred Options remain relevant and should be considered as part of this consultation response.

At present ECC withholds support for any of the Strategic Growth Options until key pieces of evidence are publicly available for consideration. We recommend that additional work is undertaken to progress the Spatial Growth Options to an informed spatial strategy, having considered a range of all reasonable alternatives. We would expect that any alternative strategies will need to consider some development in each of the Spatial Growth Options. Given the level of housing required to meet ‘objectively assessed need’ any spatial strategy may need to consider a combination of the following; a new Garden Suburb, urban extensions, key development sites in the main settlements, and some development at the rural villages. Whichever mix of growth options and strategy are considered and progressed, these should clearly evidence a sound cohesive approach between economic growth, delivery of infrastructure as well as social and environmental dimensions. In progressing any spatial strategy we consider it imperative to ensure a range of development sites are included to meet the long term growth requirements, and to ensure the delivery of a 5 year housing supply of specific deliverable sites.

### ECC Further Specific Comments

Within the context of the general comments above, ECC has outlined below a number of specific and detailed comments intended to assist Brentwood Borough in the preparation of a

sound Local Plan. ECC would welcome the opportunity of early and ongoing engagement with Brentwood Borough on these specific matters to address the concerns and issues raised. Our specific and detailed comments are set out under the following headings:

- Duty to Co-operate
- Evidence Base
- Metropolitan Green Belt
- Highway Modelling
- Crossrail
- Community Infrastructure
- Education Requirements
- Early Years and childcare
- Adult Social Care and Extra Care Provision
- Brentwood Surface Waste Management Plan
- Historic Environment
- Minerals safeguarding Areas and Consultation
- Waste planning
- Sustainability Appraisal.

### **Duty to Cooperate**

The 'duty to cooperate' (the duty) was introduced by the Localism Act in November 2011. The Act inserted a new Section 33A into the Planning and Compulsory Purchase Act 2004. This placed a legal duty on all local authorities and public bodies (defined in regulations) to 'engage constructively, actively and on an ongoing basis' to maximise the effectiveness of local and marine plan preparation relating to strategic cross boundary matters, and in particular with ECCs on strategic matters.

The National Planning Policy Framework (NPPF) provides amplification on how strategic planning matters should be addressed in local plans (paragraphs 178-181). Local planning authorities are expected to work 'collaboratively with other bodies to ensure that strategic priorities across local authority boundaries are properly coordinated and clearly reflected in local plans' (paragraph 179). 'Strategic priorities' to which local planning authorities should have particular regard are set out in paragraph 156 of the NPPF.

Specific guidance on how the duty should be applied is included in the National Planning Practice Guidance (NPPG). This makes it clear that the duty requires a proactive, ongoing and focussed approach to strategic matters. Constructive cooperation must be an integral part of plan preparation and result in clear policy outcomes which can be demonstrated through the examination process.

ECC welcomes and supports paragraph 1.17 of the consultation document identifying the need to cooperate with Essex ECC. ECC offers to contribute cooperatively with Brentwood Borough Council in the preparation of the New Local Plan through to examination. This will include assisting with assessment of the impact on the transport and highway network, and the need for additional school places, amongst other matters, in the identification of a preferred spatial strategy. Given the proximity of key transport interchanges on the M25 and A12 it is considered essential that the Highways Agency is actively engaged to ensure that any strategic impacts arising from growth in the LDP is considered. A specific concern includes reference to new junctions on the strategic road network, for example the new junction promoted on the A12 as part of the suggested site at the Brentwood Centre (ref 089) within Figure 10, in the absence of supporting evidence.

### **Evidence Base**

ECC welcomes the opportunity to comment on the emerging Brentwood Local Plan with regards the Strategic Growth Options consultation. This is of interest to ECC with regards the

potential impact on the delivery of key ECC services and other areas of statutory responsibility. In order for a Local Plan to be found 'sound' it is required to be based on a strategy which seeks to meet the full objectively assessed needs for market and affordable housing in the housing market area (NPPF, para 47), provision of necessary infrastructure (NPPF, para 162) and based on proportionate evidence (NPPF, para 158).

The Preferred Option consultation proposed a level of housing, which was lower than the 'objectively assessed need' of the Borough, and adjoining authorities were not prepared to accommodate any shortfall within their administrative area. Paragraph 1.4 refers to Brentwood Borough seeking to meet its local housing need of approximately 5,500 new homes, a significant uplift of some 2,000 dwellings from the Preferred Options Local Plan. It is unfortunate that the supporting Objectively Assessed Need (OAN) report, outlining the calculations was not published at the outset of the consultation period, and is now only available one week before the close of the consultation. It would be anticipated that the OAN report along with other important evidence including highway modelling would be available for comment alongside the consultation, however as set out in Paragraph 1.13 of the Strategic Growth Options, lists the following key information as either 'forthcoming' or not presently available for consideration:

- Green Infrastructure Study
- Landscape Capacity Assessment
- Housing Viability Study
- Objectively Assessed Housing Needs (published 10 February)
- Crossrail Economic Impacts
- Highways Modelling
- Open Spaces Study
- Sports Strategy.

The National Planning Policy Framework (NPPF) makes it clear that evidence, or 'objectively assessed development needs' should underpin the overall strategy and each policy in the local plan. It is imperative that evidence should inform what is in the plan, rather than being collected retrospectively in an attempt to justify the plan. The preparation of any spatial strategy needs to be based on a proportionate evidence base.

As stated above ECC is concerned that the Spatial Growth Options consultation has been published in the absence of this evidence, especially given the statement within Paragraphs 1.11 to 1.13 which recognise the importance of positively prepared plans, informed by robust up to date evidence.

ECC withholds its support for any of the Strategic Growth Options until key pieces of evidence are publicly available for consideration. To assist ECC has identified a range of issues which we consider to be required to progress the Spatial Growth Options to an informed spatial strategy, having considered a range of all reasonable alternatives. We expect any alternative strategies would need to consider some development in each of the Spatial Growth Options. Given the level of housing required to meet 'objectively assessed need' any spatial strategy may need to consider a combination of the following; a new Garden Suburb, urban extensions, key development sites in the main settlements, and some development at the rural villages, with respective scale and distribution. Whichever mix of growth options and strategy are considered and progressed, these should clearly evidence a sound cohesive approach between economic growth, delivery of infrastructure as well as social and environmental dimensions. In progressing any spatial strategy it will be imperative to ensure a range of development sites are included to meet the long term growth requirements, and to ensure the delivery of a 5 year housing supply of specific deliverable sites.



Any proposed strategy is of particular importance to ECC as it will need to be satisfied that the impact of any planned scale and distribution of growth can be accommodated by ECC areas of responsibility, or identify what additional facilities or mitigation is required to make the strategy sustainable in social, economic and environmental grounds. ECC welcomes the opportunity for early engagement with BBC to assist in the preparation of the Local Plan to enable the Plan to be shaped based on an evidence led approach to inform and shape the Plan.

ECC agrees that the following Strategic Objectives (para 1.24) should be a key component of any emerging strategy and ECC welcomes reference to the following:

- Manage development growth to that capable of being accommodated by existing or proposed infrastructure, services and facilities
- Safeguard the Green Belt and protect and enhance valuable landscapes and the natural and historic environment
- Foster a prosperous, vibrant and divers local economy by attracting new commercial investment in order to maintain high and stable levels of economic and employment growth
- Optimise the social and economic benefits that arise from Crossrail for the benefits of residents and visitors to the Borough
- Improve public transport, cycling and walking facilities and encourage sustainable transport choices
- Secure the delivery of essential infrastructure, including transportation schemes and community facilities in order to support new development growth throughout its delivery

### **Metropolitan Green Belt**

ECC is committed to working closely with its local authorities to meet the increasing demand for housing and infrastructure that meets the needs of residents, drives economic prosperity and protects and enhances the local environment. When developing Local Plans appropriate assessment should be undertaken to protect the Green Belt from inappropriate development, but should also ensure that housing does not occur where there is insufficient infrastructure provision.

Paragraph 83 - 85 of the NPPF identifies that Local Planning Authorities should establish Green Belt boundaries that ensure consistency with the Local Plan strategy for meeting identified housing requirements, and should be undertaken as part of the Local Plan preparation. Brentwood's Strategic Growth Options indicates that the Green Belt is a valuable asset covering 89% of the Borough. However, it recognises that any development over 2,500 dwellings will need to consider the use of Green Belt, given the restricted capacity for additional growth in the existing Brentwood urban area. This indicates that some 55% of future growth will be necessary on Green Belt land. The emerging Local Plan does not appear to be informed by a comprehensive review of the Green Belt, which could identify opportunities for more sustainable patterns of development, as well as establish robust and permanent boundaries for the longer term.

ECC therefore recommend that a comprehensive review of Brentwood's Green Belt boundaries is carried out to ensure the most appropriate long term strategy is progressed supported by evidence of a robust Green Belt boundary. Any review should cover all three Strategic Growth Options in order that all appropriate options for growth have been considered in terms of large scale strategic allocations; urban extensions to existing settlements and individual site releases.

ECC's preference is for any implications of development on the Metropolitan Green Belt to be progressed through the local plan process, to ensure a sound and robust approach.

## Highway Modelling

The Strategic Growth Options identifies two strategies that are likely to have an impact on key transport corridors in the Borough, namely the A12 Corridor and A127 Corridor. These Options contain key strategic junctions and transport corridors, which will need to be considered in any modelling, namely M25 junctions 28 and 29, the A12 junction 12 (Mountnessing); the unsubstantiated new junction suggested on the A12, as well as the A127 Corridor. Despite recent improvements there are still a number of locations on the local strategic road network where journeys are unreliable or improvements will be required to support significant numbers of new homes. The Council will therefore continue to identify measures to tackle the causes of unreliable journeys and work with planning authorities to identify investment needs to support growth.

ECC, as highway authority, will need to be satisfied with the approach to highway modelling and the necessary mitigation required on the overall network and key junctions before support can be given to any future strategy and strategic development sites. Any modelling work will assist in identifying particular areas within Brentwood urban area which experience unacceptable periods of congestion and key pinch points (eg Wilsons Corner, Brentwood). It is noted that some 2500 dwellings are likely to be provided in urban areas, and it will be necessary to ascertain the potential cumulative impact of these sites on the network.

As part of any highway modelling it is necessary to involve the Highways Agency given the proximity to the A12 and M25 (key junctions identified above), and to ensure their support for any underlying parameters to modelling, and their views of the impact of strategic sites on their network. The Government released its Road Building Strategy (December 2014) which includes commitments to the A12, which seek to improve its reliability and capacity. Commitments include:

- A12 M25 to Chelmsford (D17) – raising section from M25 to Chelmsford to 3 lanes to help address congestion problems and inconsistent standards in the next road period (next 5 years)
- M25 Junction 28 improvement (E12) – upgrading the interchange with the A12 to provide dedicated left turn slip lanes and improvement of gyratory system – Late Road Period (2021).

ECC welcomes the identification of the above commitments by government and their role in assisting with the funding of enabling infrastructure. ECC is seeking early engagement with Department for Transport / Highways Agency on the detailed scope and timetable for any projects within these commitments.

Other national infrastructure projects of relevance:

- Lower Thames Crossing – in 2014 the Secretary of State for Transport announced the next steps for delivering a new Lower Thames crossing in the ‘Government Response to Consultation’. There is yet no clear preference, a decision has been taken to develop and assess route options in detail at each of the two remaining locations, options A and C, before choosing the site of a new crossing. The Department for Transport continues to work on a range of possible routes and are scheduled to carry out a full public consultation on the preferred option in late 2015. Whilst the route is not known, the highway modelling should have regard to any potential impacts.

Reference is made to the A127 Corridor, a PR1 Strategic Route, having potential for larger growth options through strategic mixed use allocations in the A127 Corridor Option. The A127 is an ageing corridor, but one that is a vitally important primary route for the South Essex area which connects the M25, Basildon and Southend (including London Southend Airport). A major aim of ECC is to improve journey time reliability along this route. There is

significant growth planned along the A127 Corridor in adopted and emerging Local Development Plans, which will need to be considered in any highway modelling in terms of capacity, key junctions and access from direct and access to side roads, if necessary.

In addition, highway modelling will also need to clearly demonstrate and consider the potential impacts on the “local roads” such as the A128.

### **Crossrail and Economic Growth and Development**

A key conclusion from the Preferred Option (2013) consultation was the need for more evidence on the economic impacts arising from Crossrail and other related impacts, as raised in our consultation response to the Preferred Options.

Crossrail will improve links from Essex to central and western London by providing a high frequency service from Shenfield via Brentwood, Stratford and Liverpool Street to the West End and on to Maidenhead. This is an opportunity for Essex but improvements are required at Shenfield and Brentwood stations to improve access and interchange opportunities for passengers.

Works are being carried out by the rail industry at Brentwood and Shenfield stations, to accommodate the new Crossrail trains, as well as an expected increase in passenger demand by 2026 (current forecast increase is 28%). All works are being co-ordinated with mainline overhead line and track renewal (which is happening anyway). There is a desire to improve the environment in the vicinity of both Brentwood and Shenfield stations, to provide better accessibility, interchange and public realm, and also minimise traffic congestion.

Initial conclusions from an economic impact assessment has identified that Crossrail is likely to increase demand for homes in the immediate vicinity of the stations. While large numbers of extra passengers are by no means certain, the ‘being on the tube map’ effect is likely to make homes near Crossrail stations more desirable. The Brentwood Local Plan, Preferred Options 2015-2030 was published for consultation in July 2013 to provide some 3,500 dwellings, and which identified no significant development in the Shenfield area. The emerging Local Plan is required to provide a significant uplift in the housing requirement to 5,500 dwellings over the next 15-20 years. Consideration should be given to the implications of options arising from Crossrail to accommodate some of the uplift in housing, as well as the relationship with the potential growth options to the south of the borough.

### **Community Infrastructure**

As plan preparation progresses, the viability of the Local Plan will need to be tested and will form part of the evidence base. It is imperative that the costs of providing infrastructure as a direct result of development proposals, particularly those related to early years and childcare, primary and secondary schools, and highways, for which ECC has a statutory responsibility, are included in the viability assessment from the outset, to ensure provision is guaranteed. It is not acceptable to only secure land for education purposes without the necessary and full financial contributions as it is deemed unviable. This should be considered from the outset at the Local Plan stage to ensure viability, deliverability and the creation of sustainable communities.

The funding, viability and Community Infrastructure Levy for the provision of infrastructure to fully mitigate developments within Local Plans is a key concern to ECC, and the requirement for clear evidence and commitment from developers to provide the necessary infrastructure. The NPPF paragraph 41 specifically requires the LPA’s to identify and protect, where there is robust evidence, sites and routes which could be critical in developing infrastructure, to widen transport choice, paragraphs 74 and 156 concern the strategic priorities and the

provision of services. A key consideration is the provision of infrastructure (paragraph 162) and the requirement to ensure both the viability and deliverability of schemes (paragraph 177).

ECC requires the emerging local plan to be supported by clear evidence of the viability and deliverability of any future strategy or growth options to both meet the needs of the community and to deliver the necessary community infrastructure required to mitigate in full the impacts of any proposals. The mitigation should not be at the cost of ECC as a service provider. To this end please refer to “The ECC Developers’ Guide to Infrastructure Contributions” (2015 Revision consultation draft), which details the scope and range of contributions towards infrastructure which ECC may seek from developers in order to make development acceptable in planning terms.

### **Education Requirements**

Each year ECC publishes the Commissioning school places in Essex document, and which currently covers the period 2014-2019. This document sets out the number of places available at each school and the number of pupils that currently attend each. Using historic births data, current GP registrations, historic admissions patterns and current numbers on roll the demand for places five years hence is forecast. Longer range forecasts are not attempted as reliable data on future birth rates is not available.

Reference is made to education requirements in paragraph 6.4 regarding the potential need for new primary school (s), along with the remodelling and expansion of existing schools and early years and childcare facilities.

A high level view has been provided with regards the current capacity at existing primary and secondary schools with regards the three Options. The more detailed requirements for additional primary; secondary school and early years and childcare places that would be required to accommodate pupils from future growth will be ascertained at the point that there was an indication of the number of dwellings to be built and the likely housing mix i.e. the proportion of 1, 2, 3 etc. bed properties. ECC would be seeking to use Section 106 agreements/ the Community Infrastructure Levy with the Borough Council to provide the additional sites required for new schools and the full funding to provide the additional primary and secondary school places that would be generated by future growth.

### ***Option A – North of the Borough***

#### *Primary School Capacity*

This area is predominantly rural and is served by the following primary schools:

Blackmore Primary School,  
Doddinghurst Infant and Junior schools; and  
Kelvedon Hatch Community Primary School.

In addition some of the primary aged children in this area attend primary schools, particularly faith schools, located in Brentwood town and Ingatestone and Mountnessing.

There is some existing capacity at the primary schools in Blackmore, Doddinghurst and Kelvedon Hatch that could be used to accommodate growth from new housing. However, this is limited and, depending on the scale of growth some new provision may be required. As some of Blackmore Primary School’s accommodation is temporary this would need to be replaced with permanent accommodation should the level of development in this area warrant it.

### Secondary School Capacity

Secondary school aged children living in the north of the borough predominantly attend secondary schools in Brentwood town and The Anglo-European School in Ingatestone.

The Secretary of State's recent decision to grant permission for a new free school in Ongar, Ongar Free School, may reduce the number of pupils living in the north of the borough attending secondary schools located in Brentwood borough. The Ongar Free School is scheduled to open in Chipping Ongar in September 2015, and ECC will be monitoring its impact on pupil numbers in the existing secondary schools in Brentwood borough. Any loss of pupils to Ongar Free School would increase the level of surplus places across the Brentwood town area, possibly to over 1,000 places, again by 2018-19.

### **Option B – A12 Corridor**

#### Primary School Capacity

The majority of primary schools serving the borough are located in the A12 corridor.

#### **Brentwood town primary schools:**

Bentley St Paul's CE (VA) Primary School,  
Hogarth Primary School,  
Holly Trees Primary School,  
Hutton All Saint's CE Primary School, Ingrave  
Johnstone CE (VA)  
Primary School, Larchwood Primary School,  
Long Ridings Primary School,  
St Helen's Catholic Junior School Academy,  
St Helen's Catholic Infant School,  
St Joseph The Worker Catholic Primary  
School,

St Mary's CE (VA) Primary School, Shenfield;  
St Peter's Primary School, South Weald;  
St Thomas of Canterbury CE (VA) Infant  
School,  
St Thomas of Canterbury CE (VA) Junior  
School,  
Warley Primary School; and Willowbrook  
Primary School.

There is currently very little surplus capacity in the Brentwood town group of primary schools and the current forecasts indicate a deficit of 273 permanent places by the school year 2018-19, once the figures are adjusted to take account of new housing.

Discussions are currently underway with primary schools located in Brentwood town regarding potential expansions to accommodate this forecast growth. Any significant new housing in this area will require an expansion of primary provision. This could take the form of the expansion of existing schools, where this is possible, or the establishment of new school provision. In the latter case, sites for the new provision would need to be identified within the Local Plan. Some existing temporary accommodation at schools within the group would also need to be replaced with permanent accommodation.

**Ingatestone / Mountnessing primary schools:** Ingatestone Infant School, Ingatestone and Fryerning CE (VA) Junior School, and Mountnessing CE (VC) Primary School.

The schools located in Ingatestone/ Mountnessing are all currently operating at close to capacity and are forecast to continue to do so for the foreseeable future. Any significant new housing in the area is likely to require an expansion of provision. This could take the form of the expansion of existing schools, where this is possible or the establishment of new school provision. In the latter case sites for the new provision would need to be identified within the Local Plan. Some existing temporary accommodation within the group would also need to be replaced with permanent accommodation.

### Secondary School Capacity

All of the borough's secondary schools are located within the A12 corridor.

**Brentwood town schools:** Becket Keys Church of England Free School, Brentwood County High School; Brentwood Ursuline Convent High School, Shenfield High School and St Martin's School.

There is currently a significant level of surplus secondary school places in Brentwood borough (over 1,000 places in the school year 2013-14) that could be utilised to accommodate growth generated by new housing in this area and in the north and south of the borough. The level of surplus is forecast to fall over the course of the next 5 years as Becket Keys Church of England Free School fills.

**Ingatestone:** The Anglo-European School draws its pupils from a very wide area in addition to Ingatestone, Mounthessing and Margaretting. As the school gives priority in terms of admissions to local children it should be in a position to accommodate the growth generated by new housing within its local area.

### **Option C – A127 Corridor**

#### Primary School Capacity

This area is a predominantly rural area with only a single settlement, West Horndon, of any significant size. As a consequence this area is currently served by a single primary school, West Horndon Primary School. This school currently has a capacity of 105 places (½ form of entry) and is currently operating at capacity and is forecast to continue to do so for the foreseeable future.

West Horndon Primary School currently has the site capacity to enable it to expand beyond its current size. However, large scale development in this area is likely to require the expansion of the existing school and/ or the provision of at least one new primary school.

#### Secondary School Capacity

There is no secondary school located within reasonable walking distance of West Horndon. New housing development in this area would, therefore, require all secondary aged pupils to be transported to and from schools located in Brentwood town or Basildon town.

### **Early Years and Childcare**

ECC has a duty to ensure, as far as reasonably practicable, that there is sufficient childcare across Essex to meet the needs of parents. This is called childcare sufficiency. Termly sufficiency meetings are conducted and a termly childcare sufficiency assessment is produced. This gives a picture of the supply and demand for childcare and identifies any barriers to families accessing childcare. ECC will provide advice regarding the current provision of early years and childcare provision and future requirements once a preferred strategy has been identified.

### **Adults Social Care & Extra Care Provision**

ECC People Commissioning welcome the opportunity to work with BBC in developing this matter as part of the preparation of the Local Plan. Given the limited information available within the consultation the data below has been presented at a very high level. The information is provided to support the social dimension and role of planning as defined by "sustainable development" within paragraph 6 of the NPPF.

The ECC Adult Social Care Market Position Statement published in 2012 evidenced the growing cohort of Older People that will be accessing social care; estimated at 10% increase in Brentwood in the five years to 2015 (page 8). Current projections for the demand for Extra Care accommodation using nationally accepted benchmarks indicates an existing shortfall in Brentwood Borough of circa 150 units; this information is captured in the published Housing for People with Additional Needs Strategy 2013-2016 (page 12). It would appear from the list of suggested sites in Appendix 1 that no sites have been identified for Extra Care accommodation and therefore delivery of this essential care provision is put at risk. Extra Care schemes meet the needs of all adults with additional care needs, which include those with physical and learning difficulties, poor mental health or older people. Extra care schemes are located close to town centres and have good transport links.

Consideration is required for the provision of extra care provision within the Local Plan, in line with the NPPF and requirements to promote healthy communities (please refer to NPPF paragraphs 23 (6<sup>th</sup> bullet); 28 (4<sup>th</sup> bullet) and 70.

### **Brentwood Surface Water Management Plan**

A Surface Water Management Plan (SWMP) is a plan produced by the Lead Local Flood Authority (LLFA) and outlines the preferred surface water management strategy in a given location. These Plans focus on areas of highest surface water flood risk and consider flooding from sewers, drains, groundwater, and runoff from land, small water courses and ditches that occurs as a result of heavy rainfall.

These Plans outline the causes and effects of surface water flooding and recommend the most cost effective way of managing surface water flood risk for the long term. A SWMP is carried out at an intermediate risk assessment level identifying those parts of the study area that are likely to require more detailed assessment to gain an improved understanding of the causes and consequences of surface water flooding.

The intermediate assessment identifies areas where the flood risk is considered to be most severe; these areas are identified as Critical Drainage Areas (CDAs). They are typically located within EA Flood Zone 1 but should not be excluded from other Flood Zones if a clear surface water (outside of other influences) flood risk is present.

It is important to recognise that flooding within the study area is not confined to just the CDAs, and therefore, there are opportunities for generic measures to be implemented through the establishment of a policy position.

#### Suggested new policy

1. *The Critical Drainage Areas (CDAs) for the district will be defined through the establishment of a SWMP.*
2. *Within the identified CDAs development must not increase the risk of fluvial or surface water flooding, and should seek to reduce the risk of fluvial and surface water flooding through the delivery of the following measures as appropriate to the location of the proposal and recommendations from a Surface Water Management Plan once produced.*
  - a. *Increased community awareness;*
  - b. *Improved management regimes of main rivers, ordinary water courses and their tributaries;*
  - c. *Increased conveyance;*
  - d. *Retention and increased flood storage capacity;*
  - e. *Improved land management;*
  - f. *Increased online storage; and*

- g. Incorporation of Sustainable Urban Drainage Systems (SuDS) appropriate to the development type, size and location.*

*The Council will require development to be in compliance with and contribute positivity towards delivering the aims and objectives of water management plans affecting the area such as a Surface Water Management Plan.*

ECC as the Lead Local Flood Authority (LLFA) will continue to work with Brentwood BC to ensure the Local Plan and proposals are in compliance with and contribute positivity towards delivering the aims and objectives of water management plans affecting the area such as a Surface Water Management Plan.

The emerging Brentwood Surface Water Management Plan does not appear to be referenced in the Local Plan (other than forthcoming evidence) as being considered in the determination of any spatial strategy. The emerging draft, highlights a number of areas to be at a higher risk than others to surface water flooding, namely West Horndon, Ingatestone and Brentwood Town Centre. Such areas should not be precluded from development but will lead to additional work to identify appropriate mitigation and amelioration work.

It is noted that this is forthcoming evidence ECC as the LLFA welcome the opportunity to provide advice should any sites in the borough come forward where there may be opportunities to alleviate existing flooding. ECC will continue to work with Brentwood BC to ensure the Local Plan and proposals are in compliance with and contribute positivity towards delivering the aims and objectives of water management plans affecting the area such as a Surface Water Management Plan

**Glossary: Critical Drainage Area (CDA).** A discrete geographic area (usually a hydrological catchment) where multiple or interlinked sources of flood risk cause flooding during a severe rainfall event thereby affecting people, property or local infrastructure.' The CDA comprises the upstream 'contributing' catchment, the influencing drainage catchments, surface water catchments and, where appropriate, a downstream area if this can have an influence on CDA.

ECC as the LLFA welcome the opportunity to provide advice should any sites in the borough come forward where there may be opportunities to alleviate existing flooding.

### **Historic Environment**

ECC will continue to work with Brentwood BC to protect and promote the Historic Environment. Paragraph 1.13 refers to the need for the Local Plan to be informed by robust and up to date evidence, as required by the NPPF. It is unfortunate that Question 11 does not seek views on the historic environment of the Borough.

ECC has undertaken an Historic Environment Characterisation assessment for most of the local authorities in Essex, which have been used in the consideration of both emerging spatial strategies and the determination of planning applications. This assessment provides a planning tool which gives an overview of the historic environment character and significance. Although the consultation document refers to the Essex Historic Environment Record, which includes details of all listed buildings, scheduled monuments, designated and other non-designated heritage assets it does not provide an assessment of the significance of those heritage assets, it only refers to designated assets.

ECC recommends that further consideration and evidence should be given to the 1160 historic assets across the borough, as recorded in the Essex Historic Environment Records. This forms part of the knowledge base for the historic environment of the Borough as



required by the NPPF and does not focus solely on the designated assets. Paragraph 128 of the NPPF advises that as a minimum the relevant historic environment record should have been consulted and the heritage assets assessed using appropriate expertise where necessary. Further comments are supplied on this matter in relation to the SA/SEA.

### **Minerals Safeguarding Areas and Consultation Areas**

The NPPF requires Minerals Planning Authorities to define Mineral Safeguarding Areas (MSAs) and Minerals Consultation Areas within their Local Plans so that known locations of specific minerals are not needlessly sterilised by other forms of development, whilst not creating a presumption that the defined resources will ever be worked. ECC has done this through Policy S8 (Safeguarding mineral resources and mineral reserves) in the Adopted Replacement Minerals Local Plan (2014). It is necessary to safeguard existing mineral workings and Preferred Sites to prevent the possibility of new incompatible neighbours being established and ultimately restricting extraction activities. Mineral Consultation Areas (MCAs) apply to the safeguarded site itself and extend for a distance of 250 metres outwards from the site boundary of each of these safeguarded sites.

The following are defined in the Minerals Plan as 'safeguarded sites' for the purposes of protecting mineral workings and existing mineral reserves (MCAs):

- mineral extraction sites and their associated facilities with planning permission that are currently in active mineral use,
- mineral extraction sites with unimplemented planning permission for minerals extraction (including 'dormant' sites with extant planning permission for mineral extraction that have remained unimplemented for some years)
- Preferred Sites proposed in the Adopted Replacement Minerals Local Plan for future mineral extraction.

ECC as Minerals Planning Authority will continue to work with Brentwood BC to address the requirements of defined Mineral Safeguarding Areas (MSAs) and Mineral Consultation Areas (MCA's) within the Local Plan in accordance with Policy S8 of the Adopted Essex Replacement Minerals Local Plan

### **Waste Planning**

Waste Management Facilities: The National Planning Policy for Waste (October 2014) (NPP Waste) and the PPG seeks the need for closer working between local planning authorities and waste planning authorities. This is required to integrate the need for waste management with other spatial concerns in the preparation of Local Plans.

The above policy documents require the waste planning authority, namely ECC, to prepare a Waste Local Plan, which identifies sufficient opportunities to meet the identified needs of an area for the management of waste. It should ensure that suitable sites and areas for the provision of waste management facilities are identified in appropriate locations (PPG, Paragraph: 011, Reference ID: 28-011-20141016).

Waste is a strategic issue which should be addressed effectively through close co-operation between waste planning authorities and other local planning authorities. In order to achieve this it is necessary to gather, evaluate and ensure consistency of data and information required to prepare Local Plans. By the nature of the activity, waste planning policy requires a strategic, cross-boundary approach to ensure that waste is effectively managed and facilities are properly located.

The PPG (Paragraph: 018, Reference ID: 28-018-20141016) states that opportunities for land to be utilised for waste management should be built into the preparatory work for Local Plans, to the level appropriate to the local planning authorities planning responsibilities. For example,

- Suitable previously-developed land, including industrial land, provides opportunities for new waste facilities and priority should be given to reuse of these sites. It is important for waste to be considered alongside other land uses when looking at development opportunities.
- As reviews of employment land are undertaken, it is important to build in the needs of waste management before releasing land for other development or when considering areas where major regeneration is proposed.
- The integration of local waste management opportunities in new development should be integral to promoting good urban design.
- Facilitating the co-location of waste sites with end users of waste outputs such as users of fuel, low carbon energy/heat, recyclates and soils.

The above is reinforced by the 'Guidance for local planning authorities on implementing planning requirements of the European Union Waste Framework Directive (2008/98/EC), DCLG, December 2012'. This specifically states that when local planning authorities are undertaking Employment Land Reviews, it is important they consider the full range of employment opportunities, including appropriate waste management proposals.

The potential for employment land to be used for waste purposes is discussed in paragraphs 8.28 and 8.29 of the Colchester Employment Lands Need Assessment (January 2015). However, Brentwood BC should satisfy itself that the national policy and guidance requirements (detailed above) have been referenced, considered and any conclusions justified.

ECC recommend that waste management uses are included as a permitted use within appropriate employment areas. As ECC continues preparation of the replacement Essex and Southend-on-Sea Waste Local Plan, it will engage with Brentwood BC through the duty to cooperate.

Paragraph 8 of the NPP for Waste also clarifies the position and requirements of local planning authorities when determining non-waste related developments, in which they should (to the extent appropriate to their responsibilities), ensure that,

- The likely impact of proposed, non-waste related development on existing waste management facilities, and on sites and areas allocated for waste management, is acceptable and does not prejudice the implementation of the waste hierarchy and/or the efficient operation of such facilities.
- New, non-waste development makes sufficient provision for waste management and promotes good design to secure the integration of waste management facilities with the rest of the development and, in less developed areas, with the local landscape. This includes providing adequate storage facilities at residential premises, for example by ensuring that there is sufficient and discrete provision for bins, to facilitate a high quality, comprehensive and frequent household collection service.
- The handling of waste arising from the construction and operation of development maximises reuse/recovery opportunities, and minimises off-site disposal.

ECC as Waste Planning Authority recommend that the above policy requirements be considered when preparing the new Local Plan. ECC will continue to work with Brentwood BC to ensure closer working between local planning authorities to integrate the need for waste management with other spatial concerns in the preparation of Local Plans, in accordance with the National Planning Policy for Waste (October 2014). The aim is to

ensure that there are sufficient opportunities to meet the identified needs of an area for the management of waste and to apply and promote the waste management hierarchy within sustainable development.

### **Sustainability Appraisal (SA) of the Brentwood Borough Local Plan Interim SA Report January 2015**

ECC support the Interim SA Report as a useful document that appraises the various options / alternatives thoroughly and independently. In terms of compliance with regulations, the SA states that such a document need not 'provide the information legally required of the SA Report' at this stage. This is a viewpoint that is supported, in order to best inform the public consultation of the strategic growth options in a useful manner in line with the scope of the Strategic Growth Options document.

#### Reasonable alternatives

Within the content of the SA, chapter 10 'AN OVERVIEW OF PLAN-MAKING / SA BETWEEN 2009 – 2014' paragraph 10.1.4 states that the latest available SHLAA was undertaken 'in May and June 2011.' Considering the Borough's SHMA was undertaken in 2013, it is uncertain whether sufficient evidence exists to suggest that the sites explored at this stage represent all those 'reasonable' alternatives for strategic growth. This is based on the fact that the SHLAA has not been updated since the borough's objectively assessed housing need has been known. The SHLAA should be the definitive background document as to where the viability of sites is evidenced, and without an up-to-date version the SA could be found lacking in its justification of:

- What evidence has been used to exclude sites from the plan-making and SA processes;
- The inclusion of preferred sites; and
- The rejection of non-preferred sites.

ECC is concerned that the coverage of alternatives in the SA is difficult to evidence whether those explored at this stage represent all those options that are reasonable, particularly given that paragraph 11.2.2 states that '*through discussion with planning officers, it has been established that there is merit to appraising the following alternatives at the current time...*' There seems to be no further rationale to support the inclusion of these sites (or any exclusion of others) as the only reasonable alternatives and as such ECC recommend that the detailed audit trail of all sites is supplied in later iterations of the SA.

#### Historic Environment

ECC is concerned that the Sustainability Appraisal fails to assess the Historic Environment to an appropriate. The following sections are of concern and ECC recommend further consideration should be given to address the matters raised below:

- |         |   |
|---------|---|
| Section | Identifies the numbers of designated assets within the Borough but fails to   |
| 8.6.1   | identify the Historic Environment Record which contains some 1160 records relating to the heritage of Brentwood. This forms the basis of the knowledge of the historic environment assets of the Borough and is identified within the NPPF. |
| 8.6.2   | Identifies only 2 heritage assets at risk identified by English Heritage, whereas the Essex buildings at risk document of 2011 identified 8.  |
| 8.6.3   | The document should identify that any new developments must take account of the impact on the historic environment and should, as a minimum, consult the Historic Environment Record.   |

Page 40      Cultural Heritage  
This section has failed to consider the impact of development on the 1160

heritage assets recorded on the Historic Environment Record and have only assessed the heritage impact against designated assets. As defined in the NPPF many undesignated assets can be of a similar importance to designated assets. No approach has been made to the Historic Environment advisors by URS to assess these sites or obtain the information to allow their staff to assess them. The failure to undertake this assessment would bring into question the final Appraisal summary in relation to Cultural Heritage.