

# Sustainability Appraisal (SA) of the Brentwood Local Plan

SA Report Addendum

October 2019

REVISION SCHEDULE					
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AECOM Infrastructure & Environment UK Limited  
 2 Leman Street, London E1 8FA  
 Telephone: 020 7061 7000

**TABLE OF CONTENTS**

<b>NON-TECHNICAL SUMMARY .....</b>	<b>1</b>
<b>1 INTRODUCTION .....</b>	<b>2</b>
<b>2 APPRAISAL OF FOCUSSED CHANGES.....</b>	<b>5</b>
<b>3 CONCLUSIONS AND NEXT STEPS.....</b>	<b>21</b>

## NON-TECHNICAL SUMMARY

This report presents an appraisal of the Focussed Changes to the Pre-Submission Local Plan that are currently published for consultation. The Focussed Changes are relatively narrow in scope, specifically involving:

- a decrease in the number of homes assigned to four allocated sites, namely: Site R18 Land off Crescent Drive, Shenfield (20 homes); Site R19 Land at Priests Lane, Shenfield (30 homes); Site R25 Land North of Woollard Way, Blackmore (10 homes); and Site R26 Land North of Orchard Piece, Blackmore (10 homes); and
- a consequential 70 homes increase in the number of homes assigned to Site R01 Dunton Hills Garden Village (DHGV) Strategic Allocation.

The appraisal finds that that the Focussed Changes have positive implications in respect of: 'Community' objectives, reflecting the fact that the Focussed Changes have been developed in response to concerns raised by local residents; and 'Flood risk' objectives, given the surface water flood risk issue at Site R26. However, the Focused Changes are found to have negative implications in respect of:

- Air quality – increasing the number of homes assigned to DHGV by 70 is potentially associated with a degree of risk, noting issues (currently a focus of ongoing investigation) in respect of air quality along the A127 within Basildon Borough; however, on the other hand, decreasing the homes assigned to the Brentwood/Shenfield urban area by 50 may serve to reduce traffic through the problematic town centre AQMA (but any benefit would be marginal, and, equally, these are accessible locations suited to minimising car dependency).
- Housing – as the effect is to shift the balance of housing away from the Brentwood/Shenfield urban area, which is the part of the Borough where housing needs are likely to be highest, and concentrate housing at a single large site (DHGV) to a greater extent, potentially leading to a degree of increased risk in respect of delivering the Borough-wide housing requirement. There is also a need to consider a notable contextual change, namely the fact that Local Housing Need (LHN) is now understood to be higher than was the case at the time of the Pre-submission Plan / SA Report.
- Landscape – as the effect is to decrease the number of homes at sites within the Brentwood/Shenfield urban area and increase the number of homes at DHGV, which falls within the Green Belt and is subject to landscape constraint.
- Soils - as the effect is to decrease the number of homes assigned to a brownfield site and another site within the urban area (greenfield, but inaccessible), albeit this is a marginal conclusion as the Focussed Changes will not directly lead to additional loss of agricultural land.

The appraisal also revisits the conclusion reached within the SA Report (January 2019) in respect of the Pre-submission Plan, finding that the conclusion broadly still holds true for the 'Pre-submission Plan plus Focussed Changes', although there is now a need to flag a risk of negative effects in respect of 'air quality' objectives, and also highlight the positive conclusion reached in respect of 'Housing' objectives as uncertain.

## 1 INTRODUCTION

### 1.1 Background

- 1.1.1 The Brentwood Local Plan is at an advanced stage of preparation, with the ‘pre-submission’ version of the Plan having been published for consultation in January 2019.<sup>1</sup> Once in place, the Local Plan will establish a spatial strategy for growth and change in the Borough over the next 15 years, allocate sites to deliver the strategy and establish the policies against which planning applications will be determined.
- 1.1.2 At the current time an “Addendum of Focussed Changes to the Pre-submission Plan” (henceforth Focussed Changes) is published for consultation. Subsequently both the Pre-submission Plan and the Focussed Changes will be submitted to Government for examination in public by a Planning Inspector. All consultation responses received will also be submitted.
- 1.1.3 The Focussed Changes are relatively narrow in scope, specifically involving:
- a decrease in the number of homes assigned to four allocated sites, namely: Site R18 Land off Crescent Drive, Shenfield (20 homes); Site R19 Land at Priests Lane, Shenfield (30 homes); Site R25 Land North of Woollard Way, Blackmore (10 homes); and Site R26 Land North of Orchard Piece, Blackmore (10 homes); and
  - a consequential 70 homes increase in the number of homes assigned to Site R01 Dunton Hills Garden Village Strategic Allocation.

### 1.2 This SA Report Addendum

- 1.2.1 The Local Plan is being developed alongside a process of **Sustainability Appraisal (SA)**, a legally required process that aims to ensure that the significant effects of an emerging draft plan (and alternatives) are systematically considered and communicated. It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations (the ‘SEA Regulations’) 2004.
- 1.2.2 The primary **aim of this SA Report Addendum** is to present an appraisal of the Focussed Changes, with a view to informing the current consultation.
- 1.2.3 A secondary aim is to appraise the ‘Pre-submission Plan plus Focussed Changes’. This is considered an appropriate and necessary step - despite those elements of the Pre-submission Plan not a focus of Focussed Changes not being open for consultation at the current time - for two reasons. Firstly, participants at the examination in public will wish to draw upon this report and, secondly, a required element of the SA process is the consideration of cumulative effects.
- Reasonable alternatives?**
- 1.2.4 As required by the SEA Regulations, the SA Report published alongside the Pre-submission Plan (January 2018) presented an appraisal of “the plan... and reasonable alternatives” as well as “an outline of the reasons for selecting the alternatives dealt with”.<sup>2</sup> More specifically, the SA Report presented information on reasonable alternative approaches to the allocation of land to meet development needs, or ‘spatial strategy alternatives’.
- 1.2.5 However, as part of the process of preparing Focussed Changes and this SA Report Addendum there was not considered to be need to give further formal consideration to reasonable alternatives. Whilst there are feasibly many alternative approaches that might be taken in respect of modest adjustments to the housing strategy (i.e. decreasing the number of homes at certain sites, and increasing the number of homes at others) it was considered unlikely that alternatives would lead to notably different significant effects.<sup>3</sup>

<sup>1</sup> See <http://www.brentwood.gov.uk/index.php?cid=694>

<sup>2</sup> See Regulation 12(2) and Schedule 2(8) of the SEA Regulations

<sup>3</sup> Planning Practice Guidance (see paragraph 009 at: [www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal](http://www.gov.uk/guidance/strategic-environmental-assessment-and-sustainability-appraisal)) states: “The sustainability appraisal should only focus on what is needed to assess the likely significant effects of the plan.”

Update to the SA Report?

1.2.6 In addition to this SA Report Addendum an update to the SA Report, as previously published alongside the Pre-submission Plan in January 2019, is also made available at the current time. However, the changes made to the SA Report in response to Focussed Changes amount only to a summary of the appraisal findings presented within this SA Report Addendum. As such, for the purposes of this current consultation there is little to be gained from reading the updated SA Report that cannot be gained from this SA Report Addendum. The SA Report, as updated, will be a focus of scrutiny and discussion as part of the examination in public.

**1.3 Scope of the appraisal**

1.3.1 As discussed, the aim of this report is to present an appraisal of the Focussed Changes. More specifically, the merits of the Focussed Changes are appraised in terms of a list of sustainability topics and objectives, known as the ‘SA framework’. The SA framework, which is unchanged from that used to structure the appraisal work reported within the SA Report (January 2019), is presented in Table 1.1.

Table 1.1: Sustainability topics and objectives (the SA framework)

Topic	Objectives
Air quality	<ul style="list-style-type: none"> <li>• Air pollution (and associated risks to health) must be an on-going consideration particularly that which results from traffic congestion in Brentwood town centre.</li> <li>• The health of those in the Borough must be protected from the adverse effects of development through avoidance or mitigation measures.</li> </ul>
Biodiversity	<ul style="list-style-type: none"> <li>• The Borough's existing natural assets need to be protected from the impacts of future development and where possible enhanced.</li> <li>• The Borough's network of green infrastructure should be protected, enhanced and strategically expanded to deliver benefits for people and wildlife.</li> <li>• Areas that are home to declining species or habitats should be a particular target for protection and ecological restoration.</li> </ul>
Climate change mitigation	<ul style="list-style-type: none"> <li>• With regionally high levels of domestic GHG emissions, it will be necessary to improve the energy efficiency of all buildings in the Borough.</li> <li>• A shift towards low carbon forms of transport will be required in order to reduce per capita transport related emissions.</li> <li>• An opportunity exists to obtain a greater proportion of energy from renewable sources.</li> <li>• Development should be constructed and situated in order to minimise resource use and to maximise the opportunities for reuse and recycling.</li> <li>• Businesses in the Borough should to contribute to the creation of a low-carbon economy, including reduced levels of energy use in buildings and from transport.</li> </ul>
Community and well-being	<ul style="list-style-type: none"> <li>• Reduce health inequalities, and inequalities more generally, with a particular focus on those areas suffering from the highest levels of deprivation.</li> <li>• As the number of people aged over 85 in the Borough grows there will be a need for provision of services and suitable accommodation for older people.</li> <li>• Ensure that Gypsy and Traveller communities have suitable access to services and healthcare and that sufficient sites are available to meet demand.</li> <li>• Improve levels of educational performance in certain areas; and ensure that there is sufficient provision of education facilities across the Borough.</li> <li>• Improve access to services and facilities in rural areas of the Borough.</li> <li>• Improved open spaces and recreation facilities are a requirement in certain areas, with a particular focus on youth facilities needed in many places.</li> </ul>

Topic	Objectives
Economy and employment	<ul style="list-style-type: none"> <li>• Protect and support the Borough's smaller centres and parades.</li> <li>• The competitiveness of key employment areas such as Brentwood town centre and Warley Business Park must be supported, including by promoting sites for high quality offices.</li> <li>• Support investment that leads to high value, knowledge-based employment activities.</li> <li>• Consider future opportunities and consequences associated with the Shenfield and Brentwood Crossrail link.</li> <li>• Support a thriving town centre focused on Brentwood High Street through a good balance of retail (comparison and convenience), services, employment and residential.</li> </ul>
Flooding	<ul style="list-style-type: none"> <li>• Reduce flood risk, including as climate change may increase risk.</li> <li>• Protect and enhance existing natural flood risk management infrastructure and ensure all development incorporates SuDS to minimise flood risk.</li> </ul>
Heritage	<ul style="list-style-type: none"> <li>• The Borough's heritage assets must be given protection relative to their importance.</li> <li>• Areas of identified historic character should be protected as should the historic buildings that contribute most to local character.</li> <li>• Development must be of an appropriate scale and design, respecting existing character.</li> </ul>
Housing	<ul style="list-style-type: none"> <li>• Housing affordability is a significant issue for many in the Borough and demand for affordable housing is likely to continue to rise; as such there is a need to increase delivery of affordable and intermediate housing.</li> <li>• New housing must be of an appropriate size, tenure and design so as to meet the needs of existing and future residents (including the elderly, disabled people and those in poor health) and ensure that people are able to remain in the Borough as circumstances change.</li> </ul>
Landscape	<ul style="list-style-type: none"> <li>• The Borough includes highly valued rural landscapes that require protection and careful management with a view to supporting distinctiveness.</li> <li>• Urban fringe landscapes should also be a focus of careful planning.</li> </ul>
Soils	<ul style="list-style-type: none"> <li>• Make best use of brownfield land and protect the resource of productive agricultural land.</li> </ul>
Waste	<ul style="list-style-type: none"> <li>• A primary concern is to promote the integration of facilities to enable efficient recycling as part of new developments.</li> <li>• Developers should be encouraged to adopt sustainable construction practices, including handling waste, recycling waste, and disposing of waste in a sustainable manner.</li> </ul>
Water	<ul style="list-style-type: none"> <li>• Water quality is a concern, with a need to improve the ecological status of waterways.</li> <li>• Deliver water efficiency measures, given serious water stress regionally.</li> </ul>

## 2 APPRAISAL OF FOCUSSED CHANGES

### 2.1 Introduction

2.1.1 This section presents an appraisal of the Focussed Changes, and also discusses the 'Pre-submission Plan plus Focussed Changes' (thereby updating the SA Report, January 2019). The appraisal is structured under the 12 topic headings that comprise the central core of the SA framework - see Table 1.1 - mindful of the specific objectives set out under each topic.

### 2.2 Air quality

Air pollution (and associated risks to health) must be an on-going consideration particularly that which results from traffic congestion in Brentwood town centre.

#### Commentary on the targeted changes

2.2.1 In total there are three air quality management areas (AQMAs) – two located on the A12 and one located within Brentwood Town Centre at the A128/A1023 junction. Furthermore, there is a need to consider the area-wide AQMA covering the entirety of London Borough of Havering, and also air quality issues associated with the A127 in Basildon Borough (close to the boundary with Brentwood Borough) - see Box 2.1.

#### Box 2.1: Air quality issues along the A127 in nearby Basildon Borough

In June 2019 Basildon Council received a Direction from Government requiring it to improve air quality in locations around the A127 in the shortest possible time consistent with the requirements of the European Air Quality Directive.<sup>4</sup> Basildon Council then wrote to the Planning Inspector conducting the examination of the Basildon Borough Local Plan in July 2019, explaining the situation as follows:<sup>5</sup>

*"The Direction covers matters related to NOx emissions, which modelling has shown do, and will continue to exceed EU Value Limits at two junctions on the A127 within Basildon Borough. The Direction seeks solutions to achieving compliance with the EU Value Limits in the shortest possible time, and seeks explicit consideration of a Charging Clean Air Zone.*

*... Defra has currently rejected an Outline Business Case which focused mitigation on advances in sustainable travel and improvements to electric vehicle charging infrastructure.*

*A review of the Air Quality modelling that underpinned the Outline Business Case is currently underway, and the modelling of a Charging Clean Air Zone will be carried out imminently. The timescale for these pieces of work will not provide a detailed output until late November 2019.*

*In terms of the implications this has for... the Local Plan, these are being considered in parallel. There are significant concerns locally with regard to the implementation of a Charging Clean Air Zone...*

*To this end, additional work has been programmed to seek to understand and better mitigate the implications of Local Plan growth on air quality. This includes:*

- Additional transport modelling, and testing of the local plan growth and highway mitigation proposals in the Air Quality model. This is due for completion by early December 2019;*
- A review of the Infrastructure Delivery Plan (IDP) to ensure sufficient emphasis is placed on securing sustainable and active travel improvements... underpinned by work on 'inter-urban connectivity' being undertaken... as part of a pilot project [set to report November / December 2019]*
- The Association of South Essex Authorities (ASELA) are also working on a joint approach to key growth corridors across the area including the A127 corridor, and again outcomes from this work during the next three months will also feed into the IDP;*
- A general review of the Local Plan's approach to air quality to ensure it is sufficiently robust, given the issues highlighted through the Direction..."*

<sup>4</sup> See [www.basildonmeetings.info/documents/g6854/Public%20reports%20pack%2027th-Jun-2019%2019.30%20Council.pdf?T=10](http://www.basildonmeetings.info/documents/g6854/Public%20reports%20pack%2027th-Jun-2019%2019.30%20Council.pdf?T=10)

<sup>5</sup> See [www.basildon.gov.uk/article/7601/Local-Plan-Examination-Correspondence](http://www.basildon.gov.uk/article/7601/Local-Plan-Examination-Correspondence)



- 2.2.2 Sites **R18** Land off Crescent Drive, Shenfield (20 homes decrease) and **R19** Land at Priests Lane, Shenfield (30 homes decrease) are both in proximity to the town centre AQMA; however, any benefit, in respect of reduced polluting car trips through the AQMA, is likely to be marginal, given the number of homes involved. Traffic from both sites will pass through the AQMA en route to the A12/M25 junction; however, in respect of Site R19 there is an alternative route that avoids the problematic junction.
- 2.2.3 There is also a need to consider the likelihood of these sites supporting a high incidence of walking, cycling and use of public transport amongst residents, given their location in the Brentwood/Shenfield urban area. Site R18 is located nearly equidistant from Brentwood and Shenfield centres and rail stations, and is adjacent to Brentwood Community Hospital; whilst Site R19 is slightly closer to Brentwood town centre and rail station (specifically, the walking route to the town centre is under 1km and that to the rail station comfortably under 2km).
- 2.2.4 With regards to Site **R25** Land North of Woollard Way, Blackmore (10 homes decrease) and Site **R26** Land North of Orchard Piece, Blackmore (10 homes decrease), there is not likely to be any significant implications in respect of air quality. These sites are located in a rural area associated with high car dependency, and traffic congestion was a concern raised by local residents through the consultation on the Pre-submission Plan; however, there is no designated AQMA in the north of the Borough.
- 2.2.5 Finally, with regards to Site **R01** Dunton Hills Garden Village (DHGV) Strategic Allocation (70 homes increase), there are no AQMAs in the vicinity, other than the blanket AQMA covering London Borough of Havering to the west (also, traffic from DHGV would lead to some increase in car movements through the Brentwood town centre AQMA, despite it being over 6km distant); however, there are concerns regarding air quality along the A127 at nearby locations in Basildon Borough, as discussed above. The A127 issues are currently being explored through dedicated work-streams, hence the need for a precautionary approach.
- 2.2.6 With regards to the question of minimising the need to travel, supporting a modal shift away from reliance on the combustion engine vehicles (and towards walking, cycling and use of public transport) and supporting the 'switch-over' to Ultra Low Emission Vehicles (ULEVs), there is a strong argument to suggest that DHGV represents a significant opportunity. This is on the basis of the locational merits of the site, in particular its location in proximity to West Horndon Rail Station, and at the junction of two road corridors that can be a focus of public transport enhancements; and also on the basis that the scale of the scheme enables delivery in line with best practice garden village principles. Furthermore, detailed work has been completed to establish Local Plan policy to ensure that this opportunity is realised. For example, Policy R01ii (Spatial Design Of Dunton Hills Garden Village) requires: *"Proposals should not allow for the dominance of cars and car travel. The scheme should promote car-limiting and clean vehicle alternatives in line with Policies BE12 and BE15. Emphasis should be on: a. incorporating car sharing clubs and electric vehicle only development; b. time limiting car parking in the central locations; and c. clean air zones around the main schools and community buildings."* It is also noted that the supporting text potentially goes further, stating: *"The motor vehicle should be subordinate in importance on the street network within the village."* **However**, on the other hand, there is a need to note concerns that have been raised regarding the need to travel and reliance on the private car amongst DHGV residents, particularly during the early years of scheme delivery - see Box 2.2.

*Box 2.2: Views expressed on DHGV by Basildon and Thurrock Councils in respect of DHGV*

Both Basildon Borough and Thurrock Councils responded to the Pre-submission Plan consultation raising concerns in respect of DHGV. Focusing on concerns in respect of the related issues of infrastructure delivery and minimising the need to travel / supporting modal shift, the following is a summary:

**Select Basildon Borough Council Regulation 19 representation quotes**

- *“It is noted that the Plan assumes that all commuters will use West Horndon railway station and other areas in Brentwood Borough to access a means of travelling to other places. It fails however to investigate the possible impacts on Basildon Borough’s road and rail infrastructure, as a neighbouring authority, arising from commuters or other road users choosing to access facilities within the Basildon Borough instead... Laindon railway station, with three platforms and starter trains has greater commutable capacity than West Horndon and could become an alternative choice... despite a lack of new connections hampering their ability to make that choice easily without driving, via the A127.”*
- *“... DHGV will require new primary and secondary school provision. However, whilst the Brentwood IDP shows the primary provision in particular being delivered early, it is understood to not be economically viable to operate a school with low pupil numbers, and it may be the case that the village grows for a number of years with these pupils travelling to other schools in the locality...”*
- *“The Council has noted the two Growth Corridors [Central and Sotuhern]... It has reflected however that there are fundamental distinctions between them... The Central Brentwood Growth Corridor is the location of nationally and regionally managed and maintained infrastructure... which helps to put this investment into use through the growth locations. The South Brentwood Growth Corridor, whilst at its far west includes the M25, the remainder of the corridor consists [of] the A127 (maintained by Essex County Council) and Essex Thameside Line (maintained by Network Rail and operated by c2c). It is not considered [that] they offer comparable choices in terms of the capacity...”*
- *“It is questionable whether it can be adequately demonstrated by the Brentwood Local Plan that the allocations chosen, represent the most sustainable option without identifying and testing the viability of specific highway mitigation measures that will be necessary to make them deliverable and sustainable. Without this work, Brentwood Borough could find its ability to unlock the capacity to deliver new communities and homes, particularly at an accelerated pace... becomes hindered by a lack of infrastructure capacity...”*

**Select Thurrock Council Regulation 19 representation quotes**

- *“Generally, there seems to be insufficient information to support the change in travel behaviour that is needed to support the ambition and policies of the local plan. More information is needed in relation to sustainable travel initiatives, cost of implementation/operation (where relevant) and, importantly, how residents and commuters will be encouraged and empowered to use and embrace the suggested sustainable travel initiatives. It is unlikely that simply delivering more cycle routes, cycle parking provision, EV charging etc will result in the required increase in sustainable modes of travel, without some form of behavioural change provision. It is unclear how the suggested improvements to walking, cycling, public transport and EVs will deliver meaningful benefit if they are not supported by a package of behaviour change components which set out and support the need to use sustainable travel options.”*
- *“The policies and supporting text refer to the DHGV concept as self-sustaining. What does this mean? It is not considered that DHGV is self-sustaining given the reliance on transport and infrastructure provision elsewhere including Laindon, West Horndon and given proximity to Basildon and the role of its town centre. Education... would create some cross border issues in terms of early provision of places. It is questioned whether 2,700 to 4,000 dwellings is really a self-sustaining community.”*

**Conclusion on the Focussed Changes**

- 2.2.7 It is difficult to draw strong conclusions, with the primary considerations being: A) decreasing the homes assigned to the Brentwood/Shenfield urban area by 50 may serve to reduce traffic through the problematic town centre AQMA, but any benefit would be marginal, and equally these are accessible locations suited to minimising car dependency; and B) increasing the number of homes assigned to DHGV by 70 is potentially associated with a degree of risk, noting the ongoing work being undertaken in respect of improving air quality along the A127 within Basildon Borough, and noting consultation responses received.

- 2.2.8 Overall, it is appropriate to conclude that the Focussed Changes have **uncertain negative implications** for the achievement of air quality objectives.

#### Pre-submission Plan plus Focussed Changes

- 2.2.9 The SA Report reached the following conclusion on the Pre-submission Plan:

*“The Draft Plan (2016) appraisal highlighted some concerns, but concluded no significant effects. The proposal to increase the focus of growth at the main urban area gives rise to some additional concerns, albeit most of the new sites proposed (since 2016) are relatively well located in air quality terms. On balance, **significant negative effects are not predicted** at the current time; however, there is considerable uncertainty, with growth at the main urban area and elsewhere set to increase traffic congestion in the AQMAs. Robust development management policy is proposed, which adds certainty to the conclusion of no significant effects; however, steps might feasibly be taken to further bolster the stringency of policy.”*

- 2.2.10 The latest situation is that there is a need to question this conclusion, in light of the new evidence available which serves to highlight an air quality issue associated with the A127 corridor that might be said to be of national significance (on the basis that National Government is seeking to intervene). In light of this new evidence there is an increased degree of concern associated with DHGV, from an air quality perspective, and this situation is compounded, albeit marginally, by the Focussed Changes.

- 2.2.11 On this basis, and taking a precautionary approach, it is considered appropriate to flag a risk of a **uncertain negative effects** resulting from the Pre-submission Plan plus Focussed Changes.

## 2.3 Biodiversity

The network of green infrastructure and natural assets should be protected, enhanced and strategically expanded to deliver benefits for people and wildlife. Areas that are home to declining species or habitats should be a particular target for protection and ecological restoration.

#### Commentary on the targeted changes

- 2.3.1 The primary consideration here is in respect of the proposal to increase the number of homes assigned Site **R01** Dunton Hills Garden Village Strategic Allocation by 70. This is a large site, and hence unsurprisingly is associated with a range of biodiversity constraints, hence the proposal to deliver a higher density scheme, albeit only marginally higher density, inherently leads to a degree of concern. The SA Report stated the following regarding the growth strategy for the A127 corridor (namely allocation of DHGV alongside 580 homes at Site R02 Land at West Horndon Industrial Estate and also new strategic employment land):

*“... with regards to proposals for the A127 corridor... the ambitious growth strategy leads to a number of issues; however, work has been ongoing to examine green infrastructure issues and opportunities associated with DHGV and the wider area. An important consideration is the maintenance of ecological connectivity between Thorndon Living Landscape (as identified by the Wildlife Trusts) to the north and the Langdon Hills and/or the Bulphan Fen Living Landscapes to the south. There is a clear opportunity to leave areas within the site undeveloped as green corridors (including land in the vicinity of Eastlands Spring, which links to habitat patches/landscapes to the north and south). Importantly, Policy R01i (Dunton Hills Garden Village Strategic Allocation) requires “green and blue infrastructure to be a minimum of 50% of the total land area”. Policy R01ii (Spatial Design Of Dunton Hills Garden Village) then requires: “A green and blue infrastructure (GBI) plan should be submitted that demonstrates how the design of GBI will be an integral part of the masterplan layout to achieve multi-functional, coherent and connected GBI in line with Policy BE18. The GBI plan should be informed by a comprehensive wildlife and habitat survey and heritage and landscape character assessment. The GBI Plan should incorporate the following...”*

- 2.3.2 A further consideration, in the respect of DHGV, is the following representation made by Natural England on the Pre-submission Plan: “[Local Plan Natural Environment] Policy incorporates measures to avoid significant adverse impacts on designated sites including those identified under Essex [Recreational disturbance Avoidance and Mitigation Strategy; RAMS], arising from this new development (subject to a well-designed masterplan being produced which includes all relevant and necessary measures).” The policy framework is unchanged by the Focussed Changes, hence it may be fair to assume that Natural England’s support will hold true for the Pre-submission Plan plus Focussed Changes.
- 2.3.3 Two further sites associated with a degree of biodiversity constraint that might benefit from a lower density scheme (and, in turn, the potential for increased greenspace) are:
- Site **R18** Land off Crescent Drive, Shenfield (20 homes decrease) is adjacent to a minor stream corridor and a notable woodland patch (comprising deciduous woodland priority habitat) and, more generally, sits within a framework of woodland and mature trees; and
  - Site **R19** Land at Priests Lane, Shenfield (30 homes decrease) - the railway embankment at the site’s eastern extent comprises deciduous woodland priority habitat, and on the opposite side of the railway is Thrift Wood ancient woodland.
- 2.3.4 It is also worth noting that these two sites are in close proximity, from functional biodiversity perspective, and both might be seen to fall within a fragmented green corridor that runs north south through the Brentwood/Shenfield urban area, from Hall Wood (north of Shenfield) in the north to Thorndon Park (and beyond) and Hall Wood (east of Hutton Mount) in the south.
- 2.3.5 With regards to the other sites in question, namely **R25** and **R26** at Blackmore (combined 20 homes decrease), these sites are not known to be subject to any strategic biodiversity constraint, and hence no benefit can be attributed to the Focussed Changes.

#### Conclusion on the Focussed Changes

- 2.3.6 In conclusion, the net effect of reducing the number of homes at R18 and R19, which are associated with a degree of biodiversity sensitivity, and increasing the number at homes at R01, which is associated with a range of sensitivities, but for which a mitigation strategy has been established and endorsed by Natural England, is **not likely to be significant**.

#### Pre-submission Plan plus Focussed Changes

- 2.3.7 The SA Report reached the following conclusion on the Pre-submission Plan:
- “The Draft Plan (2016) appraisal highlighted some concerns, but concluded no significant effects. Proposed changes to the spatial strategy since 2016 give rise to limited concerns, although there is a risk of growth to the south of Warley impacting on locally and nationally designated habitats. Past appraisals have concluded that “there remains room for further work, e.g. policy to ensure net biodiversity gains at appropriate landscape scales (e.g. the scale of the Thorndon Park Living Landscape)”, and it is clear that there has been further work, in particular in respect of site specific policy to guide development at DHGV; however, recommendations remain outstanding at the current time, focused on policy wording necessary to ensure that the plan leads to ‘net gain’ at appropriate functional scales. In conclusion, **significant negative effects are not predicted**.*
- 2.3.8 This conclusion **broadly holds true** for the Pre-submission Plan plus Focussed Changes.



## 2.4 Climate change mitigation

There is a need to minimise per capita greenhouse gas (GHG) emissions both from transport, and also from the built environment. With regards to transport, there is a need to minimise the need to travel, and encourage a shift towards lower carbon forms of transport. With regards to emissions from the built environment, the allocation of land for development through the local plan represents an opportunity to support the delivery of decentralised, low carbon or renewable heat and/or electricity generation. Also, an opportunity exists to require or encourage schemes to adopt ambitious standards of 'sustainable design'.

### Commentary on Focussed Changes

- 2.4.1 Implications of the Focussed Changes in respect of minimising the need to travel, supporting modal shift away from reliance on private combustion engine vehicles (and towards walking, cycling and public transport) and supporting the switch-over to ULEVs has already been discussed above under the Air quality heading. The broad conclusion reached is that the Focussed Changes have mixed implications, and there are also some notable uncertainties in respect of DHGV. It follows that the effects of the Focussed Changes in respect of minimising per capita transport-related greenhouse gas emissions are mixed and uncertain.
- 2.4.2 With regards to minimising per capita greenhouse gas emissions from the built environment, the primary consideration is in respect of Site **R01** (DHGV), as the other sites in question are non-strategic sites that cannot be expected to deliver low carbon infrastructure or standards of sustainable design and construction that exceed the requirements of building regulations.
- 2.4.3 The SA Report reached the following conclusion in respect of the proposed strategy for the A127 corridor, the central element of which is DHGV:
- *“With regards to transport emissions, there is the potential to achieve new homes and jobs in close proximity, deliver a new bus route linking the A127 corridor to Brentwood,<sup>6</sup> ensure good access to West Horndon station (and in turn enable commuting into London by train), deliver the highest quality walking and cycling infrastructure and also increase the offer at West Horndon local centre; however, on the other hand, there will be easy access by motorists onto the strategic road network, and growth will not be in proximity to Brentwood Crossrail station.*
  - *With regards to built environment emissions, DHGV clearly gives rise to the opportunity to implement ambitious low carbon measures, including decentralised low/renewable heat and/or power generation (e.g. a biomass fuelled Combined Heat and Power system). Site specific policy includes a considerable focus on supporting active travel, transport impact mitigations and clean vehicle alternatives; however, in respect low carbon heat/energy generation, and use of the high sustainable design/construction standards, there is only a brief cross reference to borough-wide thematic policy BE04. It is recommended that there could be an increased emphasis within site-specific policy and/or supporting text, given the considerable opportunity that exists.”*
- 2.4.4 The modest increase in the number of homes assigned to the site through the Focussed Changes may marginally increase scheme viability, which, in turn, could potentially lead to increased funds being made available to deliver low carbon infrastructure and/or higher standards of sustainable design and construction; however, any benefit of the Focussed Changes in this respect are uncertain, and would be marginal.

### Conclusion on the Focussed Changes

- 2.4.5 In conclusion, an increased number of homes assigned to DHGV may lead to marginal benefits in respect of minimising per capita greenhouse gas emissions from the built environment; however, **any benefits are uncertain**. With regards to per capita emissions from transport, implications of the Focussed Changes are **mixed and uncertain**.

<sup>6</sup> The Transport Assessment (PBA, 2018) highlights that there is an opportunity to provide services that will link Dunton Hills Garden Village (and Basildon), West Horndon Station, Brentwood Enterprise Park, Childerditch Business Park and Brentwood.

### Pre-submission Plan plus Focussed Changes

2.4.6 The SA Report reached the following conclusion on the Pre-submission Plan:

*“The Draft Plan (2016) identified some positives, but concluded no significant effects. Changes to the strategy since 2016 potentially give rise to some additional opportunity in respect of delivering low carbon decentralised heat/energy generation; however, there is much uncertainty ahead of detailed proposals being prepared. A robust development management policy framework is proposed, in respect of supporting reduced per capita CO<sub>2</sub> emissions from both transport and the build environment, including with references to the particular opportunities that exist at the strategic sites; however, there remains some room for improvement (albeit it is recognised that viability is a consideration). In conclusion, the plan is considered to perform quite well, but **significant positive effects are not predicted**, recognising the global nature of the climate change mitigation issue.”*

2.4.7 This conclusion **broadly holds true** for the Pre-submission Plan plus Focussed Changes.

## 2.5 Community and well-being<sup>7</sup>

Efforts are needed to tackle the Borough's high levels of inequality, with a particular focus on those areas suffering from the highest levels of deprivation. There is also a need to address the health inequalities that exist within the population, and which are set to worsen, including because of the ageing population. Also, there is a need address specific issues associated with Gypsy and Traveller communities.

There is a need to improve levels of educational performance in certain areas of the Borough, with provision of sufficient education facilities being a key issue.

There is a need for better access to services and facilities in rural areas of the Borough; and improved open spaces and recreation facilities are a requirement in certain areas, including youth facilities.

### Commentary on the Focussed Changes

2.5.1 A primary consideration here is the concerns raised by the residents of Blackmore, as expressed through the representation received on the Pre-submission Plan on behalf of Blackmore, Hook End & Wyatts Green Parish Council and Blackmore Village Heritage Association. The representation records the findings of a local survey that found 98% of respondents (over 300 respondents) to be opposed to allocation of **R25** and **R26**, and presents concerns under the following headings:

- Inadequate access - both R25 and R26 are bordered to the north by Redrose Lane, which is described as “*narrow and with limited passing space for two motor cars*” and “*a rare extant example of a plague detour route*”. The representation goes on to state that:
 

*“Redrose Lane is narrow and infrastructure works would be required to make necessary improvements which would harm the character of this area but may also result in the loss of historic hedges and important habitats.”*
- Flooding - whilst the Environmental Agency classifies both sites within Flood Zone 1, both R25 and R26 have flooded historically - see further discussion below, under ‘Flood risk’.
- Disproportionate increase in the housing stock - the representation highlights that the proposal is to deliver an increase in housing stock at Blackmore that exceeds that proposed for any other category 3 village.<sup>8</sup>

<sup>7</sup> Issues relating to the Gypsy and Traveller community are considered under the ‘Housing’ topic heading.

<sup>8</sup> The representation states that: “*Kelvedon Hatch is in the order of 2.5 times larger (by population) than Blackmore – however its proposed housing allocation is less, by approximately 25%, than that proposed for Blackmore... [and] the larger Category 3 settlements of Doddinghurst and Ingrave have no proposed allocation for housing... [and] no allocation is proposed for the other Category 3 settlements of Herongate and Mountnessing.*” The representation also explains that the Pre-submission Plan proposal for Blackmore would have increased dwelling stock at Blackmore by in the region of 25% [N.B. figures provided suggest 20%].

- Unsustainable - Blackmore is over 6km from Brentwood and has a very limited bus service. The representation also states the following:
  - “The village School is at capacity and local residents are having to send children to neighbouring schools.”
  - “There is no local shopping parade but, instead, one Co-Op Store (with Post Office), a hairdressers and a coffee shop.”
  - “The nearest Doctor’s surgery is in Doddinghurst (which is ~3 miles away and on roads not suitable for walking).”
  - “There are no, or very few, local jobs. Of those of working age nearly all commute out of the village.”

2.5.2 Concerns raised by local residents have also influenced the Focussed Changes in respect of Site **R18** Land off Crescent Drive, Shenfield (20 homes decrease) and Site **R19** Land at Priests Lane, Shenfield (30 homes decrease), with the primary concerns here relating to residential character and also road access. R18 is a brownfield site, but in a sensitive location adjacent to Brentwood Community Hospital and hence there is a need to guard against ‘over development’ of the site; whilst R19 falls within a lower density residential area. Also, in respect of R19, it is notable that the site is designated Protected Urban Open Space in the adopted Local Plan, although the site is not publically accessible.

2.5.3 At these two sites within the Brentwood/Shenfield urban area there is also a need to consider that costly access and transport infrastructure upgrades will be required in order to ensure a good flow of traffic and support safe access by walking and cycling. This is potentially a particular issue for R19, which may need to deliver a new pedestrian road crossing. As such, there is potentially a need to question whether scheme viability could be adversely affected as a result in the reduction in the number of homes.

2.5.4 Finally, with regards to Site **R01** Dunton Hills Garden Village Strategic Allocation (70 homes increase), it is difficult to suggest implications for ‘communities’ objectives with any certainty. The following statement made within the SA Report (January 2019) broadly holds true in light of the Focussed Changes:

*“... there is a considerable opportunity at DHGV, recognising that the scheme has Garden Village status. Government’s 2017 Housing White Paper is strongly supportive of Garden Villages because of the potential to deliver community benefits over-and-above what can be achieved through urban extensions, with statements including: “[The Government will] strengthen local representation and accountability, and increase opportunities for [garden] communities to benefit from land value capture.” Numerous requirements are established through site specific policies R01i, R01ii and R03iii, with an established aim to deliver “an exemplar all through school with a design that fosters a learning environment for all types of learners and through life, from nursery through to adult learning opportunities.” Focusing on the matter of the school, there are also detailed requirements within the supporting text, including: “The school should be set within a garden itself, providing opportunities for outdoor learning and ‘forest school’ sessions...”*

2.5.5 Questions have been raised through Regulation 19 representations regarding the timing of infrastructure delivery, including community infrastructure (see Box 2.2); however, it is difficult to conclude that the Focussed Changes lead to notable implications.

#### Conclusion on the Focussed Changes

2.5.6 In conclusion, the Focussed Changes respond to concerns raised by local residents, and hence are considered to have **positive implications**, in respect of the achievement of communities objectives. However, there remains a degree of uncertainty ahead of detailed work to explore delivery of new homes alongside infrastructure, including community infrastructure at DHGV.

### Pre-submission Plan plus Focussed Changes

2.5.7 The SA Report reached the following conclusion on the Pre-submission Plan:

*“The Draft Plan (2016) identified some positives, but concluded no significant effects. Changes to the spatial strategy since 2016 give rise to some additional opportunity in respect of delivering new and upgraded community infrastructure, and it is noted that work has been completed at all strategic sites in respect of clarifying what can and should be delivered, by way of new and upgraded community infrastructure. In conclusion, the plan performs well; however, **significant positive effects are not predicted**, as it is not clear that there would be delivery of new strategic community infrastructure to address any existing issues/opportunities (i.e. new infrastructure would primarily ‘consume the smoke’ of the new development only).”*

2.5.8 This conclusion **broadly holds true** for the Pre-submission Plan plus Focussed Changes. Whilst the effects of Focussed Changes are positive, they are of limited significance.

## 2.6 Economy and employment

The competitiveness of key employment areas such as Brentwood town centre, and Warley Business Park must be supported, including by promoting sites for high quality office development.

There is a need to support a thriving town centre through a good balance of shopping and other uses; and there is also a need to protect and support smaller centres and parades.

Opportunities exist to support investment that leads to high value, knowledge-based employment activities; in particular, there is a need to consider future opportunities associated with Crossrail.

### Commentary on the Focussed Changes

2.6.1 It is not possible to suggest that the Focussed Changes, namely the proposal to reduce the number of homes assigned to four sites in the rural north of the Borough by 70 homes, and the Brentwood/Shenfield urban area and the consequential need to increase the number of homes assigned to DHGV by 70 homes, leads to any notable implications for the achievement of economy related objectives. In respect of DHGV the SA Report concluded that *“there is a strategic opportunity to develop the A127 corridor as an employment growth corridor”*, and hence it might be suggested that the proposal to increase the number of homes assigned to DHGV by 70 is supportive of realising this opportunity; however, any benefit in this respect would be marginal.

### Conclusion on the Focussed Changes

2.6.2 In conclusion, the Focussed Changes **do not lead to significant implications** for economy related objectives.

### Pre-submission Plan plus Focussed Changes

2.6.3 The SA Report reached the following conclusion on the Pre-submission Plan:

*“The Draft Plan (2016) appraisal concluded the likelihood of significant positive effects resulting from a strategy that meets needs and includes a strategic concentration of growth along the A127 corridor; however, latest understanding from the Transport Assessment serves to highlight concerns regarding traffic congestion at M25 J29, and also at junctions along the A127. Taking a precautionary approach, **significant positive effects are not predicted**.”*

2.6.4 This conclusion **broadly holds true** for the Pre-submission Plan plus Focussed Changes.



## 2.7 Heritage

Heritage assets must be given protection relative to their importance, which must include giving protection to areas of identified historic character.

### Commentary on the Focussed Changes

- 2.7.1 None of the four sites that see a reduction in homes under the Focussed Changes are subject to a strategic heritage constraint, with Historic England not having raised concerns in respect of any of these sites through the Pre-submission Plan consultation; however, certain heritage concerns were raised in respect of **R25** and **R26** through the representation received on the Pre-submission Plan on behalf of Blackmore, Hook End & Wyatts Green Parish Council and Blackmore Village Heritage Association, as discussed under 'Communities' heading above.
- 2.7.2 With regards to **DHGV**, there are a range of heritage sensitivities, as might be expected of a site of this scale; however, it is again important to note that Historic England has not raised any objection to the proposed allocation. The following conclusion reached within the SA Report (January 2019) holds true in light of the Focussed Changes:

*“With regards to development in the A127 corridor a concern - raised by Historic England [in 2015]... - is that development at both West Horndon and Dunton would lead to cumulative effects ('urbanisation') and harm to 'various heritage assets'; however, Historic England did not suggest outright objection to growth in this area (“an adequate buffer between West Horndon and Dunton would be expected”) and concerns from 2015 may now be somewhat allayed, given that a comprehensive Dunton Garden Suburb scheme is no longer being actively considered as an option. A Dunton Hills Garden Village scheme might well impact on the setting of Dunton Hills farmhouse (grade II listed), however.*

### Conclusion on the Focussed Changes

- 2.7.3 In conclusion, the Focussed Changes **do not lead to significant implications** for heritage objectives.

### Pre-submission Plan plus Focussed Changes

- 2.7.4 The SA Report reached the following conclusion on the Pre-submission Plan:
- “The Draft Plan appraisal (2016) identified some positives, and some potential draw-backs, but overall concluded no significant effects. Proposed changes to the spatial strategy (since 2016) similarly give rise to a 'mixed picture' in respect of impacts to heritage assets and the historic environment. However, it remains the case that **significant negative effects are not predicted**, noting good potential to suitably avoid/mitigate effects at the development management stage.”*
- 2.7.5 This conclusion **broadly holds true** for the Pre-submission Plan plus Focussed Changes.

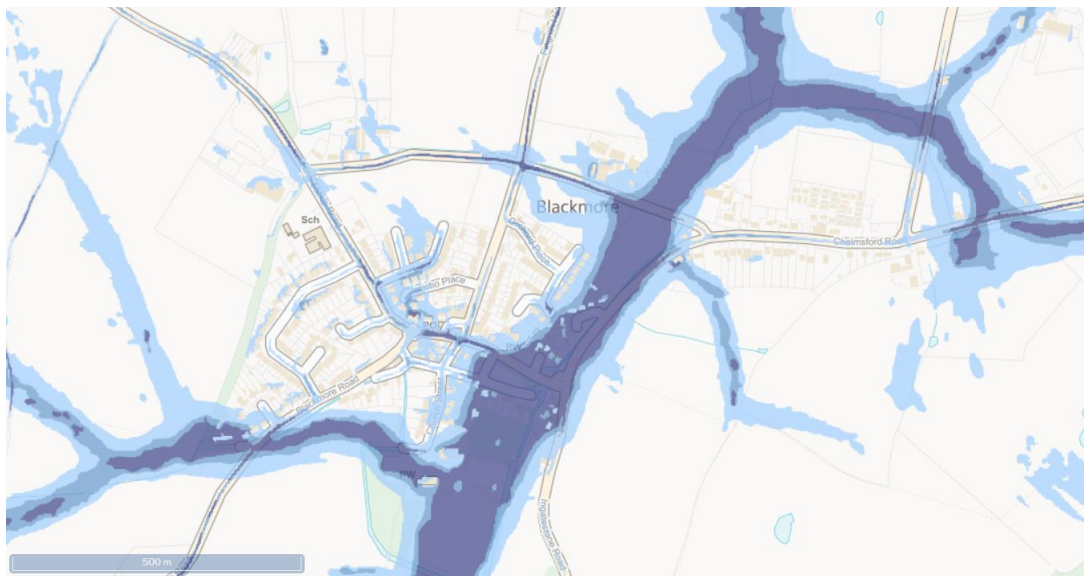
## 2.8 Flooding

Action is needed to reduce the risk of flooding, including the increased risk that climate change may pose. There is a need to protect and enhance existing natural flood risk management infrastructure and ensure all development incorporates sustainable drainage systems to minimise flood risk.

### Commentary on the Focussed Changes

- 2.8.1 None of the four sites that see a reduction in homes under the Focussed Changes are subject to a fluvial flood risk, and the Environment Agency did not raise any objection to allocation of any of the sites in question. However, Site **R26** Land North of Orchard Piece, Blackmore (10 homes decrease) is subject to a notable degree of surface water flood risk constraint - see Figure 2.1, which shows “extent of surface water flood risk” with risk categorised as either “high” (dark blue), “medium” (blue) or “low” (light blue).

Figure 2.1: Surface water flood risk at Blackmore



Source: <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map>

- 2.8.2 With regards to **DHGV**, the key point to note is that the Environment Agency has not raised an objection, and hence on this basis it is difficult to suggest that a 70 homes increase in the number of homes assigned to the site leads to any significant concerns. On balance, the following conclusion reached by SA Report (January 2019) is likely to hold true in light of the Focussed Changes:

*“A strategic allocation at Dunton Hills Garden Village would need to address flood risk issues, given the stream that runs through the site (which notably leads to an area to the south of the site, adjacent to the railway, as being ‘more’ susceptible to flooding, according to SWMP modelling). Whilst the Dunton Garden Suburb consultation document (January 2015) suggested that the area in question would be left as open space, there is currently less certainty regarding precisely where built development... would occur. Also, it is noted that a large portion of the area under consideration... is identified by the SWMP as having limited potential to deliver ‘infiltration’ measures as part of sustainable drainage strategy.<sup>9</sup>*

*... Finally, Policy R01i (Dunton Hills Garden Village Strategic Allocation) is notable as the only policy specifically referencing flood risk, requiring “strategically designed and appropriately phased infrastructure, employing the most up to date technologies to ensure a smart, sustainable and a resilient basis for drainage and flood management in line with Policy BE08.” With regards to supporting text, there is no reference to flood risk, and only one brief mention of the stream passing through the western part of the site. It is recommended that policy and supporting text be supplemented, to clarify that the stream passing through the site will be a key feature influencing masterplanning, and that the emphasis on technological solutions is reduced. It is recognised that the policy does also require “green and blue infrastructure to be a minimum of 50% of the total land area”, which helps to reduce any concerns.”*

#### Conclusion on the Focussed Changes

- 2.8.3 In conclusion, the Focussed Changes **perform well**, given the surface water flood risk issue at Site R26.

<sup>9</sup> See Appendix K of the SWMP at: <http://www.brentwood.gov.uk/pdf/22062015121842u.pdf>

### Pre-submission Plan plus Focussed Changes

2.8.4 The SA Report reached the following conclusion on the Pre-submission Plan:

*“The Draft Plan (2016) appraisal concluded no significant effects on the basis that the spatial strategy generally avoided areas of flood risk, although flood risk is a constraint to growth at DHGV. Work has been ongoing to understand surface-water flood risk, and necessary Sustainable Drainage Systems (e.g. this was a reason for a decision being taken, following the Preferred Allocations consultation, to reduce the number of homes delivered at the Blackmore allocations), and so **significant negative effects are not predicted** in relation to the Proposed Submission Plan; however, there remains some uncertainty ahead of a detailed DHGV masterplan.”*

2.8.5 This conclusion **broadly holds true** for the Pre-submission Plan plus Focussed Changes. Whilst the effects of Focussed Changes are positive, they are of limited significance.

## 2.9 Housing

Housing affordability is a significant issue for many in the Borough and demand for affordable housing is likely to continue to rise; as such there is a need to increase delivery of affordable housing. New housing must be of an appropriate size, tenure and design so as to meet the needs of existing and future residents (including the elderly, disabled people and those in poor health).

### Commentary on the Focussed Changes

2.9.1 A key consideration here is in respect of the proposal to reassign fifty homes from the Brentwood/Shenfield urban area (Sites **R18** and **R19**) to the A127 corridor (Site **R01**), as housing needs are clearly much higher in the former location than in the latter. Whilst the housing needs of Brentwood/Shenfield urban area residents will tend to be met by new housing in the A127 corridor, it is fair to assume that their needs will be met more fully and effectively by new housing directed to the urban area itself.

2.9.2 With regards to Site **R25** Land North of Woollard Way, Blackmore (10 homes decrease) and Site **R26** Land North of Orchard Piece, Blackmore (10 homes decrease), there is little reason to suggest that the effect will be that housing needs arising from Blackmore or neighbouring villages will be met less effectively. A reduced number of homes will have implications for scheme viability, and it is noted that these sites are subject to a policy requirement in respect of reserving a minimum of 25% of the proposed dwellings to be reserved for people with a strong and demonstrable local connection or those over 50 years of age;<sup>10</sup> however, it is not possible to conclude any significant risk of the schemes becoming undeliverable.

2.9.3 Finally, there is a need to consider the question of whether the **Focussed Changes as a whole**, which equates to an increased concentration of the Borough’s housing supply at one site, could have implications in terms of delivering homes at the trajectory required Borough-wide; specifically, the Pre-submission Plan explains that there is a requirement to deliver the established Local Housing Need (LHN) figure, which is now understood to equate to 454 dwellings per annum.<sup>11</sup> In answer to this question, it is fair to conclude that there is naturally a degree of increased risk associated with reliance on DHGV, as this is a large and complex site associated with delivery challenges, including in respect of infrastructure delivery; however, discussions between the Council and the site promoter have served to indicate that the 70 homes additionally assigned to the site through the Focussed Changes are deliverable within the plan period, and indeed can be delivered in a timely fashion such that the Local Plan housing delivery trajectory is unaffected.

<sup>10</sup> Site specific policy requires “a minimum of 25% of the proposed dwellings to be reserved for people with a strong and demonstrable local connection or those over 50 years of age. These dwellings should comprise affordable housing. A person with a strong local connection should meet one of the following criteria...”

<sup>11</sup> N.B. the LHN figure was understood to be 350 dpa in January 2019, at the time that the Pre-submission Plan and SA Report were published for consultation.

### Conclusion on the Focussed Changes

- 2.9.4 In conclusion, the decision to shift the balance of housing away from the Brentwood/Shenfield urban area, which is the part of the Borough where housing needs are likely to be highest, and concentrate housing at a single large site to a greater extent, potentially leading to a degree of increased risk in respect of delivering the Borough-wide housing requirement, has **uncertain negative implications** for the achievement of 'Housing' objectives.

### Pre-submission Plan plus Focussed Changes

- 2.9.5 The SA Report reached the following conclusion on the Pre-submission Plan:

*“The Draft Plan (2016) appraisal concluded the likelihood of **significant positive effects** on the basis of the proposal to meet LHN, and also to provide for specialist accommodation needs. Changes to the strategy, since 2016, serve to reinforce this conclusion, although there inevitably remains a degree of uncertainty whilst there remains a risk that LHN could increase to a figure as high as 454 dpa, and whilst there remains some (albeit very minor) risk of needing to provide for unmet needs from elsewhere in South Essex.”*

- 2.9.6 This conclusion **broadly holds true** for the Pre-submission Plan plus Focussed Changes on balance. **However**, this conclusion is now associated with a greater degree of uncertainty. First and foremost, this is on the basis that LHN, and therefore the annual housing requirement, is now understood to equate to 454 dpa, such that the proposed supply figure of 456 dpa can no longer be said to put in place a significant 'buffer' over-and-above the housing requirement. Secondly, the Focussed Changes will result in the housing supply being focused at DHGV to a greater extent, which leads to an increased degree of risk in respect of delays to delivery (the very reason why a buffer over-and-above the housing requirement is appropriate), albeit this risk is uncertain and may be marginal.

## 2.10 Landscape

The borough includes highly valued rural landscapes that require protection and careful management with a view to supporting distinctiveness; and urban fringe landscapes should also be a focus...

### Commentary on the Focussed Changes

- 2.10.1 A key consideration here is in respect of the proposal to reassign fifty homes from sites within the Brentwood/Shenfield urban area (Sites **R18** and **R19**) to DHGV (Site **R01**), which falls within the Green Belt, and is understood to be associated with landscape constraint. The SA Report stated the following in respect of DHGV:

*“With regards to the A127 corridor, concerns are primarily in relation to DHGV, which is judged by the Landscape Capacity Study as having “medium to low-medium” landscape capacity, and is judged by the Green Belt study to contribute to purposes to a “moderate-high” extent. DHGV has led to concerns raised by both Basildon and Thurrock Councils;<sup>12</sup> however, site specific policy is proposed to ensure that the development is ‘landscape-led’. A key consideration is the ridge-line running through the site, with Dunton Hills Farm located on the ridge, higher ground more exposed to the Basildon urban edge above it and a band of land at risk of flooding at the foot of the ridge. It is recommended that site specific policy might be supplemented to refer more explicitly to these site features, and how the*

<sup>12</sup> For example, Thurrock Council stated, through their response to the January 2018 consultation: “[The landscape] has been recognised by the Thames Chase Heritage Lottery Fund as a distinctive landscape character worth conservation and has been identified by Campaign for the Protection of Rural England as nationally significant area of tranquillity in the Metropolitan Green Belt. Dunton Hill Farm site is on a highly distinctive rise on a raised plateau between Laindon Hills and the Brentwoods Hills and separates the catchments of the Mardyke River to west and the River Crouch to the east. Basildon descends north-east from Langdon Hills to the River Crouch. The urban edges of Brentwood and Basildon are set back from the steeper slopes and screened with woodlands from views across the fenland. The settlements of Upminster and South Ockendon are identifiable in distant views to the east and south-east. There are built features within the open rural landscape which do not significantly impact the value of the area but may lower the quality or condition of the landscape in field by field character assessments. The impact to the wider fenland character is likely to be greater than the settlements of South Ockendon in the south west...”



*masterplan should respond, albeit the need for flexibility is equally recognised.”*

2.10.2 Both Basildon and Thurrock Councils also commented further on landscape evidence and issues through the most recent consultation on the Pre-submission Plan. Notably -

- Basildon Borough Council stated: “... during 2017, efforts were made by both Basildon and Brentwood Councils to determine whether a West Basildon urban extension could be delivered in the Basildon Borough Local Plan, alongside DHGV, whilst maintaining a sense of visual separation between both developments. To this end, a joint Dunton Area Landscape Corridor Design Options Study was commissioned by both Councils... to consider how both Council’s Green Belt and land management policies, either side of the boundary, could be coordinated in this location going forward. This was to also help determine whether it was possible for DHGV to co-exist with development in West Basildon without causing harm to heritage and environmental assets within Basildon Borough. The Council has noted that the Plan does now includes specific references that the joint borough boundary needs a degree of landscape and Green Belt treatment to maintain a visual separation with the edge of Basildon Borough, but it does not elaborate as to how this will be achieved...”
- Thurrock Council stated: “Brentwood... produced a Landscape Sensitivity and Landscape Character Assessment (LSLC) in 2018. The site scale level of the LSLC is helpful in general, however the sites on the Brentwood and Thurrock boundary are large and require, as the report recommended, further assessment. The methodology and findings are in general helpful. however there are points of concern with regards to [DHGV]. Firstly the description of landform under Geomorphology which describes [DHGV] as two sites... a plane and... rolling hills. This does not describe plateau of higher land in the east which descending by shallow slopes to the flood plain of the Fen to the south west. The landform... affords long distance view across the fen to settlements of Buphan, Orsett and South Ockendon. The assessment of these long distance views to and from the site are not fully addressed in the report.”

2.10.3 Finally, with regards to Site **R25** Land North of Woollard Way, Blackmore (10 homes decrease) and Site **R26** Land North of Orchard Piece, Blackmore (10 homes decrease), it is difficult to conclude that there is any benefit in landscape terms. These sites are within the Green Belt, and a reduced density could result in the potential to maintain a degree of openness; however, any benefit would be marginal. Also, there is a need to consider the objective of seeking to make best use of land removed from the Green Belt, which means developing at an appropriate density.

#### Conclusion on the Focussed Changes

2.10.4 In conclusion, the decision to decrease the number of homes at sites within the Brentwood/Shenfield urban area and increase the number of homes at DHGV, which falls within the Green Belt and is subject to landscape constraint, has **minor negative implications** for the achievement of ‘Landscape’ objectives.

#### Pre-submission Plan plus Focussed Changes

2.10.5 The SA Report reached the following conclusion on the Pre-submission Plan:

*“The Draft Plan (2016) appraisal concluded significant negative effects, given the sensitivities that exist, albeit noting that the preferred strategy has evolved over time in response to concerns raised and that detailed work has been completed to enable the identification of A12 urban extension sites that are best performing from a landscape / Green Belt perspective. Changes to the spatial strategy, since 2016, give rise to limited additional concerns, noting the emphasis on making best use of previously developed sites. Work has been ongoing regarding how best to avoid and mitigate landscape impacts at specific sites; however, at the current time it remains appropriate to conclude the likelihood of **significant negative effects**.”*

- 2.10.6 This conclusion **broadly holds true** for the Pre-submission Plan plus Focussed Changes, and, indeed, the effect of the Focussed Changes is to reinforce this conclusion.

## 2.11 Soils

There is a need to make best use of brownfield land and protect the Borough's resource of productive agricultural land.

Housing affordability is a significant issue for many in the Borough and demand for affordable housing is likely to continue to rise; as such there is a need to increase delivery of affordable housing. New housing must be of an appropriate size, tenure and design so as to meet the needs of existing and future residents (including the elderly, disabled people and those in poor health).

### Commentary on the Focussed Changes

- 2.11.1 A key consideration here is in respect of the proposal to reassign fifty homes from sites within the Brentwood/Shenfield urban area (Sites **R18** and **R19**) to DHGV (Site **R01**). The effect will not be the loss of any additional agricultural land, as all agricultural land within the DHGV site would be lost or sterilised (i.e. used for built development, infrastructure or open / green space) in any event; however, it is nonetheless the case that efforts should be made to make best use of brownfield sites (such as Site R18) and inaccessible greenfield sites within the urban area (Site R19) as far as possible.
- 2.11.2 Finally, with regards to Site **R25** Land North of Woollard Way, Blackmore (10 homes decrease) and Site **R26** Land North of Orchard Piece, Blackmore (10 homes decrease), there is the possibility of one or both of these sites comprising higher grade agricultural land; however, there is nonetheless no reason to suggest that any agricultural land will be retained within the sites as a result of the Focussed Changes.

### Conclusion on the Focussed Changes

- 2.11.3 In conclusion, the proposal to decrease the number of homes assigned to a brownfield site (Site R18) and an inaccessible greenfield site within the urban area (Site R19) has **negative implications** for the achievement of 'land' objectives, albeit this is a marginal conclusion as the Focussed Changes will not directly lead to additional loss of agricultural land.

### Pre-submission Plan plus Focussed Changes

- 2.11.4 The SA Report reached the following conclusion on the Pre-submission Plan:

*"The Draft Plan (2016) appraisal concluded no significant effects, on the basis of the proposal to make best use of brownfield sites, and on the basis of the assumption that much of the agricultural land lost would be of relatively low quality, i.e. not 'best and most versatile'. Since the Draft Plan stage further detailed work has been completed to ensure that most efficient use is made of brownfield land, with the outcome being a significant increase in the number of homes proposed on brownfield land. However, with regards to agricultural land, the proposal is now to increase the area lost, and there is a significantly increased likelihood that some of this land will be 'best and most versatile'. As such, at this stage it is appropriate to flag the potential for **significant negative effects**."*

- 2.11.5 This conclusion **broadly holds true** for the Pre-submission Plan plus Focussed Changes.

## 2.12 Waste

A primary concern is to promote the integration of facilities to enable efficient recycling as part of new developments; and developers should be encouraged to adopt sustainable construction practices, including handling waste arisings, recycling, and disposal in a sustainable manner.

### Commentary on the Focussed Changes

2.12.1 The Focussed Changes do not lead to any implications for the achievement of waste management objectives.

### Conclusion on the Focussed Changes

2.12.2 No implications.

### Pre-submission Plan plus Focussed Changes

2.12.3 The SA Report reached the following conclusion on the Pre-submission Plan:

*“The Draft Plan (2016) appraisal concluded no significant effects, mainly noting that development management policy has some, albeit limited, potential to support good waste management practices, and that there is the potential to strengthen the policy approach. There are some waste infrastructure capacity issues locally; however, **significant negative effects are not predicted.**”*

2.12.4 This conclusion **broadly holds true** for the Pre-submission Plan plus Focussed Changes.

## 2.13 Water quality and water resources

Water quality is a concern, with efforts needed to improve the ecological status of waterways; and, given the Borough’s position in an area of serious water stress, water efficiency measures should be sought.

### Commentary on the Focussed Changes

2.13.1 The Focussed Changes do not lead to any implications for the achievement of water-related objectives. Anglian Water notably stated through the recent consultation on the Pre-submission Plan that: *“We are supportive of the Local Plan policies relating to infrastructure delivery (SP06) Sustainable Design and construction and future proofing (BE01 and BE02) Drainage and flood risk (NE06 and BE08) and policies relation to Dunton Hills strategic allocation (RO1 (I) and RO1 (III)).”*

### Conclusion on the Focussed Changes

2.13.2 No implications.

### Pre-submission Plan plus Focussed Changes

2.13.3 The SA Report reached the following conclusion on the Pre-submission Plan:

*“The Water Cycle Study (2019) highlights a number of issues in respect of WwTW capacity, but ultimately finds that there will be the potential to deliver the necessary upgrades and/or take the necessary steps to mitigate any impacts to water quality. On this basis, **significant negative effects are not predicted.**”*

2.13.4 This conclusion **broadly holds true** for the Pre-submission Plan plus Focussed Changes.

### 3 CONCLUSIONS AND NEXT STEPS

#### 3.1 Conclusions

##### Focussed changes

3.1.1 The appraisal presented above finds that that the Focussed Changes have positive implications in respect of: 'Community' objectives, reflecting the fact that the Focussed Changes have been developed in response to concerns raised by local residents; and 'Flood risk' objectives, given the surface water flood risk issue at Site R26.

3.1.2 However, the Focused Changes are found to have negative implications in respect of:

- Air quality – increasing the number of homes assigned to DHGV by 70 is potentially associated with a degree of risk, noting issues (currently a focus of ongoing investigation) in respect of air quality along the A127 within Basildon Borough; however, on the other hand, decreasing the homes assigned to the Brentwood/Shenfield urban area by 50 may serve to reduce traffic through the problematic town centre AQMA (but any benefit would be marginal, and, equally, these are accessible locations suited to minimising car dependency).
- Housing – as the effect is to shift the balance of housing away from the Brentwood/Shenfield urban area, which is the part of the Borough where housing needs are likely to be highest, and concentrate housing at a single large site (DHGV) to a greater extent, potentially leading to a degree of increased risk in respect of delivering the Borough-wide housing requirement. There is also a need to consider a notable contextual change, namely the fact that Local Housing Need (LHN) is now understood to be higher than was the case at the time of the Pre-submission Plan / SA Report.
- Landscape – as the effect is to decrease the number of homes at sites within the Brentwood/Shenfield urban area and increase the number of homes at DHGV, which falls within the Green Belt and is subject to landscape constraint.
- Soils - as the effect is to decrease the number of homes assigned to a brownfield site and another site within the urban area (greenfield, but inaccessible), albeit this is a marginal conclusion as the Focussed Changes will not directly lead to additional loss of agricultural land.

##### Pre-submission Plan plus Focused Changes

3.1.3 The SA Report reached the following conclusion on the Pre-submission Plan:

*“The appraisal identifies the likelihood of significant **positive** effects in respect of **housing** (as the proposal is to provide for LHN in full, albeit there is uncertainty ahead of Government confirming the LHN figure), and also finds the plan to perform well (but not to a ‘significant’ extent) in respect of: **climate change mitigation** (four strategic scale schemes are proposed that should lend themselves to delivery of low carbon infrastructure etc.); **community and wellbeing** (amongst other things, the scale of DHGC leads to an opportunity to deliver a range of other community infrastructure, including a secondary school, and detailed site specific policy has been established leading to confidence that the opportunity will be realised); and **economy and employment** (employment land targets will be met in total quantitative terms, and the spatial strategy involving a major focus on the A127 corridor is tentatively supported). Also, limited concerns are highlighted in respect of **biodiversity, heritage and flood risk**, which might be contrasted to a ‘future baseline’ (or ‘reference case’) situation whereby there is unplanned development (or at least less planned development) leading to greater impacts/risk.*



However, significant **negative** effects are predicted in respect of **landscape** (as a number of the proposed allocations will lead to an impact to valued landscapes, most notably DHGV); and **soils** (given the likelihood of significant loss of 'best and most versatile' agricultural land). Also, notable tensions are highlighted in respect of **air quality** (as there will be increased traffic through the Brentwood AQMAs), **water quality** (as there is a need to rely on upgrades to WWTWs and other measures, in order to ensure no adverse effects to water quality within receiving watercourses); and **traffic congestion**, which in turn potentially leads to negative implications in respect of 'community and wellbeing' and 'economy and employment'.

*There will be the potential to make further improvements to the plan during the course of the Examination in Public (EiP), at which time account should also be taken of the specific recommendations that are made within the appraisal above, which mostly relate to potential ways of increasing the stringency of development management policy (albeit it is recognised that there is a need to balance policy stringency with viability and deliverability considerations). "*

- 3.1.4 This conclusion broadly still holds true for the 'Pre-submission Plan plus Focussed Changes', although there is now a need to flag a risk of negative effects in respect of 'air quality' objectives, and also highlight the positive conclusion reached in respect of 'Housing' objectives as uncertain.

## 3.2 Next steps

- 3.2.1 Both the Pre-submission Plan and the Focussed Changes will be submitted to Government for examination in public by a Planning Inspector. All consultation responses received will also be submitted, as will the updated SA Report and this SA Report Addendum.