

## **Brentwood Local Plan Review**

### **Strategic Land Availability Assessment (SLAA) Methodology Consultation 18 December 2023 to 4 March 2024**

#### **Consultation Responses Summary**

<b>Consultee</b>	<b>Section / Para</b>	<b>Comment</b>	<b>Action</b>
ECC	Para. 1.5	<p>The assessment methodology generally follows standard practice/guidance in PPG/NPPF and has commonality with other LPAs in Essex. However, consideration needs to be given in particular to Paragraph: 010 (Reference ID: 3-010-20190722) of the PPG which is clear that: ‘When carrying out a desktop review, plan-makers need to be proactive in identifying as wide a range of sites and broad locations for development as possible (including those existing sites that could be improved, intensified or changed). Identified sites, which have particular constraints (such as Green Belt), need to be included in the assessment for the sake of comprehensiveness but these constraints need to be set out clearly, including where they severely restrict development. An important part of the desktop review, however, is to identify sites and their constraints, rather than simply to rule out sites outright which are known to have constraints. It is important that plan-makers do not simply rely on sites that they have been informed about, but actively identify sites through the desktop review process that may assist in meeting the development needs of an area.’ The supply of sites for assessment is mostly based on sites that are already in the planning system or form part of redevelopment/regeneration ambitions, and the methodology as proposed, is unclear that sites will be proactively sought out for assessment. The SLAA process itself should determine the suitability of future development sites rather than arbitrary restrictions outside of the process (e.g. settlement limits), and</p>	<p>BBC notes ECC’s comments and can confirm that the Council will be following best practice as required through the NPPF and PPG.</p> <p>No changes are required</p>

Consultee	Section / Para	Comment	Action
		there is a need to ensure that the criteria are not overly restrictive and that there is some account made for site specific circumstances. As the PPG states the process should be as thorough as possible because it justifies why sites should not be allocated just as much as it justifies why sites should be allocated.	
ECC	Para.2.1	Update required to NPPF paragraph number – is now 69 not 68. For clarity it is recommended that the full paragraph 69 is quoted here which sets out the requirement for planning policies to identify a supply of deliverable and developable sites. It may also be helpful to include the definitions of deliverable and developable sites as set out in the Glossary to the NPPF.	Paragraph number change is noted and will be updated in document accordingly.
ECC	Proposed Uses – Para 3.4 – Table – Residential	In addition to ‘Older Persons Housing’, reference should be made to ‘Specialist and Supported Housing’, in order to address the full range of residential uses.	Noted, reference can be made to <b>‘Specialist and Supported Housing’</b> as suggested.
ECC	Proposed Uses – Para 3.4 – Table – Commercial	The term ‘Employment’ could be expanded to show the different types of uses within this broad category.	Comments are noted, however no changes are required.
ECC	Proposed Uses – Para 3.4 – Table – Infrastructure	It is recommended that ‘SuDS’ and ‘flood alleviation / resilience schemes’ are also listed here.	Noted, reference to ‘SuDS’ / ‘flood alleviation / resilience schemes’ will be added to the Infrastructure list in the table.
ECC	Proposed Uses – Para 3.4 – Table – Infrastructure	It is recommended that the ‘Transport’ heading is expanded to include PRoW’s, and strategic cycle/walking and bridleway networks which provide for sustainable/active travel modes; and can form part of the Green Infrastructure Network as greenways.	Noted, include ‘Transport <b>and active travel</b> ’ to table under infrastructure.
ECC	Proposed Uses – Para 3.4 – Table – Infrastructure	Within the Education use consideration should be given to school playing fields being multi-purpose and functional use to provide green spaces for natural play, sensory, areas that enhanced biodiversity and contribute to climate change mitigation and adaptation (flood and water mitigation, shading, air quality etc.) and contribute to the wider curriculum (PE, science, English, maths, outdoor learning and forest schools)	Noted, no changes required.

Consultee	Section / Para	Comment	Action
ECC	Proposed Uses – Para 3.4 – Table – Green Infrastructure	ECC welcomes the inclusion of the heading of Green Infrastructure under Proposed Uses. ‘Allotments’ could be further clarified to include community gardens and orchards. It is also recommended that Blue Infrastructure is included, such as watercourses, lakes, ponds etc, as these provide opportunities as part of GI nature-based solutions to flood and water management / SuDS. ECC has drafted an Essex Water Strategy that is currently going to Cabinet and should be taken into consideration once published. Moving forward, this emerging study, the supporting works and findings of this strategy have the potential to influence and support the direction taken in regard to water conservation. Consideration should also be taken of the potential sites identified as part of the Greater Essex Local Nature Recovery Strategy, including natural or semi-natural green spaces or sites of high Biodiversity Net Gain value or sites for Biodiversity credits	Noted, no changes required.
ECC	Desktop Review – Para 3.8 – Table 1 – 5 th row (public sector land)	There is no objection to the ECC reference under data sources. It may also be helpful to list other “strategic bodies” here or in a glossary	Noted. A list of statutory consultees are listed within the Council Statement of Community Involvement. Therefore, no changes are required.
ECC	Desktop Review – Para 3.8 – Table 1 – 9 th row (business requirements)	ECC often receives enquiries for business land/buildings and has worked with local planning authorities to facilitate delivery. ECC can be listed as a data source here	Noted. No changes required.
ECC	Para 3.8 – Table 1	ECC is the ‘Responsible Authority’ for delivering the Greater Essex Local Nature Recovery Strategy (GELNRS) but will work closely with the Essex Local Nature Partnership to provide direction and ensure key stakeholders are engaged. The GELNRS is being prepared for completion by early 2024. The GELNRS will form the baseline for habitat information, which in turn will generate action to promote biodiversity management and improvement. The mapping from the	Noted. BBC has been an active member of the LNRS working group and fully intends to use this evidence base to help support the Local Plan and identify strategy habitat areas to ensure the requirements of Biodiversity Net Gain as set out in the Environment Act is achieved. No changes required.

Consultee	Section / Para	Comment	Action
		GELNRS has potential to help to identify sites to protect, enhance and investment opportunities	
ECC	Initial Survey – Paras 3.20 & 3.21	It appears that sites are assessed in isolation in stage 1, and then possible combinations of sites are assessed in stage 2/later. However, some sites eliminated in stage 1 may be deliverable if combined with another site but having failed stage 1 would not have that opportunity to be assessed in combination. While there could be many combinations of sites overall, it is recommended that there should be a second review of rejected sites that have been dismissed for reasons that could be mitigated if the scale of the site was adjusted. Similarly, sites may be considered in parcels rather than as a whole if it would result in passing the test. For example, a 5ha site which is 75% in Flood Zone 3 would likely fail the test, however the remaining 1.25ha site in Flood Zone 1 would pass the test and should be considered	Noted. The Council will be considering sites as it relates to the wider context, and therefore if a combination of sites make a site acceptable this will be captured in stage 1 of the site assessment process. Therefore, there will not be a need to re-review omitted sites at stage 2. No changes are needed.
ECC	Initial Survey – Paras 3.18 – 3.20 and Table 2	In stage 1 sifting, several categories appear to be absolute pass/fail, but there is an interaction between elements, such that a decision flow chart should be used to pass / fail sequentially, rather than pass / fail on each indicator individually. For example, in the Flood Zone (FZ) test in Table 2, while FZ3 is generally resisted for development, some employment uses may be appropriate in FZ3 such as Ports, however, the site would fail FZ3 and not be considered for port use.	Comment is noted. No change required.
ECC	Initial Survey – Table 2 – 4 <sup>th</sup> row (isolated from existing settlement)	The Initial Stage of assessment is ruling out sites which are isolated from an existing settlement. This is considered to be an arbitrary criterion which could potentially dismiss sites without proper consideration of their other attributes/opportunities, and sites that are sustainable, developable and achievable. The introduction of a RAG rating could overcome this issue rather than using the current suitable/unsuitable assessment.	Noted. The Council typically uses a RAG system to determine if a site is suitable vs. unsuitable. No changes required.

Consultee	Section / Para	Comment	Action
ECC	Initial Survey – Table 2 – 5 th row (flood zone)	Seek clarity on whether Flood Zone 2 should also be listed here. This would align with the flood zone criteria set out in the suitability table (page 19) which refers to Flood Zones 2 and 3. It is also recommended that reference is made here to the sequential and exception tests.	Noted. No changes required.
ECC	Initial Survey – Table 2 – last row (access from public highway)	Clarity is sought over whether ‘classified roads’ is referring to all highway roads. Smaller sites may be accessible via unclassified roads. A List of Streets under Section 36 of the Highways Act 1980 provides details of roads that are or are not classified and is published every April	Noted. Yes, highway roads are referring to both classified and unclassified roads.
ECC	Initial Survey – Table 2	<p>Minerals Safeguarding Areas, Minerals Consultation Areas, and Waste Consultation Areas should be included as an assessment criterion in Table 2. Assessment criterion: Is the site within a Minerals Safeguarding Areas, Minerals Consultation Area, Waste Consultation Area? The ‘Source’ should include ‘ECC data’ and ‘the Essex Minerals Local Plan and Essex and Southend-on-Sea Waste Local Plan’. Justification: Using the Local Plan GIS map alongside GIS information provided by Essex County Council, the proximity of promoted sites to identified Minerals Safeguarding Areas, Minerals Consultation Areas and Waste Consultation Areas is observed. Where a promoted site lies within a Minerals or Waste Consultation Area or has an area of 5ha or greater within a Minerals Safeguarding Area, Essex County Council will be consulted to confirm whether the Minerals/Waste infrastructure is temporary or permanent in nature and whether a Minerals Resource Assessment is required. RAG Assessment:</p> <ul style="list-style-type: none"> <li>• Less than 5ha of a site is within a Minerals Safeguarding Area. Site is not within a Minerals or Waste Consultation Area</li> <li>• Site is wholly or partially within an identified Minerals Consultation Area and/or a Waste Consultation Area but planning permission for the safeguarded uses would have expired prior to the intended delivery of development, the safeguarded use has</li> </ul>	<p>Agreed. Following text to be added:</p> <p>Assessment criterion:  <b><u>Is the site within a Minerals Safeguarding Areas, Minerals Consultation Area, Waste Consultation Area?</u></b></p> <p>Explanation:  <b><u>Where a promoted site lies within a Minerals or Waste Consultation Area or has an area of 5ha or greater within a Minerals Safeguarding Area, Essex County Council will be consulted to confirm whether the Minerals/Waste infrastructure is temporary or permanent in nature and whether a Minerals Resource Assessment is required.</u></b></p> <p>Assessment:  <b><u>Suitable: site is less than 5ha within a Minerals Safeguarding Area / site is not within a safeguarding area.</u></b></p>

Consultee	Section / Para	Comment	Action
		<p>otherwise ceased, and the site or infrastructure is considered unsuitable for a subsequent minerals and/or waste use</p> <ul style="list-style-type: none"> <li>• Site is wholly or partially within an identified Minerals Safeguarding Area and requires further assessment to be undertaken in the form of a Minerals Resource Assessment</li> <li>• Site is wholly or partially within an identified Minerals Consultation Area and/or Waste Consultation Area where safeguarded infrastructure is permanent in nature or where the allocated activity would not have ceased prior to the intended delivery of development</li> </ul>	<p><b><u>Unsuitable: site is wholly or partially within an identified Minerals Consultation Area and/or a Waste Consultation Area where further Minerals Resource Assessment has found it to not be suitable.</u></b></p>
ECC	Initial Survey – Para 3.20 – Table 2	Consideration needs to be given to whether a site performs an important functional role in terms of BNG/ LNRS i.e. Does the site provide high biodiversity value or within allocated site for Greater Essex Local Nature Recovery Strategy. A reason for potentially excluding a site from development at this stage, may be a reason for inclusion on BNG grounds.	Noted. BNG and LNRS is covered within Table 1 as Data Sources that will help assess sites that have been put forward. Therefore, no changes required.
ECC	Section1: Suitability – Para 3.34	It is recommended that access to train stations, bus stops and Brentwood Town centre is considered at an individual site level rather than at a settlement scale to provide consistency throughout the planning process. Planning applications are assessed based on individual site level, not settlement level	
ECC	Section1: Suitability – Table – General Comment	The assessment criterion and/or the RAG Assessment may be different depending on whether the site is being assessed for residential, commercial, or infrastructure. Some consideration is required as to how appropriate assessment of the different types of sites can be achieved using the currently proposed criterion.	Noted. No changes required.
ECC	Section1: Suitability – Table – 3 rd row (access / highway constraints)	The Justification and RAG Assessment criterion need to consider the balance between providing vehicular access to a site and access via sustainable modes. Paragraph 114 of the NPPF requires development to ensure that ‘safe and suitable access to the site can be achieved for all users’. Paragraph 116 states that development should ‘give priority first to pedestrian and cycle	Noted. No changes required.

Consultee	Section / Para	Comment	Action
		movements, both within the scheme and with neighbouring areas; and second – so far as possible – to facilitating access to high quality public transport, with layouts that maximise the catchment area for bus or other public transport services, and appropriate facilities that encourage public transport use’.	
ECC	Section1: Suitability – Table – 5 th row (limits to developable area)	It is recommended that flood risk zones should also be included here, as well as consideration of the risk of increasing downstream flood risk in Critical Drainage Areas	Noted. No changes required.
ECC	Section1: Suitability – Table – 7 th row (agricultural land)	It is noted that given the relatively rural nature of the Borough and the scale of growth, it is likely that many sites will be high-quality farmland and so there is some inevitability of losses	Noted. No changes required.
ECC	Section1: Suitability – Table – 8 th row (neighbouring uses)	<p>This Assessment Criterion may require some additional text to address the assessment in relation to employment areas, particularly around Use Class E which is now considered broadly acceptable in/near residential use.</p> <p>An employment site may evolve as operators change, so to avoid future “bad neighbour” conflicts (e.g. noise, smell, vibration), sites promoted for residential use near to existing employment use should consider the potential for intensification of “bad neighbour” issues originating from the employment site.</p> <p>For example, sites suitable for office/Research &amp; Development may not be suitable for heavier industry/logistics, so the assessment must recognise the different user possibilities rather than a blanket “employment” categorisation. Furthermore, impacts from commercial/industrial uses are often specific to the development</p>	Noted. No changes required.

Consultee	Section / Para	Comment	Action
		and can usually be managed via planning obligations and/or conditions	
ECC	Section1: Suitability – Table – 11th row (enhance/create GI)	It is acknowledged that the Assessment Criterion column provides examples of Green Infrastructure (GI), however it is recommended that a link to a list of appropriate GI assets/features is included to ensure no GI is missed in this process. The Assessment should also include the question has the site/setting been appraised for multiple GI functions and benefits and /or can the enhancement of GI deliver multiple functions and benefits, including BNG and wider environmental net gains. In relation to the RAG Assessment for GI, in theory GI can be incorporated on any scale and should be integral to planning the layout and design of new buildings and developments from the outset, the important aspect is determining the right design. However, it is understood that there needs to be a way to identify the viability of sites. It is also recommended that the Assessment should also consider if the development site would cause harm/impact on important/ high value habitats (i.e., following BNG hierarchy of avoidance first) or link this to the delivery of multifunctional GI, as mentioned above (i.e., can the site retain and expand GI and habitat networks including nature recovery networks?)	Noted. It is the Council's view this has been adequately captured within the site assessment methodology document. No changes required.
ECC	Section 1: Suitability – Table – 12th row (heritage)	The Essex Historic Environment Record could be included as a source. Consideration should be given to including 'protected lanes'	Noted. Include reference to ' <b>protected lanes</b> '.
ECC	Section 1: Suitability – Table – 13th row (PROW)	It should be recognised that PROWs are protected by the Highways Act, so the RAG Assessment must consider this. There cannot be any loss of PROWs. It should also be noted in the Assessment Criterion that a bridleway is a PROW. PROWs consist of public footpaths, byways and bridleways.	Noted. This has been captured within the site assessment methodology. No changes required.



Consultee	Section / Para	Comment	Action
ECC	Section1: Suitability – Table – Access to Key Services – General	Clarification is sought on how the distances to different services in the RAG Assessment column for ‘Key Services’ were derived and are to be measured. The NPPF (para.114b) states that ‘in assessing sites that may be allocated for development in plans, or specific applications for development, it should be ensured that safe and suitable access to the site can be achieved for all users’. It is recommended that consideration be given to a ‘finer grain’ of assessment criterion as it is currently very broad, and services are provided at different scale (i.e. the distance to travel to a supermarket, and potentially the mode of travel, could be different to the distance to travel to a convenience store, or a GP etc.). Consideration should also be given to access from potential residential development sites to employment uses/locations. This is currently not included in the table. The assessment of a site’s accessibility to schools, shops and GP surgeries may be appropriate for residential development sites, but there is less (or no) reliance on these attributes when considering a site for employment development purposes. Consideration should be given to how this can be addressed, for example could an employment site be graded “green” rather than “N/A”	The site assessment will be undertaken using best practice and inline with the NPPF and PPG. No changes required.
ECC	Section1: Suitability – Table – Access to Key Services – General	It is recommended that consideration be given to including access to green spaces in this section, as the distance to the nearest open/green space can be a constraint. The use of the National Green Infrastructure Framework S2 – Accessible Greenspace Standard (previously known as Accessible Natural Green Space Standard (ANGSts)) is considered appropriate as it recommends that everyone has access to good quality green and blue spaces close to home (within fifteen minutes’ walk) for health and wellbeing and contact with nature.	GI is considered as part of the Natural and Historic Environment section of the table. No changes required.
ECC	Section1: Suitability – Table – 16th row	Clarification is sought on how the distances to schools set out in the RAG Assessment column were derived and are to be measured. The Essex Design Guide and ECC Developers’ Guide to	Distances identified within the ECC evidence regarding walking distances to school will be used for this assessment. No changes required.

Consultee	Section / Para	Comment	Action
	(primary school) & 17th row (secondary school)	Infrastructure Contributions define a reasonable walking distance as 600m for primary and 1500m for secondary school pupils, and that these distances are measured via the shortest available safe walking route	
ECC	Section1: Suitability – Table	<p>Minerals Safeguarding Areas, Minerals Consultation Areas, and Waste Consultation Areas should be included as an assessment criterion in the Suitability Table. Assessment criterion: Is the site within a Minerals Safeguarding Areas, Minerals Consultation Area, Waste Consultation Area?</p> <p>The 'Source' should include 'ECC data' and 'the Essex Minerals Local Plan and Essex and Southend-on-Sea Waste Local Plan'.</p> <p>Justification: Using the Local Plan GIS map alongside GIS information provided by Essex County Council, the proximity of promoted sites to identified Minerals Safeguarding Areas, Minerals Consultation Areas and Waste Consultation Areas is observed.</p> <p>Where a promoted site lies within a Minerals or Waste Consultation Area or has an area of 5ha or greater within a Minerals Safeguarding Area, Essex County Council will be consulted to confirm whether the Minerals/Waste infrastructure is temporary or permanent in nature and whether a Minerals Resource Assessment is required. RAG Assessment:</p> <ul style="list-style-type: none"> <li>• Less than 5ha of a site is within a Minerals Safeguarding Area. Site is not within a Minerals or Waste Consultation Area</li> <li>• Site is wholly or partially within an identified Minerals Consultation Area and/or a Waste Consultation Area but planning permission for the safeguarded uses would have expired prior to the intended delivery of development, the safeguarded use has otherwise ceased, and the site or infrastructure is considered unsuitable for a subsequent minerals and/or waste use</li> <li>• Site is wholly or partially within an identified Minerals Safeguarding Area and requires further assessment to be undertaken in the form of a Minerals Resource Assessment</li> </ul>	Noted. This point was raised under Initial Survey – Table 2 and appropriate amendments made. Refer to response given under Initial Survey – Table 2.

Consultee	Section / Para	Comment	Action
		<ul style="list-style-type: none"> <li>• Site is wholly or partially within an identified Minerals Consultation Area and/or Waste Consultation Area where safeguarded infrastructure is permanent in nature or where the allocated activity would not have ceased prior to the intended delivery of development</li> </ul>	
ECC	Section 2: Availability – Table – 5 th row (unimplemented permissions)	It is not considered that sites should be ruled out in the Initial Stage of assessment just because they have an unimplemented permission. There can be multiple reasons why a development may have stalled, including potentially allowing for consideration of other uses for the land. Permissions are for the land, and different owners/developers may be promoting a site from those that did not implement previous planning permissions and should not be penalised for the unimplemented permissions obtained by a predecessor. It is recommended that officer judgement is needed to allow for flexibility. Sites promoted for employment use may be more affected by this criterion than residential sites given how market trends for employment uses have changed and will continue to change over time	Noted. No changes required.
ECC	Section 2: Availability – Table	Minerals Safeguarding Areas, Minerals Consultation Areas, and Waste Consultation Areas should be included as an assessment criterion in the Availability Table. Assessment criterion: Is the site within a Minerals Safeguarding Areas, Minerals Consultation Area, Waste Consultation Area? The 'Source' should include 'ECC data' and 'the Essex Minerals Local Plan and Essex and Southend-on-Sea Waste Local Plan'. Justification: Using the Local Plan GIS map alongside GIS information provided by Essex County Council, the proximity of promoted sites to identified Minerals Safeguarding Areas, Minerals Consultation Areas and Waste Consultation Areas is observed. Where a promoted site lies within a Minerals or Waste Consultation Area or has an area of 5ha or greater within a Minerals Safeguarding Area, Essex County Council will be consulted to confirm whether the Minerals/Waste infrastructure is temporary	Noted. This point was raised under Initial Survey – Table 2 and appropriate amendments made. Refer to response given under Initial Survey – Table 2.

Consultee	Section / Para	Comment	Action
		<p>or permanent in nature and whether a Minerals Resource Assessment is required. RAG Assessment:</p> <ul style="list-style-type: none"> <li>• Less than 5ha of a site is within a Minerals Safeguarding Area.</li> </ul> <p>Site is not within a Minerals or Waste Consultation Area</p> <ul style="list-style-type: none"> <li>• Site is wholly or partially within an identified Minerals Consultation Area and/or a Waste Consultation Area but planning permission for the safeguarded uses would have expired prior to the intended delivery of development, the safeguarded use has otherwise ceased, and the site or infrastructure is considered unsuitable for a subsequent minerals and/or waste use</li> <li>• Site is wholly or partially within an identified Minerals Safeguarding Area and requires further assessment to be undertaken in the form of a Minerals Resource Assessment</li> <li>• Site is wholly or partially within an identified Minerals Consultation Area and/or Waste Consultation Area where safeguarded infrastructure is permanent in nature or where the allocated activity would not have ceased prior to the intended delivery of development</li> </ul>	
ECC	Section 3: Achievability –	It may be helpful to expand on this section and refer to other policy requirements. For example the ECC Developers' Guide to Infrastructure Contributions outlines a range of requirements that relevant development sites are expected to provide and/or contribute financially	Noted. No changes required.
ECC	Table – 1 st row (contributions)	It should be noted that such contributions are often necessary to make an unsustainable site become a sustainable one, for example bus contributions	Noted.
ECC	Section 3: Achievability – Table – 3 rd row (M & W safeguarding areas /	The wording for this row should read as follows: Assessment criterion: Is the site within a Minerals Safeguarding Areas, Minerals Consultation Area, Waste Consultation Area? The 'Source' should include 'the Essex Minerals Local Plan and Essex and Southend-on-Sea Waste Local Plan' as well as 'ECC data'. Justification: Using the Local Plan GIS map alongside GIS information provided by Essex	Noted. This point was raised under Initial Survey – Table 2 and appropriate amendments made. Refer to response given under Initial Survey – Table 2.

Consultee	Section / Para	Comment	Action
	consultation zones)	<p>County Council, the proximity of promoted sites to identified Minerals Safeguarding Areas, Minerals Consultation Areas and Waste Consultation Areas is observed. Where a promoted site lies within a Minerals or Waste Consultation Area or has an area of 5ha or greater within a Minerals Safeguarding Area, Essex County Council will be consulted to confirm whether the Minerals/Waste infrastructure is temporary or permanent in nature and whether a Minerals Resource Assessment is required. RAG Assessment:</p> <ul style="list-style-type: none"> <li>• Less than 5ha of a site is within a Minerals Safeguarding Area. Site is not within a Minerals or Waste Consultation Area</li> <li>• Site is wholly or partially within an identified Minerals Consultation Area and/or a Waste Consultation Area but planning permission for the safeguarded uses would have expired prior to the intended delivery of development, the safeguarded use has otherwise ceased, and the site or infrastructure is considered unsuitable for a subsequent minerals and/or waste use</li> <li>• Site is wholly or partially within an identified Minerals Safeguarding Area and requires further assessment to be undertaken in the form of a Minerals Resource Assessment</li> <li>• Site is wholly or partially within an identified Minerals Consultation Area and/or Waste Consultation Area where safeguarded infrastructure is permanent in nature or where the allocated activity would not have ceased prior to the intended delivery of development</li> </ul>	
ECC	Section 3: Achievability (including viability) – General Comment	Figure 2 identifies the extent of Brentwood BC boundary where the call for sites will extend. However, whilst some sites may not align with Brentwood BC SLAA methodology and be rejected, they could be of benefit to a neighbouring authority under the Duty to Cooperate in delivering their Local Plan. Additional criteria or commentary to address this may be required following engagement with neighbouring authorities	Noted. No changes required.

Consultee	Section / Para	Comment	Action
ECC	Green Infrastructure – Para 3.37	It is recommended that reference should be made to the use of the Essex Green Infrastructure Standards (2022) that are endorsed by Natural England and were awarded Building with Nature Policy accreditation in 2023. Reference should also be made to the Essex Green Infrastructure Strategy (2020) in securing multifunctional green infrastructure. The GI standards cover nine principles and standards for the protection, enhancement, creation and management of an inclusive and integrated network of GI in Essex. The application of these principles and standards through planning policy and development management will help ensure the delivery of multifunctional, accessible high-quality GI from development. The Essex GI Standards also compliment the Natural England Tool National Green Infrastructure Framework. It is also recommended that reference is made to having consideration of the Sustainable Drainage Systems Design Guide for Essex (2020)	Noted. No changes required.
ECC	Green Infrastructure – Para 3.39	<p>It is recommended that the following are also included in the list of principles to be considered:</p> <ul style="list-style-type: none"> <li>• Multifunctionality – delivery of environmental benefits including BNG, climate change measures, economic benefits (i.e., tourism, attractive to businesses), and social benefits (NPPF para.96(c) looks to green infrastructure to enable and support local health and wellbeing needs).</li> <li>• Stewardship</li> <li>• Expansion of Access to consider not only barriers but inclusivity. There is the potential to appraise existing and new facilities/features of existing and new open/green spaces.</li> <li>• Mainstreaming – GI should be considered and prioritised throughout the planning process to ensure it is effectively designed and integral to place making and place keeping (stewardship) to the whole development from the outset. The Natural Environment section of the PPG supplements the information provided in the NPPF and describe the GI benefits and how it can be considered in</li> </ul>	<p>Noted. Following changes made:</p> <ul style="list-style-type: none"> <li>• <b><u>Multifunctionality</u></b></li> <li>• <b><u>Stewardship</u></b></li> </ul>

Consultee	Section / Para	Comment	Action
		the preparation of planning policy. It emphasises that GI opportunities and requirements need to be considered at the earliest stages, and as an integral part, of development proposals	
ECC	Stage 5 – Final Evidence Base	In addition to the outputs listed, the report would benefit from an analysis of the cumulative impacts and opportunities of adjoining/nearby sites where this may enable viable provision of infrastructure.	Noted. No changes required.
ECC	SLAA Methodology – General Comment	Using the methodology as proposed it is likely that sites in the open countryside will be rejected, however the Council's FEMA and subsequent Employment Strategy may seek to direct development to particular locations, such as identifying B8 logistics uses on the trunk road junctions. Other projects such as the South Essex Rapid Transport System may also only be realised through a combination of sites that create the critical mass to deliver a project. Consideration should therefore be given to including a criterion to assess the "fit with other strategies/aspirations" that would be balanced against rejection in other criteria.	Noted. Amend text to include:  <b><u>Sites will be assessed and considered where it is determined the site located and propose use fits with other strategic priorities / aspirations.</u></b>
ECC	SLAA Methodology – General Comment	The assessment overall addresses how sites may fit in to the existing circumstances, addressing barriers and constraints. It does not appear to address opportunities. Examination of maps of settlements and consideration of potential development opportunities that have not been previously assessed through previous SLAAs or have not been promoted could be undertaken. For example this could include land around railway stations; "missing link" sites that could enable 2 other sites to join up to maximise opportunities; and "rounding off existing settlements to natural boundary edges". Any sites that come through that process can then be added into the SLAA process as a separate source. Whilst those sites may not be deemed deliverable in the short term (due to lack of promotion), they may stimulate market interest once presented as opportunities.	Comment is noted. No change required.

Consultee	Section / Para	Comment	Action
ECC	SLAA Methodology – General Comment	<p>The assessment is focused on the spatial/physical attributes of the land, however there may be instances where sites may need to be assessed for the intended use. For example;</p> <ul style="list-style-type: none"> <li>• A small existing hamlet around a railway level crossing that impedes the strategic flow of traffic on a main road, may be too small to possess a settlement boundary, nor services and facilities, resulting in the proposed methodology likely eliminating sites around it. However, there may be a large site being promoted that could accommodate a bypass, bridge and enabling development to bring broader strategic benefits that are not recognised by this initial sifting.</li> <li>• A site in FZ3 next to a river, a few hundred metres distant from settlement boundary, would likely be eliminated using the proposed methodology. However, it may be being promoted for marina/port use where these attributes are less of a barrier to the proposed use</li> </ul>	Comment is noted. No change required.
TfL	Table 1 - Additional opportunities for unestablished uses (e.g. making productive use of under-utilised facilities such as garage blocks)	<p>A new row to the table could be added: 'Opportunities to make more efficient use of land in low-density uses within walking distance of National Rail or Elizabeth line stations or town centres.'</p> <p>Data sources for this could include a desktop review of sites.</p>	<p>Noted. Amendment to site assessment to include <b><u>Opportunities to make more efficient use of land in low-density uses within walking distance of National Rail or Elizabeth line stations or town centres</u></b>, as suggested.</p>
TfL	Table 2 - ' <i>What is the main access point/s to the site? Is the access safe and</i>	Needs to be refocused and expanded beyond highways to take account of all transport considerations when assessing the availability of sites. We recommend that it considers access to the site by all modes of transport including walking, wheeling, cycling, bus and rail in addition to access by car. In addition to highway	Noted, include 'Transport <b><u>and active travel</u></b> ' to table under infrastructure



Consultee	Section / Para	Comment	Action
	<i>suitable? Are there any highway constraints?</i>	constraints, the capacity of public transport and active travel networks to support the scale of development should also be considered, as well as any barriers to access such as severance caused by infrastructure. In other words it needs to focus on access by people rather than solely access by vehicles and this should be made explicit in the assessment criterion.	
TfL	Para 3.34	We also recommend that consistent with the advice in NPPF the criteria for access to nearest primary and secondary schools, supermarket/convenience store and GP surgeries should consider actual travel times by different modes of transport, taking into account off road routes and potential barriers caused by infrastructure with the objective of minimising travel times by walking, wheeling, cycling and public transport. Paragraph 3.34 refers to ' <i>Distances to train stations, bus stops and Brentwood Town Centre</i> ' but the wording is unclear and doesn't explain how these are reflected in the assessment criteria.	Distances identified within the ECC evidence regarding walking distances will be used for this assessment. No changes required.
Mrs A Ratcliffe [31081]	All	The so called 'call for sites' should not be the first step. Rather, the strategy should be driven by: where in the Borough is there a housing need; where are the main centres (i.e. that have the necessary infrastructure and services) that can be expanded and/or linked to the decisions made in the last LDP (e.g. Dunton Hills Garden Village); where can larger scale developments be carried out in conjunction with adjoining Authorities (can ASEELA actually deliver a tangible outcome); and other strategic considerations.	Comments are noted, however no changes are required. The purpose of the SLAA is not to create the spatial strategy it is part of technical evidence base for the Local Plan which complements other important sources of information such as public consultation and sustainability appraisal. Together these sources of evidence inform the strategic planning decision making process.
Bloor Homes [31148]	All	As a general comment it is not clear how the scoring will be applied or weighted, as some factors or more important than others. Clarity on this would be helpful	Noted. The RAG assessment is bespoke to each assessment criterion, as tabled in the SLAA methodology.

Consultee	Section / Para	Comment	Action
			<p>The initial survey (Stage 1) is the only part of the assessment where a site can be excluded from further assessment.</p> <p>From Stage 2 of the assessment one Red RAG Assessment does not necessarily rule out the site from further consideration. The RAG Assessment is not intended to rate the sites at this stage or identify preferred sites.</p>
Bloor Homes [31148]	Para 3.34	<p>The criteria included in this paragraph includes the location of a site in terms of its proximity to Brentwood Town Centre. However, it is not clear how this will be applied, and it is over simplistic by failing to recognise that Brentwood is not the only major settlement serving the Borough. For example, Ingatestone is also a settlement with a full range of facilities and services and is the only other settlement with a secondary school apart from Brentwood. It is also in the Local Plan Strategic Transit and Growth Corridor with bus and rail access to higher order services in Chelmsford, Brentwood, Shenfield and far beyond.</p> <p>Consequently, the criteria should be amended or expanded to recognise sites that have proximity to a full range of facilities and services and are accessible by all modes of transport, such as those at Ingatestone and other well connected urban centres. It should not solely refer to distance from Brentwood Town Centre. This will better inform the selection of sites and the development of a sustainable growth strategy</p>	<p>Noted and agreed. This has been amended to read as follows:</p> <p><b><u>This approach has been taken as it is considered more suitable to look at infrastructure and services on a settlement scale, as opposed to individual sites.</u></b></p>
Bloor Homes [31148]	Para 3.34 Physical Constraints Criteria Table Page 15	Coalescence: This criterion is poorly defined and should refer to not extending beyond the existing extent of built development. It should also recognise the opportunity to create extensive green buffers to maintain and enhance the identify of settlements. More clarity is required.	No update considered necessary in relation to coalescence.

Consultee	Section / Para	Comment	Action
Bloor Homes [31148]	Para 3.34 Natural and Historic Environmental Constraints Criteria Table Page 17	<p>Creation of GI: This criterion is fully supported given the focus on the environment first approach in the Plan Review. Some clarity would be welcomed on the additional positive weight that would be applied to sites that offer such strategic opportunities, such as the land submitted west of Ingatestone by WSP for Bloor Homes (potential site for multifunctional GI of about 46ha, see submitted masterplan).</p> <p>Heritage Assets: The assessment should also recognise and take in to account the potential to mitigate any harm due to protecting the setting, deliver landscape restoration or screening. This may reflect the proposals submitted, and the flexibility and extent of land control.</p> <p>Critical Drainage Areas (CDA): The relevance and nature of critical drainage areas has been misunderstood and they are being applied incorrectly in the site assessment process, in effect as a second level flood zone test. These are actually small catchments where there is some increased risk of surface water flooding in specific locations. They are looked at by the LLFA for potential mitigation schemes. They are not flood zones and much of the land in them is not at risk of flooding. The CDAs should not be applied in such a blanket approach.</p> <p>The criteria also fail to recognise that development and land in these areas may have the potential to alleviate existing flooding problems and deliver betterment to existing communities. This supports the environment first approach advocated in the Plan Review.</p> <p>The land submitted west of Ingatestone, by WSP for Bloor Homes has been identified as being in Flood Zone 1 and as also having</p>	<p>Noted. No update considered necessary. From Stage 2 of the assessment one Red RAG Assessment does not necessarily rule out the site from further consideration. The RAG Assessment is not intended to rate the sites at this stage or identify preferred sites.</p> <p>The SLAA represents a starting point for the consideration of sites with the potential for allocation in the new Local Plan. It is a proportionate study that considers a wide range of sites for a variety of uses in different locations across Brentwood Borough.</p>

Consultee	Section / Para	Comment	Action
		<p>potential to deliver a water management strategy that reduces existing flood risk on the A12 and Ingatestone. This existing risk and the potential to mitigate on land west of Ingatestone, is already identified as an opportunity in the Surface Water Management Plan 2015 (SWMP). This opportunity has been factored into the 'Call for Sites' submission masterplan for land west of Ingatestone. With the initial drainage strategy designed to show how it could help with existing flood issues as well as the management run off from the proposed development. It would therefore support and help deliver the mitigation in the SWMP.</p> <p>The current criteria should therefore be deleted and replaced with an alternative that recognises the improvements that a development on land west of Ingatestone can deliver. Sites where built development is in Zone 1 and they can help deliver key aspects of the SWMP should be supported and afforded a 'Green' scoring.</p> <p>Biodiversity Net Gain (BNG): It is considered that the significance of opportunities for increased Biodiversity Net Gain should be more strongly recognised in the Assessment Criteria to support the environment first approach. Such a criterion more formally recognises the importance of securing Biodiversity Net Gain in the Borough.</p> <p>Somes sites offer the opportunity for enhancements of Biodiversity, both in terms of the ability of a site to provide a significant uplift on current values and opportunities for providing opportunities for biodiversity offsetting for sites elsewhere in the Borough where it is not possible or appropriate to have sufficient on-site biodiversity net gain. This should be recognised.</p>	

Consultee	Section / Para	Comment	Action
		<p>Sites which can demonstrate that they will be able to provide future biodiversity net gain and potentially offsetting for other sites in the Borough should be given a green rating. The RAG ratings for this criterion should be:</p> <ul style="list-style-type: none"> <li>• Green: Site is likely meet or exceed a 10% BNG requirement on site.</li> <li>• Amber: Unknown or possible with offsite provision or contributions.</li> <li>• Red: Unlikely to deliver the required 10% net gain.</li> </ul>	
Bloor Homes [31148]	Para 3.34 Access to Key Services – Page 19/20	<p>Some sites are large enough to include key services on the site which would provide new facilities for residents. As a result, the Proximity to Key Services assessment criteria should include an additional criterion related to onsite new provision as a positive (green) assessment. This would recognise the inherent sustainability of larger walkable new communities, especially where they are well related to larger settlements within the Strategic Transit and Growth Corridors, such as land west of Ingatestone.</p> <p>There should also be a new assessment for sites where they have the capacity, and the developer/landowner has indicated the intention, to deliver new services for example a new school or GP services which would also benefit existing residents. This should be an additional positive (green) assessment criterion weighing in favour of a proposed development.</p>	<p>No update considered necessary.</p> <p>A number of evidence base documents (including the SLAA, Sustainability Appraisal, Infrastructure Delivery Plan and others) will be used alongside engagement and consultation to develop a spatial strategy and preferred site allocations. There will be the opportunity for further engagement as part of the Local Plan process.</p>
Bloor Homes [31148]	Para 3.35 Section 2 Availability - Working in	<p>The criterion assessing working in partnership should be modified as follows:</p> <p>Green – should be assigned only to sites that require no joint working or agreement.</p>	<p>Comment is noted. No change is considered necessary.</p>

Consultee	Section / Para	Comment	Action
	Partnership – Page 21/22	<p>Amber – should be assigned to sites that are not known or the promoter has indicated that they are willing to work jointly. Red – should assigned to sites where the owner is not open to joint working.</p> <p>Affording a willingness to work jointly a ‘green’ scoring fails to sufficiently distinguish sites that are in single control and require no collaboration. All promoters are likely to answer yes to this question at this stage and therefore this criterion is ineffective. In practice such arrangements can be incredibly complex and therefore deliverability, and single control, should be a major determinant of site selection and inclusion in the new Plan.</p>	
CODE Development Planners [31182]	All	Following our review of the draft SLAA Methodology we largely agree with the criteria for how the 'red, amber, green' (RAG) score is assessed, CODE is in agreement with the draft criterion found under section 3: Achievability (including viability). With the exception of the criteria for sites within a critical drainage area, we also accept all of the proposed criteria in the natural and historic environmental constraints section. As stated in the proposed methodology, paragraph 69 (previously paragraph 68) of the National Planning Policy Framework (NPPF) requires that “policy-making authorities should have a clear understanding of the land available in their area...”	Comment is noted. No change required.
CODE Development Planners [31182]	Para 3.34 Physical Constraints	<p>“Is the site within or adjacent to the existing settlement boundary?”</p> <p>For the criterion, BBC should amend this criterion to insert the following underscored text, "Green – within an existing settlement boundary or where the site is bounded on at least two sides by existing settlement boundary." This would allow the methodology to account for sites which may not technically be</p>	Comment is noted. The Amber category accounts for sites adjacent to or within close proximity to an existing settlement boundary. No change required.

Consultee	Section / Para	Comment	Action
		within the settlement boundary, but which could form a logical and sustainable extension to it.	
CODE Development Planners [31182]	Para 3.34 Physical Constraints	<p>“Is the site brownfield or greenfield?”</p> <p>For the question, BBC should amend this criterion to insert the following underscored text, "Amber - part brownfield, part greenfield or greenfield sites that are bounded on at least two sides by an existing settlement boundary.” This reflects that greenfield sites which are logical extensions to the settlement can be as and sometimes more sustainable than sites which are part brownfield and part greenfield but divorced from a settlement boundary. Greenfield sites that are bounded on a least two sites by an existing settlement boundary should not be considered in the same category as other greenfield sites.</p>	This approach is reflective of the NPPF’s preference for utilising previously developed land, over greenfield land. No change is considered necessary.
CODE Development Planners [31182]	Para 3.34 Physical Constraints	<p>“What is the agricultural Land Classification?”</p> <p>The assessed sites receive a green score only if 50% or more of the site is grade 4-5 this should be amended to insert the following underscored text, "Green - Grades 4-5 (50% or more) or Grades 3a or 3b where the area of the site available for food production is less than 20 hectares." The magnitude of loss of agricultural land is low where less than 20 hectares of best and most versatile agricultural land would be lost. The provisions set out within schedule 4 of Statutory Instrument 595, of the Town and Country Planning (Development Management Procedure) (England) Order 2015 state that Natural England should only be consulted in circumstances that involve the loss of 20 hectares or more of best and most versatile agricultural land.</p>	Comment is noted. No change is considered necessary.

Consultee	Section / Para	Comment	Action
CODE Development Planners [31182]		Impact on neighbouring uses. The criterion should be amended to insert the following underscored text, "Amber – There is a possibility development would result in some neighbouring use issues. Green – there are no neighbouring use issues, or it has been demonstrated that any neighbouring use issues could be mitigated to an acceptable standard."	Comment is noted. No change is considered necessary. The overall strategy and site allocations for the Brentwood Local Plan Review will be informed by a range of evidence base documents and engagement
CODE Development Planners [31182]	Para 3.34 Physical Constraints	“Is the site located within a critical drainage area?” BBC should seek to amend the criteria for sites within a critical drainage area by inserting the following underscored text, "Amber – site is partially within or adjacent to a Critical Drainage Area (CDA) or the site is entirely within the CDA but there is opportunity for development to provide a net betterment to the conditions of the CDA." This would likely allow more sustainable sites to receive an improved score, provided there is real opportunity for the site to improve drainage conditions on site and/or further downstream from the site.	Comment is noted. No change is considered necessary. The overall strategy and site allocations for the Brentwood Local Plan Review will be informed by a range of evidence base documents and engagement, this will include a Strategic Flood Risk Assessment.
CODE Development Planners [31182]	Para 3.34 Access to Key Services	Distance to the nearest primary school. The proposed methodology will require sites to be within 400m of a primary school to receive a green ‘RAG’ score. BBC should amend this criterion to insert the following underscored and strikethrough text, "Red – site is in excess of 801m 1.5 km of a primary school. Amber – site is within 401m and 800m 801m and 1.5km of a primary school. Green – site is within 400m 800m of a primary school." This would allow the methodology to remain consistent with the previous methodology used in the 2019 Sustainability Appraisal. The methodology for the 2019 Sustainability Appraisal required a site to be between 800m and 1500m to receive an 'amber' rating, this is evidenced by the Transport Analysis Guidance (TAG) Unit A4.2. The latest edition	Comment is noted. No change is considered necessary.



Consultee	Section / Para	Comment	Action
		which was published in May 2023 by the Department for Transport. Therefore, we believe the SLAA Methodology should remain consistent with what was previously published.	
CODE Development Planners [31182]	Para 3.35 Section 2: Availability	<p>“Is the landowner open to working in partnership and bringing the site forward in combination with others to enable a comprehensive approach to development?”</p> <p>Due to the nature of collaboration agreements and 'equalisation' in such agreements, sites in multiple ownership are not straightforward to deliver. Therefore, the criterion on the "Draft SLAA Methodology" consultation should be amended to reflect this. The criterion should be amended as per the following underscored and strikethrough text, "Amber – Not known or the landowner is willing to work in partnership to bring the site forward in combination with others and this is evidence through a signed collaboration agreement between the landowning/controlling parties. Green – site is in single ownership. Yes, the landowner is willing to work in partnership to bring the site forward in combination with others.</p>	Comment is noted. No change is considered necessary.
CODE Development Planners [31182]	Para 3.35 Section 2: Availability	<p>“Does the site have a history of unimplemented permissions?”</p> <p>The criterion that asks, “Does the site have a history of unimplemented permissions?” We recommend that BBC amends this criterion to insert the following underscored text, "Does the site have a history of unimplemented planning permissions?"</p>	Noted and agreed. Insertion of the word <b>planning</b> made.
Marrons [31190]	Natural and Historic Environmental Constraint 7 – “Is the site	Different sites will present different challenges in regards to flood risk and drainage. Hallam Land Management disagree with this assessment criterion as Critical Drainage Areas are not geographically-specific enough for a site-by-site assessment to determine the achievability of residential development.	<p>Comment noted. No change is considered necessary.</p> <p>From Stage 2 of the assessment one Red RAG Assessment does not necessarily rule out the</p>

Consultee	Section / Para	Comment	Action
	within a Critical Drainage Area”	<p>Flood risk can be determined more accurately from surveys conducted on site, with drainage strategies, including sustainable drainage systems, allowing for development on sites within a Critical Drainage Area, with areas of increased flood risk being designed out of part of development proposals.</p> <p>Suggested Change Allow for sites to be assessed based on their flood risk, drainage capabilities and ability to effectively mitigate flooding and drainage through attenuation.</p>	<p>site from further consideration. The RAG Assessment is not intended to rate the sites at this stage or identify preferred sites.</p> <p>The overall strategy and site allocations for the Brentwood Local Plan Review will be informed by a range of evidence base documents and engagement, this will include a Strategic Flood Risk Assessment.</p>
Marrons [31190]	Para3.39	Hallam Land Management are supportive of the principles outlined in the Paragraph 3.39. Sustainable connections, good access, current use and environmental constraints are adequate planning principles to assess a Site. However, there does need to be transparency as to how these principles will be assessed by the Council.	Comment noted. No change required. The SLAA assessments will be made publicly available via the Council’s website and/or Consultation Portal.