

F3D Council's response to Q10 Duty to Cooperate strategic issues – July 2020

INSPECTORS' QUESTION 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?

1. Identification of strategic issues

- 1.1 A number of broad strategic issues with possible cross-boundary implications were examined in the early stages of the preparation of the Local Plan, through conducting evidence based studies, collaborating working with stakeholders and partners as part of the Duty to Co-operate, and consultation on the Council's draft Local Plan. Throughout the Local Plan preparation process, the list of strategic matters and co-operation activities has been kept under review.
- 1.2 As a result of the process outlined above, the Local Plan set out four overarching strategic objectives that define how sustainable growth is to be achieved, and how development should take positive steps to secure gains in economic, social and environmental objectives.
 - SO1: Manage Growth Sustainably
 - SO2: Deliver a Healthy and Resilient Built Environment
 - SO3: Deliver Sustainable Communities with Diverse Economic & Social-cultural Opportunities for All
 - SO4: Deliver Beautiful, Biodiverse, Clean and a Functional Natural Environment
- 1.3 Furthermore, the Association of South Essex Local Authorities (ASELA) identified the following key spatial planning priorities:
 - Housing numbers, type and distribution (including delivery issues and affordable housing)

- Economic development priorities and strategic locations informed by an emerging Local Industrial Strategy
- Transport Infrastructure requirements to deliver growth
- Green and Blue Infrastructure Strategy (to include consideration of connected green space/parks, Green Belt and the role of the Thames Estuary)
- Design and quality (including future proofing development/potential new technologies)
- Social inclusion and other supporting infrastructure

1.4 Taking all the above into consideration, the following strategic planning issues have been identified:

- Housing and Gypsy and Travellers sites
- Green Belt impacts
- Flooding
- Green and blue infrastructure
- Education
- Health and wellbeing
- Transport and travel
- Other

1.5 Please note, for further details of which organisations were involved in their identification and how, please also refer to the Council's response to Inspectors' question 7, 8 and 9 (examination documents **F3A**, **F3B** and **F3C**).

- The Council's response to Inspectors' question 7 (examination document **F3A**) provides an update on the Council's progress in establishing a joint position with relevant organisations and public bodies via Statements of Common Grounds or Memorandums of Understanding, to resolve outstanding matters relating to the above strategic issues.
- The Council's response to Inspectors' question 8 (examination document **F3B**) details how each organisation was involved in identifying strategic matters.
- The Council's response to Inspectors' question 9 (examination document **F3C**) provides a list of meetings that took place, as well as meeting notes and summaries of strategic matters discussed.

2. Involvement of other authorities and actions taken to address the strategic matters

HOUSING AND GYPSY AND TRAVELLERS SITES

How and when this was identified as a strategic issue

- 2.1 The requirement to identify and meet objectively assessed housing need for market and affordable housing and Gypsy and Traveller needs is set out in the National Planning Policy Framework. This includes consideration of any unmet needs from neighbouring authorities or neighbouring housing market areas.
- 2.2 The Essex Planning Officers Association (EPOA) developed a protocol for addressing unmet housing need, which starts with asking those authorities within the housing market areas to take the unmet need, followed by approaching neighbouring housing market areas if there still remains unmet housing need. Brentwood is its own housing market area, thus requiring the Council to approach other neighbouring housing market areas if they can take any of the Council unmet need.
- 2.3 Planning for the required housing need and Gypsy and Travellers sites has been the subject of many duty to cooperate discussions and representations throughout the consultation process. During the 2013 and 2014 Regulation 18 consultations, majority of neighbouring authorities responded stating that they would not be able to take any of Brentwood's unmet housing need and encouraged the Council to make every effort possible to provide for its full objectively assessed housing needs and Gypsy and Traveller site requirements.
- 2.4 The Brentwood Local Plan Preferred Options 2013 (examination document **B3**) proposed to provide for fewer new homes than the identified need. This was based on the conclusions of various technical evidence at the time including consideration of the Borough being 89% Green Belt.
- 2.5 Following this consultation it became apparent that several issues needed to be reconsidered including Objectively assessed housing need. These issues were set out within the Brentwood Ordinary Council report, 10 December 2014 (examination document **F3d1**) which allowed for the approval to consult on the Strategic Growth Options January 2015 (examination document B7). One of the issues outlined was that there were objections from three neighbouring authorities (Basildon, Chelmsford and Thurrock) due to the plan not proposing to meet full needs. These authorities confirmed that they would not accept any shortfall from Brentwood Borough within their own boundaries. There was also consideration that other Local Plans at the time were being found unsound on the basis of not meeting objectively assessed needs. Further to this there was a recognised need to positively prepare the plan supported by technical evidence.
- 2.6 The Strategic Growth Options consultation established the need for the Council to meet its objectively assessed need which then informed the preparation of the Draft Local Plan January 2016 (examination document **B9**). The Brentwood Ordinary Council report 27 January 2016 (examination document **F3d2**) continued this emphasis for meeting OAN (see page 173). It also established the importance of the sequential approach for identifying sites

to meet need ensuring all options within the urban area are fully explored before identifying sites within the Green Belt.

- 2.7 These principles were then reflected in the subsequent iterations of the Local Plan reflected the requirement to meet full objectively assessed needs. The sequential approach to selecting sites ensured urban brownfield areas were prioritised but in order to meet full needs it was still necessary to allocate land within the Green Belt. The Green Belt assessment (examination document **C18**) considered that the impacts on Green Belt are fairly uniform wherever a site is identified. The failure to meet fully assessed housing need (with the application of an appropriate buffer) would compound the historic undersupply and further compound affordability issues within the Borough (with all the attendant social and economic consequences that would follow over the plan period), and this can only be remedied by meeting the identified need by the full utilisation of suitable PDL and land within the Green Belt (which constitutes approximately 89% of the Council's area).

Which organisations were involved?

- 2.8 With regards to meeting housing needs, the Council has actively and positively engaged with neighbouring and adjoining authorities and stakeholders from early on. Throughout stages of the Local Plan's consultations, it was clear that adjoining authorities were struggling to meet their own housing needs due to the Green Belt constraints and were unable to take any neighbouring authority's unmet housing needs:

- Thurrock Borough Council: responded to Brentwood's Regulation 18 consultations in 2013 and 2014 indicated their inability to take any of Brentwood unmet housing needs and suggested that Brentwood prepare a Plan that meets all of the borough own housing needs.
- Epping Forest District Council: replied to Brentwood BC's 2013 Regulation 18 consultation noting that they would not be in a position to take any of Brentwood's unmet housing need and outlined their intention to have unmet housing need met within their Housing Market Area.
- Chelmsford City Council: responded to Brentwood's 2014 consultation stating that they were unable to take any neighbouring authority's unmet housing need.
- Basildon Borough Council: acknowledged that neither authority is in the position to meet another neighbouring authority's unmet housing need. Basildon's Pre-Submission Local Plan (2018) clearly outlined their intention to have their unmet housing need met through the joint working being undertaken by the South Essex Joint Strategic Plan.
- Castle Point Council (neighbouring authority, not adjoining): had identified they were unable to meet their own housing need and their Pre-Submission was found unsound in 2017.
- Southend-on-Sea Borough Council (neighbouring authority, not adjoining) indicated that they are unable to meet their own housing needs in their Issues & Options consultation document.
- Rochford DC (neighbouring authority, not adjoining) is also a green belt authority and is unable to meet their housing need within the district.
- Greater London Authority has also been consulted in every stage of the Local Plan, and the Council has considered GLA's comments in reviewing its links to locations beyond the Borough, as explained later in this paper.

- 2.9 Similarly because the Green Belt covers approximately 89% of Brentwood Council's area and it has a limited supply previously developed land capable of being developed for housing, the Council was also unable to take others' unmet housing needs, this message has been made explicit in our formal responses to neighbouring authorities' Local Plans.

Actions undertaken to address this strategic issue

- 2.10 Demographic projections are the starting point for assessing how much housing will be required across an area. In 2013, Brentwood commissioned work to define its housing market area as part of a Strategic Housing Market Area and the work concluded that Brentwood Borough was a self-contained Housing Market Area.
- 2.11 However, Greater London Authority's 2016 consultation response noted strong links to locations beyond the Borough, including commuting flows into London, and suggested that the data used to prepare this work should be updated. Brentwood therefore reviewed the neighbours' housing market evidence to update its Strategic Housing Market Assessment (SHMA); the 2017 SHMA retested the commuting and migration links beyond Brentwood in light of the updated 2011 Census data. The conclusion that Brentwood is a self-contained Housing Market Area remains.
- 2.12 In terms of local housing need (LHN), the housing need calculated from the 2016-based official household projections produced the figure of 350 dpa under the standard method provided in NPPF. Based on advice in the Strategic Housing Market Assessment (PBA, October 2018), the standard-method number of 350 dpa was lifted to 380 dpa. At the time when the Pre-Submission Local Plan was launched for Reg 19 consultation on 14th February 2019, the government had just consulted on a revised method in October-December 2018, which would use the 2014-based projections. Therefore, the Pre-Submission Local Plan's housing requirement is based on the advice to lift the standard-method figure of 350 dpa to 380 dpa, plus a 20% margin to cover the possibility that a new standard method would increase the local housing need, resulting in a total figure of 456 dpa. The conclusion reached was that the objectively assessed need for Brentwood is 7,752 new homes a year over the period 2016 – 2033.
- 2.13 It should be noted that the LHN, based on 2014 national projections as set out by the current standard method, is 452 dpa, Therefore, the plan's requirement of 456 dpa delivers the LHN required by the NPPF.
- 2.14 In terms of Gypsy and Traveller sites, it was identified that a total of 13 additional Gypsy and Traveller pitches to be developed by 2033 for those who meet the PPTS definition of 'travelling'.
- 2.15 Each stage of the Local Plan development has been subject to ongoing Sustainability Appraisal and Habitats Regulations Assessment. These tested the emerging Plan against high level objectives, options for housing and employment targets, and the Vision and Spatial Principles. The outcomes have influenced the choice of location and quantum of development.
- 2.16 The requirements for new housing in Brentwood are outlined in Strategic Policy SP02: Managing Growth. Monitoring for the delivery of housing will be undertaken by the Council through the annual Authority Monitoring Report.

- 2.17 The provision for Gypsies and Travellers is required in Policy HP07: Provision for Gypsies and Travellers.
- 2.18 This strategic matter relates to the Inspectors' other questions and will be further elaborated in the Council's Housing Topic Paper.

Table 1 - Housing and Gypsy and Traveller sites actions

<p>Strategic matter: Housing and Gypsy and Travellers Sites</p>
<p>Action 1: Update the evidence base regarding Brentwood HMA in the wider Strategic Housing Market Area, and plan for the local housing need in accordance with NPPF</p> <p>Organisations involved: all stakeholders consulted through Local Plan preparation</p> <p>Outcome:</p> <ul style="list-style-type: none"> Brentwood's SHMA has been updated to inform the plan-making process. The 2017 SHMA concluded that Brentwood is a self-contained Housing Market Area. The Local Plan's housing requirement of 456 requirement is based on the housing need calculated by the previous version standard method, plus a margin to insure against future contingencies, including future changes in the standard method.
<p>Action 2: Preparation of a Local Plan Viability Study to provide an evidence base on affordable housing targets</p> <p>Organisations involved: stakeholders consulted through Local Plan preparation</p> <p>Outcome:</p> <ul style="list-style-type: none"> Local Plan Viability Assessment (HDH, 2018)
<p>Action 3: Preparation of Essex-Wide Mechanism on Unmet Housing Needs</p> <p>Organisations involved: EPOA comprising Essex Local Planning Authorities and Essex County Council</p> <p>Outcome:</p> <ul style="list-style-type: none"> A protocol was subsequently produced and agreed by the EPOA in July 2017 (note that as Brentwood is its own HMA, therefore most of the agreed protocol did not apply to Brentwood).
<p>Action 4: Preparation of a joint evidence base on Gypsy and Traveller and Travelling Showpeople accommodation requirements (GTAA)</p> <p>Organisations involved: EPOA comprising Essex Local Planning Authorities and Essex County Council.</p>

Outcome:

- A summary for Brentwood GTAA was published in 2016 to allow the Council to understand levels of need for plan period. Brentwood GTAA is part of a wider study that covers the whole of Essex, together with Southend-on-Sea and Thurrock. Although Basildon were not part of this commission, they have been a partner in the process and have used the same consultant and methodology for their GTAA.
- A mechanism was subsequently produced, and All Essex Local Planning Authorities signed up to the EPOA's procedure on unmet Gypsy, Traveller & Traveller Showpeople need (2018)

Action 5: Preparation of a Strategic Growth Locations Strategy as a starting point to identify the development capacity within South Essex based on a 'policy off' approach

Organisations involved: Association of South Essex Authorities (ASELA) - Basildon Borough Council, Brentwood Borough Council, Castle Point Borough Council, Rochford District Council, Southend-on-Sea Borough Council, Thurrock Borough Council, and Essex County Council

Outcome:

- The Strategic Growth Location Strategy was commissioned by the Chief Executive and Leaders (ASELA) to identify all possible development sites across South Essex as at starting point to determine the maximum leave of development that could occur within the area without considering any constraints. This evidence will be used to inform the Joint Strategic Plan in identifying possible strategic development sites.
- The baseline report has been completed.

Action 6: Preparation of the ASELA Delivery and Infrastructure Working Group, aimed at identifying site allocations which could be accelerated with assistance / funding from Central Government.

Organisations involved: Homes England and the Association of South Essex Authorities (ASELA) - Basildon Borough Council, Brentwood Borough Council, Castle Point Borough Council, Rochford District Council, Southend-on-Sea Borough Council, Thurrock Borough Council

Outcomes:

- All authorities identified sites which have planning permission and have stalled, are on the Brownfield Land Register, and/or identified within the existing or emerging Local Plans which meet the Frameworks definition of developable but have not come forward due to infrastructure or viability issues. A detail assessment has been undertaken and regular working group meetings to discuss the progress of this work.

- Details from this workstream have been used to help form part of the ASELA Prospectus set to be submitted to Central Government the end of July 2020.

GREEN BELT IMPACTS

How and when this was identified as a strategic issue

- 2.19 With Brentwood set fully within London's Metropolitan Green Belt, it was clear from the start that this would pose a considerable development constraint. Green Belt makes up 89% of Brentwood's area and the availability of previously developed land is very limited. This posed a challenge in meeting housing need, triggering a need to review the status of the Green Belt. The review work commenced in 2017 and concluded in 2019.
- 2.20 The sensitivities around Green Belt release to meet development needs meant this was flagged up as a strategic issue, dominating many Local Plan discussions and representations throughout the consultation process.

Which organisations were involved?

- 2.21 Like many local authorities in the same position, BBC undertook a Green Belt Study (see evidence document [C18](#)) to help inform the preparation of the Local Plan in line with NPPF (para 136) as a matter of course.
- 2.22 The NPPF states that once established, Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans. Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so they can endure beyond the plan period.
- 2.23 Organisations and residents have responded to the concluding position set out by the Green Belt Study through the Reg 18 and Reg 19 consultation process. These responses have highlighted further the contentious nature of the subject matter and therefore, the strategic nature of the Green Belt impacts.
- 2.24 The large majority of responses have been from either developers / land promoters, or residents who have objected to the position reached by the Green Belt Study and the corresponding Sustainability Appraisal process of site selection, mostly objecting, giving reasons from opposite ends of the argument.

Actions taken to address this strategic issue

- 2.25 In 2017/2018 the Council commissioned Crestwood Environmental Ltd to undertake a Borough wide study of the strategic function of Green Belt designated land, to form part of the emerging the evidence base to guide strategic development and site selection to meet housing need. This resulted in [Part 1](#) and [Part 2](#) of the Green Belt evidence base.
- 2.26 In parallel, the production of the Housing and Economic Land Availability Assessment ([HELAA](#)) in October 2019 (which was undertaken to review the previous SHLAA baseline in accordance with requirements of the National Planning Policy Framework (NPPF)), resulted

in a number of additional potential housing sites being identified and were put forward for consideration as housing and employment land.

- 2.27 In response, further work was commissioned forming [Part 3: Individual Sites Assessment](#), published in January 2019. This took the additional sites identified by the HELAA Assessment work and undertook a relative assessment of potential Site Allocations against the purposes of the Green Belt. The assessment focused on an individual sites basis and was supplemented by an addendum covering cumulative aspects as appropriate.
- 2.28 The Sustainability Appraisal (SA) (see evidence document [A3 & A4](#)) analysis of reasonable alternatives took all information and arising conclusions on board in analysing and defining the final list of site allocations to be taken forward, (in accordance with the requirement of para 137 NPPF) and concluded that it would be necessary to release Green Belt land for development to meet all of BBC housing needs, being a single housing market.
- 2.29 The Council's strategy for growth has considered all potential brownfield sites and previously developed underutilised land within the main urban area; this has largely informed the Central Brentwood Growth Corridor.
- 2.30 It was clear from the Green Belt Study and various iterations of the SA that no matter where growth was placed, the impact to Green Belt was uniform, but that some locations performed better in terms of sustainability than others. This has meant the Council has had to make difficult decisions on the potential additional locations to meet housing need. In so doing, BBC has had to balance minimising the impact on the Green Belt and ensuring chosen locations are more sustainable, accessible, and least harmful to other key environmental designations, as well as capable of being delivered without major impacts to wider infrastructure requirements.
- 2.31 Further urban extensions into the Green Belt along the Central Brentwood Growth Corridor proved problematic from an infrastructure point of view. This largely led to confirming that the southern sites, and the South Brentwood Growth Corridor strategy, would promote more sustainable patterns of development, in line with NPPF para 138, due to the transport links and opportunities to improve infrastructure as a result of the scale of development that could be accommodated there.
- 2.32 It should also be noted that this strategy was also informed by the knowledge that neighbouring authorities will not be able to take on any of BBC need, as required by para 137(c); Basildon and Castle Point at the time published their Local Plans demonstrating they were unable to meet their own need; and the position in Thurrock has yet to be established, as they are still undergoing their local plan review.
- 2.33 In conclusion, Green Belt release to address housing need has complied with the requirements of para 137-138 of the NPPF, with all necessary actions having been taken to iteratively assess and justify the site allocations. In total less than 2% of Green Belt is being released.

Table 2 – Green Belt actions

Strategic matter: Green Belt impacts
Action 1: Preparation and review of Green Belt evidence
Organisations involved: all stakeholders engaged through the plan-making process
Outcome: <ul style="list-style-type: none">• Green Belt Study (2018)• Sustainability Appraisal

FLOODING

How and when this was identified as a strategic issue

- 2.34 As part of the Local Plan process Local Planning Authorities need to identify appropriate area where development can safely happen, considering the impacts and risks to both the built and natural environment. Flood risk includes flooding from rivers, rainfall, rising groundwater, which can overwhelm sewers and drainage systems, and from reservoirs, canals, lakes, and other artificial sources. Incidence of high rainfall are forecasted to increase in intensity as a result of climate change. Developing inappropriately in areas at risk from flooding, can put properties and lives at risk. Flood risk in Brentwood Borough is not limited to areas in very close proximity to local watercourses. There are a number of areas where flooding within the borough is a result of rapid surface water runoff and ponding, in areas with low lying roads. The Council undertook a Strategic Flood Risk Assessment (SFRA) and Water Cycle Study working alongside Thames Water and Anglian Water to determine areas within the borough at greater risk of flooding and gaps within the infrastructure for water supply and wastewater management. The Lead Local Flood Authority, Essex County Council has produced the Surface Water Management Plans for all boroughs in Essex as well as regular updates to the Critical Drainage Areas (CDAs).
- 2.35 This evidence base identified above, and comments received by Essex County Council, Environment Agencies, and water companies were used to develop a number of the Local Plan policies such as BE08 Sustainable Drainage, NE01 Protecting and Enhancing the Natural Environment, and NE06 Flood Risk

Which organisations were involved?

- 2.36 The Council has positively engaged with the Thames Water and Anglian Water companies in the development of the Water Capacity Study. The Council has also worked in partnership with Essex County Council, the Lead Local Flood Authority, and the Environment Agency to manage and mitigate flood risk.

Table 3 – Flooding actions

<p>Strategic matter: Flooding</p>
<p>Action 1: Preparation of evidence with regards to water issues</p> <p>Organisations involved: Essex County Council, Environment Agency, Anglian Water, Thames Water, Natural England</p> <p>Outcomes:</p> <ul style="list-style-type: none"> • Brentwood Strategic Flood Risk Assessment (2018) (document C16 on the Local Plan Document Library) • Brentwood Water Cycle Study (2018) (document C17 on the Local Plan Document Library) • Essex County Council (2015) Brentwood Surface Water Management Plan (document C15 on the Local Plan Document Library) • Essex County Council Critical Drainage Area
<p>Action 2: Preparation of Memorandum of Understanding: Land Drainage Enforcement</p> <p>Organisations involved: ECC and other local authorities</p> <p>Outcome:</p> <ul style="list-style-type: none"> • In 2015 ECC and Brentwood together with other local authorities signed a Memorandum of Understanding: Land Drainage Enforcement; this set out how the parties will work together to ensure the successful delivery of Flood water enforcement activity.

GREEN AND BLUE INFRASTRUCTURE

Recreational Disturbance Avoidance and Mitigation Strategy (RAMS) and SPD

2.37 There are a number of Local Plans in preparation in Essex set to deliver up to 180,000 new homes over the coming 15-20 years. These new homes have the potential to bring new visitors to the sensitive coastal area, resulting in impacts on protected sites both individually and in combination through recreational disturbance. Local Planning Authorities are duty bound to comply with their responsibilities to protect habitats and species in accordance with the UK Conservation of Habitats and Species Regulations 2017 (the 'Habitats Regulations'). The need for a long term, strategic approach was identified by Natural England, the Government's advisor for the natural environment in England, to ensure compliance with the Habitat Regulations. Twelve Essex Authorities have been working together with the assistance of Essex Place Services and Natural England in an advisory role. The 12 LPAs are:

- Basildon Borough Council;

- Brentwood Borough Council;
- Braintree District Council;
- Brentwood Borough Council;
- Castle Point Borough Council;
- Chelmsford City Council;
- Maldon District Council;
- Rochford District Council;
- Southend Borough Council;
- Tendring District Council;
- Thurrock Borough Council; and
- Uttlesford District Council

- 2.38 The twelve authorities have developed a joint RAMS Strategy and Supplementary Planning Document (SPD) which is supported and endorsed by Natural England. The RAMS SPD provides the mechanism to secure developer contributions for those developments which fall within the zone of influence (Zol) to contribute towards the mitigation measures identified within the RAMS Strategy. The RAMS SPD is currently being taken through each authorities respective committee / council process and is expected to be formally adopted by all partners by September 2020.
- 2.39 The commitment to joint working is outlined within the Memorandum of Understanding, signed by all partners in January 2017. The twelve authorities are in the process of finalising a partnership agreement to strengthen this commitment and clearly outline each partners roles and responsibilities. It is expected this will be formally adopted in autumn 2020.
- 2.40 Once the SPD and Partnership Agreement has been adopted, the RAMS Strategy will be implemented. A delivery officer and two rangers are expected to be hired in the autumn 2020, and ongoing monitoring will be managed by the delivery officer and reported back to the RAMS steering group.
- 2.41 The RAMS Strategy has informed the Council's policy approach to mitigation, with the Strategic Objective SO4 of the Plan seeking to deliver beautiful, biodiverse, clean and a functional natural environment. Policy NE02 Recreational disturbance Avoidance Mitigation Strategy specifies the need to contribute towards the RAMS.
- 2.42 Relevant policies in the Local Plan with regards to Green and Blue Infrastructure include: Strategic Policy SP01: Sustainable Development, Policy NE01: Protecting and Enhancing the Natural Environment, Policy NE02 Recreational disturbance Avoidance Mitigation Strategy, Policy NE03: Trees, Woodlands, Hedgerows, Policy NE04: Thames Chase Community Forest, Policy NE05: Air Quality, Policy BE01: Future Proofing, Policy BE18: Green and Blue Infrastructure. In addition, site specific policies also specify Green and Blue Infrastructure requirement where appropriate.

The South Essex Green and Blue Infrastructure (GBI) strategy

- 2.43 The need for a strategic green and blue infrastructure assessment has been prepared as part of the Joint Strategic Plan (JSP) evidence base. This was identified as a key priority to help

improve the connectivity within South Essex and improving the existing natural habitats. This evidence base will be used to support Local Plans and develop a Strategic Green and Blue Infrastructure policy within the Joint Strategic Plan.

- 2.44 In addition to supporting the development of the Joint Strategic Plan, the Strategic Green and Blue Infrastructure Assessment has also been adopted by ASELA and is being used to support the ASELA Coastal Corridor working group and ASELA Prospectus planned to be submitted to Central Government the end of July 2020.

Table 4 – Green and blue infrastructure actions

<p>Strategic matter: Green and blue infrastructure</p>
<p>Action 1: To identify the zone of influence, to develop RAMS Strategy and RAMS SPD, to adopt the SPD</p> <p>Organisations involved: Natural England, ECC and participating authorities comprising Southend-on-Sea Borough Council, Chelmsford City Council, Braintree District Council, Rochford District Council, Castle Point Borough Council, Uttlesford District Council, Colchester Borough Council, Basildon Borough Council, Thurrock Borough Council, Tendring District Council, Maldon District Council</p> <p>Outcome:</p> <ul style="list-style-type: none"> • A partnership of the 12 Essex authorities has been formalised, with a memorandum of understanding signed in January 2018. Monthly steering group meetings are on-going. Once the SPD and Partnership Agreement have formally been adopted, the steering group will be able to hire a delivery officer and two rangers, thus allowing the group to meet quarterly, with the ability for additional meeting to be held as needed. The delivery officer will be responsible for maintaining regular monitoring and report back to the steering group. • Essex RAMS Strategy was developed identifying the zone of influence. The strategy was then used for developing a Supplementary Planning Document (SDP). Both the RAMS Strategy and the RAMS SPD were consulted on between 10th January and 21st February 2020. A consultation statement entitled 'You Said, We Did' has also been published. • The Local Planning Authorities are currently in the process of going to their respective committees and adoption is expected in September 2020. • The steering group has drafted a partnership agreement. This is expected to be formally adopted in autumn 2020. • RAMS contributions have been collected by all authorities as per the RAMS strategy.
<p>Action 2: Preparation of evidence base - the Brentwood Green Infrastructure Strategy</p> <p>Organisations involved: Natural England, Historic England, Environment Agency, ECC as well other stakeholders through the GIS and Local Plan consultations</p>

<p>Outcome:</p> <ul style="list-style-type: none"> • Green Infrastructure Strategy (2015)
<p>Action 3: To develop the Strategic Green and Blue Infrastructure Strategy in support of the JSP</p> <p>Organisations involved: Natural England, ASELA</p> <p>Outcome:</p> <ul style="list-style-type: none"> • Completion of the Strategic Green and Blue Infrastructure Assessment, consisting of three core documents – Stage 1: Baseline Report, Stage 2 and 3: Main Report, and Stage 2 and 3 Appendix document. The Stage 2 and 3 Main Report includes suggested policy wording and priorities which will be used within the Joint Strategic Plan Green and Blue Infrastructure policy. • A workshop was held with neighbouring local authorities and external consultees following the completion of the Baseline Report to allow stakeholders an opportunity to feed into the strategy developed as part of stage 2 and 3. A follow up meeting was held with the consultants, officer’s group, and Natural England to discuss how to align the South Essex Green and Blue Infrastructure Strategy with some of Natural England’s priorities and achieving biodiversity net gains. • The South Essex Green and Blue Infrastructure Strategy has now been completed. These documents are being used to support the work currently being undertaken by the ASELA Coastal Corridor working group and will be included as supporting evidence for the ASELA Prospectus.

EDUCATION

- 2.45 A key consideration for the Local Plan is the additional demand on education facilities as a result of new development and how this can be accommodated and/or mitigated. The Infrastructure Delivery Plan (IDP) is a key evidence base document and sets out details of the education facilities identified by ECC as education provider as being needed to support the delivery of new development.
- 2.46 From evidence-based studies, and ongoing engagement with Essex County Council, the Council has included education provision as part of site-specific policy requirements where appropriate.

Table 5 – Education actions

<p>Strategic matter: Education</p>
<p>Action 1: Preparation of evidence – Infrastructure Delivery Plan</p> <p>Organisations involved: ECC</p>

Outcome:

- The Council has been working closely with ECC to provide input to education need forecast. ECC has been closely involved in agreeing Local Plan requirements for education – for early years and childcare, primary and secondary provision. Regular meetings and ongoing dialogue, against the background of ECC’s evidence document Commissioning School Places in Essex.
- As a result, the requirements for education facilities and appropriate mitigation measures to support the Local Plan growth have been assessed and incorporated into the IDP and the Local Plan policy requirements.

Action 2: Liaison with developers on education facilities at site R03: Land North of Shenfield and site R01: Dunton Hillgs Garden Village

Organisations involved: ECC, site promoters, Shenfield Highschool

Outcome:

- The Council has been working closely with ECC and site promoters to determine the location of required education facilities and to ensure the provision would meet DfE guidelines
- A draft SoCG has been circulated to site promoters of site R03 and all parties are working together to establish areas of agreement
- A draft SoCG has been circulated to site promoters of site R01 and all parties are working together to establish areas of agreement including education provision

HEALTH AND WELLBEING

- 2.47 Health and Wellbeing has been identified as a strategic matter as it is expected to be embedded through the Local Plan policies to ensure health good quality design, access to open space, active travel, access to employment, shops, and health facilities. The importance of health and wellbeing has also been highlighted within the revised National Planning Policy Framework.
- 2.48 The Essex Planning Officers Association (EPOA) 2008 guidance note on Health Impact Assessments sets out targets for all local authorities to ensure that their Local Plans contain a policy requiring HIA for relevant planning applications. The EPOA guidance note on Health Impact Assessments (2019) was being updated when the Brentwood Local Plan was being prepared for Regulation 19. The Council has worked closely with EPOA by providing comments on the updated guidance note. The Council ensured that policy SP04: Health Impact Assessments was aligned with the EPOA’s guidance note.
- 2.49 In preparation for the Regulation 19 Pre-Submission, a desktop Health Impact Assessment was undertaken on the 2016 draft Brentwood Local Plan draft policies to ensure that the policies are robust as possible from a health and wellbeing perspective. The Assessment found that there were a number of policies from the 2016 Draft Local Plan which had a positive impact on health, but also identified where there were possible gaps in policies

requiring either additional work / evidence to strengthen the policy or the creation of new policies. In response to the findings of the HIA, revisions were made to the Local Plan prior to the Pre-Submission Local Plan Regulation 19 consultation. The Local Plan HIA is a living document and will be updated following the Local Plan examination process.

2.50 The Infrastructure Delivery Plan (IDP) is a key evidence base document setting out details of the additional healthcare facilities needed to support the delivery of new development. This was in liaison with Mid and South Essex STP acting on behalf of NHS.

Table 6 – Health and wellbeing actions

Table 6 - Strategic matter: Health and wellbeing
<p>Action 1: Preparation of evidence – Infrastructure Delivery Plan</p> <p>Organisations involved: ECC, EPOA, Mid and South Essex STP</p> <p>Outcome:</p> <ul style="list-style-type: none"> The Council has been working closely with ECC to provide input to education need forecast; ECC advised on the impact the Local Plan growth would have upon education facilities. As a result, the requirements for education facilities and appropriate mitigation measures to support the Local Plan growth have been assessed and incorporated into the IDP and the Local Plan policy requirements.
<p>Action 2: Undertake an HIA of the draft Local Plan policies</p> <p>Organisations involved: ECC, EPOA, Brentwood Health and Wellbeing Board</p> <p>Outcome: The HIA identified where there were possible gaps in policies and whether additional work or new policies were needed. Some of the key changes made to the Local Plan were:</p> <ul style="list-style-type: none"> Embedding health and wellbeing throughout the Local Plan; Restructuring the Local Plan Framework so that it was aligned with the principles of sustainable development – environmental, social, and economical; Including a Strategic Health and Wellbeing Policy and a Health Impact Assessment Policy to highlight the importance of health and wellbeing to those wishing to develop and invest in the borough; Ensuring strong support for active travel through improved access to cycle and walking paths, car limited policy; More in-depth policies were established for Dunton Hills Garden Village, to ensure this development takes advantage of the Garden Village Principles, that design strategies are used to create a sense of place / community, limit environmental impacts, and promote a health throughout the development Brentwood Local Development Plan Health Impact Assessment (HIA) (document A10 on the Local Plan Examination Library)

TRANSPORT AND TRAVEL

How and when this was identified as a strategic issue

- 2.51 Transport and travels can have many implications beyond traffic flows and air quality, such as health and well-being of the public, safety, social interaction as well as local economic performance. Therefore, it has rightfully been raised by residents as well as other authorities as a strategic matter requiring well thought-out plans, provision, mitigation and delivery, as far as plan-making is concerned.
- 2.52 With major roads such as the M25, A12 and A127 running through the Borough and a very high level of car ownership, there are opportunities to improve connectivity, but transport implications of planned growth would need to be considered should we aim to meet housing and employment needs in the most sustainable way. There are four rail stations in the borough: Brentwood, Shenfield, Ingatestone, and West Horndon, all present further opportunities to improve accessibility to sustainable transport.
- 2.53 Early conversation regarding transport modelling began in 2012 with Essex County Council (more details can be found under the Council's response to Inspectors' questions 8 and 9, examination documents **F3B** and **F3C**) to prepare for transport evidence informing the housing and employment strategy.

Which organisations were involved?

- 2.54 Responsibility for the planning, operation and maintenance of the highway network in Brentwood dominantly lies with:
- Highways England: who has responsibility for a small section of the A13, the A12 and the M25
 - ECC: who governs the A12 and A127 section in Brentwood
- 2.55 Improvements to the highway infrastructure capacity has been a key topic of conversations that were had with Highways England, ECC, TfL, Basildon Borough Council, Thurrock Council, Castle Point Borough Council, Rochford District Council, Southend on Sea Borough Council, as well as other authorities from the wider region (Havering, and other authorities in the ASELA).
- 2.56 With regards to improving multimodal integration and capacity at train stations, the Council has been working closely with infrastructure providers including C2C, Network Rail, Greater Anglia Rail and relevant site promoters.
- 2.57 In addition, informal discussions regarding transport have taken place through the ASELA Central Corridor group (this is also known as the A127 corridor or the South Brentwood Growth Corridor), involving Basildon and Thurrock councils. This has focussed on growth at Dunton Hills Garden Village and cross-boundary impacts.

Actions undertaken to address this strategic issue

- 2.58 The Transport Assessment has been prepared to appraise the broad impact of planned growth on local and strategic junctions. In response to statutory consultees' comments to the Local Plan consultations, BBC has been working closely with ECC, Highways England and LTC to progress further transport modelling of the Transport Assessment as well as informed

Highways England's Lower Thames Crossing proposals. There are outstanding issues to be agreed but all parties are working collaboratively towards the aim of establishing a joint position.

- 2.59 Junction 29 of the M25 acts as a gateway both into London and South Essex along the A127. The junction itself straddles several Highways and Local Authorities including Transport for London, Essex County Council and Havering and Brentwood Councils. It is recognised as a key strategic junction and given the level of expected growth in the wider area, the proximity to Brentwood Enterprise Park and Dunton Hills Garden Village, the implications of Lower Thames Crossing, there has been regular engagement with Highways England and their Lower Thames Crossing (LTC) Team on arrangements at M25 junction 29 as they relate to existing accesses to sites proposed to be allocated for employment land at Codham Hall Farm and Brentwood Enterprise Park.
- 2.60 The Council has also been actively engaged in the Lower Thames Crossing (LTC) project, Arrangements for bringing forward LTC and Brentwood Enterprise Park are the subject of ongoing discussion to allow for both projects to be delivered together without delay. These discussions include Essex County Council as local highways authority. There is overlap with the A127 Economic Task Force and involvement with LB Havering and TfL.
- 2.61 Junction 28 of the M25 has been the subject to Highways England's capacity improvements proposals. BBC responded to the M25 junction 28 consultations in 2017 and 2018 and 2019 to raise the strategic issues including impacts to vehicular traffic and congestion, the need to continue explore active travel improvement options and newly identified impacts. Regular meetings were taken place from in 2019 between BBC, London Borough of Havering and Highways England officers to discuss the M25 junction 28 improvement scheme, Essex County Council later joined the discussion regarding M25 J28 Designated Funds Cycling Scheme.
- 2.62 The Council took part in the A127 Corridor Liaison Meeting with other Essex LPAs, Highways England, TfL and ECC to address outstanding strategic transport matters. Consequently, a Statement of Common Ground was signed in 2017 to agree a way forward on how the participating authorities will work collaboratively to address the identified strategic transport issues. Following on this work, the authorities have continued to work together through the ECC led A127 Corridor Economic Task Force to raise the profile of the A127 corridor supporting bids for funding to deliver improvement schemes along this key route, which spans two LEP areas.
- 2.63 Regular discussion has taken place with C2C about the role of West Horndon station as a result of growth proposed in the wider area, discussion has included Network Rail when relevant. Discussion has also included Network Rail, Essex County Council, Thurrock Council, and relevant land promoters. A Memorandum of Understanding has been drafted and is in the process of agreement between those involved regarding roles and potential funding sources.
- 2.64 The Council has been liaised with Greater Anglia Rail regarding Shenfield and Ingatestone station and the public realms, including improved disabled access and the role of station car parks. In addition, there has been engagement with various Crossrail contacts regarding the role of Brentwood and Shenfield stations in relation to investment in the public realm.

- 2.65 In preparation for the Regulation 19 Pre-Submission Local Plan, policies wordings have been modified and additional policies created taking into account received through previous consultations. A stronger emphasis has been placed on sustainable transport provision.
- 2.66 As part of this, a set of [sustainable transport measures for the Central Brentwood Growth Corridor](#) were developed and costed; these were appended to the Transport Assessment. The [Southern growth corridor integration vision](#) was also prepared to inform sustainable transport infrastructure proposals that are needed to support the site allocations within the Southern Brentwood Growth Corridor; costs for all these proposals have been outlined in the study.
- 2.67 From these studies and ongoing engagement, the Local Plan lists site-specific transport infrastructure requirements in relevant site policies. Local Plan transport and highways infrastructure requirements are outlined in Part B of the Infrastructure Delivery Plan (IDP).

Table 7 – Transport and travel actions

<p>Strategic matter: Transport and travel</p>
<p>Action 1: Preparation of evidence – Transport Assessment</p> <p>Organisations involved: ECC, Highways England including the Lower Thames Crossing Team, key stakeholders engaged through the Local Plan consultations</p> <p>Outcome:</p> <ul style="list-style-type: none"> • Traffic modelling, along with other evidence-based studies, has informed the Council’s strategy for directing growth to the most sustainable locations where the impact on the local and strategic network can be minimised. • It has also led to the emphasis on provision of sustainable transport infrastructure, non-vehicular modes of travel, mitigation measures, and access to future development. • Consideration of cross boundary traffic impacts included in Local Plan. • Regular engagement takes place with Highways England on the Local Plan Transport Assessment and growth proposals, such as Brentwood Enterprise Park and Dunton Hills Garden Village. • Continuing engagement with Highways England and their LTC Team on arrangements at M25 junction 29 as they relate to existing accesses to sites proposed to be allocated for employment land at Codham Hall Farm and Brentwood Enterprise Park. In addition, arrangements for bringing forward LTC and Brentwood Enterprise Park are the subject of ongoing discussion to allow for both projects to be delivered together without delay. These discussions include Essex County Council as local highways authority.
<p>Action 2: Preparation of evidence - Southern growth corridor integration vision</p> <p>Organisations involved: all key stakeholders engaged through the Local Plan consultations</p>

Outcome:

- [South Brentwood Growth Corridor Sustainable Transport Vision \(2020\)](#)

Action 3: Preparation of evidence - the Infrastructure Delivery Plan (IDP)

Partners: all key stakeholders engaged through the Local Plan consultations

Outcome:

- The IDP sets out the cost of infrastructure and how it will be delivered, giving clarity to developers on what development is required to deliver. Clear funding routes are set out for key strategic infrastructure projects.
- This work also provides the basis for on-going discussion with developers to agree on infrastructure provision on-site and off-site.
- [Infrastructure Delivery Plan](#)

Action 4: Consider the roles of train stations in light of planned growth - West Horndon Station, Brentwood Station, Shenfield Station

Partners: Greater Anglia Rail, C2C, Network Rail, Crossrail, Essex County Council, Thurrock Council, and relevant land promoters.

Outcome:

- A Memorandum of Understanding has been drafted and is in the process of agreement between those involved regarding roles and potential funding sources for West Horndon Interchange.

Action 5: To agree a way forward in addressing outstanding strategic transport matters along the A127

Organisations involved: ECC, Highways England, TfL, Basildon Borough Council, Thurrock Council, Castle Point Borough Council, Rochford District Council, Southend on Sea Borough Council, and London Borough of Havering

Outcome:

- A Statement of Common Ground (SoCG) Subject: Strategic Transport Issues was signed on 29 September 2017 with the above parties to agree a way forward in addressing outstanding strategic transport matters.
- The A127 Corridor Economic Task Force was formed to raise the profile of the A127 corridor and to support funding bids to deliver improvement schemes along this key route.

Action 6: To be actively involved in the M25 Junction 28 improvement scheme and the M25 Junction 28 Designated Funds Cycling Scheme

Organisations involved: Highways England, London Borough of Havering and ECC

Outcome:

- This work is on-going

Action 7: To work with Highways England and ECC on M25 Junction 29 arrangements to bring forward LTC and Brentwood Enterprise Park without delays

Organisations involved: Highways England, ECC

Outcome:

- This work is on-going

OTHER: ECONOMY

How and when this was identified as a strategic issue

2.68 The National Planning Policy Framework makes clear that Local Plans need to be prepared keeping in mind housing and employment needs of the area. Employment needs are a requirement to ensure the borough maintains a competitive and successful local economy. Therefore, employment needs were identified at the beginning of the Local Plan process along with housing needs. The Pre-Submission Local Plan clearly outlines the Councils economic strategic priorities as follows:

- P1. Support business development and growth;
- P2. Facilitate and deliver skills and employability support;
- P3. Facilitate and encourage business workplace, infrastructure and inward investment;
- P4. Facilitate and support stronger and more vibrant town & village centres;
- P5. Develop and support the borough’s rural economy; and
- P6. Promote Brentwood Borough as a place to visit and invest, encouraging the visitor economy

2.69 These priorities were identified following the completion of the various economic and employment needs assessments and finalising the Council’s Local Plan Spatial Strategy and Vision for the borough.

Which organisations were involved?

2.70 To maximise opportunities for economic growth and development, the Council has continued to work closely with the South East Local Enterprise Partnership (SELEP), the Essex Business Board (EBB) and the Brentwood Business Partnership (BBP).

2.71 Additional economic and employment evidence base is expected to be developed as part of the Joint Strategic Plan alongside ASELA partners to help form a sound strategic employment strategy and supporting policies.

Actions taken to address this strategic issue

2.72 Through the Local Plan process the Council has commissioned a number of economic related evidence base to inform policies within the Pre-Submission Local Plan such as:

- PC01: Cultivating a Strong and Competitive Economy;
- PC02: Job Growth and Employment Land;
- PC03 Employment Land Allocations;
- PC04 Development and Expansion of Business Space;
- PC05 Employment Development Criteria; and
- PC06 Supporting the Rural Economy.

2.73 These policies have been developed to help support the Brentwood economy and entrepreneurs within the local community.

2.74 In addition, it is anticipated that the Joint Strategic Plan will include strategic employment policies. The Joint Officer Group (JOG) have commissioned an Economic Land Availability Assessment evidence base document which will be used to identify where strategic employment sites are needed.

OTHER: EMPLOYMENT AND RETAIL

How and when this was identified as a strategic issue

2.75 The National Planning Policy Framework indicates that the Local Planning Authority should ensure the Local Plan policies aim to meet the retail needs as identified within the evidence base, so that the local economy is not constrained and potential investment is not diverted elsewhere or lost. The revised NPPF (2018) removed the requirement to identify primary and secondary shopping frontages and acknowledged the significant challenges facing town centres and in particular the retail sector. It recognised that diversification is key to the long-term vitality and viability of town centres to 'respond to rapid changes in the retail and leisure industries'. As such the policies within the Pre-Submission Local Plan also aim to clarify the range of uses permitted in Designated Centres, as part of a positive strategy for the future of each centre.

Which organisations were involved?

2.76 Brentwood Borough Council has engaged positively with neighbouring authorities and Essex County Council through the various Local Plan consultations and Brentwood Down Centre SPD consultation to ensure the evidence base and proposed Local Plan policies are robust.

Actions taken to address this strategic issue

2.77 The NPPF place emphasis on the sequential approach with regards to the location of new retail provision. It also promotes mixed-use development (particularly the incorporation of residential uses) and the retention of the main town centre uses. The sequential approach is

reflected in the network of centres set out in policy PC08: Retail Hierarchy of Designated Centres, defined to meet retail and service needs and support local businesses and communities. This position of a centre in the hierarchy reflects its size and range of services and facilities, as well as the size of its catchment. The Pre-Submission Local Plan contains a number of policies aimed to achieve a good balance of mixed uses in the borough's centres to meet the needs of those who live, work, shop and spend leisure time within Brentwood, such as:

- PC07: Retail and Commercial Leisure Growth;
- PC08: Retail Hierarchy of Designated Centres;
- PC09: Brentwood Town Centre;
- PC10: Mixed Use Development in Designated Centres;
- PC11: Primary Shopping Areas;
- PC 12: Non-Centre Uses; and
- PC13: Night Time Economy

2.78 The Association of South Essex Local Authorities (ASELA) is currently undertaking a number of retail and employment evidence base documents to develop strategic employment and retail policies that will be included within the Joint Strategic Plan. To date ASELA have commissioned and started work on the following assessments to be undertaken:

- Employment Grow-on Study;
- Tourism Assessment; and
- Town Centre Assessment

(Note: these assessments are still work in progress and have not been completed).

OTHER: SPORTS AND LEISURE

How and when this was identified as a strategic issue

2.79 Local Plan Authorities need to consider access to open space, playing fields, and leisure facilities to ensure adequate level of provision is provided within the area. Sport England provides clear evidence and guidance on how and why this evidence should be prepared through the Local Plan process. Typically, a strategic assessment, taking into consideration an entire housing market area would be undertaken. As Brentwood has been identified as its own housing market area the evidence base has focused on Brentwood Borough only, however facilities provided close to the Brentwood boundary were considered.

Which organisations were involved?

2.80 The Council has actively engaged with Sports England, Active Essex, Essex and Wales Cricket Board, Essex Cricket, Essex Football Association, England Hockey, and Essex Rugby through the creation of the Brentwood Play Pitch Strategy Steering Group which meets twice a month to discuss Local Plan and sports related matters.

2.81 The Council has also positively engaged with Sport England to address the objection raised (please see Council's response to question 8, examination document **F3B**). In response to Sport England's objection to Dunton Hills Garden Village due to the loss of the golf course,

the Council worked in partnership with England Golf to prepare a Golf Course Needs Assessment. The Council is currently working with England Golf and Heartswood Golf Course (Council owned) to provide adequate mitigation as a result of the Dunton Golf Course.

Actions taken to address this strategic issue

- 2.82 As part of the Local Plan process the Council commissioned the Brentwood Built Facilities Strategy (BFS) and Play Pitch Strategy (PPS) as recommended by Sports England to ensure the borough provided enough sports and leisure facilities for the community. The assessments examined the existing quantity, the quality of the facility, and the capacity to determine whether additional provision would be need to meet demand. Following the completion of these evidence base documents the Council also updated its Brentwood Leisure Strategy 2018-2028 (2018) which took account of the actions outlined within the PPS. These documents were used to develop some of the Pre-Submission Local Plan policies, such as policy BE22: Open Space in New Development and policy BE23: Open Space, Sport and Recreational Facilities.
- 2.83 During the Draft Local Plan 2016 Regulation 18 consultation Sport England raised objections to the Dunton Hills Garden Village site allocation on the grounds that it would result in a loss of golf provision within the borough and a Golf Course Needs Assessment had not been undertaken. The Council undertook an in-house Golf Course Needs Assessment working alongside England Golf and Sports England. The Golf Course Needs Assessment concluded that the borough as adequate provision of 18-hole golf however would loss the entry level golf provision (para 3, 9-holes) which was previously offered at the Dunton Golf Course. This loss of entry level golf will be addressed by providing mitigation at the Heartswood Golf Course owned by the Council as agreed with England Golf

Table 8 - Economy, employment and retail and sports and leisure actions

Strategic matter: **Economy**

Action 1: Preparation of employment and economic related evidence base for the Brentwood Local Plan

Organisations involved: South East Local Enterprise Partnership (SELEP), the Essex Business Board (EBB) and the Brentwood Business Partnership (BBP)

Outcomes:

- Economic Futures 2013-2033 (2018) (document C12 on the Local Plan Examination Library)
- Employment Land Review (2010) (document C13 on the Local Plan Examination Library)
- Brentwood Economic Strategy 2017-2020

Strategic matter: [Employment and retail](#)**Action 2: Preparation of evidence base documents for the Brentwood Local Plan**

Organisations involved: ECC

Outcome:

- Retail and Commercial Leisure Study (2014) (document C14 on the Local Plan Examination Library)
- Brentwood Town Centre Design Plan (2017) (document C9 on the Local Plan Examination Library)
- Brentwood Town Centre Design Guide (2018) (document C8 on the Local Plan Examination Library)

Strategic matter: [Sports and leisure](#)**Action 3: Preparation of evidence base – the Brentwood Play Pitch Strategy and Brentwood Built Facilities Strategy**

Organisations involved: Sport England, Active Essex, Essex and Wales Cricket Board, Essex Cricket, Essex Football Association, England Hockey, Essex Rugby, Brentwood Borough Council

Outcomes:

- Creation of a PPS Steering group. The group meets twice a year to provide updates, discuss and undertake actions identified within the PPS and BFS to ensure they are realised, and ensure ongoing positive collaborative working.
- [Play Pitch Strategy 2018-2033 \(2018\)](#) (document C4 on the Local Plan Examination Library)
- [Built Facilities Strategy \(2018\)](#) (document C3 on the Local Plan Examination Library)

Action 4: To work with statutory consultees and key stakeholders to address potential implications of development on natural and heritage assets

Organisations involved: Historic England, Natural England and developers

Outcomes:

- Historic England has been involved with the Conservation Area Appraisal work and changes made to the conservation areas.
- Historic England has been engaged in a number of workshops regarding site R01 DHGV, conversation is on-going with the aim to progress outstanding issues via a SoCG
- Natural England supports the commitment to the protection, conservation and enhancement of the natural environment throughout the Brentwood Pre-Submission Local Plan and agrees that there are no outstanding disagreement between the Council and Natural England.

Action 5: To work with statutory consultees and key stakeholders to address potential implications of development on recreational facilities in the borough

Organisations involved: Sport England, Golf England, Hartwood Golf Course (Council owned) and developers of site allocations

Outcomes:

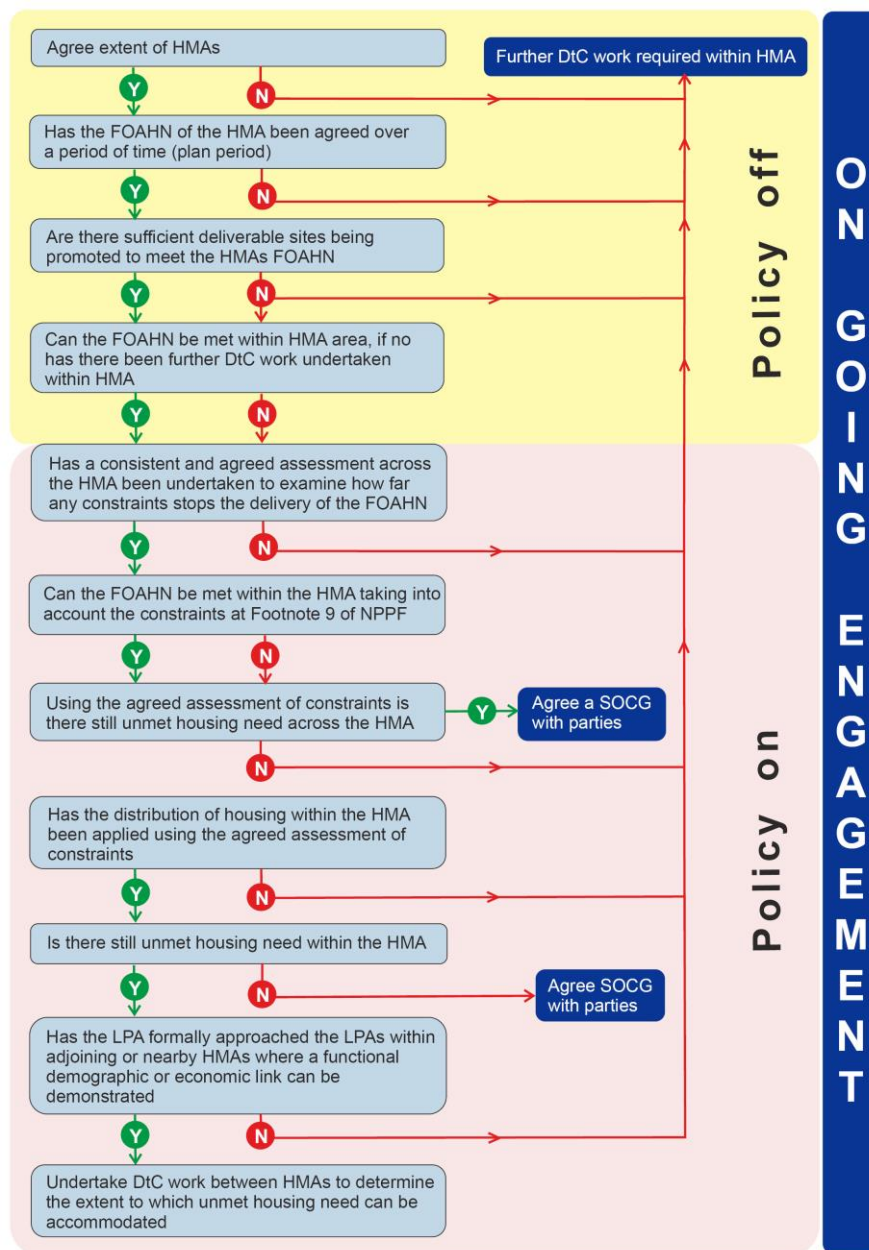
- Sport England objected to Dunton Hills Garden Village due to the loss of golf facilities, and the absence of a Golf Course Needs Assessment (Draft 2016 Local Plan Regulation 18 consultation). In response the Council undertook a Golf Course Needs Assessment which identified there would be a loss of entry level golf (par 3, 9-holes) (document C5 on the Local Plan Examination Library). Once this was identified and the position agreed with Sport England and England Golf the Council has been working closely with England Golf to identify suitable mitigation measures to be implemented at the Council owned Heartswood Golf Course (please refer to **2020-03-19 Golf England Support Letter – Dunton Hills Golf Centre in the supporting evidence folder for question 8**) .
- The Council is in the process of commissioning a Feasibility Assessment on the request of Sport England. It is anticipated this assessment will be completed into the next two to three months. This will then be used to assist with the Dunton Hills Garden Village S106 discussions to ensure all required mitigation measures are actioned.
- England Golf have agreed to sign a SoCG and the Council is in the process of drafting this document as identified within the Council's response to question 7 (examination document **F3A**).
- In addition, the Council has been working closely with Sport England in addressing their objections to R03, Land North of Shenfield due to the policy text not specifically stating the existing playing fields will be maintained. The Council has been working closely with the developers of this site and Sport England to ensure this issue is address through the masterplanning process.
- Statement of Common Grounds with Sport England is in the process of being drafted. Sport England as indicated that they are not willing to sign a SoCG until all the required work is completed. The Council has agreed a way forward with Sport England (please refer to meeting notes found within the **supporting evidence fold to question 8, 2019-10-16 Sport England Initial SoCG Discussions and 2020-06-09 SoCG Sport England meeting minutes.**) and expects the SoCG will be signed prior to the examination hearings.

3. Discussion with adjoining authorities around unmet housing needs including Gypsy, Traveller and Travelling Showpeople

Unmet housing needs

3.1 A Protocol for dealing with unmet housing needs requests was agreed in July 2017 between Essex Local Planning Authorities through the Essex Planning Officers' Association (EPOA) as illustrated in figure 1 below.

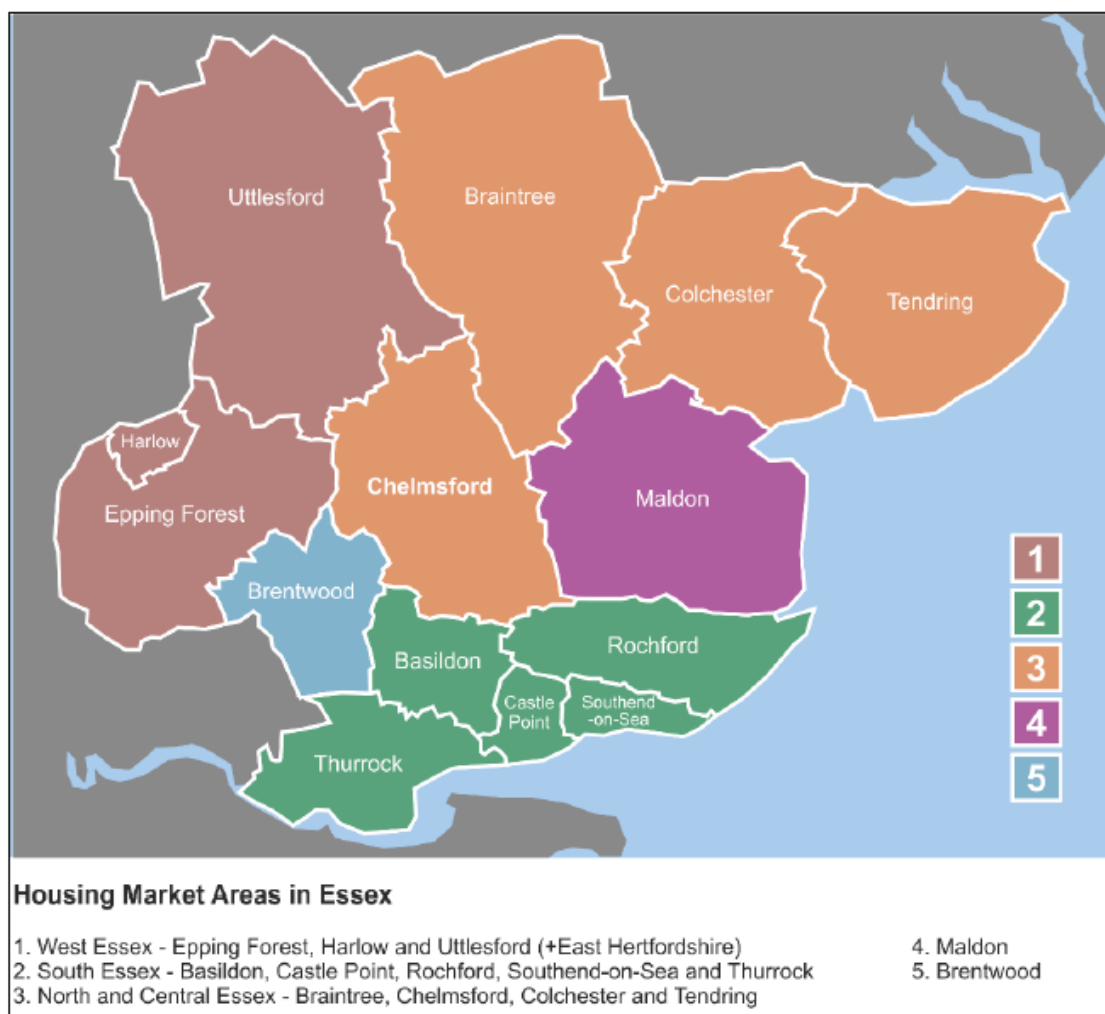
Figure 1 - EPOA flow diagram of agreed process for addressing unmet need



3.2 The EPOA's agreed housing market areas are illustrated below in figure 2. The diagram clearly illustrates that Brentwood Borough Council is its own housing market area which meant most of the agreed protocol did not apply to Brentwood. Majority of the communication with neighbouring authorities regarding unmet housing need has been formally done through

the Local Plan consultation process. Details are provided in the Council's response to the Inspectors question 8.

Figure 2 – Essex housing market areas



Unmet Gypsy, Traveller and Travelling Showpeople need

3.3 The EPOA jointly commissioned a Gypsy, Traveller & Traveller Showpeople Accommodation Assessment. As part of this workstream in December 2018, all Essex Local Planning Authorities signed up to the EPOA's procedure on unmet Gypsy, Traveller & Traveller Showpeople need as illustrated in figure 3 below. A copy of the EPOA report, *Mechanism for the consideration of Unmet Gypsy and Traveller Need (2018)*, is included in the Council's response to the Inspectors letter under question 8, additional documents folder.

Figure 3 - EPOA flow diagram of agreed process for addressing unmet Gypsy and

Traveller need

