

# **Sustainability Appraisal (SA) of the Brentwood Local Plan**

**Interim SA Report  
Non-technical Summary**

REVISION SCHEDULE					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	February 2016	Non-technical Summary of the Interim SA Report published alongside the 'Draft Plan' consultation document	Mark Fessey Principal Consultant	Steve Smith Technical Director	Steve Smith Technical Director

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## INTRODUCTION

AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Brentwood Local Plan. Once adopted, the plan will establish a spatial strategy for growth and change over the next 15 years, allocate sites and establish the policies against which planning applications will be determined.

SA is a mechanism for considering and communicating the likely effects of an emerging plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives. SA for Local Plans is a legal requirement, in-line with the EU Strategic Environmental Assessment (SEA) Directive.

At the current time, an 'Draft Plan' is published for consultation, and an 'Interim SA Report' is published alongside. The Interim SA Report aims to inform consultation responses, and subsequent plan-making work (i.e. preparation of the 'Proposed Submission Plan' - see the discussion of 'next steps' below).

This is a Non-technical Summary (NTS) of the Interim SA Report.

### Structure of the Interim SA Report / this NTS

SA reporting essentially involves answering the following questions in turn:

1. What has plan-making / SA involved up to this point?
  - i.e. in the run-up to preparing the Draft Plan consultation document.
2. What are the appraisal findings at this current stage?
  - i.e. in relation to the Draft Plan.
3. What are the next steps?

Each of these questions is answered in turn below. Firstly though there is a need to set the scene further by answering the question 'What's the scope of the SA?'

### What's the scope of the SA?

The scope of the SA is essentially reflected in a list of sustainability objectives, grouped under 12 topic headings. Taken together, these topics and objectives indicate the parameters of SA, and provide a methodological 'framework' for appraisal.

#### *Sustainability topics and objectives (i.e. 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 natural assets need to be protected from the impacts of development.</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 carbon 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.</li> <li>• An opportunity exists to obtain a greater proportion of energy from renewable sources.</li> <li>• There is the need for businesses in the Borough to contribute to the creation of a low-carbon economy, including reduced levels of energy use in buildings and from transport.</li> </ul>

Topic	Objectives
Community and well-being	<ul style="list-style-type: none"> <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>• There is a need to reduce health inequalities.</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>• 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.</li> <li>• There is a need to improve educational performance in certain areas of the Borough.</li> <li>• As the number of young people grows there will be a need to ensure that there is sufficient provision of education facilities across the Borough.</li> <li>• There is a need for better 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>
Cultural 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>
Economy and employment	<ul style="list-style-type: none"> <li>• There is a need to protect and support the Borough's smaller centres and parades.</li> <li>• The competitiveness of key employment areas such as Brentwood Town Centre (including the area around Brentwood station) must be supported.</li> <li>• Support investment that leads to high value, knowledge-based employment activities.</li> <li>• There is a need to consider future opportunities and consequences associated with the Shenfield and Brentwood Crossrail link.</li> <li>• There is a need to support a thriving town centre focused in and around Brentwood High Street through a good balance of shopping (comparison and convenience retail) and other uses – services, employment and residential.</li> </ul>
Flooding	<ul style="list-style-type: none"> <li>• Reduce the risk of flooding, including the increased risk that climate change may pose.</li> <li>• 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.</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; hence there is a need to increase delivery.</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 and disabled) and ensure that people are able to remain in the Borough as their 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>
Soil and contamination	<ul style="list-style-type: none"> <li>• There is a need to make best use of brownfield land and protect the Borough's resource of highly 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>• Encourage adoption of sustainable construction practices, including handling waste arisings, recycling, and disposal as part of a life cycle approach to resource use.</li> </ul>
Water quality and water resources	<ul style="list-style-type: none"> <li>• Water quality is a concern, with a need to improve the ecological status of waterways.</li> <li>• Given the Borough's position in an area of serious water stress, water efficiency measures should be sought.</li> </ul>

## WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?

An important element of the required SA process involves appraising 'reasonable alternatives' in time to inform development of the draft plan, and then presenting information on reasonable alternatives within the report published alongside the draft plan.

As such, Part 1 of the Interim SA Report explains how work was undertaken to develop and appraise alternative approaches to housing growth ('alternative spatial strategies'). Specifically, Part 1 of the report -

- 1) Explains the process of establishing reasonable alternatives;
- 2) Presents the appraisal of the reasonable alternatives; and
- 3) Gives the Council's response to the alternatives appraisal findings.

There is no need to dwell on (1) within this NTS, but it is helpful to present summary appraisal findings (2) and the Council's response (3). This information is presented below.

### Summary alternatives appraisal findings

The alternatives are introduced below, in graphical form, and then the subsequent table presents summary appraisal findings.

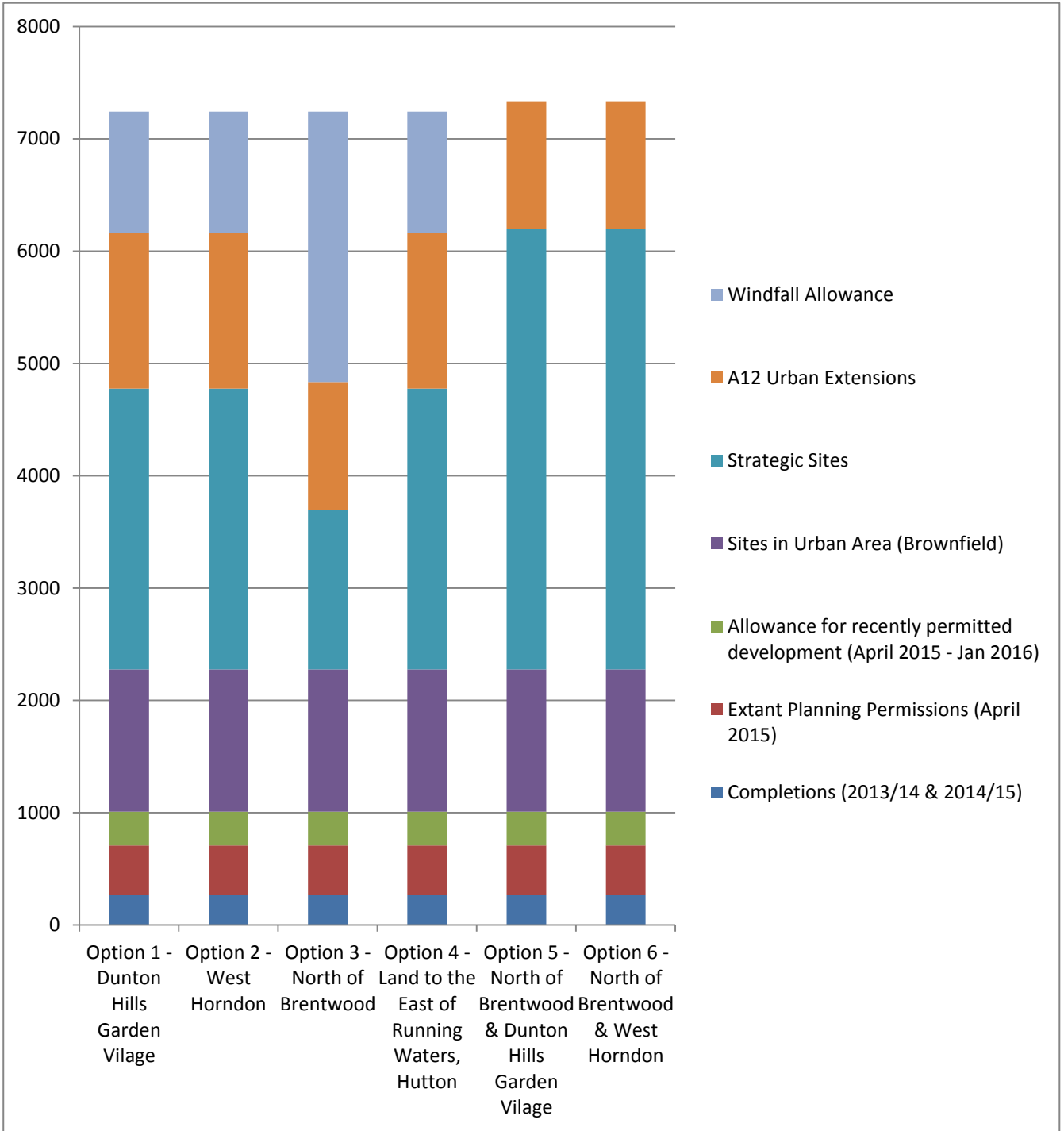
In seeking to understand the alternatives, the key point to note is that there are several constants (see the bottom four/five segments of each bar) and two main variables:

- Variable 1 is the approach to strategic allocations. Options 1, 2, 3 & 4 each involve a different strategic allocation, whilst Options 5 & 6 involve two strategic allocations.
- Variable 2 is the reliance that is placed on delivery of windfall sites. Option 3 involves a large reliance on windfalls because of the low growth directed to a strategic allocation, whilst Options 5 & 6 necessitate a small reliance on windfalls because of the high growth directed to strategic allocations.

In seeking to understand the appraisal table, note that:

Within each row of the table - i.e. for each sustainable topic - the alternatives are ranked in order of preference (1 being best) and efforts are also made to categorise performance in terms of 'significant effects' (using **red** and **green** shading). Also, '=' is used to denote instances where the alternatives perform on a par (i.e. it not possible to differentiate between them).

*The reasonable alternatives*



Summary spatial strategy alternatives appraisal findings

Topic	Option 1 Dunton Hills Garden Village	Option 2 West Horndon	Option 3 North of Brentwood	Option 4 Land to the East of Running Waters, Hutton	Option 5 North of Brentwood & Dunton Garden Village	Option 6 North of Brentwood & West Horndon
Air quality	2	★1	5	6	4	3
Biodiversity	5	5	★1	★1	3	3
Climate change mitigation	4	3	5	5	2	★1
Community and well-being	3	4	5	5	★1	2
Cultural heritage	★1	5	★1	6	★1	4
Economy and employment	3	3	5	6	★1	★1
Flooding	=					
Housing	3	3	6	3	★1	★1
Landscape	4	★1	★1	5	4	★1
Soil and contamination	4	4	★1	4	2	2
Water quality / resources	=					

The primary **conclusion** to draw from the table is that, in terms of the majority of objectives, a strategic allocation at one or either of the A127 locations (West Horndon or Dunton Hills Garden Village) is to be supported. ‘Biodiversity’ objectives are a notable exception, although the appraisal is fairly marginal, i.e. it is not clear that there are major constraints to growth south of the A127.

With regards to other notable topics/objectives -

- Air quality - a (relatively) clear conclusion is reached that a focus of growth along the A127 corridor performs well, with options focusing growth instead along the A12 corridor / around the Brentwood Urban Area (and relying on windfall development) predicted to result in significant negative effects.
- Communities and wellbeing - there are notable opportunities associated with concentrating growth along the A127 corridor, although a North Brentwood scheme could also have some merit.
- Cultural heritage - appraisal findings reflect a view that West Horndon is constrained; however, in practice there may be the potential to avoid/mitigate effects.
- Economy and employment - particularly strong conclusions are reached, with the need to deliver new employment land along transport corridors being the primary consideration.
- Housing - Options 5 and 6 perform particularly well as planning for a level of growth slightly above the objectively assessed housing need (OAN) figure would provide some useful contingency / ‘headroom’.
- Landscape - appraisal findings reflect a view that a Dunton Hills Garden Village scheme would be significantly constrained; however, there is a need for much further work to investigate issues.

### The Council's response / justification for the preferred approach

Following consideration of representations made in response to the Strategic Growth Options consultation it was evident that splitting the Borough into three areas did not sufficiently consider rural areas in the south of the Borough. The North of the Borough as set out in the Growth Options document is made up of villages set amongst rural surroundings. In the same way, the south of the Borough contains villages surrounded by countryside.

For the purpose of the Draft Plan and Local Development Plan going forward the Borough will be split into four areas. This is consistent with the emerging spatial strategy regarding the Borough's character and clearly defines the two transport corridors as separate areas.

Ultimately the spatial strategy aims to achieve the right balance between the retention of local character and meeting development needs. The development of the sequential land use for the borough considers that Green Belt land can only be considered after all suitable and available brownfield locations are brought forward first. A sequential list of sites and land types has been proposed to meet development needs for new homes and jobs - see the flow **diagram** below (which is taken from the plan consultation document).

The preferred approach seeks to achieve balance between conserving the Borough's character and delivery of development which meets the needs of all those who live, work and visit. Key considerations are land availability, development needs, scale of growth proposed, the existing settlement pattern and hierarchy and capacity of places to accommodate growth in a sustainable manner. The Council has carefully considered evidence on all these matters from a variety of sources before reaching a view on the proposed spatial approach. Areas within the Borough's two key transport corridors create the focus for sustainable growth. This is achieved by considering suitable sites and land types sequentially.

Within the A12 Corridor, Brentwood and Shenfield are considered sustainable locations for growth, given excellent transport links, access to jobs and services and town centre facilities.

Developing in the wider Brentwood Urban Area supports redevelopment, underpinning the viability of the town centre, and provides opportunities for development where access to services and jobs is greatest. Ingatestone will help to support growth in sustainable locations although capacity constraints and land availability limit development potential. Mountnessing village will be retained as existing with recently permitted development nearby to the village making a significant contribution to the Borough's needs.

Within the A127 Corridor, a new strategic allocation at Dunton Hills Garden Village will provide a new mixed use self-sustaining community in the south-east of the Borough. A strategic allocation at M25 junction 29 (Brentwood Enterprise Park) will provide for the majority of new employment land needed, bringing forward a modern business park village in the south-west of the Borough with excellent access to the M25. This will also act as a focus for a M25/A127 employment cluster considering existing employment uses in the area.

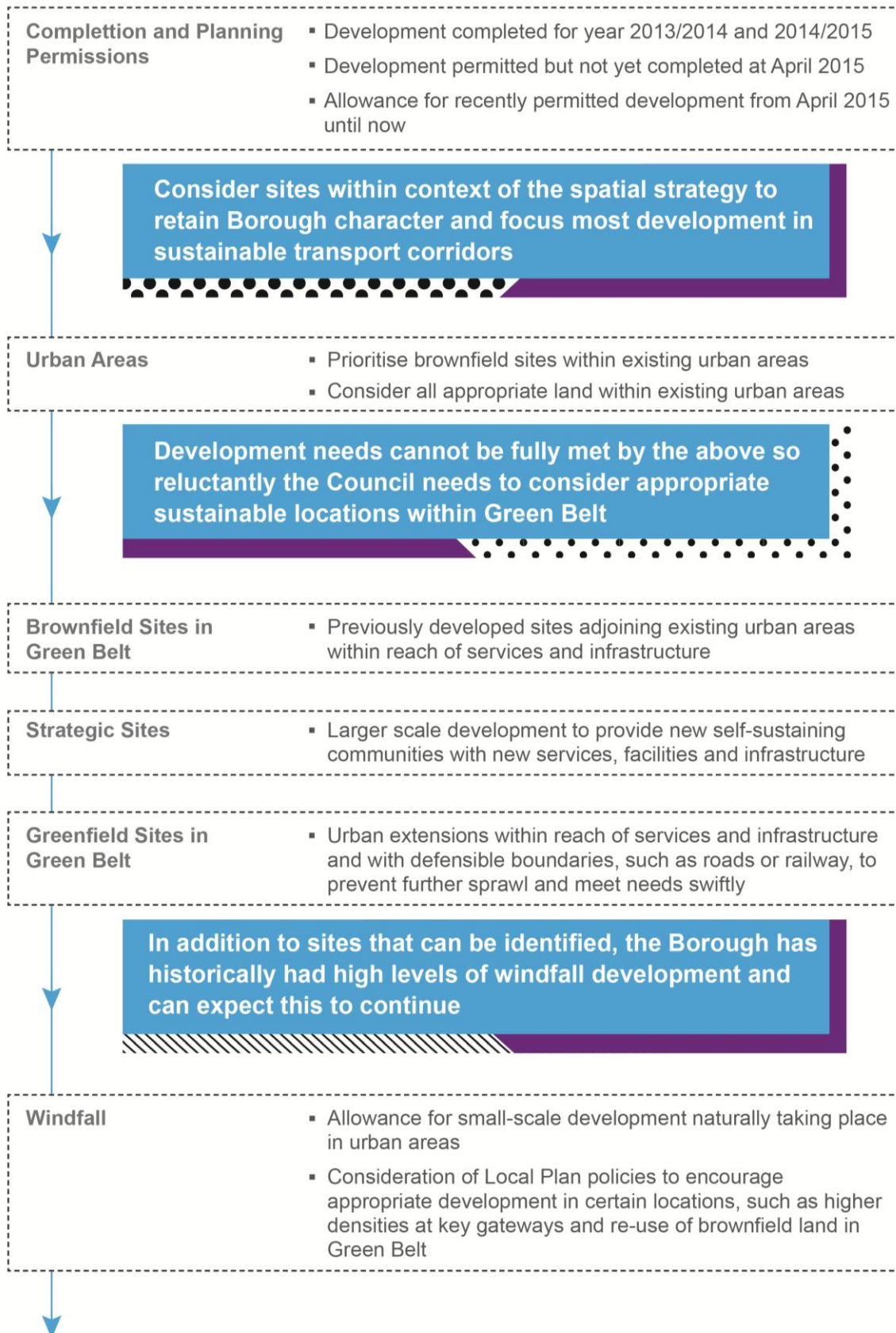
Brownfield opportunities will be taken to effectively meet local needs, such as a residential-led mixed use redevelopment of existing industrial land in West Horndon. Growth in the Rural North and Rural South areas of the Borough will be limited to retain local character, although brownfield opportunities will be encouraged where appropriate schemes help meet local needs. Where appropriate this includes the redevelopment of previously developed sites in Green Belt and infill while improving links to nearby villages. A windfall allowance for small scale development is being considered further.

The process of the assessment of sites that are: suitable, available and deliverable for development within the Borough is on-going. The development of the Borough's preferred approach has been informed by the SA, and in particular the consideration of alternatives. This has raised a range of important issues that need to be considered when deciding on the best spatial strategy, and the balance between the two transport corridors in particular. The balance that has been struck by the Council is considered appropriate, recognising that the Council's priority is to deliver objectively assessed need whilst maintaining distinctive local character, but the Council remains open to considering matters further.

Brentwood Borough Council acknowledges the complexity and challenges raised by the Sustainability Appraisal, and anticipates further investigation of these matters including through the on-going commissioning and publication of evidence. The Draft Local Plan consultation will enable further comments on the development of the Plan and the identified sites, which will be used to inform the next iteration of the Plan.



*The sequential approach to site selection*



## WHAT ARE THE APPRAISAL FINDINGS AT THIS CURRENT STAGE?

Part 2 of the Interim SA Report answers the question – *What are appraisal findings at this stage?* – by presenting an appraisal of the Draft Plan.

Summary appraisal statements - under each of the SA framework topic headings - are presented below.

### Air quality

The spatial strategy performs well, given a focus of housing and employment growth along the A127 corridor, i.e. away from the designated Air Quality Management Areas (AQMAs). A degree of growth directed towards the A12 / around the main urban area gives some cause for concern, although it is noted that the largest allocation (Officer's Meadow, Shenfield) is well located, i.e. should enable good potential for 'modal shift' away from the private car. Other policies also perform well, although there is the potential to establish more detailed policies to guide development schemes, with a view to ensuring that 'sustainable transport' opportunities are fully realised. Overall, **no significant effects** are predicted.

### Biodiversity

The spatial strategy generally directs growth away from the most sensitive areas, including the extensive Thorndon Park 'Living Landscape' to the south of Brentwood. Growth to the south of the A127 is unlikely to impact directly on important habitat patches within this landscape, although recreational pressure is another consideration. A Dunton Hills Garden Village scheme will need to address some notable on-site constraints, and also ensure that Green Infrastructure opportunities are fully realised. Finally, it is noted that some question marks do remain regarding the impact of the A12 urban extension allocations on existing 'green wedges' that extend into the urban area. Proposed development management policy will help to ensure that negative effects are avoided/mitigated, and opportunities realised; however, there may be the potential to 'go further' (i.e. generate the evidence to inform detailed policy). Overall, **no significant effects** are predicted.

### Climate change mitigation

The draft plan performs fairly well in terms of minimising per capita greenhouse gas emissions from both transport and the built environment. Importantly, the plan is to concentrate growth to a significant extent (i.e. support larger development schemes), which leads to certain opportunities in terms of minimising emissions from the built environment; and direct growth to locations where there are opportunities to support use of public transport and walking/cycling. Overall, **no significant effects** are predicted.

### Community and well-being

The spatial strategy performs well, although much work remains to be completed (working with partner organisations including Essex County Council, NHS England and Basildon and Brentwood Clinical Commissioning Group) to ensure adequate access to community infrastructure for new and existing residents. It is expected that further work will lead to the refinement of development management policy. **No significant effects** are predicted.

### Cultural heritage

The spatial strategy generally directs growth away from the most sensitive areas/assets, and where there is the potential for impacts to the setting of assets there will be good potential to avoid/mitigate impacts through careful siting, masterplanning and landscaping/design. **No significant effects** are predicted.

### Economy and employment

The spatial strategy includes a focus on maximising opportunities along the A127 corridor, which has the potential to become an employment cluster of regional significance, and on this basis **significant positive effects** are predicted. However, it is recognised that there is some uncertainty given the need for more work to consider transport capacity/impacts. With regards to the A12 corridor, the preferred strategy reflects a balance of evidence that points to road capacity constraints (at least in the short to medium term) and Crossrail related opportunities that, whilst significant, are not 'game changing'. It will be important to ensure that the Council continues to monitor Crossrail related interest from business.

N.B. Another consideration is that there could be additional issues (potentially both opportunities and constraints) for the A127 corridor should it transpire that Highways England favours the 'northern route' option for a road linking a new Lower Thames Crossing to the M25. However, at the current time this option is not preferred, and so this matter has not factored into the appraisal.

### Flooding

The spatial strategy generally avoids areas of flood risk, although flood risk is a constraint to growth at Dunton Hills Garden Village. **No significant effects** are predicted, given that there will be good potential to address flood risk through careful siting, masterplanning and (if necessary) design. This will include the adoption of Sustainable Drainage Systems (SuDS), although it is noted that the Dunton area is potentially not ideal for delivering effective SuDS.

### Housing

The plan performs well on the basis that objectively assessed housing needs are set to be met. There should be good potential to deliver a range of types and tenures of housing at larger sites, and it is also noted that a strategy is in place for meeting the needs of Gypsies and Travellers. **Significant positive effects** are predicted.

### Landscape

Brentwood Borough is heavily constrained from a landscape perspective, and in this context it is likely that the preferred strategy goes as far as it can to minimise impacts. It is noted that the preferred strategy has evolved over time in response to concerns (in particular in relation to growth at West Horndon) 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. However, at the current time it remains appropriate to 'flag' the potential for **significant negative effects** given the uncertainty that remains regarding Dunton Hills Garden Village.

### Soil and contamination

The plan seeks to make best use of brownfield sites, recognising that not all available brownfield sites are deliverable or suitable for allocation. The agricultural land set to be lost is Grade 3, i.e. of relatively low quality in the national context, and hence **no significant effects** are predicted.

### Waste

Development management has some, albeit limited, potential to support good waste management practices. Recommendations are made for strengthening the policy approach. **No significant effects** are predicted.

### Water quality and water resources

Few strategic issues/considerations emerge from a review of the available evidence-base, but the proposed spatial strategy performs well in terms of those that are known of (specifically the matter of restricted waste water capacity in the Rural North area). Development management policy should be put in place to ensure that water quality and water resource considerations are taken fully into account at the planning application stage, recognising that the East of England is a water stressed region and that good development viability in Brentwood should mean that it is sometimes possible to achieve standards over and above national requirements. **No significant effects** are predicted.

### Conclusions at this current stage

The appraisal finds that the draft plan is set to result in significant positive effects in terms of 'housing' and 'economy/employment' objectives, but significant negative effects in terms of 'landscape' objectives. This trade-off between socio-economic and environmental objectives may be to some extent inevitable (given that national policy dictates that local authorities meet objectively assessed needs); however, there is good potential to add further policy in order to reduce tensions. Plan-making work to date has already managed to address a number of tensions (including in respect of landscape, to some extent).

Also, there may be potential to 'go further' through policy in order to enhance the predicted positive effects of the plan - e.g. through ensuring that policy is in place to maximise opportunities ('economy', 'communities', 'green infrastructure' etc) along the A127 corridor. Similarly, the policy approach to growth along the A12 corridor will require further careful consideration, in order to ensure that the best balance is struck between planning in line with known constraints and known opportunities.

A number of policy specific recommendations are made; however, these are not repeated here (within the Non-technical Summary) for brevity. Recommendations will be taken into account by the Council when finalising the proposed submission plan for publication.

## WHAT ARE THE NEXT STEPS?

### Plan finalisation

Subsequent to the current consultation it is the intention to prepare the Proposed Submission version of the plan for publication in-line with Regulation 19 of the Local Planning Regulations 2012. This version will be that which the Council believes is 'sound' and intends to submit for Examination. Preparation of the Proposed Submission Plan will be informed by the findings of the Interim SA Report, responses to the current consultation and potentially further appraisal work (potentially to include further appraisal of alternatives and/or site options).

The SA Report will be published alongside the Proposed Submission Plan. It will answer the same three questions answered within the Interim SA Report at the current time, and in doing so will present certain legally required information.

Once the period for public representations on the proposed submission plan / SA Report has finished, the main issues raised will be identified and summarised by the Council, who will then consider whether the plan can still be deemed 'sound'. If this is the case, the Plan will be submitted for Examination, alongside a statement setting out the main issues raised during the publication period. The Council will also submit the SA Report.

At Examination the Inspector will consider representations (alongside the SA Report) before then either reporting back on the Plan's soundness or identifying the need for modifications. If the Inspector identifies the need for modifications to the Plan these will be prepared and then subjected to consultation (with an SA Report Addendum published alongside).

Once found to be 'sound' the Plan will be formally adopted by the Council. At the time of Adoption a 'Statement' must be published that sets out (amongst other things) 'the measures decided concerning monitoring'.

### Monitoring

The SA Report must present 'measures envisaged concerning monitoring'. At the current, initial ideas regarding monitoring (only) have been formulated. Specifically, in-light of the appraisal of the draft plan presented above, it is suggested that there might be a focus of monitoring effort on -

- The distribution of windfall development
- Traffic congestion at key junctions
- The effectiveness of landscaping / landscape mitigation measures.
- Access to services/facilities, retail and employment for residents of new communities
- Biodiversity enhancement measures implemented as part of Green Infrastructure strategy
- The number and nature of businesses with an interest in locating within the urban area or at the new dedicated employment sites.