F10 Council's response to Inspectors questions strategic policies, sustainable growth strategy, and settlement hierarchy

INSPECTORS QUESTION 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?

Is it clear what the spatial strategy is and where the majority of new development will be located?

1. The spatial strategy is set out in chapter 3 (Spatial Strategy - Vision and Strategic Objectives) of the Local Plan.

2. This chapter explains the driving factors underpinning the vision, strategic objectives and spatial strategy of the Plan to ensure sustainable development:

    i.   Transit-oriented growth;

    ii.   Developing naturally and sustainably; and

    iii.   Healthy communities.

3. The Key Diagram (Figure 3.1) illustrates the main aspects of the spatial strategy set within the broader local context. 'Transit-orientated growth' is central to the borough's growth strategy, as it focuses development along the two key transit corridors to ensure that future development maximises the benefits of transport infrastructure, including more importantly, public transport infrastructure. Section 3.21 of the Local Plan elaborates on the two identified growth areas, and Figure 3.2 conceptualises the two growth areas where the majority of new development will be located:

    - the Central Brentwood Growth Corridor with the A12, the Great Eastern Main Line to London Liverpool Street Station, and the Elizabeth Line; and

- the South Brentwood Growth Corridor with the A127 and the London, Tilbury and Southend Railway to London Fenchurch Street Station.

4. This chapter also sets out broad spatial development principles comprising of a sequential approach, strategic sites and development proposals in the vicinity of key gateways into Brentwood Borough, all principles which promote accessible locations.

5. Other relevant chapters directly supporting the spatial strategy include:

- Chapter 4 (Managing growth) setting out cross-cutting policies to implement the Council's strategy for sustainable growth; and

- Chapter 9 (Site allocations) presenting the site allocations that underpin the broad distribution of development within the borough.

6. In summary 70% (28/40) of the allocation sites are located along the Central Growth Corridor within or at the margins of the main urban area. 17.5% (7/40) of the site allocations are located within the South Growth Corridor, with the remaining 12.5% (5/40) around the existing northern villages.

Is this clearly set out in strategic policies?

7. Strategic policies are set out in Chapter 4 (Managing Growth) of the Plan. They set out how sustainable development is to be achieved, where development is best placed to ensure accessible and sustainable growth, and what development proposals must respond to. These strategic policies are prefixed with 'SP'.

8. It is proposed that the title and introductory text of Chapter 4 make clear that these are the 'strategic policies', as set out in examination note F9.

9. In line with paragraph 21 of the NPPF, strategic polices contain only those necessary to address the strategic priorities of the Borough and relevant cross-boundary issues, to provide a clear starting point for non-strategic policies.

10. The strategic policies are supported by development management policies which provide more details on a number of thematic topics (Chapter 5 to 8) and site allocations policies (Chapter 9), as noted in paragraph 4.3 of the Plan:

> *These policies are supported by the site allocation policies (Chapter 9), which give more detail about each of the growth areas. The site allocation policies detail the amount and type of development expected to be provided, and the specific supporting infrastructure and other requirements needed for each of the sites.*

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?

11. Employment needs are set out in Policy PC03 Employment Land Allocations. Provision for retail needs are set out in Policy PC03 Employment Land Allocations Retail and Commercial Leisure Growth.

12. On reflection, given the strategic nature of these two policies, the Council proposes that they are placed in Chapter 4 and the policy headings are renamed, as set out in examination note F9.

Does the Plan make explicit which policies are strategic in accordance with paragraph 21 of the Framework?

13. The Policy Index at page 3 differentiates strategic policies and non-strategic policies.

14. Paragraph 3.20 of the Plan explains that:

    The policies are split into two types;

    i. *Spatial policies which provide the overarching strategic guidance to steer development opportunities across the borough. Most of these policies relate to delivering Strategic Objective SO1; and*

    ii. *Development management policies which provide more details on a number of thematic topics.*

15. Strategic policies are all contained in Chapter 4 and are numbered with "SP" prefix.

16. However, on reflection, the Council considers that the Plan could make it more explicit which policies are strategic by renaming the headings of these policies, as set out in examination note F9.

INSPECTORS QUESTION 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?

17. As outlined above one of the overarching aims of the spatial strategy is to focus a large proportion of growth along two key transit corridors within the Borough. Including the Central Brentwood Growth Corridor and Southern Brentwood Growth Corridor. Focusing growth along these corridors ensures that future development is sustainable, maximising the benefits of transport infrastructure. This growth strategy ensures economies of scale are reached, with the critical mass of development making it more viable for such investment to occur, including investment in transport infrastructure.

18. Sustainability considerations, such as reducing the need for vehicular travel, has been central to establishing the Local Plan's transit-orientated growth strategy. Transport mitigation measures to address the cumulative impacts of planned growth and a sustainable transport package to facilitate the shift away from vehicular travel have been identified in the Transport Assessment (evidence document C35) and the South Brentwood Growth Corridor Sustainable Transport Vision (evidence document C37). In addition, the Cycling Action Plan (examination document C36) also sets out a long term plan that will lead to a significant and sustained increase in cycling by establishing a coherent, comprehensive and advantageous cycle network. These measures are costed in the Infrastructure Delivery Plan; funding critical transport infrastructure would be secured primarily via the proposed developments (clarification in F51 Transport Infrastructure), which are large enough to contribute to their delivery within the plan period.

19. The Transport Assessment (examination document C35) has demonstrated that through sustainable transport measures and physical highway improvement works, the impact of the Local Plan can be mitigated and that there are no major residual impacts that might prevent the delivery of the Local Plan development. Understanding that there is a clear opportunity in South Brentwood to expand an existing community based on a viable sustainable transport network, the Council commissioned the South Brentwood Growth Corridor (SBGC) Sustainable Transport Vision (evidence document C37) which sets out principles and illustrations to demonstrate that both delivery of sustainable infrastructure and the safe movement of Non-Motorised Users is achievable. Sustainable transport movements and the infrastructure required for it, have been considered beyond the timescales of the current local plan, and beyond the SBGC boundary to ensure connectivity with neighbouring authorities.

INSPECTORS QUESTION 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?

How will a decision maker apply the settlement hierarchy when considering development proposals or is this not necessary to manage the patterns of growth?

20. The settlement hierarchy categories defined the general character, role and broad development capacity of each settlement within Brentwood Borough. This helped to guide where development might be best placed to accommodate growth in a sustainable manner.

21. Although the settlement hierarchy is set out in the supporting text, it has informed and is embedded in the Local Plan vision, spatial strategy, strategic policies as well as development policies. In particular:

    i.   Strategic policy SP01 supports development that preserves and enhances the character and settlement setting of our borough of villages;

    ii.   Future growth in the Borough is directed in sustainable locations to ensure that the quality and character of environment is valued and sustained (as explained in the Council's response to the Inspectors' question 15 and the Spatial Strategy Topic Paper (examination document F6A);

    iii.   Policy HP03 Residential Density emphasises the requirement to make efficient use of land and allows development to achieve a higher density in appropriate locations, whilst also allows for a lower density in locations that require schemes to be sympathetic to the local character;

    iv.   Policy HP14 Responding to Context requires development to respond positively to its sites context and demonstrates how proposals use appropriate local characteristics to inform the use, layout, massing scale, detailing, materials, location of entrances and landscape design of new development;

    v.   Policies in Chapter 8 aim to ensure the natural heritage, which is a key part of the 'Borough of villages' identity, is protected and enhanced for future generations to enjoy.

22. As such, the Council considers the Local Plan has incorporated the requirement for proposals to be mindful of the character of their setting. There is flexibility for development proposals to interpret what comprises of the local settlement character and provide the evidence to demonstrate how it has been taken into account.

Can the Council direct us to the evidence that justifies the settlement categorisations?

23. Paragraph 2.8 - 2.17 and Figure 2.3 of the Local Plan set out the broad assessment undertaken by BBC to identify the settlement hierarchy, based on the size of the population and character of the settlements taking into account services and facilities available. This primarily draws on the population data from Census 2011. The Council proposes a modification to the supporting text at paragraph 2.8 to avoid confusion. This is set out in examination note F9.