

Brentwood Local Plan Examination

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Inspectors' Initial Questions to the Council

Phil Drane
Director of Planning and Economy
Brentwood Borough Council
SENT VIA EMAIL

Dear Mr Drane

Introduction

1. As you will be aware, we have been appointed by the Secretary of State to conduct the examination of the Brentwood Local Plan. We have had an initial read of the Plan, the submitted evidence and the representations. We have identified several initial questions at this stage that would benefit from early clarification from the Council. The Council's response will assist us with defining our matters, issues and questions on the soundness and legal compliance of the Plan.
2. In responding to our questions we would like the Council to produce separate topic papers/examination notes that demonstrate how the evidence has influenced the Plan-making process and developed the policies. The Council should clearly direct us to the relevant documents in the evidence base, identifying specific chapters or pages where appropriate.
3. It would also be useful if the Council can consider whether it might be necessary to advance any further potential main modifications to the Plan at this stage, in addition to the suggested focussed changes.

Legal compliance - duty to cooperate

4. The duty to cooperate as set out in section 33A of the Planning and Compulsory Purchase Act 2004, places a legal duty on the Council to engage constructively, actively and on an ongoing basis to maximise the effectiveness of local plan preparation in the context of strategic cross boundary matters.

5. Paragraphs 24-27 of the National Planning Policy Framework (the Framework) identifies the requirements for maintaining effective cooperation. Paragraph 27 specifically requires effective and on-going joint working to be demonstrated through the preparation and maintenance of one or more statements of common ground to be produced throughout the plan making process. The national Planning Practice Guidance (PPG) clearly sets out the scope of statements of common ground and identifies when they should be produced and what they should document.
6. Whilst the Council's Duty to Cooperate Statement (A11) (the DtC Statement) dated February 2020 was submitted for examination with the Plan, the information within it is not sufficient for us to assess whether the duty to cooperate has been met. We therefore require further information.
7. The DtC Statement indicates that the Council aims to produce statements of common ground or memoranda of understanding to provide clarification on discussions relating to strategic matters and the duty to cooperate. Can the Council direct us to these within the evidence and clarify whether they have been duly prepared in accordance with national planning policy and guidance on cooperation matters? If they have not been prepared and submitted can the Council explain the reasons for this and confirm when these will be available?
8. Section 8 of the Duty to Cooperate Statement identifies those organisations that have been involved in the preparation of the evidence base and/or the Plan. However this provides limited details on exactly how and when these organisations have been involved in the process, on what strategic matters and what the outcomes of discussions have been. Can the Council provide these details please?
9. We note that Annex 1 of the Duty to Cooperate Statement lists various meetings, workshops and discussions that have occurred, but this provides limited detail. Can the Council direct us to where the minutes and notes of these meetings are in the evidence or provide them? As a large number of meetings/workshops have been listed, we would like the Council to provide a summary of these, in chronological order, succinctly setting out their purpose, who attended, what strategic issues were discussed and what outcomes and actions were identified including any agreements or disagreements between any parties.
10. Whilst the DtC Statement provides a list of strategic issues under section 8, it is not clear how and when these were identified, which organisations were involved in their identification and what actions have been taken to address them. Can the Council clarify this please? In relation to the strategic matter of housing what discussions have occurred with adjoining authorities around meeting any unmet housing needs including gypsy, traveller and travelling showpeople. Is there an agreed protocol for dealing with unmet housing needs should they arise?
11. Whilst the Dunton Hills Garden Village is referred to in the DtC Statement, it is not identified as a separate strategic issue and there is limited detail

on the discussions and outcomes that have occurred through cooperation with relevant authorities and other prescribed bodies on this issue. Can the Council please clarify how the proposed Garden Village has been considered as a strategic matter?

12. In order to ensure that all relevant matters have been identified, can the Council summarise all comments received on duty to cooperate as part of the Regulation 19 consultation and provide a Council response to these please?

Spatial Strategy and the Sustainability Appraisal (SA)

13. Paragraph 20 of the National Planning Policy Framework (the Framework) requires strategic policies to '*set out an overall strategy for the pattern, scale and quality of development*'. Paragraph 17 states that strategic policies must be included to address priorities for the development and use of land.
14. Is it clear what the spatial strategy is and where the majority of new development will be located? Is this clearly set out in strategic policies? Why does Policy SP02, which seeks to manage growth, only provide details on the amount of housing that is required? What about other types of development, including employment and retail? Does the Plan make explicit which policies are strategic in accordance with paragraph 21 of the Framework?
15. Does the spatial strategy focus significant development in locations which are or can be made sustainable, in accordance with paragraph 103 of the Framework? Where is this demonstrated in the evidence?
16. Whilst the Plan sets out a settlement hierarchy within Chapter 2, this is within the supporting text, rather than a policy. How will a decision maker apply the settlement hierarchy when considering development proposals or is this not necessary to manage the patterns of growth? Paragraph 2.8 of the Plan states that a 'Settlement Hierarchy Assessment' has been undertaken. Whilst reference is made to the Brentwood Borough Profile, this document does not clearly explain how the hierarchy has been reached. Can the Council direct us to the evidence that justifies the settlement categorisations?
17. How has the scale and distribution of growth been determined and how has the SA influenced this during plan-making? Whilst the main 2018 SA document identifies 7 reasonable spatial strategy alternatives in table 5.5 on page 33 (and the associated maps), reference is also made to other options that have been considered in previous versions of the SA. This includes a dispersed option of development appraised in the 2013 Interim SA Report and consideration of several strategic site options referenced in paragraph 5.3.2. Can the Council clarify whether the reasons for rejecting these and any other earlier options are clearly summarised in the final report and if so point us to where this is please?

18. To assist us, we would like the Council to provide a succinct topic paper on the SA process, listing in chronological order, the growth distribution options that have been considered and how they have influenced the Plan during its preparation. Please clarify how a comparative assessment of each alternative has been carried out and provide clear reasons and conclusions as to why each alternative has been chosen to be reasonable or not. The Council should comment on whether the reasonable alternatives chosen are sufficiently distinct such that meaningful comparisons can be made of the different sustainability implications.
19. The paper should also clearly explain how the decision was made to include the Garden Village, particularly as the SA specifies under para 5.3.1 that '*Throughout the recent evolution of the Brentwood Borough Local Plan there has always been an intention to deliver at least one large-scale, strategic site...*', and what implications this has had on the SA process, if any. Has this predetermined the strategy and what impacts has its inclusion had on the consideration of alternative patterns of growth distribution within the borough?
20. The topic paper should also explain why some sites are deemed to be 'constants' within the options set out in the SA; how existing national designations, particularly the Green Belt has been considered; and clarify how the SA clearly justifies the chosen spatial strategy in the Plan given the reasonable alternatives.

Other legal compliance issues

21. Can the Council clarify the following please:
 - a. Has the Plan been prepared in accordance with the Local Development Scheme?
 - b. Has the Plan been prepared in general accordance with the Statement of Community Involvement and public consultation requirements?
 - c. Have any concerns been expressed by interested parties about the Habitat Regulations Assessment?
 - d. Have any concerns been expressed about the Equality assessment?
 - e. Have any significant concerns been expressed about whether the Council has complied with all other legal requirements?
 - f. Will the Plan supersede any existing development plans/policies and if so, is this clearly defined within the Plan?

South Essex Joint Strategic Plan

22. The Plan at paragraphs 1.35-1.38 refers to the emerging South Essex Joint Strategic Plan (JSP). It identifies that the Council, together with the Basildon, Castle Point, Rochford, Southend-on-Sea and Thurrock authorities, together with Essex County Council, have set up joint working arrangements and are currently preparing a joint strategic plan. The Local Development Scheme sets out the anticipated timescale for its production. Can the Council confirm the purpose of this joint strategic plan, provide an update on the timeframe for its production, and clarify its status and relationship to the Brentwood Local Plan? Are key strategic matters being

progressed through this joint plan and is updated evidence being prepared to support this joint plan?

Green Belt

23. The Plan proposes significant Green Belt boundary alterations to enable land to come forward for development. Whilst the Council has undertaken a Green Belt Study, this does not fully address the requirements in the Framework. Paragraph 136 of the Framework states that '*Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified...*'. It also identifies that strategic policies should establish the need for any changes to Green Belt boundaries.
24. The first stage in considering whether the release of Green Belt land is necessary to meet development needs in a sustainable way, requires the Council to demonstrate that it has examined fully all other reasonable options. This includes considering the potential for the use of suitable brownfield sites, the optimisation of the density of development and the consideration of whether neighbouring authorities could accommodate some of the identified needs, as specified in paragraph 137 of the Framework.
25. Where this first stage has determined that a review of Green Belt boundaries is necessary to help meet development needs, a second stage assessment is then required. This determines which site or sites would best meet the identified needs having regard to Green Belt harm and other relevant considerations. Paragraph 138 of the Framework states that Plans should give first consideration to land which has been previously developed and/or is well served by public transport. Plans should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining Green Belt land.
26. It is only after satisfactory completion of the above two stages that exceptional circumstances are capable of being fully demonstrated. How is the Plan consistent with these requirements of the Framework and where is the evidence to demonstrate this? What are the exceptional circumstances and where are they set out in the evidence?
27. When defining Green Belt boundaries, paragraph 139 of the Framework states that, where necessary, plans should identify areas of safeguarded land between the urban area and the Green Belt in order to meet longer-term development needs stretching beyond the plan period. It also states that plans should be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period. How does the Plan accord with these requirements? Has the Council considered longer-term development needs, and is it necessary to identify areas of safeguarded land?
28. The '*Proposed Changes to Policies Maps*' document sets out the proposed amendments to the Green Belt boundary, on a site by site basis. For clarity, is there a composite map showing the extent of the Green Belt changes proposed? If not, can one be produced please?

29. In responding to the above, the Council should produce a Green Belt topic paper that clearly sets out the processes that have been followed and the justification for the decisions made, with reference to relevant evidence.

Strategic site allocation - Dunton Hills Garden Village (DHGV)

30. The Plan proposes to allocate DHGV as the largest strategic site allocation for residential-led development. Can the Council provide an update on the planning status of the site and the progress made on bringing the site forward? What is the position regarding land assembly of the site?
31. The ethos of Garden Communities is that they are sustainable. How will the development be 'self-sustaining'? Where is the evidence to demonstrate that this can be achieved?
32. Of the 259.2 ha site proposed to be allocated, a minimum of 50% of the land area is proposed to be available for green and blue infrastructure. Is this feasible and can the level of development, including that to be delivered beyond the plan period, and all other necessary infrastructure be delivered within the remaining developable site area?
33. A total of 5.5 ha is proposed to accommodate 'a creative range of employment uses'. What type of employment uses are proposed and how and when is this to be delivered? Have locations and timescales for delivery been determined? How has the amount of employment land been determined and is this sufficient to ensure the site limits the need to travel and is self-sustaining?
34. The Transport Infrastructure section of the Infrastructure Delivery Plan (IDP) identifies four key items of sustainable infrastructure (T20-T23) which are required to support DHGV. Can the Council provide an update on these infrastructure projects? What are the highway mitigation measures that are required to support the development? Are these transport and highways requirements costed, funded and within approved delivery programmes? Is the Plan clear on what other infrastructure is necessary to support the development? Are all these infrastructure requirements justified, deliverable and viable?
35. The housing trajectory in Appendix 1 of the Plan shows that 100 houses will be delivered in 2022/23 with variable increased completions in subsequent years. This means that some houses are proposed to be delivered as part of the five year housing land supply. Having regard to the definition of deliverable sites in Annex 2 of the Framework, is this realistic and justified? On what basis has the lead-in time and the proposed annual delivery rates been determined? What evidence supports the on-going delivery rates, as set out in the housing trajectory, throughout the remainder of the plan period.
36. How have Green Belt, heritage and landscape matters been considered as part of the DHGV site allocation?

37. Has a specific viability assessment of DHGV been undertaken?
38. In responding to the above, the Council should produce a topic paper to justify and support the DHGV allocation and direct us to appropriate evidence.

Housing

39. Figure 4.1 of the Plan (page 49) indicates that the annual housing requirement would be 350 dpa, when calculated using the standard method. This is based on annual average growth over years 2019-2019. The Plan states that this is the starting point in establishing the amount of housing to be provided.
40. The Strategic Housing Market Assessment Part 1 (SHMA1), published in January 2018, identifies that the 2014-based household projection demographic starting point is 348 dpa. It then suggests that the objectively assessed housing need (OAN) should be 380 dpa. This appears to be based on a demographic starting point of 280 dpa, with the addition of a 36% uplift to take account of market signals. Figure 4.1 also includes this annual housing figure and then proceeds to add a further 20% uplift, resulting in a housing supply figure of 456 dpa. Based on this figure of 456 dpa, provision is made in Policy SP02 for 7,752 new homes to be delivered to cover the 17 year plan period of 2016-2033.
41. A further updated calculation of local housing need is provided in the Council's Five Year Housing Land Supply Statement as at 31 March 2019 (dated January 2020). This calculates the local housing need using the standardised methodology as 452 dwellings.
42. Taking the above into account, there is limited clarity and explanation in the Plan, as to what the housing need, housing requirement and housing supply figures are and how they have been calculated. Can the Council provide necessary clarity by summarising its housing approach in a topic paper? This should confirm what the total housing need and requirement is for the plan period and provide any updates to the calculation of the standard method for 2019/20. It should also set out figure 4.1 in a more detailed way so that the steps from the standard method calculation to the proposed annual housing supply can be clearly followed and understood.
43. Table 1 of the Brentwood Monitoring Report on housing delivery for 2018/19 identifies net housing completions since 2001. Between 2016 and 2019 the housing trajectory in Appendix 1 of the Plan displays different figures to those set out in this document. Are the monitoring figures correct and if so, can the Council update the housing trajectory? In doing this can the Council confirm whether other aspects of the trajectory also need updating? Can the figures be updated to include completions for 2019/20? If this update is not yet available, when would it be?

44. How have the annual average housing delivery rates in Policy SP02 been identified, as the figures do not appear to match those set out in the housing trajectory? Can the Council clarify this please? Is the stepped trajectory justified?
45. Do any of the strategic policies include a trajectory illustrating the expected rate of housing delivery, as required by paragraph 73 of the Framework?
46. Can the Plan demonstrate, at adoption, a deliverable five year supply of housing land (5YHLS) and is there a reasonable prospect of this being maintained throughout the plan period? Where is this demonstrated in the evidence? In calculating its 5HLS can the Council clarify whether a 20% buffer in response to under delivery is justified and clarify how this is calculated as part of the 5YHLS?

Site allocations

47. Can the Council provide us with an update on the planning status of the housing site allocations as listed in the housing trajectory, including progress made on their delivery? Also can the Council include an update on the extant residential planning permissions, clarifying which sites are referred to in Figure 4.2 of the Plan. Does this accord with the list of sites set out in Appendix 1 of the Brentwood Housing and Economic Land Availability Assessment October 2018?
48. Is the West Horndon Industrial Estate (Policy R02) in current employment use? If so, how many existing businesses and employees are currently located on the site? Can the Council direct us to the evidence showing that the existing businesses have been engaged in the plan-making process? Is there evidence which addresses the issues raised in the Brentwood Economic Futures Report 2013-2033, paragraphs 5.11-5.12 about the displacement of existing businesses on the site? What evidence supports the trajectory that the site will start delivering houses from 2021/22, including the completion of 65 houses in 2021/22? Has there been specific viability testing of the redevelopment of the West Horndon site for housing, particularly in light of the comments in the Local Plan Viability Assessment October 2018 regarding Vacant Buildings Credit?
49. The Plan proposes that homes will start to be delivered on the site in Policy R04 and R05 from 2024/25. Is this realistic and is it demonstrated by evidence? What is the current position regarding the relocation of the existing uses on the site and the site's availability? Has there been specific viability testing, particularly in light of the comments in the Local Plan Viability Assessment October 2018 regarding Vacant Buildings Credit?

Affordable housing

50. The SHMA Part 2 dated June 2016 (SHMA2), concludes that the total annual affordable housing need in Brentwood is 107 households per year. It states that this represents 30.6% of the annual projected housing requirement of 350 dpa in the plan period. The SHMA2 suggests that the

Council should 'pursue an overall affordable housing target of 35% or so...'. What is the specific evidence which supports and justifies the requirement for 35% affordable housing as set out in Policy HP05? How many affordable houses will this provide over the plan period? How does this compare to previous provision as set out in table 3 of the Brentwood Monitoring Report on housing delivery for 2018/19? Is this level of provision viable?

51. Why is affordable housing sought on all residential sites of 11 or more units in Policy HP05 when national policy allows it on all major residential development sites (10 units or more)? Has provision of sites of 10 or more dwellings been assessed and is it viable? Also, why does the policy include a requirement for affordable housing on sites of 10 units or less as this is not consistent with national policy, except in relation to designated rural areas?
52. How will the proposed stepped trajectory, and reliance on the DHGV later in the plan period and beyond, assist delivery of affordable housing needs and increase affordability in the borough in the short, medium and long term?

Gypsies, travellers and travelling showpeople

53. The Plan identifies a need for 13 pitches for gypsies and travellers, to be provided for through Policy HP07. This states that 'consideration' will be given to the regularisation of 8 pitches in accordance with Policy HP08. Can the Council clarify what this means? Is Policy HP07 allocating the two sites identified? Whilst the Plan states that these sites are in use as existing traveller sites, can the Council direct us to the evidence demonstrating that they are available, deliverable and suitable?
54. Policy HP07 also seeks provision through the incorporation of 5 pitches as part of the DHGV allocation, subject to meeting the criteria in Policy HP11. Is Policy HP07 allocating these 5 pitches? If so, why is it necessary to specify that Policy HP11, which relates to windfall sites, applies in this case? Can the Council explain how these pitches are to be delivered as part of the DHGV development and demonstrate how they are available, deliverable and suitable?
55. Can the Council clarify the timeframe for the delivery of the above sites, and direct us to the evidence showing that a five year land supply can be demonstrated at adoption?
56. Policy HP09 identifies 15 existing gypsy and traveller sites and seeks to safeguard them from alternative development. It would appear that these existing sites are all in the Green Belt. Paragraph 6.66 of the Plan states that the two sites in Policy HPO8 '*will remain washed over by the Green Belt*'. Relevant development proposals for all sites would therefore need to accord with national Green Belt policy including demonstrating very special circumstances. Our queries are therefore as follows:
 - a. Can the Council confirm whether all existing gypsy and traveller sites are in fact in the Green Belt?

- b. How will the approach of keeping such sites in the Green Belt be effective in ensuring that needs associated with the occupants of those sites can be met?
 - c. Why are these sites to remain in the Green Belt when residential site allocations are proposed to be removed from the Green Belt?
 - d. Has the Council considered whether there are exceptional circumstances to justify removing safeguarded and proposed new sites from the Green Belt and instead allocating them specifically as traveller sites as referred to in the national Planning Policy for Traveller Sites policy E? If so, where is this evidence?
57. Where is the evidence justifying a 10 pitch restriction on sites as specified in Policies HP10 and HP11?
58. The GTAA evidence concludes that there is a need for 66 additional pitches during the plan period for gypsies and travellers who do not meet the PPTS definition. The Plan states in paragraph 6.57 that the Council will assess and plan to meet these accommodation needs through Policy HP04 Specialist Accommodation. Can the Council clarify where in the evidence it has explained how this approach will work? Have these needs been taken in to account in the SHMA?
59. In responding to the above, the Council should produce a topic paper on gypsies, travellers and travelling showpeople clearly setting out the reasoning behind its approach, how it is to be achieved and whether it is positively prepared, justified and effective.

Housing standards and housing mix

60. The Framework in paragraph 127 seeks the provision of a high standard of amenity for existing and future users. Footnote 46 confirms that planning policies may make use of the optional technical standards for accessible and adaptable housing, where this would address an identified need. It also states that the nationally described space standards may be used, where the need for an internal space standard can be justified.
61. In relation to the technical standards included in Policy HP01, what is the identified need and justification for requiring all dwellings on sites of 10 or more homes, to be built to the M4(2) standard, unless it complies with the M4(3) standard? Similarly, what is the identified need and justification for a minimum of 5% of new affordable houses on sites of 60 or more dwellings, to meet the M4(3) standard? What is the justification for the 60 dwelling threshold?
62. As regards the internal space standards, paragraph 6.41 of the Plan states that needs are identified in the Council's authority monitoring report (AMR). Can the Council clarify this please, point us to where the AMR is in the evidence and justify the requirements of Policy HP06 in this regard?
63. How has the Council considered the likely future need for housing for older and disabled people, the accessibility and adaptability of existing housing stock, how needs vary across tenures and the overall impact on viability?

Have the standards and housing mix requirements in Policies HP01 and HP06 been suitably viability tested to ensure that residential development is viable?

64. What specialist accommodation provision will be sought on sites of 500 dwellings or more? Is the 5% requirement for self-build homes on these large sites justified? What is the justification for the 500 dwelling threshold? Will the amount of provision on such sites meet the identified needs for these forms of accommodation?

Employment

65. Can the Council direct us to where the Council's Economic Strategy is within the evidence please? How has this Economic Strategy and the other economic documents referred to in the Plan, influenced the approach to delivering economic growth during the plan period? Can the Council explain how the Plan sets out a clear strategy which positively and proactively encourages sustainable economic growth?
66. In relation to Policy PC02 reference is made in paragraph 7.13 to a range of economic evidence that has informed the employment land and job growth needs, including the Brentwood Economic Futures 2013-2033 report and the SHMA1. The Economic Futures report provides economic forecasts for the 'new Local Plan period (2013-2033)' and concludes that the gross employment land requirement is estimated to be between 8.1 ha and 20.3 ha. Paragraph 7.19 of the Plan identifies these figures as part of the calculation of the employment land requirement. However, as the plan period is now 2016-2033 rather than 2013-2033, is this level of employment land still justified by the evidence?
67. Paragraph 7.19 of the Plan then continues by stating that almost 21.01 ha of existing employment land will be redeveloped for alternative uses. The Plan seeks to re-provide this. Where in the evidence is the justification for the loss of this amount of existing employment land? Can the Council please clarify why it is necessary for these sites to be allocated for alternative uses and explain how this is a positively prepared strategy? Where will any existing operational uses be re-located to and is this justified and feasible?
68. The forecast loss of existing employment allocations is then identified in paragraph 7.19 with a figure of 4.65 ha. How has this forecast loss been determined and is it realistic?
69. Combining the above figures, the Plan identifies an employment land requirement ranging from 33.76 ha to 45.96 ha. Is setting the requirement out as a range effective and is it clearly identified in strategic policy within the Plan?
70. The Plan, through Policy PC02 and individual site policies, allocates 47.39 ha of new employment land, which is more than the requirement. Can the Council explain why they propose to allocate more land than is required?

71. Paragraph 7.23 states that it summarises the employment site selection process. However it is not entirely clear in the Plan what approach has been taken in deciding which sites should be allocated and whether they are supported by robust evidence. We note that a Housing and Economic Land Availability Assessment (HELAA) was published in 2018, which has included consideration of the 2010 Employment Land Review and other evidence. Can the Council provide clarity on the process of site selection for employment site allocations in the Plan please?
72. Are sites to be allocated through Policy PC03 as well as the individual site allocations and if so, why are the sites set out in Figure 7.6 rather than in the policy?
73. What are the exceptional circumstances for the removal of employment sites from the Green Belt and where can we find this assessment in the evidence?
74. Figure 7.6 includes four existing employment sites in the Green Belt. Are these sites to be allocated through the Plan and if so, will they remain washed over by the Green Belt? Is there a reason why these sites need to remain in the Green Belt? As relevant development proposals for these sites would need to demonstrate very special circumstances, can the Council clarify how this approach will be effective? Are there exceptional circumstances to justify removing these sites from the Green Belt and if so, where is this evidence?
75. Which parts of the evidence support the allocation, deliverability and viability of the Brentwood Enterprise Park (Policy E11)? Whilst Policy E11 refers to the need for highway works and the provision for sustainable transport, have the detailed transport infrastructure requirements been assessed and are they deliverable and viable?
76. The Plan provides a housing trajectory. Can the Council also produce an employment trajectory to assist us in understanding the timescales for delivery over the plan period?

Transport infrastructure

77. The Brentwood Borough Local Plan Transport Assessment (Stantec January 2020) appears to still be in draft. Has this report been finalised? There is a missing section concerning the M25 Junction 28 at paragraph 10.4.40 on page 113. The report states that this section is to be completed. Can the Council confirm if this part of the report has now been completed, and if not, when this will be available? Can the Council please provide an update in relation to the work being carried out with Highways England on assessing the mitigation required at both junctions 28 and 29 of the M25?
78. Paragraphs 1.2.19-1.2.21 of the Transport Assessment make reference to neighbouring authority local plans. Paragraph 1.2.21 states that additional information on growth from other authorities has been explained in section 2.5, but this section is missing from the report. Can this be

provided please? Section 3.5.3 explains that neighbouring authority committed developments in Basildon and Havering have been included within the modelling, but not Thurrock or other authorities. Is this correct and does the Council intend to update this evidence? If not does the Transport Assessment fully take account of the cumulative impact of traffic growth including that arising from existing and proposed developments in neighbouring areas?

79. Can the Council provide a copy of the A127 Corridor for Growth study, which is referred to in the Transport Assessment?
80. Can the Council also please provide an update to the list of Sustainable Transport measures and Highways Mitigations set out in Figures 3.14 and 3.16 of the Transport Infrastructure Development Plan (V4 February 2020) setting out progress in bringing the schemes forward, and whether they are costed, funded and within a delivery programme?

Retail

81. Retail provision within the Plan is based on the needs identified in the 2014 Retail and Commercial Leisure Study. This has assessed future floorspace requirements up to 2030. The study is now 6 years old and does not cover the full plan period. Can the Council confirm whether there has been an update? If not, how is reliance on the 2014 Study justified?

Air quality

82. The IDP, in paragraphs 3.20-3.22, provides some information on local emissions and pollution relating to road transport, including Air Quality Management Areas (AQMA). This shows that Brentwood has the second highest level of emissions per person in Essex and indicates that figures are significantly higher than the UK and County averages.
83. Paragraph 8.50 of the Plan states that transport generated emissions are the main source of poor air quality. It also identifies the AQMA within the borough. Can the Council provide maps showing the AQMA locations and provide us with details on the reasons for their designations? What plans are in place to improve air quality in the AQMA? Is any development proposed in the vicinity of these AQMA (including commitments and allocations), which could impact on traffic levels through the AQMA? If so, can these developments be identified on the AQMA maps please?
84. Have assessments been carried out to determine the impact that the planned growth within the Plan will have on air quality within the borough, including the AQMA? Are there any forecasts available to assess future levels of traffic emissions, particularly where the majority of growth is proposed?

Historic environment

85. How has the Council considered the effect of the planned growth on the significance of heritage assets and their settings, within or in the vicinity of development sites proposed to be allocated within the Plan?

Open space

86. The supporting text to Policy BE22, particularly paragraph 5.181, sets out specific development requirements that do not appear to be in the policy. Can the Council explain why this is the case? Are these requirements justified?
87. The designation of Local Green Space and Protected Urban Open Space are both referenced in figure 5.3 (page 111) of the Plan and Policy BE23. Does the former relate to Local Green Space as defined in the Framework and if so where is the evidence to support their designation and is it consistent with the Framework? Does the Plan clearly define what is meant by the different open space terms, including Local Green Spaces and Protected Urban Open Spaces? Are the designations justified?

General matters

88. Paragraph 22 of the Framework states that strategic policies should look ahead for a minimum 15 year period from adoption. The strategic policies in the Plan look ahead to 2033, so if the Plan was adopted in 2021, it would not provide for a 15 year period. How does the Council propose to address this matter so that the Plan would be consistent with the Framework? What would be the implications for the evidence base supporting the Plan and for the policies if the plan period were to be extended?
89. Paragraph 16 includes requirements that plans should 'serve a clear purpose' and 'contain policies that are clearly written and unambiguous, so it is evident how a decision maker should react to development proposals'. In this regard we note that a number of the policies in the Plan appear mainly or partly to set out general Council aspirations or objectives rather than to provide a clear indication of how a decision maker should react to a development proposal. Can the Council comment on this approach?
90. The site allocation policies state that 'Development proposals should consider the following:...' and then provide criteria on the amount and type of development and the development principles for each site. Can the Council clarify whether these are policy requirements rather than just considerations and if not, explain how a decision maker would apply such policies to development proposals?
91. Are there any neighbourhood plans in preparation within the borough and if so, what stage have they reached?

92. The Council has submitted a document entitled '*Proposed Changes to Policies Maps*'. This includes whole borough maps showing proposed site allocations and designations and individual plans showing each site.
93. We note that some of the maps do not clearly show the proposed amended Green Belt boundary, as they appear to just follow the site boundaries. Can the Council provide plans clarifying what the new Green Belt boundary would be please?
94. Can the Council provide a composite Policies Map showing all the proposed designations and allocations?

Next steps

95. We recognise that most of the above questions will involve additional work and the Council will need time to respond and produce the relevant topic papers. We would therefore be grateful if the Council could provide a timetable setting out how they propose to produce the necessary documents and information we have requested. We will not be able to establish dates for the hearing sessions, until we have received and considered the Council's responses to this letter.
96. We would ordinarily set out a deadline for the Council to submit this timetable. However due to current circumstances in relation to the Coronavirus situation we would like the Council to inform us when they consider they would be able to provide this. If the Council has any queries on the contents of this letter, please contact us through the Programme Officer.

Yours sincerely

Yvonne Wright and Mike Worden

Inspectors appointed to examine the Brentwood Local Plan

1 June 2020