

# Sustainability Appraisal (SA) of the Brentwood Local Plan

SA Report

October 2019

REVISION SCHEDULE					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	October 2018	SA Report presented to Extraordinary Council	Mark Fessey Associate	Steve Smith Technical Director	Steve Smith Technical Director
2	January 2019	SA Report published alongside the Pre-submission Plan	Chris McNulty, Senior consultant		
3	October 2019	Partial update to the SA Report published alongside an “Addendum of Focussed Changes to the Pre-Submission Local Plan (Regulation 19)”			

**Limitations**

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**A note on this partial update**

This partial update to the SA Report is made available as part of the consultation on “Focused Changes”.

The only updates made within this report, relative to the SA Report as previously published in January 2019, are within **Section 9** of the report, which presents an appraisal of the Pre-submission Plan.

Specifically, at the end of each of the thematic sub-sections within Section 9 a new discussion is added under the heading “Implications of the Focussed Changes”, which gives consideration to:

- the Focussed Changes, which are relatively narrow in scope, involving a decrease in the number of homes assigned to four allocated sites<sup>1</sup> and a consequential 70 homes increase in the number of homes assigned to Site R01 Dunton Hills Garden Village Strategic Allocation; and
- updates to the evidence-base since January 2019, including the new higher Local Housing Need (LHN) figure for Brentwood Borough, which is 454 dwellings per annum (dpa).

The decision was taken to leave other Parts/Sections of the report unchanged,<sup>2</sup> including Part 1, which importantly explains the process of exploring ‘reasonable alternatives’.

Latest understanding – including in respect of housing capacity at the five sites that are a focus of Focussed Changes, and also in respect of LHN – did not lead to a need to reconsider the reasonable alternatives.

<sup>1</sup> 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);  
<sup>2</sup> The opportunity was also taken to correct a small number of typographical errors, and also to change references to ‘the Proposed Submission Plan’ to ‘the Pre-submission Plan’, with a view to ensuring consistent terminology.

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## INTRODUCTION

## 1 INTRODUCTION

### 1.1 Background

1.1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Brentwood Local Plan.

1.1.2 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. **Figure 1.1** shows the plan area.

1.1.3 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 of Local Plans is a legal requirement.<sup>1</sup>

### 1.2 SA explained

1.2.1 It is a requirement that SA is undertaken in-line with the procedures prescribed by the Environmental Assessment of Plans and Programmes Regulations 2004, which were prepared in order to transpose into national law the EU Strategic Environmental Assessment (SEA) Directive.<sup>2</sup>

1.2.2 In-line with the Regulations, a report (known as **the SA Report**) must be published for consultation alongside the draft plan that essentially 'identifies, describes and evaluates' the likely significant effects of implementing 'the plan, and reasonable alternatives'.<sup>3</sup> The report must then be taken into account, alongside consultation responses, when finalising the plan.

1.2.3 More specifically, the SA Report must answer the following **three questions**:

1. What has Plan-making / SA involved **up to this point**?
  - including with regards to the consideration of 'reasonable alternatives'.
2. What are the SA findings **at this stage**?
  - i.e. in relation to the draft plan.
3. What happens **next**?
  - including in respect of monitoring.

### 1.3 This SA Report

1.3.1 This report is the Brentwood Local Plan SA Report. It is published alongside the final draft ('proposed submission') plan in-line with Regulation 19 of the Local Planning Regulations.

1.3.2 Questions 1 - 3 are answered in turn, in order to provide the required information.<sup>4</sup> Before answering Question 1, two initial questions are answered in order to further set the scene:

- i) What is the plan trying to achieve?
- ii) What is the scope of the SA?

<sup>1</sup> Since provision was made through the Planning and Compulsory Purchase Act 2004 it has been understood that local planning authorities must carry out a process of Sustainability Appraisal alongside plan-making. The centrality of SA to Local Plan-making is emphasised in the National Planning Policy Framework (NPPF, 2018). The Town and Country Planning (Local Planning) (England) Regulations 2012 require that an SA Report is published for consultation alongside the 'Proposed Submission' plan document

<sup>2</sup> *Procedurally* SA and SEA are one and the same, with no legislation or guidance to suggest that SA process should differ from the prescribed SEA process. SA and SEA differ only in terms of *substantive focus*. SA has an equal focus on all three 'pillars' of sustainable development, whilst SEA involves a degree of focus on the environmental pillar. SA therefore 'incorporates' SEA.

<sup>3</sup> Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.

<sup>4</sup> See **Appendix I** for further explanation of the regulatory basis for answering certain questions within the SA Report, and a 'checklist' explaining more precisely the regulatory basis for presenting certain information.



## 2 WHAT IS THE PLAN SEEKING TO ACHIEVE?

2.1.1 The aim of this section is to explain more fully the objectives of the plan, introduce the policy and legislative context, and also present a brief discussion of what the plan is 'not trying to achieve', in order to explain the role of the plan within the wider planning process.

### 2.2 Objectives of the Local Plan

2.2.1 The Local Plan seeks alignment with the Council's Corporate Plan 2016-19, which identifies five overarching priorities: 1) Environment and Housing Management; 2) Community and Health; 3) Economic Development; 4) Planning & Licensing; 5) Transformation. Specifically, the plan is being prepared with a view to achieving the following objectives:

- **Managing Growth Sustainably** - by directing development to the most sustainable locations, ensuring that the characteristics and patterns of our different settlements are protected and enhanced to provide a strong emphasis on 'sense of place' to be enjoyed by people living, working and visiting Brentwood.
- **Deliver a Healthy and Resilient Built Environment** - one where our design creates spaces that encourage social interaction; mitigates, reduces impact or adapts to conditions of a changing climate through smart infrastructure; creates public realm and homes where both the internal and external spaces are conducive to human health.
- **Deliver Sustainable Communities with Diverse Economic & Social-cultural Opportunities for all** - opportunities which flexibly respond to the changing economic climate and employment sector trends making citizens feel economically empowered to enjoy and benefit from the necessary community/social infrastructure that sustains inclusive, informed, vibrant, active and cohesive communities.
- **Deliver Beautiful, Biodiverse, Clean and a Functional Natural Environment** - where our natural heritage is protected and ecosystem services are restored, enhanced and integrated back into the built environment through multi-functional green/blue infrastructure.

### 2.3 Legislative and policy context

2.3.1 The plan is being prepared under the Town and Country (Local Planning) Regulations 2012, and must be in accordance with Government policy as set out in the National Planning Policy Framework (NPPF, 2018) and Planning Policy for Traveller Sites (2015). In particular, the NPPF requires local authorities to take a positive approach to development, with an up-to-date local plan that meets objectively assessed development needs (**OAHN**), otherwise known as local housing needs (**LHN**), as far as is consistent with sustainable development.

N.B. the Council will submit the Brentwood Local Plan post 24<sup>th</sup> January 2019, which is the date that marks the end of the 'transition period' for implementing the new NPPF. As such, it will be examined by the Planning Inspectorate under the **new NPPF (2018)**.

2.3.2 The plan is also being prepared in the context of objectives and policies established by various national and local level organisations, in accordance with the Duty to Cooperate established by the Localism Act 2011, notably: the South East Local Enterprise Partnership (LEP); Essex County Council (ECC; particularly in relation to transport, minerals and education); Greater London Authority (GLA); and the Association of South Essex Local Authorities (ASELA). Figures 2.1 and 2.2 highlight some of the key geographies.

### 2.4 What is the Local Plan *not* seeking to achieve?

2.4.1 The plan will be strategic in nature, and hence naturally omit consideration of some detailed issues in the knowledge that these can be addressed at subsequent stages of the planning process. Specifically, decisions taken on planning applications will provide a forum for establishing and addressing many site-specific issues, meaning that not all issues need be identified and addressed through policy within the Local Plan.

Figure 2.1: Brentwood Borough in the South Essex context

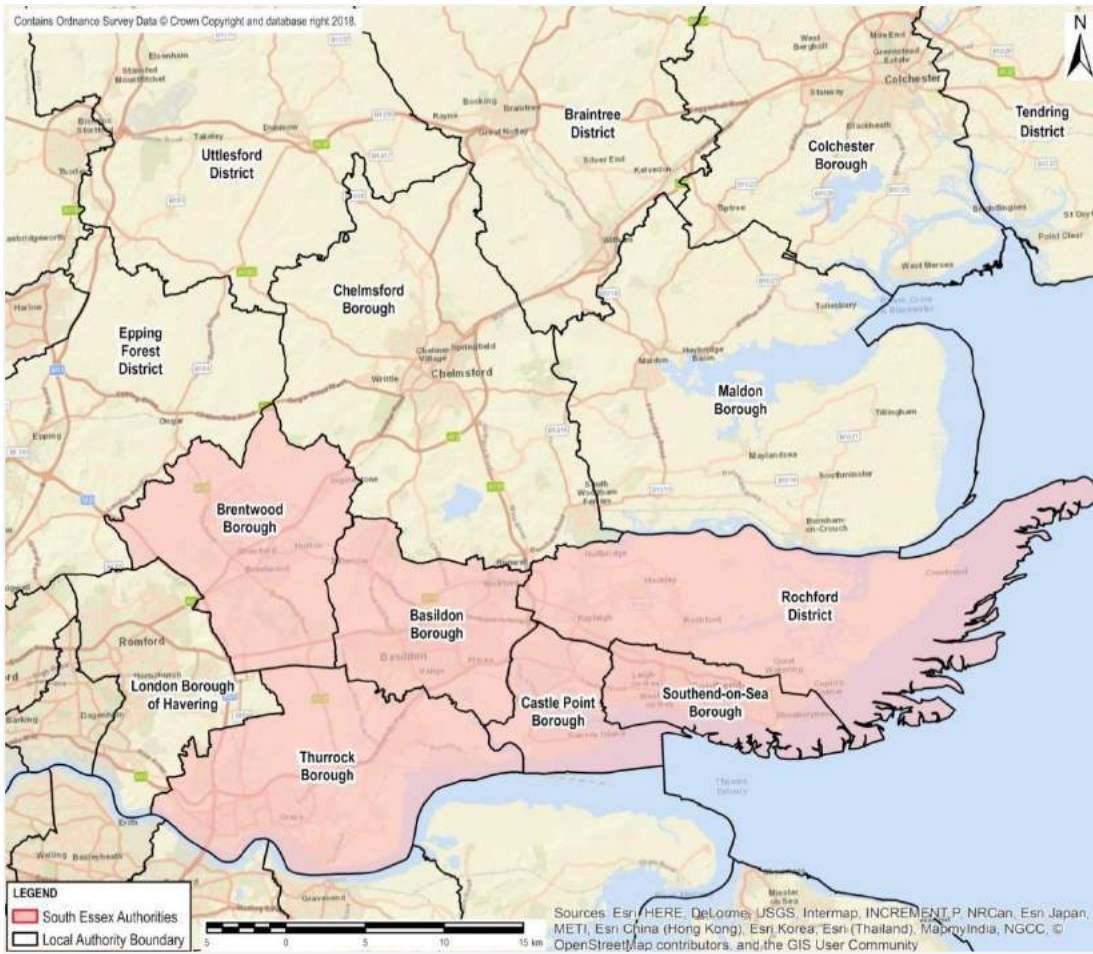
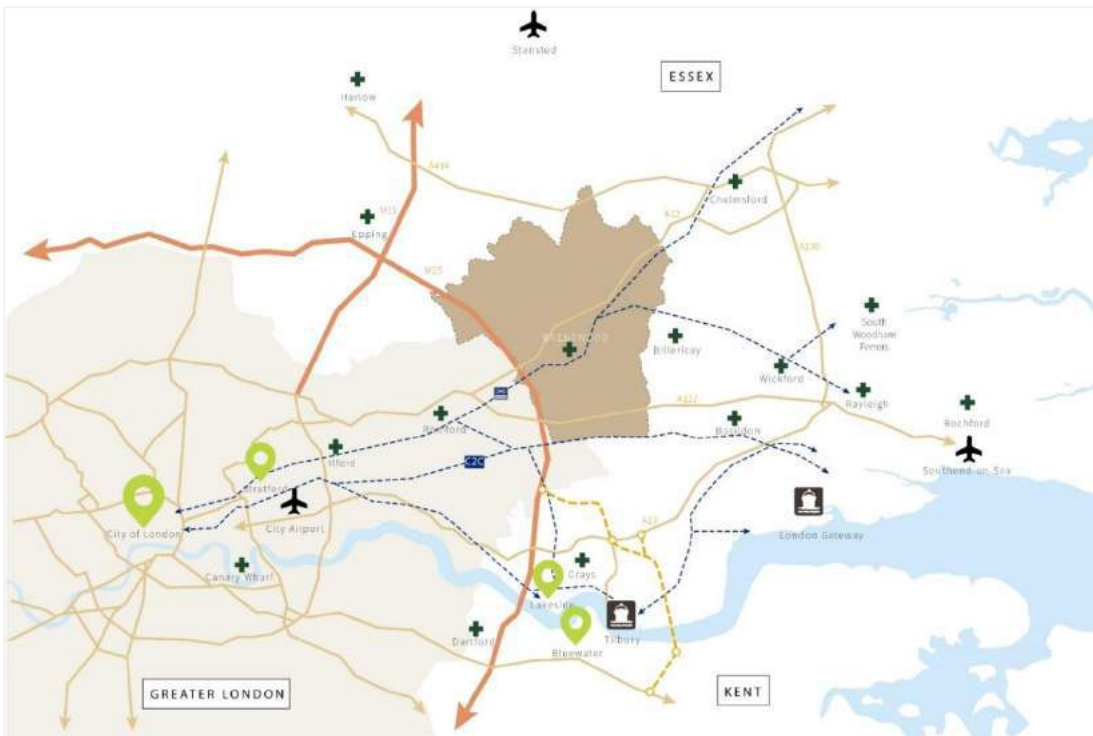


Figure 2.2: Brentwood Borough in the sub-regional context





**3 WHAT’S THE SCOPE OF THE SA?**

**3.1 Introduction**

3.1.1 The aim here is to introduce the reader to the scope of the SA, i.e. the sustainability issues / objectives that should be a focus of appraisal work. **Appendix II** presents further information.

*Consultation on the scope*

3.1.2 The Regulations require that “*When deciding on the scope and level of detail of the information that must be included in the Environmental Report [i.e. the SA scope], the responsible authority shall consult the consultation bodies*”. In England, the consultation bodies are the Environment Agency, Historic England and Natural England.<sup>5</sup> As such, these authorities were consulted on the SA scope in 2013.

**3.2 Key issues / objectives**

3.2.1 Table 3.1 presents the sustainability issues/objectives (henceforth ‘objectives’) established through SA scoping. Objectives are grouped under ‘topics’. Taken together, these sustainability topics and objectives provide a methodological ‘framework’ for appraisal.<sup>6</sup>

*Table 3.1: 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>

<sup>5</sup> In-line with Article 6(3) of the SEA Directive, these consultation bodies were selected because ‘by reason of their specific environmental responsibilities, [they] are likely to be concerned by the environmental effects of implementing plans and programmes.’

<sup>6</sup> N.B. the objectives listed here are unchanged from 2013. Chapter 10 (‘Appraisal of the Proposed Submission Plan’) presents the objectives in a refined form.

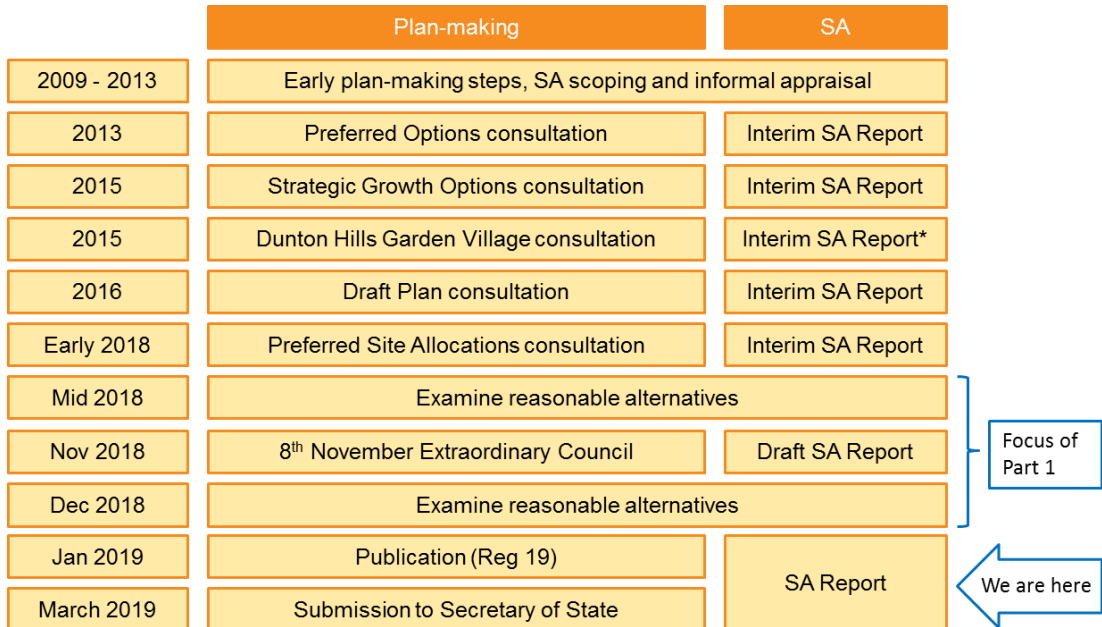
Topic	Objectives
Community and well-being	<ul style="list-style-type: none"> <li>• Reduce health inequalities, and inequalities more generally, with a particular focus on those areas suffering from the highest levels of deprivation.</li> <li>• As the number of people aged over 85 in the Borough grows 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>
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>

**PART 1: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?**

**4 INTRODUCTION (TO PART 1)**

4.1.1 Plan-making has been underway since 2009, with several consultations having been held (under Regulation 18 of the Local Planning Regulations) prior to this current Regulation 19 consultation, and five Interim SA Reports having been published (also, a draft version of this SA Report was presented to Extraordinary Council in November 2018) - see **Figure 4.1**.

*Figure 4.1: Key steps in the plan-making / SA process*



\* The ISA Report published alongside the Dunton Hills Garden Village consultation document was prepared jointly with Basildon District Council, and led by LUC consultants.

4.1.2 The focus here, within Part 1, is not to relay the entire ‘story’ of plan-making to date, but rather the work undertaken to **examine reasonable alternatives**. Specifically, the aim is to:

- explain the reasons for selecting the alternatives dealt with - see **Chapter 5**
- present an appraisal of the reasonable alternatives - see **Chapter 6**
- explain the Council’s reasons for selecting the preferred option - see **Chapter 7**

4.1.3 Presenting this information is in accordance with the regulatory requirement to present an appraisal of ‘reasonable alternatives’ and ‘an outline of the reasons for selecting the alternatives dealt with’ within the SA Report.

4.1.4 Presenting this information is also a means of demonstrating plan soundness. Basildon Borough Council’s 2018 consultation response raised “a *technical comment... that the Brentwood Local Plan could be procedurally unsound as a result of [failure to examine reasonable alternatives]*”,<sup>7</sup> which serves to highlight the importance of this Part of the report.

*What about earlier stages of work?*

4.1.5 Much work has been completed to examine reasonable alternatives (also emerging draft proposals) throughout the course of the plan-making SA process, with five Interim SA Reports having been published under Regulation 18 in order to elicit consultation responses.

<sup>7</sup> See <https://brentwood.idi-consult.net/localplan/download.php?action=download&uploadid=14748> (pg. 10 of the PDF).

4.1.6 Work completed at earlier stages provides important context, and must be referenced and relied-upon at the current time (see Figure 5.1); however, findings of earlier work stages naturally become out-of-date and superseded, such that there is little to be gained from reporting findings in detail at the current time.<sup>8</sup>

4.1.7 There is, however, a pragmatic need to explain how understanding in respect of reasonable alternatives changed following the Extraordinary Council meeting of 8<sup>th</sup> November 2018.

#### Reasonable alternatives in relation to what?

4.1.8 It is the matter of allocating a package of sites to meet housing needs (alongside the achievement of wider objectives) that has been the focus of alternatives appraisal (and consultation) throughout the course of the plan-making / SA process.

4.1.9 The term ‘**spatial strategy**’ is used as shorthand. It is clear that establishing spatial strategy is a central plan objective (see Chapter 3).<sup>9</sup>

#### What about other plan issues?

4.1.10 The plan must address a range of other spatial and thematic issues/objectives; however, it is reasonable for preferred policy approaches to emerge without formal consideration having been given to reasonable alternatives. Such issues/objectives are not of the same magnitude of strategic importance as the ‘spatial strategy’, and, in turn, there is less potential to differentiate alternatives in terms of significant effects.

#### What about site options?

4.1.11 Site options are not ‘reasonable alternatives’ where there is no mutually exclusive choice to be made between them;<sup>10</sup> however, it is naturally the case that there is a need to examine site options as part of the process of arriving at reasonable spatial strategy alternatives. As such, site options are discussed in Chapter 5 (‘Selecting the reasonable alternatives’). As part of this discussion there is reference to Appendices III, IV and V, which examine individual site options in isolation (but do not aim to present a formal ‘appraisal’).

#### A focus on strategic site options?

4.1.12 There is a perception of the SA process having focused on strategic site options as a rule. This was the case in the past; however, recent work, as reported in this SA Report, has focused on strategic site options only to the extent that they warrant particular attention as the sites most likely to result in significant effects. All site options were considered as part of the process of arriving at reasonable spatial strategy alternatives, as discussed in Chapter 5.

#### Who’s responsibility?

4.1.13 It is important to be clear that: selecting reasonable alternatives is the responsibility of the plan-maker (BBC), with AECOM acting in an advisory capacity; appraising the reasonable alternatives is the responsibility of AECOM; and selecting the preferred option is the responsibility of the plan-maker (BBC).

<sup>8</sup> Essex County Council responded to the 2018 Preferred Allocations consultation with the suggestion that: “a comprehensive audit trail of those alternatives that have been considered and subject to SA throughout the plan-making process should be produced, including detailing the reasons for rejecting and progressing alternatives at each stage.” We disagree on the necessity of presenting information on past alternatives appraisal over-and-above what is necessary for the purposes of providing “an outline of the reasons for selecting the alternatives dealt with”. Comprehensive information on past alternatives appraisal work is of only academic interest, recognising that the work has been superseded, and presenting this information is not a requirement.

<sup>9</sup> Regulation 12(2) requires that, when determining what should be a focus of alternatives appraisal, account is taken of “the objectives and geographical scope of the plan”.

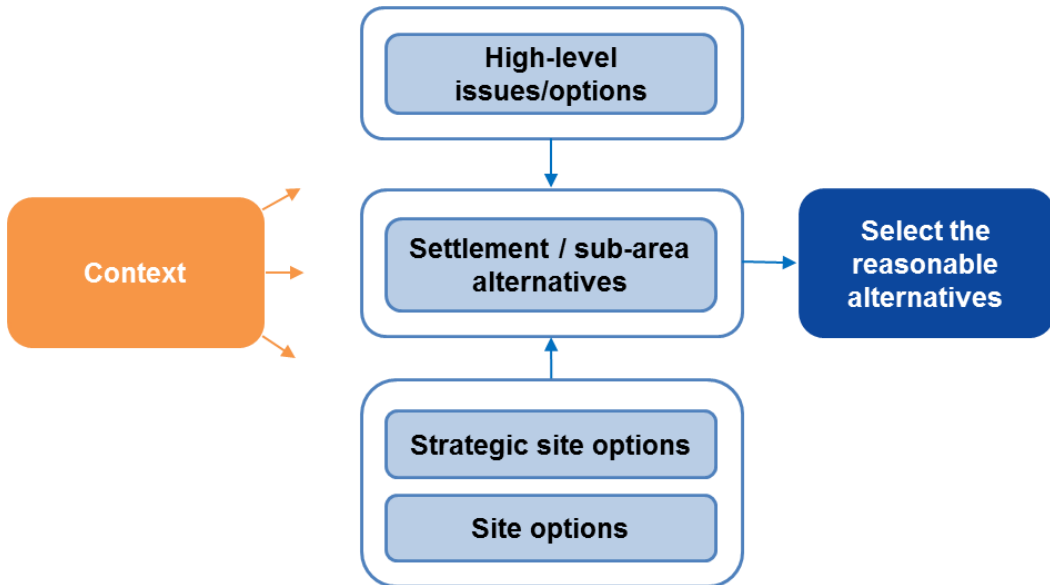
<sup>10</sup> The SEA Directive and Regulations aim to ensure that plan-makers and stakeholders are presented with clear, mutually exclusive choices; however, if a site option is presented without an explanation of how it would be delivered in combination with other sites (e.g. “in addition to sites X, Y and Z”; or “in place of site X”) then the choice remains essentially undefined.

**5 SELECTING THE REASONABLE ALTERNATIVES**

**5.1 Introduction**

5.1.1 The aim here is to discuss the key steps that led to the development of the reasonable spatial strategy alternatives. Key steps are summarised in **Figure 5.1**.

*Figure 5.1: Establishing reasonable spatial strategy alternatives*



Structure of this chapter

5.1.2 This chapter firstly discusses the **‘top-down’** consideration of high-level issues and the **‘bottom-up’** consideration of site options - both strategic and non-strategic - before going on to explain how this understanding was drawn-up to identify alternatives for individual sub-areas and settlements and then, in turn, district-wide spatial strategy alternatives.

5.1.3 The decision-making **context** is also referenced throughout Chapter 5, setting out how an understanding been built-up, in respect of spatial strategy and site options, over the course of a plan-making process that started in 2011. As part of this, particular consideration is given to the decisions reached as a result of the Extraordinary Council meeting of 8th November 2018.

## 5.2 High-level issues/options

5.2.1 As a first step, when seeking to establish reasonable spatial strategy alternatives in 2018, there was a need to consider the ‘top down’ factors relating to -

- **quantum** (*how many new homes should the Brentwood Local Plan provide for?*); and
- **broad distribution** (*what areas are more / less suited to housing growth?*).

### Quantum

5.2.2 A central tenet of plan-making process is the need to A) objectively establish housing needs; and then B) develop a policy response to those needs, which will usually mean providing for needs in full, but which under certain circumstances may mean providing for a quantum of homes above or below needs. This principle was stated clearly at paragraph 47 of the NPPF (2012), and is taken forward through the NPPF (2018) at paragraph 11, which states -

*“plans should positively seek opportunities to meet the development needs of their area, and be sufficiently flexible to adapt to rapid change... strategic policies should, as a minimum, provide for **objectively assessed needs** for housing and other uses, as well as any needs that cannot be met within neighbouring areas, **unless**: i. the application of policies in this Framework that protect areas or assets of particular importance provides a strong reason for restricting the overall scale, type or distribution of development in the plan area; or ii. any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.”* [emphasis added]

5.2.3 The NPPF uses the term objectively assessed needs interchangeably with **local housing need**, with para 60 stating: *“strategic policies should be informed by a local housing need assessment, conducted using the **standard method** in national planning guidance – unless exceptional circumstances justify an alternative approach which also reflects current and future demographic trends and market signals.”* [emphasis added] An ‘indicative’ standard method was first published for consultation in 2017 and currently remains largely unchanged.

5.2.4 The PPG is clear that the standard method should be applied to the most recent data available which, in practice, means the most recent Government household projections and the most recent data on local affordability (i.e. the ratio of house prices to income). Assuming submission in early 2019, the current set of household projections (2016 based) and the latest affordability data (2017) should still be extant. Using this most recent data, the standard method shows an ‘uncapped’ need figure for Brentwood of 365 dwellings per annum (dpa), which reduces to **350 dpa** once the 40% cap is applied.<sup>11</sup>

5.2.5 However, there is uncertainty regarding this figure, because Government is currently consulting on a proposal to revert to using the 2014-based household projections data (in the short-term, i.e. until new 2018-based projections are issued).<sup>12</sup> This is on the basis that the 2016-based projections are thought to be unduly low. Using the 2014-based household projections, the LFN figure for Brentwood Borough is **454 dpa**.

5.2.6 This uncertainty is discussed within the recently published Brentwood Borough Strategic Housing Market Assessment Part One (October 2018). The report concludes -

*“In January 2018 we advised the Council to use 380 dpa as the OAN to inform the draft plan. In this report we still find that 380 can be supported as a number the Council should consider meeting in the draft plan. Strictly, 380 is higher than that which we consider should be the upper range of the OAN. It is also above the Standard Method. But a number of factors still weigh in its favour for consideration in the Plan making process... So pragmatically we still suggest the Council still plans for **at least 380 dpa**.”*

<sup>11</sup> Applying a ‘cap’ is the third and final step in the standard method. Specifically, the method establishes that the increase on household projections to reflect affordability (step 2 of the method) should be limited to 40%.

<sup>12</sup> [https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment\\_data/file/751810/LHN\\_Consultation.pdf](https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/751810/LHN_Consultation.pdf)

- 5.2.7 In conclusion, **LHN** for Brentwood is considered to be 350 dpa, but could be as high as 454 dpa, pending the outcomes of the current Government consultation.
- 5.2.8 There are limited strategic arguments to suggest a reasonable need to explore in detail spatial strategy options involving provision for **below LHN** - see Box 5.1; however, there are certain strategic arguments in support of providing for **above LHN** - see Box 5.2. As such, the matter of reasonable higher growth options is returned within Section 5.6.

*Box 5.1: Explaining the unreasonableness of options involving provision below LHN*

Options involving providing for significantly below LHN can be ruled-out as unreasonable on the basis of there being no potential to export unmet needs to neighbouring authorities, which are equally as constrained as Brentwood in respect of the “areas or assets of particular importance” listed by footnote 6 of the NPPF that can provide “a strong reason for restricting the overall scale... of development...” In particular, all neighbouring authorities fall within the London Metropolitan Green Belt, as Brentwood does. The nearest non-Green Belt land is found to the north and east of Chelmsford; however, Brentwood Borough, and in particular the main urban area, does not connect well to this area.

Brentwood links most closely to other South Essex authorities, as reflected in the 2018 resolution to prepare a Joint Strategic Plan (JSP) for South Essex;<sup>13</sup> however, the other South Essex authorities are as constrained by ‘footnote 6’ considerations as Brentwood, if not more so (e.g. Castle Point is a small district with narrow Green Belt gaps between settlements). Work on the JSP has not progressed sufficiently to date in respect of distributing needs between the constituent authorities; however, there is little or no reason to suggest that the JSP could be used as a vehicle for distributing unmet needs from Brentwood.

Thurrock might be seen to be associated with a strategic growth opportunity given the forthcoming Lower Thames Crossing and associated link road to the M25; however, consultation responses received from Thurrock are clear that they support the Brentwood Local Plan providing for needs in full, with objections raised to any aspect of the Brentwood Local Plan that introduces a risk of needs not being met (e.g. over-reliance on one strategic allocation). It is also the case that Thurrock links as closely to Basildon and Castle Point (from where unmet needs are likely to arise - see **Table 5.1**) as it does to Brentwood.

*Box 5.2: Explaining the reasonableness of exploring options involving provision for above LHN*

Options involving providing for above LHN, in order to make some housing available to meet unmet needs arising from elsewhere, have been examined closely at past plan-making / SA stages. For example, the January 2018 Interim SA Report served to highlight concerns with higher growth in respect of ‘air quality’ and ‘landscape’, albeit higher growth options were shown to perform relatively well in certain other respects, notably ‘housing’. Drawing upon appraisal findings, the Council has repeatedly found higher growth options to perform poorly relative to the option of providing for Brentwood’s needs only.

Furthermore, the South Essex JSP SoCG aims for submission in early 2020, and hence the JSP now provides a forum for examining options for distributing unmet needs within South Essex.

However, Basildon Borough Council formally requested, through the January 2018 consultation, that options involving the Brentwood Local Plan providing unmet needs be explored.<sup>14</sup> Basildon has historically sat within a housing market area (HMA) shared with Thurrock, Castle Point, Rochford and Southend (i.e. a South Essex HMA omitting Brentwood), and a recent report prepared by Basildon officers explains a protocol for dealing with unmet need that involves focusing on the authorities within its HMA; however, the Basildon request must nonetheless be given careful consideration. It is clearly the case that Basildon does link closely to Brentwood, most notably along the A127 corridor. **Table 5.1** considers the latest situation in respect of the Basildon Local Plan, and the other plans being progressed by neighbouring authorities.

<sup>13</sup> See the Statement of Common Ground at [www.castlepoint.gov.uk/download.cfm?doc=docm93jjim4n3547.pdf&ver=5928](http://www.castlepoint.gov.uk/download.cfm?doc=docm93jjim4n3547.pdf&ver=5928)

<sup>14</sup> Basildon’s January 2018 consultation stated: “Since the... Draft Local Plan consultation in 2016... Basildon Council... has taken the position that some changes should be made... One of these changes arises from the fact that the suite of sites identified for inclusion in the Basildon Borough Local Plan does not meet the identified need for housing... This gives rise to an unmet housing need, which when delivery issues are taken into account is around 4,500 homes for the plan period up to 2034. [As such] it has been recommended that assistance is formally sought from other Local Planning Authorities (LPAs) in the Housing Market Area (HMA)... Whilst Brentwood Borough is not in the same HMA, it is a neighbouring borough, and should be aware that there could be a future need in line with the Essex Planning Officers Association - Protocol for Unmet Housing Need 2017, for it to consider meeting unmet needs from other HMAs, if options within those HMAs become exhausted...”



Finally, there is a need to consider the possibility of providing for ‘above LHN’ in order to more fully provide for affordable housing needs. There is no requirement to provide for affordable housing needs in full; however, the PPG (para 2a-027) does state: “An increase in the total housing figures included in the plan may need to be considered where it could help deliver the required number of affordable homes.” In practice, there have been few calls for the Local Plan to provide for higher growth in order to provide for a higher proportion of affordable needs. Brentwood Borough’s affordable housing need was updated in June 2016 and published as a Part 2 document to be read alongside the main SHMA, finding affordable need to be 107 dpa; which is **30.6%** of the LHN figure introduced above, whilst the Local Plan Viability Study (October 2018) concludes: “The Brentwood Borough Council area has a vibrant and active property market... In the current market, the analysis in this report shows that delivering affordable housing at **35%** is achievable on the types of site identified in the emerging Plan.”

Table 5.1: Progress on neighbouring Local Plans

Council	Next Stage <sup>15</sup>	Commentary (including key issues for Brentwood)
Basildon	Examination	The proposed submission version of the Local Plan was recently published, stating (page 100):  <i>“Whilst policy SD1 makes provision for 17,791 homes, the full objectively assessed need, there are concerns around delivery which mean it may only be possible to deliver around 15,465 of these homes in the period to 2034. This compares to a housing requirement of between 19,491 and 19,771... This means that there is a potential <b>unmet need for housing of up to 4,000 homes</b>, when both supply and delivery issues are taken into account.”</i>
Thurrock	Reg 18	An ‘Issues and Options’ consultation was held in 2016, with a subsequent report published summarising key messages received, including that “many of the representations submitted are asking for the Council to make provision to meet the housing needs of neighbouring areas.” <sup>16</sup>  An ‘Issues and Options 2’ consultation document was then published in December 2018, presenting spatial options for meeting housing needs (but not suggesting any potential to provide for unmet needs) see Box 5.8.
Castle Point	Reg 19?	Brentwood Borough Council responded to a 2018 consultation document as follows: “Brentwood Borough Council note the identified objectively assessed housing needs range of 326 to 410 new homes per annum... However, we note that Castle Point Borough Council is not intending to meet this need and are proposing a target of 107 homes per annum... Brentwood Borough Council therefore object to the Castle Point draft New Local Plan.” The unmet need figure is potentially as high as <b>6,000 homes</b> (2011 to 2031).
Rochford	Reg 18	An issues and options consultation was held in 2018, with a draft plan (Reg 18) consultation timetabled for 2019. The issues and options document is non-committal, but notably identifies three options aimed at ensuring “that we – as far as possible within the context of national policy and guidance – meet our own needs, and work effectively with our neighbours to ensure that we, as a collective, address the need for housing in the South Essex [HMA].” <sup>17</sup>

<sup>15</sup> Regulations 18 and 19 of the Local Planning Regulations (2012) establish the regulatory framework for Local Plan-making prior to submission to the Secretary of State for independent examination by a Planning Inspector. Requirements under Regulation 18 are flexible, but it is typical to hold at least one formal consultation. Regulation 19 is the formal ‘publication’ stage.

<sup>16</sup> See para 1.17 at [www.thurrock.gov.uk/sites/default/files/assets/documents/localplan\\_issuesoptions1\\_201602\\_comments.pdf](http://www.thurrock.gov.uk/sites/default/files/assets/documents/localplan_issuesoptions1_201602_comments.pdf)

<sup>17</sup> See <https://www.rochford.gov.uk/new-local-plan-issues-and-options-document-and-draft-sustainability-appraisal>

Council	Next Stage <sup>15</sup>	Commentary (including key issues for Brentwood)
Southend-on-Sea	Reg 18	An initial consultation on ‘issues and options’ is timetabled for winter 2018/19 with a draft plan (Reg 18) consultation timetabled for winter 2019/20. <sup>18</sup> Whilst there is no information available, it is readily apparent that there is very limited undeveloped land within the Borough, which gives rise to a <b>high risk of unmet need</b> .
Chelmsford	Examination	The Local Plan was submitted for examination June 2018. <sup>19</sup> The plan allocates sites sufficient to provide for up to 20% above OAHN “[t]o provide flexibility in the supply of housing sites and help significantly boost its supply.” There is no suggestion that the intention is to provide for unmet needs from elsewhere.
Epping Forest	Submission	The Local Plan was recently submitted for examination. The plan provides for 11,400 homes, a shortfall of c.1,100 against needs to reflect Green Belt and other constraints, with arrangements in place to distribute the unmet need to elsewhere within the HMA. <sup>20</sup>
LB Havering	Examination	The Local Plan was submitted for examination in March 2018. <sup>21</sup> The plan provides for 17,550 new homes, in-line with the minimum requirement of the adopted London Plan (2015). The proposal is not to provide for above the minimum, in order to close the gap between supply and need across London (which is an option that the adopted London Plan requests Councils to consider), or to reflect the higher need figure identified by the North East London SHMA (2016). <sup>22</sup>
London Plan	Examination	<p>The new London Plan was published consultation in December 2017, with the GLA subsequently appointing a panel of Planning Inspectors to examine the plan (the regulatory framework differs to that for Local Plans).</p> <p>The plan aims to provide for 65,000 new homes per annum over the plan period (2019-2041), which is a 53% increase on the current London Plan, but falls short of the housing need figure of 66,000 new homes per annum identified by the London SHMA (2017).</p> <p>This led Brentwood Borough Council to respond to the Draft London Plan consultation as follows: “...Brentwood welcomes the commitment made in the London Plan to meet ambitious housing targets, however clarification is needed as to how the London Plan will address the 1,000 dwelling per annum that cannot be accommodated within Greater London. The Council raises concerns about the ability of the London Plan to meet identified housing targets considering how the previous London Plan has failed to meet its housing targets. Therefore, clarification is sought as to how housing targets will be managed and the procedure(s) for triggering a review.”<sup>23</sup></p> <p><b>Delivery concerns</b> are also raised by other organisations, noting that the plan only allocates the 65,000 annual target amongst boroughs for the first ten years of the plan period; and also noting that delivery of the target relies on ability to deliver at significantly higher densities and also at significantly more small sites.<sup>24</sup></p>

<sup>18</sup> See <https://www.southend.gov.uk/localplan>

<sup>19</sup> See <https://www.chelmsford.gov.uk/planning-and-building-control/planning-policy-and-new-local-plan/new-local-plan/>

<sup>20</sup> See <http://www.efdclocalplan.org/>

<sup>21</sup> See <https://www.chelmsford.gov.uk/planning-and-building-control/planning-policy-and-new-local-plan/new-local-plan/>

<sup>22</sup> See [https://www.havering.gov.uk/info/20034/planning/183/planning\\_policy/12](https://www.havering.gov.uk/info/20034/planning/183/planning_policy/12)

<sup>23</sup> See <https://www.london.gov.uk/what-we-do/planning/london-plan/new-london-plan/consultation-responses-draft-new-london-plan>

<sup>24</sup> See for example <https://www.london.gov.uk/sites/default/files/Home%20Builders%20Federation%20%282320%29.pdf>

## Distribution

N.B. the focus of the discussion here is in relation to distribution of **greenfield** (Green Belt) development. With respect to brownfield development, it almost goes without saying that there is a need to maximise all opportunities that exist, with the precise number of homes to be delivered a technical matter, more so than a policy matter to be explored through the SA.

- 5.2.9 A number of broad distribution priorities can be gleaned from the June 2018 South Essex Joint Strategic Plan Statement Of Common Ground (SoCG). Specifically, the document lists five 'Strategic Opportunity Areas', of which the following relate to Brentwood -
- **The A127 Transport Corridor** - the SoCG explains that: *"The A127 provides a strategic east to west transport route across the sub-region stretching from Southend to the London Borough of Havering (LBH) in east London with direct access to the M25, A130 and A13... The route already experiences significant capacity issues, particularly at key junctions. With the right investment this strategic corridor has the potential to unlock significant new business, employment and residential opportunities... These improvements will be key to realising the 'Strategic Areas of Opportunity', including Basildon Enterprise Corridor. the economic potential of London Southend Airport and Southend on Sea as a major resort and visitor destination."*
  - **Crossrail connectivity / A12 / A129** - the SoCG explains that: *"As part of the consideration of long term spatial options, the authorities are considering the potential for new 'Garden' communities. These and other economic opportunities in the subregion would be dependent upon significant investment in improving its road and rail transport infrastructure. The opening of the Elizabeth Line through central London offers major advantages in terms of connectivity to the new 'Garden' communities, joining up business and employment opportunities as far afield as Reading, and for improving linkages between London Southend Airport to London City and Heathrow Airport."*
- 5.2.10 These broad distribution priorities tally with those that fed into development of Preferred Allocations (2018), with the Interim SA Report (2018) explaining (as part of the 'outline reasons' for arriving at reasonable spatial strategy alternatives) that: *"There is a fairly well established broad spatial strategy, which is one focused primarily on the A12 and A127 transport corridors. The A12 corridor contains the main urban area, whilst the A127 corridor is rural (albeit at the western extent is M25 J29, and to the east is Basildon); however, the A127 corridor may be as well suited to growth as the A12 corridor, if not more so."*
- 5.2.11 A key issue for the Brentwood Local Plan relates to the **balance of growth** between the two corridors, and hence this has repeatedly been a matter for close examination as a 'variable' across reasonable spatial strategy alternatives.
- 5.2.12 In light of most recent consultation responses, there is a need to consider -
- spatial strategy options that would involve growth along the A12 corridor over-and-above the January 2018 preferred approach (which itself represented an increase on the approach proposed at the 2016 Draft Plan stage) to reflect concerns raised by Thurrock Council through the 2018 Preferred Allocations consultation - see **Box 5.3**;
  - spatial strategy options that would minimise pressure on problematic links and junctions on the strategic road network to reflect concerns raised by Highways England through the 2018 Preferred Allocations consultation, and concerns raised through recent Transport Assessment work - see **Box 5.4**; and
  - the questions posed by the Essex County Council consultation responses - see **Box 5.5**.

*Box 5.3: Thurrock Council views on broad distribution*

As stated at the outset of the response: “*Thurrock Council is concerned with regard to the spatial strategy and the levels of growth proposed in the A12 and A127 corridors and considers that Brentwood Council has not thoroughly tested all reasonable options.*”

The response goes on to question the decision to rely upon a new settlement, rather than relying more (or solely) on urban extensions to existing settlements, stating: “*It is unclear why the spatial strategy should advocate a free-standing greenfield settlement in the Green Belt and that this should be the preferred location for development compared to existing settlement expansion or green field urban extensions which are likely to be more sustainable and closer to existing transport and other existing infrastructure...*” This in itself is an important broad distribution consideration, and one that is returned to within Sections 5.3 & 5.5.

The response goes on to state that: “*Thurrock Council considers that the most appropriate spatial strategy would be a variation of the previous options with growth including Green Belt release concentrated in the A12 Brentwood/Shenfield corridor but with some potential for Green Belt release at West Horndon.*” This statement goes beyond broad distribution to discuss site specifics, but the key point to note is support for increased growth along the A12 corridor, and decreased growth along the A127.

Support for this shift in strategy is also evident from subsequent discussion of -

- **Opportunities within the A12 corridor -**

*“Thurrock Council considers there is further significant potential to provide housing and other development in the A12 Corridor Broad Area including the potential for urban edge expansion of settlements... The A12 widening and delivery of Crossrail will bring about significant increased capacity and accessibility improvements to transport infrastructure for Brentwood in the A12 Broad Corridor during the later-part of the plan period. This will make the A12 Corridor broad area more suitable for development opportunities.”*

- **Constraints within the A127 corridor -**

*“The Green Belt west and east of West Horndon meets the purposes of the Green Belt including preventing urban sprawl and coalescence between Basildon and West Horndon in the east and from West Horndon westwards to Cranham and Upminster in London.”*

*“The A127 is at capacity... and does not represent a better road transport alternative to the A12...”*

*Box 5.4: Implications of transport network traffic constraints for broad distribution*

Highways England commented through the January 2018 consultation that -

*“It is considered that the provision of a number of strategic residential and employment locations in or close to the town centre could help to encourage sustainable travel and reduce the pressure on the highway network, which is welcomed. In particular, development located in close proximity to Rail Stations is welcomed as it could encourage long distance trips to shift away from private car use. The A12 highway corridor also runs alongside the railway corridor and therefore this provision could help reduce the reliance of new residents and employees on private vehicle use.*

*However, it is also noted that some development sites are located in close proximity to the M25 and A12 corridors and therefore consider that these could potentially have a notable impact on the number of trips at the junctions. I consider that the proposed development locations could have a notable impact on the SRN, particularly on **M25 Junction 28** and **Junction 29**, as well as **A12 Junction 12...***

Subsequent to the January consultation the Council commissioned a detailed Transport Assessment, which examines capacity at 29 key junctions across the Borough in the AM and PM peak period, with capacity modelled for the baseline and for three future scenarios: 1) a reference scenario involving only background growth in traffic; 2) a scenario involving proposed Local Plan allocations (i.e. the January 2018 Preferred Allocations with minor modifications); and 3) a scenario involving proposed Local Plan allocations along with a range of mitigation measures, both hard (i.e. new infrastructure) and soft (e.g. measures in support of public transport and walking/cycling).<sup>25</sup>

<sup>25</sup> See <http://www.brentwood.gov.uk/pdf/26102018091217000000.pdf>

The strongest message to come out of the assessment is that M25 Junction 28 (**A12**) is set to be well over-capacity, with the Study finding the junction to be operating (AM peak) at 220% of capacity under the future reference scenario and 375% under both the future Local Plan scenario and the 'with mitigation' scenario. The proposed committed improvements to the M25 junction 28 are to create a new two-lane loop road with a hard shoulder for traffic travelling from M25 to A12, widen the M25 anti-clockwise carriageway to facilitate the new loop road and reconfigure the A12 to accommodate two lanes joining the A12 eastbound from the proposed loop road. However, the Study nonetheless finds that the junction will remain well over-capacity.

The next strongest message relates to M25 Junction 29 (**A127**), which the Study finds to be operating (AM peak) at 153% of capacity under the future reference scenario, at 209% under the future Local Plan scenario and at 202% under the 'with mitigation' scenario. The committed mitigation measures at this junction aim to improve the junction's operation with the introduction of the Brentwood Enterprise Park; however, there is a complicating factor given the recently published proposal for a new M25 Junction 3km to the south to link the M25 with the new Lower Thames Crossing, and the associated proposal for necessary upgrades to M25 J29. In many respects this is good news for the A127 corridor, as it should assist with movements to and from the M25; however, there are a range of detailed design considerations.

The third strongest message to come out of the assessment relates to the two other main junctions on the **A127** through Brentwood Borough, namely the junctions with the B186 and A128. Both are found to be significantly over capacity under the future scenarios without mitigation, although the A127/B186 junction has capacity under the 'with mitigation' future scenario.

#### *Box 5.5 Essex County Council views on broad distribution*

The County Council's comments on 'spatial strategy' begin with statements of support for providing for housing needs in full, and maximising opportunities at brownfield sites (with a caveat in respect of existing and new social and physical infrastructure capacity).

This is followed by statement that: *"ECC acknowledges that BBC will need to be satisfied that the Local Plan is supported by a proportionate evidence base and that all reasonable alternatives have been considered. See ECC earlier commentary on the SA."* The 'earlier commentary on the SA' is detailed and helpful; however, it does not in itself provide views on broad distribution preferences or concerns.

The response in relation to 'spatial strategy' then concludes as follows: *"Following its response to the 2016 consultation, ECC continues to seek further clarification on a number of issues in relation to the proposed spatial strategy including: how the A127 Corridor provides more opportunities for growth than the A12 Corridor; identification of any cross border implications of the spatial strategy given its role as highway, education, minerals and waste, and lead local flood authority, and public health responsibilities; identification of what infrastructure is necessary to deliver the spatial strategy, strategic and individual site allocations; and a full assessment of the highway and transportation implications of the proposed spatial strategy, both in terms of the impacts of the individual preferred site allocations, and cumulatively. ECC therefore withholds support until the appropriate highway modelling has been undertaken, to assess both the site specific and cumulative impacts of such developments on the local, and wider highway network."*

From this statement it is possible to glean that highway network considerations must be a foremost consideration when arriving at reasonable spatial strategy alternatives, and the statement also serves to confirm that there is a need to test spatial strategy options involving a redistribution of growth **away from the A127 corridor / towards the A12 corridor** (relative to the Preferred Allocations distribution).

This conclusion is corroborated by the following statement made by the County Council under the Transport and Highways heading of their response: *"The A127 is a vitally important primary route for the South Essex area which connects the M25, Brentwood, Basildon and Southend (including London Southend Airport). A major aim of ECC is to improve journey time reliability along this route. There is significant growth planned along the A127 corridor in adopted and emerging Local Development Plans along its entire route, which will need to be considered in any highway modelling in terms of capacity, key junctions and access."* No equivalent concerns are raised in respect of the A12 corridor.

### 5.3 Strategic site options

5.3.1 Throughout the recent evolution of the Brentwood Borough Local Plan there has always been an intention to deliver at least one large-scale, strategic site (likely for a mix of uses, to include both housing and employment), recognising that the alternative of piecemeal Green Belt development dispersed widely has significant draw-backs (this option was appraised within the 2013 Interim SA Report). Support nationally for focusing growth at strategic sites was affirmed by the new NPPF (2018), with paragraph 72 stating -

*“The supply of large numbers of new homes can often be best achieved through planning for larger scale development, such as new settlements or significant extensions to existing villages and towns, provided they are well located and designed, and supported by the necessary infrastructure and facilities... [Authorities] should:*

*a) consider the opportunities presented by existing or planned investment in infrastructure, the area’s economic potential and the scope for net environmental gains;*

*b) ensure that their size and location will support a sustainable community, with sufficient access to services and employment opportunities within the development itself (without expecting an unrealistic level of self-containment), or in larger towns...;*

*c) set clear expectations for the quality of the development and how this can be maintained (such as by following Garden City principles), and ensure that a variety of homes to meet the needs of different groups in the community will be provided;*

*d) make a realistic assessment of likely rates of delivery, given the lead-in times for large scale sites, and identify opportunities for supporting rapid implementation...; and*

*e) consider whether it is appropriate to establish Green Belt around or adjoining new developments of significant size.”*

5.3.2 A number of strategic site options have been examined over recent years, including through consultation and SA work, such that there is now a refined understanding of those sites that are genuine (‘reasonable’) contenders for allocation through the Local Plan. Specifically, at the current time, there is a need to give close consideration to two options. The following bullet points seek to *introduce*, and provide *background* to, the two options in question -

- **Dunton Hills Garden Village (DHGV)** - the option of developing a new community between West Horndon and Basildon has been given close examination since 2015. The option featured in the appraisal of reasonable spatial strategy alternatives reported within the 2015 and 2016 Interim SA Reports, plus there was the Dunton Garden Suburb consultation in 2015. Dunton Hills Garden Village featured as a central part of the spatial strategy proposed at the 2016, and then support for the scheme was given a boost in January 2017, when it was selected by Government as one of 14 nationally to receive funding and other support, with a view to supporting delivery. The scheme then received further funding from Government in 2017; and, throughout 2017, a range of work-streams were progressed to examine issues and options (e.g. in relation to capacity, masterplanning, infrastructure needs and phasing).

Subsequently, the site featured within the spatial strategy proposed by the ‘Preferred Site Allocations’ consultation document in January 2018, with a range of consultation responses received from stakeholder organisations and individuals, both in support of the scheme and in opposition. In particular, neighbouring authorities have a keen interest in the site, noting that it is located at the very south-east corner of Brentwood Borough, very close to the boundary with Basildon and Thurrock. Key messages contained within responses received from Basildon and Thurrock are presented in **Boxes 5.6 and 5.7**.

Work to develop the evidence-base in support of the scheme continued following the consultation. In light of this detailed evidence-base work, the current view is that the site has a total capacity of 4,000 to 4,500 homes, and the ability to deliver **2,700 homes** in the plan period. Further land has been submitted to the north of A127 (Land to the north of the A127, 65ha); however, there is not considered to be any need to consider the possibility of extending the site, as previously published.

- **West Horndon** - the option of developing a strategic extension to West Horndon featured in the appraisal of reasonable spatial strategy alternatives reported within the 2015, 2016 and 2018 Interim SA Reports, and prior to that was presented as a preferred option within the 2013 Preferred Options consultation document (which pre-dated the emergence of Dunton Garden Suburb/Village proposals). The Council has repeatedly found the scheme to be sequentially less preferable to Dunton Hills Garden Village; however, equally the Council has always recognised that West Horndon does have certain merits as a location for strategic growth. Subsequent to the 'Preferred Allocations' consultation it was deemed reasonable for the option of a strategic allocation at West Horndon to remain in contention. There are two final points to note:
  - Two separate sites in West Horndon are actually being promoted, with land to the west being promoted for **900 homes** (with the same developers also promoting a linked strategic site to the southwest of the village, within Thurrock); and land to the east being promoted for **600 homes**. Alternative quantum figures have been considered in the past, but following the Preferred Allocations consultation it was deemed appropriate to accept the figures submitted by site promoters.
  - The Thurrock Issues and Options 2 consultation document (December 2018) identifies the option of a 10,000 home new settlement at West Horndon - see **Box 5.8**.

*Box 5.6: Basildon Council views on DHGV*

A primary concern relates to infrastructure provision, with Basildon Council *“apprehensive that the scale of development proposed, which amounts to over a third of the borough’s entire housing provision for the plan period, could be supported by infrastructure in the absence of a clear delivery plan.”* More specifically, there are concerns regarding *“how it will relate in terms of access and connectivity to the Basildon urban area given the nearest town centre and acute healthcare facilities are all within Basildon Borough”*. By way of context, the Council explain that: *“the delivery of new and improved infrastructure to support new development will be a key factor in determining whether or not the Council will be able to meet its [needs].”*

The response goes on to explain the full breadth of concerns as relating to “landscape, education, healthcare and highways infrastructure in the Basildon Borough, and the mitigation required.” The responses then concludes that: *“... without careful planning [the outcome could be] coalescence and inadequate access to appropriate infrastructure, which in turn could have implications on the quantum of development that can be brought forward in this location on both sides of the boundary. In light of this, it is recommended that [the Councils] should continue together under the Duty to Cooperate... to prevent coalescence of place, and address any infrastructure concerns in a more joined up manner.”*

*Box 5.7: Thurrock Council views on DHGV*

The following is a brief summary, with select quotes used to highlight the breadth of issues raised.

- Lack of technical evidence - a concern is that detailed evidence has been slow to emerge.
- The concept of the Garden Village - *“[T]he location does not have any public transport such as a railway station other infrastructure or services compared to existing settlements.”*
- Masterplan approach - a concern is that the Local Plan will not present a masterplan.
- Green Belt Issues - concerns relate to potential cumulative impacts on the gap between Upminster and Basildon, along with growth at West Horndon, Brentwood Enterprise Park and Basildon.
- Landscape Impact - *“a much greater negative impact on the landscape than stated...”*
- Deliverability and phasing - suggest that long infrastructure lead-in times will mean limited housing delivery in the short to medium term, potentially with implications for the committed housing trajectory.
- Viability - *“There must be serious questions about the market ability to absorb such a large scheme...”*
- Impact on Thurrock Housing Market - due to location close to potential Thurrock growth areas.
- Infrastructure and public funding - *“[I]t would potentially divert already limited public resources...”*
- Road traffic impact and transport evidence - various concerns are raised.
- Sustainability Appraisal - *“It is noted the Dunton Hills Garden Village site scores poorly across a range of SA criteria... when compared with other sites in the site options findings...”*

*Box 5.8: West Horndon new settlement?*

Thurrock Council published an ‘Issues and Options 2’ consultation document in December 2018 which, for the first time, identified a strategic development option at West Horndon, stating -

*“The opportunity for developing one or more new settlements in Thurrock is constrained by the nature and character of the Borough and the existing pattern of development and transport connectivity. Based on landowner/developer submissions to the Call for Sites process, the only potential location for bringing forward a new settlement of a significant scale lies in the expansion of West Horndon on land around the C2C Fenchurch Street - Shoeburyness railway line. The exact scale of development that may be considered deliverable in this location would be subject to further assessment through the planmaking process. For the purpose of this consultation, the Council is seeking comments on the provision of a new settlement of **a minimum of 10,000 new homes** as this is the scale of development that is generally regarded as a ‘new town’ and enables the settlement to have a high degree of self-containment, with a range of employment opportunities and supporting social infrastructure.”*

The opportunities are listed as follows -

- A limited number of land owners, potentially increasing the deliverability of the project.
- Potential opportunities to bid for Government funding to support the delivery of strategic infrastructure.
- Critical mass of development that could help to secure infrastructure.

The challenges are listed as follows -

- This broad location is quite detached from the Thurrock urban area (in terms of character, linkage and function). Therefore development at West Horndon has challenges in providing a range of market and affordable housing to meet the needs of the existing residents of Thurrock. In addition, north-south connectivity would need to be improved so as to ensure spin-off economic benefits for existing businesses located within the existing Thurrock urban area.
- The development of a new settlement of a significant scale would require considerable public and private sector investment in order to provide community infrastructure and upgrade the A127.
- Significant development at West Horndon would further exacerbate recognised capacity issues on the A127 corridor and it is uncertain as to whether, and when, Government funding will become available to address these issues.
- Development of scale south of the railway line at West Horndon could have significant environmental implications in terms of impact on the Green Belt and landscape character, and flood risk.

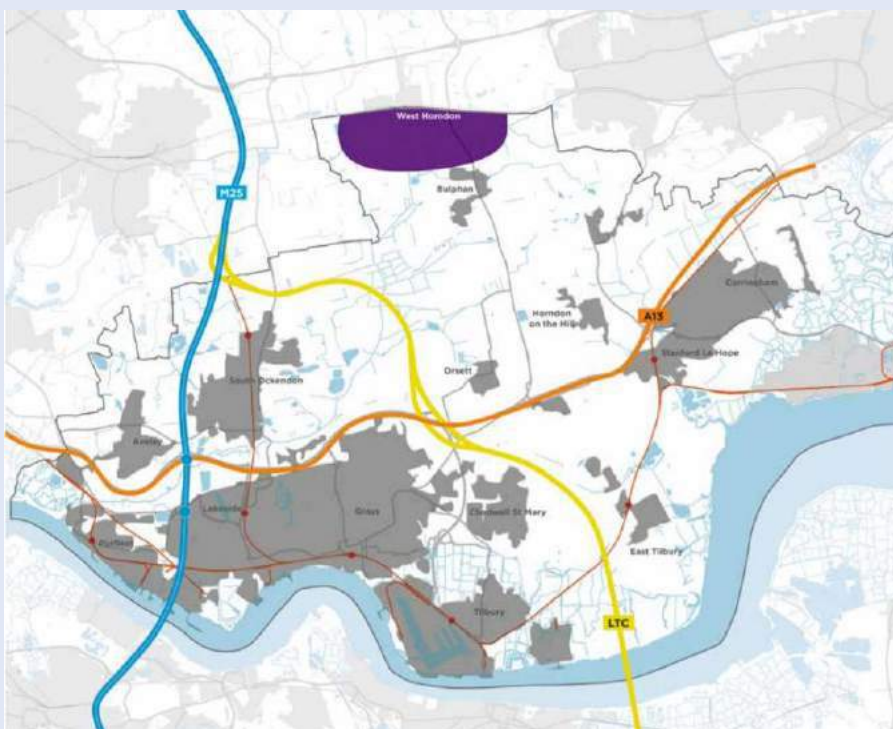
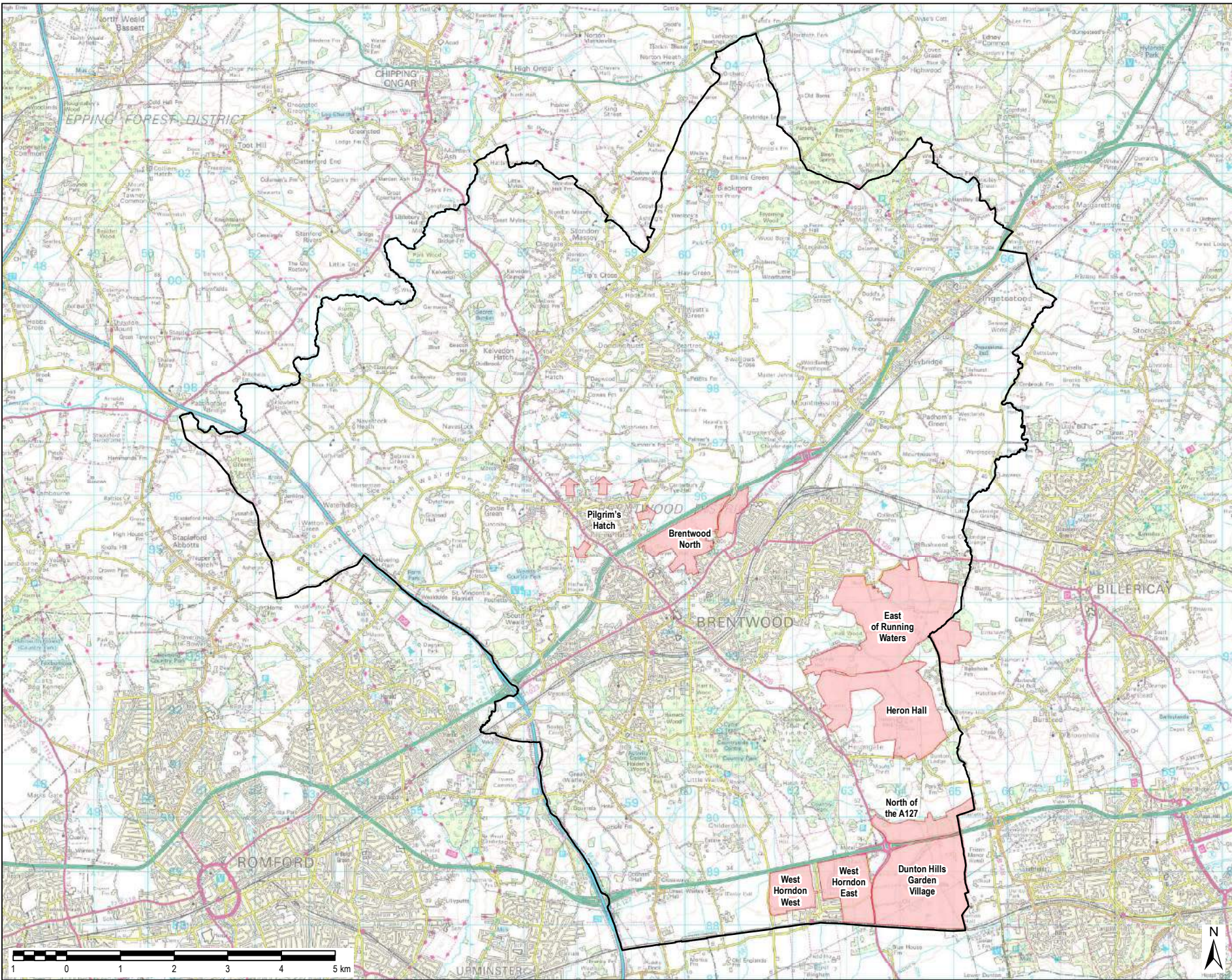


Figure 18 from the Thurrock Issues and Options 2 consultation document (Dec2018)



- 5.3.3 The strategic site options discussed above can be considered reasonably in contention at the current time, and so are discussed further in **Section 5.5**.
- 5.3.4 Several **other strategic site options** have been examined closely in the past (as reported in past Interim SA Reports), but can be ruled-out as unreasonable at the current time -
- North of Brentwood (A12/A128/A1023 triangle) - the option of developing a strategic extension to the north of Brentwood featured in the appraisal of reasonable spatial strategy alternatives reported within the 2015, 2016 and 2018 Interim SA Reports. The 2018 Interim SA Report identified numerous issues/impacts, in particular in respect of transport impacts given the clear challenges that exist in respect of delivering the major upgrades that would prove necessary, and no consultation responses were received that serve to allay concerns. Indeed, no consultation responses were received in support of a North Brentwood strategic allocation at all, with the numerous land-owners not having come together to establish a strategic scheme for the area as a whole. As such, it was decided, subsequent to the consultation, that a strategic allocation could be ruled-out as unreasonable, for the purposes of establishing reasonable spatial strategy alternatives.
  - East of the Brentwood urban area - a very large site named "Land to the East of Running Waters, Hutton" was submitted some years ago; however, the site does not relate well to the existing urban edge, with no proposed scheme layout ever having been submitted. Furthermore, no information was submitted to address the concerns raised through analysis presented within the 2015 and 2016 Interim SA Reports. As such, the scheme was ruled-out as unreasonable in late 2017, when establishing the reasonable spatial strategy alternatives that featured within the January 2018 Interim SA Report, and no consultation responses were received through that consultation in support of the scheme.
  - Pilgrims Hatch - there is potentially a strategic opportunity to deliver targeted enhancements to community infrastructure; however, it is difficult to envisage a scheme, on the basis of sites that have been submitted to the Council / are known to be available. Furthermore, as per north of Brentwood, there is uncertainty regarding precisely how necessary major road infrastructure upgrades would be achieved. It was explicitly, ruled-out in late 2017, when establishing the reasonable spatial strategy alternatives that featured within the January 2018 Interim SA Report (see para 6.3.3 of that report), and no consultation responses were received through that consultation to the contrary.
- 5.3.5 For completeness, it is also appropriate to highlight the two other large (60ha+) sites that appear in the Council's Housing and Economic Land Availability Assessment (HELAA):
- Land to the north of the A127 (65ha) - has already been mentioned above, as a feasible northern extension to DHGV. This land is subject to constraint in the form of Friern Manor Wood LWS, proximity to Thorndon Park Conservation Area, and onsite footpaths/bridleways. Also, whilst the land has not been examined through Green Belt review, it can be seen to have a relatively weak northern boundary (hedgerows and a small stream). No scheme has been submitted to the Council that would address these constraints/issues; indeed no scheme involving this land has been submitted at all.
  - Heron Hall, Herongate (236ha) - comprises much (but not all) of the land to the east of Ingrave, north of the Billaricay Road and west of Blind Lane. The site is constrained in transport terms, noting the challenge of achieving suitable access onto the A128 (which, in any case, is not a strategic corridor as per the A12 and A127) and in heritage terms, noting that the site surrounds grade 2\* listed Heron Hall is in proximity to two conservation areas. The network of footpaths crossing the site is also of note. Also, whilst the land has not been examined through Green Belt review, development would clearly impact on the gap between Brentwood/Shenfield and Basildon, and there would also seem to be no potential hard/defensible boundary at the site's northern edge. No scheme has been submitted to the Council that would address these constraints; indeed no scheme has been submitted at all.

- 5.3.6 The seven strategic site options discussed above (both 'reasonable' and 'unreasonable') are shown in **Figure 5.2**. Notes on the figure are as follows -
- The extent of the 'West Horndon East' site shows the extent of the site option considered through the Council's HELAA; however, the latest proposal involves a reduced site area.
  - The extent of a Brentwood North strategic site is open to debate. There could be the potential to work proactively with land-owners to make land available.
  - Pilgrim's Hatch is identified loosely as an area that could potentially grow in more than one direction (perhaps less so the northwestern sector, which is most constrained in heritage, biodiversity, and potentially landscape terms); however, there would be a concern that growth in more than one direction would equate to 'piecemeal' expansion.
- 5.3.7 Other strategic growth options have also been discussed, during meetings between Officers and AECOM, but all were judged to have clear drawbacks, in both sustainability and delivery terms, such that they undoubtedly perform sequentially poorly as options, and hence can be considered 'non-starter, options for the current Local Plan. For example -
- West of Brentwood - would impact the sensitive Green Belt gap to LB Havering, plus there are significant heritage and biodiversity constraints.
  - Southeast of Ingatestone - not on the Crossrail route (albeit with a good train service) and the railway serves as a robust Green Belt boundary. Also heritage constraint in the form of Ingatestone Hall (grade 1 listed) and other listed buildings (including grade 2\*).
  - North of the Borough - a rural area with poor transport links, and wide ranging environmental constraints/sensitivities, such that any strategic growth option identified would be found to be sequentially less preferable to options focused on a strategic transport corridor. There are areas of agricultural land (mainly of grade 2 quality) that might link fairly well to Chelmsford, and there is a cluster of linked villages where the option of rationalisation through strategic growth might feasibly be envisaged; however, no particular opportunities have been highlighted.
- 5.4 Smaller site options**
- 5.4.1 The remaining site options in contention for allocation are primarily those listed in Appendix IV of the Council's Housing and Economic Land Availability Assessment (HELAA) as 'deliverable or developable' (N.B. not all of the strategic site options discussed above, and shown in Figure 5.2, are identified as deliverable or developable by the HELAA).
- 5.4.2 **Figure 5.3** shows all of the 'deliverable or developable' HELAA sites. In addition, it shows four additional sites that it was deemed appropriate to examine through the SA, namely: 088 Bishops Hall Community Centre; 089 the Brentwood Centre; 287 East of Mascalls Lane; and 299 St. Faiths.
- 5.4.3 Various work-streams have focused on the task of examining the merits of individual site options in isolation, including analysis of proximity to constraint (e.g. SSSI) and opportunity (e.g. school) features using GIS software - see **Appendix III**.
- 5.4.4 Further key work-streams have involve landscape and Green Belt assessment of individual site options, as discussed in the Brentwood Borough Landscape Capacity and Sensitivity Assessment (2019) and the Brentwood Borough Green Belt Study (2018). These studies are available on the Council's website, at: <http://www.brentwood.gov.uk/index.php?cid=966>.



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**LEGEND**

- Brentwood Borough Boundary
- Strategic Site Options

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Purpose of Issue

Client  
**BRENTWOOD BOROUGH COUNCIL**

Project Title  
**BRENTWOOD LOCAL PLAN SA**

Drawing Title  
**STRATEGIC SITE OPTIONS**

Drawn JW	Checked BB	Approved MF	Date 17/01/2019
AECOM Internal Project No. 60482815		Scale @ A3 1:65,000	

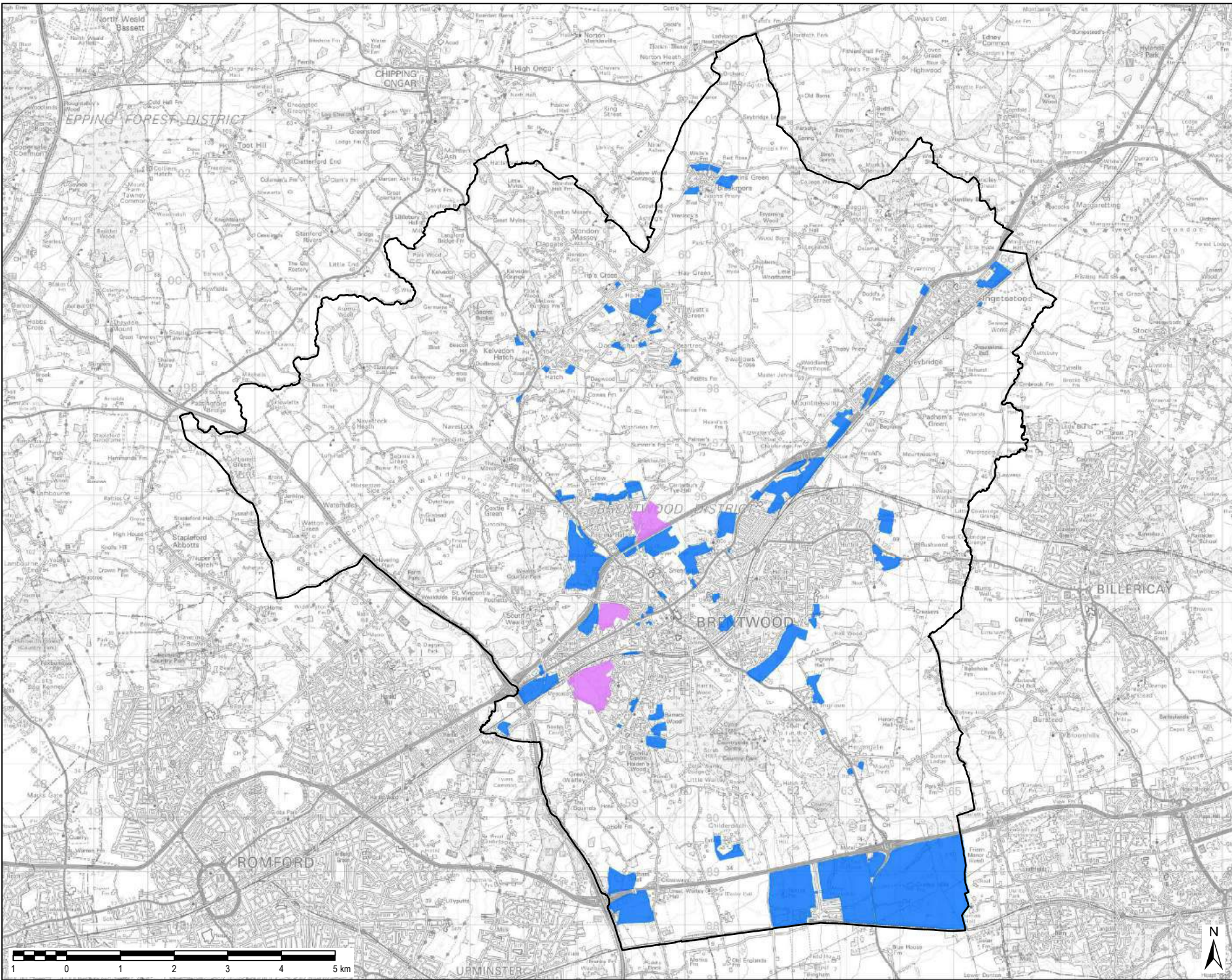
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**FIGURE 5.2**

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**LEGEND**

- Brentwood Borough Boundary
- Deliverable or Developable Site
- Other Site for Examination Through SA

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Purpose of Issue

Client  
**BRENTWOOD BOROUGH COUNCIL**

Project Title  
**BRENTWOOD LOCAL PLAN SA**

Drawing Title  
**HELAA SITES**

Drawn	Checked	Approved	Date
JW	BB	MF	17/01/2019
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Drawing Number  
**FIGURE 5.3**

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## 5.5 Sub-area options

### Introduction

- 5.5.1 Having discussed “top down” factors (housing quantum and broad distribution) and “bottom-up” factors (strategic and non-strategic site options), there is a need for one final discussion ahead of establishing reasonable spatial strategy alternatives.
- 5.5.2 Specifically, there is a need to consider each of Borough’s sub-areas in turn, examining the site options that exist, and the ways in which they might be delivered in combination.

N.B. to reiterate, this section is **authored jointly** by the Council and AECOM.

### Brentwood main urban area

- 5.5.3 The 2016 Draft Plan proposed allocation of 11 sites within the urban area (ten brownfield; one greenfield; 740 homes), and five urban extensions (one brownfield; four greenfield). The January 2018 Preferred Site Allocations document then presented an adjusted strategy, most notably with the addition of four Green Belt sites (also the removal of four undeliverable brownfield sites, reduced yield from four greenfield sites and additional yield from four brownfield sites). The net effect of these adjustments was a proposal, within the Preferred Site Allocations consultation document, to provide for a significantly increased number of homes in and around the Brentwood main urban area, relative to the 2016 Draft Plan.
- 5.5.4 Ahead of the 8<sup>th</sup> November Extraordinary Council meeting the Council worked to explore potential adjustments to the strategy, as previously published, in light of represents received, with the Council tentatively finding all of the January 2018 allocations to remain suitable. Ultimately, the plan document submitted to the 8<sup>th</sup> November meeting involved the same allocations as previously published for consultation in January 2018.<sup>26</sup>
- 5.5.5 The outcome of the 8<sup>th</sup> November Extraordinary Council meeting was that: one of the Green Belt allocation was deleted from the plan, namely Honeypot Lane (200 homes); and the number of homes assigned to the Priests Lane allocation (a greenfield site, but not within the Green Belt) was reduced from 95 to 75 homes.
- 5.5.6 As such, following the 8<sup>th</sup> November Extraordinary Council meeting, it was determined that the approach agreed by the Council could be taken as the **default** strategy, to be explored further through the appraisal of reasonable spatial strategy alternatives.
- 5.5.7 The next task was to give consideration to the possibility of **deleting** one or more of the default allocations. Specifically, the task was to identify any default allocations that are more contentious - i.e. where the decision to allocation is less clear cut.

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<sup>26</sup> The Draft SA Report submitted to the meeting explored higher growth options only. Specifically, spatial strategy options were examined involving allocation of three additional Green Belt sites.

- 5.5.8 In doing so, attention naturally focused on the eight sites within the Green Belt; however, following discussion between the Council and AECOM, all eight sites were determined to be suitably justified,<sup>27</sup> on the balance of evidence. Some of the sites are not ideally located in respect of accessing the town centre (or existing community infrastructure more generally); however, all are considered suitably free from constraints that cannot be addressed through development management, and all are well contained in Green Belt terms, with strong boundaries on all sides (i.e. no need to rely on field boundaries). Furthermore, two of the sites will be brought forward in combination with one another and a large adjacent non-Green Belt site (Officer's Meadow; 510 homes), in such a way that it should be possible to fund and deliver a new primary school. More generally, it was recognised that there is a lack of alternative brownfield capacity to fill the gap in supply that would result from removal of any of these sites, meaning that there would be pressure to A) allocate an alternative Green Belt site, which, in all likelihood, would perform worse in Green Belt and/or sustainability terms; and/or B) increase reliance on delivery of housing at one or more strategic schemes, which would increase the delivery risk associated with the plan, and also give rise to additional Green Belt and/or sustainability issues.
- 5.5.9 In conclusion, the option of deleting one or more of the default allocations was determined to be 'unreasonable', for the purposes of establishing reasonable spatial strategy alternatives.
- 5.5.10 Finally, there was a need to give consideration to the possibility of **adding** one or more omission sites.<sup>28</sup> There are no strategic omission sites reasonably in contention (see Section 5.3); however, there are a number of smaller omission sites listed as 'deliverable or developable' within Appendix IV of the Council's HELAA. Additionally, two further sites were identified as warranting consideration, despite not being identified as deliverable or developable by the HELAA, namely the Brentwood Centre and East of Mascalls Lane.
- 5.5.11 Each of these sites was subjected to GIS analysis (Appendix III) and an informal appraisal (Appendix IV), which lead to a shortlist of sites that were then subject to further informal appraisal (Table 5.2), which in turn lead to the selection of four omission sites to take forward for detailed appraisal through the appraisal of reasonable spatial strategy alternatives.
- 5.5.12 In conclusion, the option of adding one or more omission sites was determined to be 'reasonable', for the purposes of establishing reasonable spatial strategy alternatives, with four omission sites in contention.
- 5.5.13 The **overall conclusion** reached for the Brentwood main urban area was that the approach to growth should be explored further as a **variable** across the reasonable spatial strategy alternatives, with there being a need to explore the default approach alongside one or more higher growth options involving one or more of the four highlighted omission sites. This matter is explored further within Section 5.6.

<sup>27</sup> i.e. justified to the extent that the question of allocation was not considered to warrant further detailed consideration through the appraisal of reasonable spatial strategy alternatives, recognising the need to be selective.

<sup>28</sup> N.B. a North Brentwood strategic scheme should not be considered an omission site. See para 5.3.3.

Table 5.2: Final shortlist of Brentwood main urban area omission sites

Site	Commentary	Progress to Section 5.6?
022; Honeypot Lane, Brentwood	This site was allocated to deliver 200 homes within the version of the plan submitted to the 8 <sup>th</sup> November Extraordinary Council, before being removed from the plan at that meeting, primarily on traffic grounds. It remains a reasonable option, including as it performs well in Green Belt terms (“moderate-low” contribution to purposes).	Yes
024a / 024b; Sawyers Hall Farm, Brentwood	Two adjacent HELAA sites (a large site, plus a small site to the west; 20.3 ha in total) form the northwestern-most part of the area that has previously been considered (2015, 2016 and 2018 Interim SA Reports) as the North Brentwood strategic site option. The site contains Hopefield Animal Sanctuary, which has contributed to schemes proposed in the past generating considerable opposition; however, the site promoters have now proposed a masterplan to deliver 450 homes along with relocation of the Sanctuary within the site. The relocated sanctuary, along with certain other proposed measures (e.g. new pick-up/drop-off zone for the schools to the south), could lead to a degree of ‘planning gain’. The site is judged to have relatively good landscape capacity (“medium-high”) but to make a “moderate-high” contribution to GB purposes, and there are also concerns in respect of traffic generation.  The site has pros and cons, but on balance does stand-out as potentially having merit.	Yes
088 / 089; Bishops Hall Community Centre & the Brentwood Centre, Brentwood	This land (c.25ha in total) is not currently available, as it comprises the Borough’s only leisure centre (plus associated land) and adjacent Bishops Hall Community Centre (and associated land). The Council's Leisure Strategy 2018-28 commits to enhancements to the Brentwood Centre including the creation of a football hub with 3G pitches; however, the Strategy is also mindful of the need to achieve “a more financially sustainable service”. As such, it is difficult to rule-out the option of delivering some enabling housing. The land has not been examined through the Green Belt Review, but development on the Brentwood Centre land would seemingly need to rely on a soft Green Belt boundary (in the form of strong hedgerow line). Also, new homes would not be very well linked to services and facilities in Pilgrim’s Hatch and Brentwood.  In light of the current Council position - as per in the 2018 Leisure Strategy - development cannot be considered a reasonable option for the Local Plan.	No
291a/b; North West of Shenfield	Two adjacent HELAA sites - a 6.5ha site gaining access from Hall Lane, and a 10.7ha site to the west, with access from Hallwood Crescent - are being jointly proposed to deliver 450 homes. The scheme would benefit from relatively good proximity (c.1-1.5km) to Shenfield Station (Crossrail), and might also perform <i>relatively</i> well in Green Belt and landscape terms, as it would be enclosed by built form and woodland / a mature tree belt (albeit it has not been examined through the Green Belt Study or the Landscape Sensitivity and Capacity Study). However, the site is heavily constrained in biodiversity terms, with the great majority of the land designated as a LWS, and Hall Wood ancient woodland LWS adjacent to the north. There would also be concerns regarding access/traffic, and impacts to the historic core of Shenfield.	No
299; St. Faiths, Brentwood	A site is being promoted for 750 homes that comprises a 15.6ha HELAA site (Land at Weald Road and Honeypot Lane adjacent to former site of St Faiths Hospital); the BT Centre existing employment site to the south; and a small additional area of land in-between these two HELAA sites. The site relates very well to Brentwood town centre, and the Green Belt Study finds the site to contribute to GB purposes only to a ‘moderate’ extent. However, the site is subject to significant biodiversity constraint in that the northern part (i.e. the non-employment part) is a LWS with informal public access. It is also rising land, potentially with views to Weald Country Park.  The site has pros and cons, but on balance does stand-out as potentially having merit.	Yes
302c; Land off Ongar Road, Pilgrims Hatch, Brentwood	A site is being promoted for 800 homes that comprises most of the 53ha HELAA site to the west of Pilgrims Hatch, plus a small additional area of land directly to the south (the remaining land stretching down to Weald Lane). The scheme promoters are offering to make land available for a primary school; however, the Green Belt Study judges the site to contribute to Green Belt purposes to a “moderate-high” extent, the Landscape Sensitivity and Capacity Study judges the site to have “low or low medium” capacity, and the site is further constrained in heritage and biodiversity terms.  The site has pros and cons, but on balance does stand-out as potentially having merit.	Yes

### The A127 Corridor

- 5.5.14 The 2016 Draft Plan proposed a 500 home redevelopment of West Horndon Industrial Estate, and a 2,500 home new community within the Green Belt - to the east of West Horndon / west of Basildon - in the form of Dunton Hills Garden Village (DHGV). The January 2018 Preferred Site Allocations document then presented a modest adjustment to the strategy, with the proposal to deliver an additional 80 homes at the Industrial Estate site.
- 5.5.15 Ahead of the 8<sup>th</sup> November Extraordinary Council meeting the Council worked to explore potential adjustments to the strategy, as previously published, in light of represents received, with the Council tentatively finding all of the January 2018 allocations to remain suitable. Ultimately, the plan document submitted to the 8<sup>th</sup> November meeting involved the same allocations as previously published for consultation in January 2018.<sup>29</sup>
- 5.5.16 At the 8<sup>th</sup> November Extraordinary Council meeting all of the proposed allocations were agreed; however, the decision was taken to assign the 200 homes from the rejected Honey Pot Lane site (see para 5.5.5) to DHGV, with the leader of the Council explaining that discussions between the site promoter and the Council had found an increased rate of delivery to be achievable.
- 5.5.17 As such, following the 8<sup>th</sup> November Extraordinary Council meeting, it was determined that the approach agreed by the Council could be taken as the **default** strategy, to be explored further through the appraisal of reasonable spatial strategy alternatives.
- 5.5.18 The next task was to give consideration to the possibility of **deleting** one or more of the default allocations. Specifically, the task was to identify any default allocations that are more contentious - i.e. where the decision to allocation is less clear cut.
- 5.5.19 In doing so, attention naturally focused on DHGV. With regards to the other proposed allocation - West Horndon Industrial Estate - allocation was determined to be suitably justified,<sup>30</sup> given the brownfield nature of the site.
- 5.5.20 In conclusion, the option of deleting DHGV was determined to be 'reasonable', for the purposes of establishing reasonable spatial strategy alternatives.
- 5.5.21 Finally, there was a need to give consideration to the possibility of **adding** one or more omission sites. The only sites listed by the HELAA as 'deliverable or developable' are the component sites that form the West Horndon strategic site option, which has already been introduced as a 'reasonable' option within Section 5.3, above; and no other reasonable strategic site options exist in this area.<sup>31</sup>
- 5.5.22 As such, it was determined that options involving allocation of a strategic site at West Horndon should be taken forward for further detailed examination through the appraisal of reasonable spatial strategy alternatives.
- 5.5.23 In conclusion, the option of adding one or more omission sites was determined to be 'reasonable', for the purposes of establishing reasonable spatial strategy alternatives, with the omission sites at west and east of West Horndon in contention.
- 5.5.24 The **overall conclusion** reached for the A127 corridor was that the approach to growth should be explored further as a **variable** across the reasonable spatial strategy alternatives, with there being a need to explore the default approach alongside one or more lower growth options (involving deletion of DHGV) and one or more higher growth options (involving the West Horndon omission sites). This matter is explored further within Section 5.6.

<sup>29</sup> The Draft SA Report submitted to the meeting explored both lower and higher growth options. Specifically, spatial strategy options were examined involving strategic growth at West Horndon, either in place of or in addition to DHGV

<sup>30</sup> i.e. justified to the extent that the question of allocation was not considered to warrant further detailed consideration through the appraisal of reasonable spatial strategy alternatives, recognising the need to be selective.

<sup>31</sup> Several omission sites at Little Warley are ruled-out through the HELAA on account of being isolated. This reflects the fact that Little Warley is a small hamlet with a church but no other services or facilities.



### Ingatestone

- 5.5.25 The 2016 Draft Plan proposed 26 homes at two small urban brownfield sites (042 and 098) and 102 homes across two Green Belt sites (079a and 128, the latter being brownfield). The January 2018 Preferred Site Allocations document then presented a modest adjustment to the strategy, with one additional Green Belt allocation proposed (106) for 41 homes. In addition, by this time one of the brownfield sites (042) had gained planning permission, whilst the other had been determined to be unavailable.
- 5.5.26 Ahead of the 8<sup>th</sup> November Extraordinary Council meeting the Council worked to explore potential adjustments to the strategy, as previously published, in light of representations received, with the Council tentatively finding all of the January 2018 allocations to remain suitable. Ultimately, the plan document submitted to the 8<sup>th</sup> November meeting involved the same allocations as previously published for consultation in January 2018.<sup>32</sup>
- 5.5.27 At the 8<sup>th</sup> November Extraordinary Council meeting all of the proposed allocations were agreed. As such, following the 8<sup>th</sup> November Extraordinary Council meeting, it was determined that the approach agreed by the Council could be taken as the **default** strategy, to be explored further through the appraisal of reasonable spatial strategy alternatives.
- 5.5.28 The next task was to give consideration to the possibility of **deleting** one or more of the default allocations. Specifically, the task was to identify any default allocations that are more contentious - i.e. where the decision to allocation is less clear cut.
- 5.5.29 However, following discussion between the Council and AECOM, all three default allocations were determined to be suitably justified,<sup>33</sup> on the balance of evidence. All three are very well contained in Green Belt terms, albeit the corollary is that much of the land is bounded by the A12 or the railway, which gives rise to some noise and air pollution concern.
- 5.5.30 In conclusion, the option of deleting one or more of the default allocations was determined to be 'unreasonable', for the purposes of establishing reasonable spatial strategy alternatives.
- 5.5.31 Finally, there was a need to give consideration to the possibility of **adding** one or more omission sites. The HELAA lists five omission sites as 'deliverable or developable', of which the two sites with greatest potential for allocation are the adjacent 'Parklands' sites (1.8ha and 11.2ha)<sup>34</sup> at the village's northern extent.<sup>35</sup> The Green Belt Review finds both sites to contribute to purposes only to a 'moderate' extent; however, neither site is fully contained in the landscape, with the larger site having a very weak boundary at its northern edge.
- 5.5.32 In conclusion, the option of adding one or more omission sites was determined to be 'unreasonable', for the purposes of establishing reasonable spatial strategy alternatives. This conclusion reflects both site specific considerations (as discussed above) and strategic considerations, i.e. it is the case that allocation of two sites to deliver 218 homes is an appropriate strategy for Ingatestone, in light of the established 'borough of villages' strategy (a 2ha employment site is also proposed).<sup>36</sup>
- 5.5.33 The **overall conclusion** reached for Ingatestone was that the default strategy should be a **constant** across the reasonable spatial strategy alternatives.

<sup>32</sup> The reasonable alternatives examined within the Draft SA Report submitted to the meeting did not vary the approach to growth.

<sup>33</sup> i.e. justified to the extent that the question of allocation was not considered to warrant further detailed consideration through the appraisal of reasonable spatial strategy alternatives, recognising the need to be selective.

<sup>34</sup> The HELAA discounts most sites for being unavailable, too small or isolated. One site is ruled out as undeliverable (North west of Roman Road, 2ha) on the basis of extensive onsite mature trees.

<sup>35</sup> The other 'deliverable or developable' omission sites at Ingatestone are: 153 Land to South of Fryerning Lane (2ha; moderate contribution to GB purposes, but separated from the village by the A12), 225 The Nutshell, Stock Lane (0.45ha; low-moderate contribution to GB purposes, but separated from the village by the railway); and 288A Land to the north west of Roman Road (1.2ha; not assessed by the Green Belt Study, but evidently well contained, but constrained by mature vegetation and poor access).

<sup>36</sup> The Local Plan vision includes the statement: "We are a 'Borough of Villages' and we will continue to maintain our village character, ensuring development respects and enhances these environmental qualities that give Brentwood its distinctive character."

## Villages

- 5.5.34 The higher tier villages (leaving aside West Horndon) are: Blackmore, Doddinghurst and Kelvedon Hatch in the north; Mountnessing between Shenfield and Ingatestone; and Herongate and Ingrave south of Brentwood/Shenfield.
- 5.5.35 The 2016 Draft Plan did not propose allocation of any sites; however, subsequent detailed work by the Council to examine site options - in particular in Green Belt terms - led to the identification of several opportunities.<sup>37</sup> Specifically, the Council identified seven sites in the northern villages (most significantly 96 homes at two sites to the north of Blackmore), with a total capacity of 169 homes. This strategy was published for consultation in January 2018.
- 5.5.36 Ahead of the 8<sup>th</sup> November 2018 Extraordinary Council meeting the Council worked to explore potential adjustments to the strategy, as previously published, in light of representations received, with the Council reaching the tentative conclusion that, whilst all of the January 2018 allocations remain suitable, there was a need to reduce the number of homes allocated to certain sites, thereby reducing the total number of homes to 133.<sup>38</sup>
- 5.5.37 The outcome of the 8<sup>th</sup> November Extraordinary Council meeting was that one Green Belt allocation was deleted from the plan, namely Land at Hook End (10 homes). As such, following the 8<sup>th</sup> November Extraordinary Council meeting, it was determined that the approach agreed by the Council could be taken as the **default** strategy, to be explored further through the appraisal of reasonable spatial strategy alternatives.
- 5.5.38 The next task was to give consideration to the possibility of **deleting** one or more of the default allocations, i.e. where the decision to allocation is less clear cut.
- 5.5.39 However, following discussion between the Council and AECOM, all were determined to be suitably justified,<sup>39</sup> on the balance of evidence. The January 2018 Interim SA Report (see Chapter 10) highlighted limited issues/impacts;<sup>39</sup> however, on reflection the issue/impacts raised were considered to be minor, or with the potential for suitable avoidance/mitigation.
- 5.5.40 In conclusion, the option of deleting one or more of the default allocations was determined to be 'unreasonable', for the purposes of establishing reasonable spatial strategy alternatives.
- 5.5.41 Finally, there was a need to give consideration to the possibility of **adding** one or more of the omission sites listed as 'deliverable or developable' within Appendix IV of the HELAA.<sup>40</sup>
- 5.5.42 Each of these sites was subjected to GIS analysis (Appendix III) and an informal appraisal (Appendix V), which lead to the conclusion that none warrant being taken forward for detailed appraisal through the appraisal of reasonable spatial strategy alternatives, also mindful of the strategic context, namely limited arguments for higher growth at the villages.<sup>41</sup>
- 5.5.43 In conclusion, the option of adding one or more omission sites was determined to be 'unreasonable', for the purposes of establishing reasonable spatial strategy alternatives.
- 5.5.44 The **overall conclusion** reached for the villages was that the default strategy should be a **constant** across the reasonable spatial strategy alternatives.

<sup>37</sup> There was also a strategic context, with the 2017 Housing White Paper "*expect(ing) local planning authorities to identify opportunities for villages to thrive, especially where this would support services and help meet the need to provide homes for local people who currently find it hard to live where they grew up.*"

<sup>38</sup> Specifically: the yield of the two adjacent sites at Blackmore was reduced by 26 homes to take account of the potential need for surface water flooding measures on site; and the yield of the two adjacent sites in Hook End was reduced by 10 homes.

<sup>39</sup> The Interim SA Report noted, in particular, that the proposed extension to Blackmore is constrained by three adjacent or nearby listed buildings, with Blackmore Conservation Area is located c.125m to the south; and also that the two sites at Kelvedon Hatch are seemingly less strongly contained within the landscape (i.e. relative to the other proposed sites at the Northern Villages).

<sup>40</sup> The HELAA discounts most sites for being unavailable, too small or isolated. The HELAA also rules out six sites as undeliverable.

<sup>41</sup> Neither Thurrock Council nor Highways England - as the two key organisations expressing concerns regarding growth at one or both of the main transport corridors - nor any other organisation with a strategic interest, suggested higher growth in the rural north is an option that should be explored further. It is also notable that the South Essex SoCG (2018) reaffirms the long held view that Brentwood Borough is "characterised by its village character, a "Borough of Villages" surrounding Brentwood market town at its heart."

**5.6 Establishing the reasonable alternatives**

5.6.1 In light of the steps discussed above (Sections 5.2 to 5.5; see Figure 5.1 for a summary), Officers and AECOM (working in collaboration) were able to establish reasonable spatial strategy alternatives - i.e. a series of alternative packages of site allocations, where each package would provide for LHN (see para 5.2.7) in combination with other elements of housing land supply, namely completions, commitments and a windfall assumption.<sup>42</sup>

5.6.2 Section 5.5 has already established which elements of the spatial strategy should be a 'constant' across the alternatives, and which a 'variable'. **Table 5.4** presents a summary.

*Table 5.4: Constants, variables and potential options*

Settlement(s)	Variable or constant?	Options
Brentwood	Variable	<ul style="list-style-type: none"> <li>• Allocations agreed at 8<sup>th</sup> November Extraordinary Council</li> <li>• Higher growth through additional allocation of one or more of the four omission sites highlighted</li> </ul>
A127 corridor		<ul style="list-style-type: none"> <li>• Allocations agreed at 8<sup>th</sup> November Extraordinary Council</li> <li>• Lower growth through deletion of DHGV (with or without additional allocation West and/or East of West Horndon).</li> <li>• Higher growth through additional allocation West of West Horndon N.B. higher growth through additional allocation East of West Horndon is 'unreasonable' the resulting lack of a Green Belt gap to DHGV.</li> </ul>
Ingatestone and the villages	Constant	<ul style="list-style-type: none"> <li>• Allocations agreed at 8<sup>th</sup> November Extraordinary Council</li> </ul>

5.6.3 The list of potential permutations of these options is lengthy, mainly because of the potential for each of the four Brentwood omission sites to either be delivered in isolation (i.e. higher growth through additional allocation of just one site) or in any combination (i.e. the three combinations of two, or the combination of all three). As such, it was considered reasonable (given a need to keep the number of spatial strategy alternatives to a minimum, with a view to supporting public engagement) to examine only one higher growth option for Brentwood, namely additional allocation of all four omission sites in combination.

5.6.4 It was also deemed appropriate to rule out certain feasible spatial strategy options as involving allocations for too few or too many homes. Specifically, whilst low growth options involving allocation of just site at West Horndon can be envisaged, the outcome would be an insufficient land supply (at most 350 dpa plus 1%); and whilst a high growth option involving allocation all site sites that are a 'variable' across the reasonable alternatives can be envisaged, the outcome would be an over-supply (350 dpa plus 93%, or 454 dpa plus 49%).

5.6.5 In **summary**, the following rules were applied when combining the options introduced in Table 5.4 to form a series of reasonable spatial strategy alternatives: 1) East of West Horndon would not come forward in combination with DHGV;<sup>43</sup> 2) the Brentwood/Shenfield omission sites would be delivered in combination; 3) spatial strategy options that clearly involve an under-supply or over-supply of housing can be ruled-out as unreasonable.

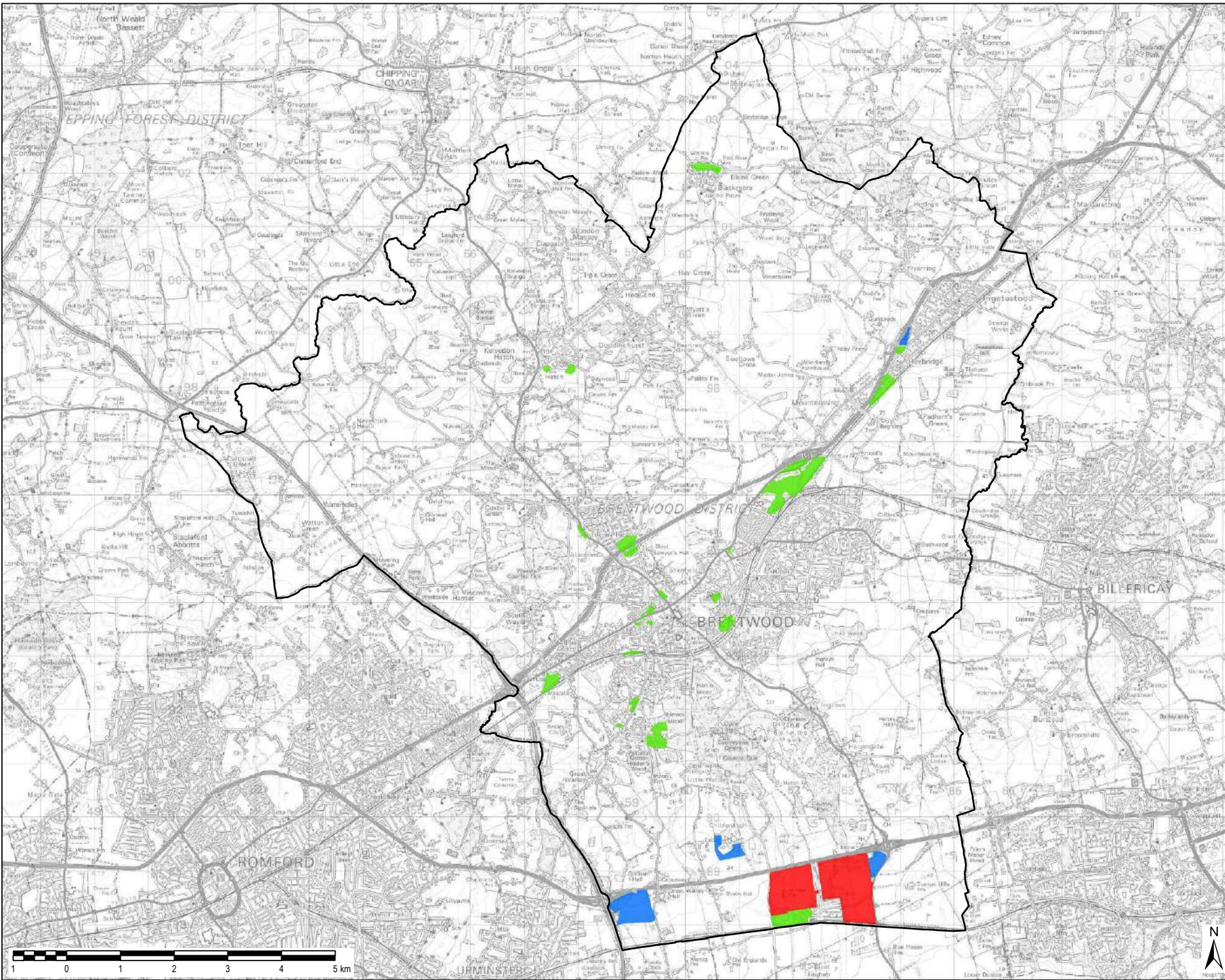
5.6.6 This list of variables, options and rules led to the identification of the reasonable spatial strategy alternatives presented below - see **Table 5.5 and subsequent maps**.

<sup>42</sup> 'Completions' are homes built since the start of the plan period (2016/17 & 2017/18); 'commitments' are homes on sites with planning permission (as at 1<sup>st</sup> April 2018; includes non-implementation discount of 10%) or neighbourhood plan allocations (of which there are none in this case); and the windfall assumption is the number of homes anticipated to come forward on unallocated sites.

<sup>43</sup> In the past a further rule has been applied, namely that East of West Horndon would only ever come forward in combination with West of West Horndon, as it is the more constrained site. However, on reflection it is considered safer not to apply this rule.





Table 5.5: The reasonable spatial strategy alternatives (following 8<sup>th</sup> November 2018 Extraordinary Council meeting)

			Option 1 WH East WH West	Option 2 Brentwood	Option 3 DHGV	Option 4 Brentwood WH East	Option 5 Brentwood WH West	Option 6 DHGV WH West	Option 7 Brentwood WH East WH West	
Completions			363	363	363	363	363	363	363	
Commitments			926	926	926	926	926	926	926	
Windfall			410	410	410	410	410	410	410	
Allocations	Constants	Brentwood / Shenfield	Urban brownfield	1,152	1,152	1,152	1,152	1,152	1,152	
			Urban greenfield	75	75	75	75	75	75	
			Green Belt	1240	1240	1240	1240	1240	1240	
		West Horndon	Urban brownfield	580	580	580	580	580	580	580
			Villages	Ingatestone GB	218	218	218	218	218	218
		Northern Village GB		123	123	123	123	123	123	
	Variables	Brentwood	Honeypot Lane		200		200	200		200
			Sawyers Hall Farm		450		450	450		450
			St. Faiths		750		750	750		750
			West of Ongar Road		800		800	800		800
		A127	West Horndon East	600			600			600
			West Horndon West	900				900	900	900
			Dunton Hills GV			2700			2700	
<b>Total dwellings</b>			<b>6587</b>	<b>7287</b>	<b>7787</b>	<b>7887</b>	<b>8187</b>	<b>8687</b>	<b>8787</b>	
<b>Total per annum</b>			<b>387</b>	<b>429</b>	<b>458</b>	<b>464</b>	<b>482</b>	<b>511</b>	<b>517</b>	
<b>% over 350 dpa</b>			<b>11%</b>	<b>22%</b>	<b>31%</b>	<b>33%</b>	<b>38%</b>	<b>46%</b>	<b>48%</b>	
<b>% over 454 dpa</b>			<b>-15%</b>	<b>-6%</b>	<b>1%</b>	<b>2%</b>	<b>6%</b>	<b>13%</b>	<b>14%</b>	



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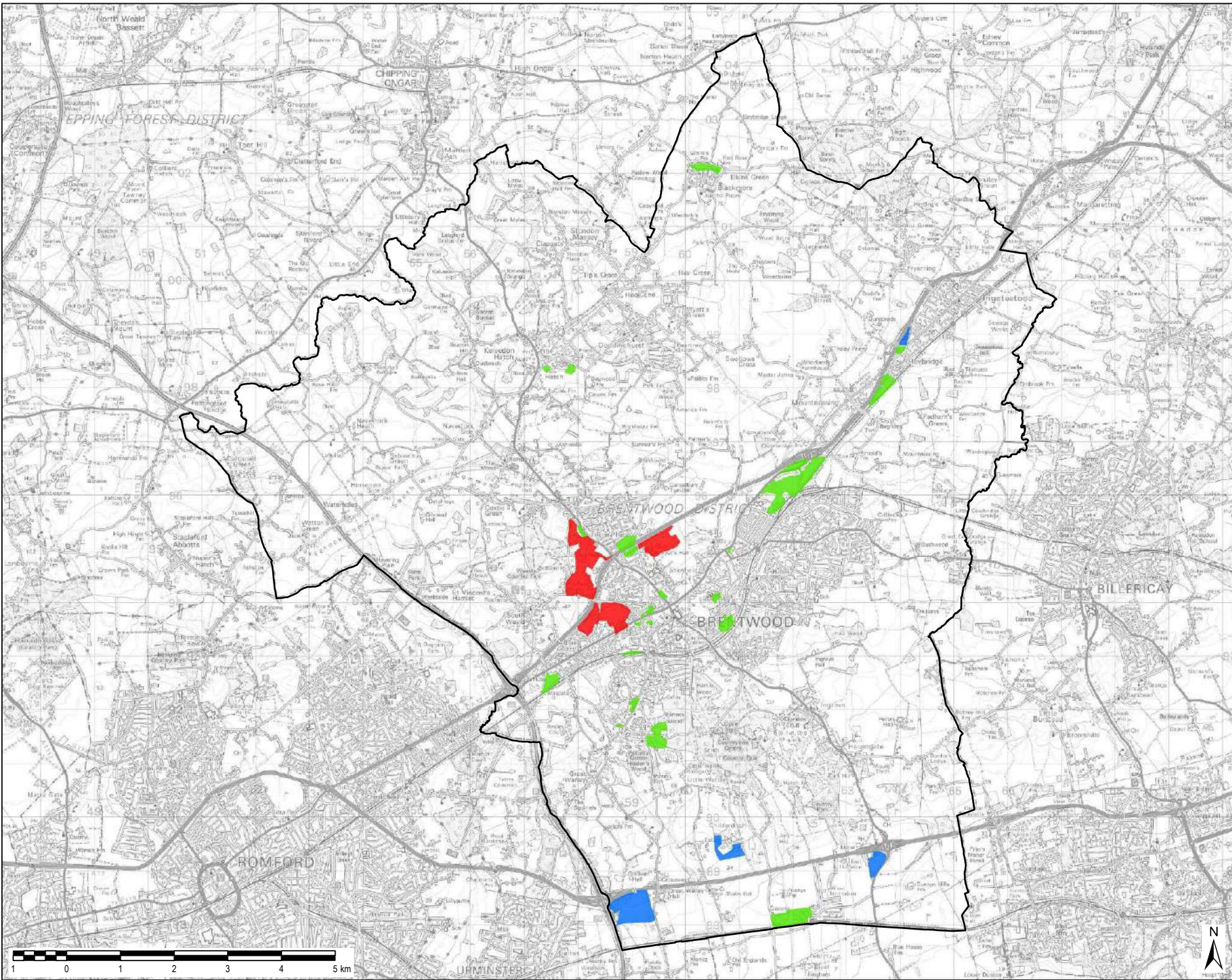
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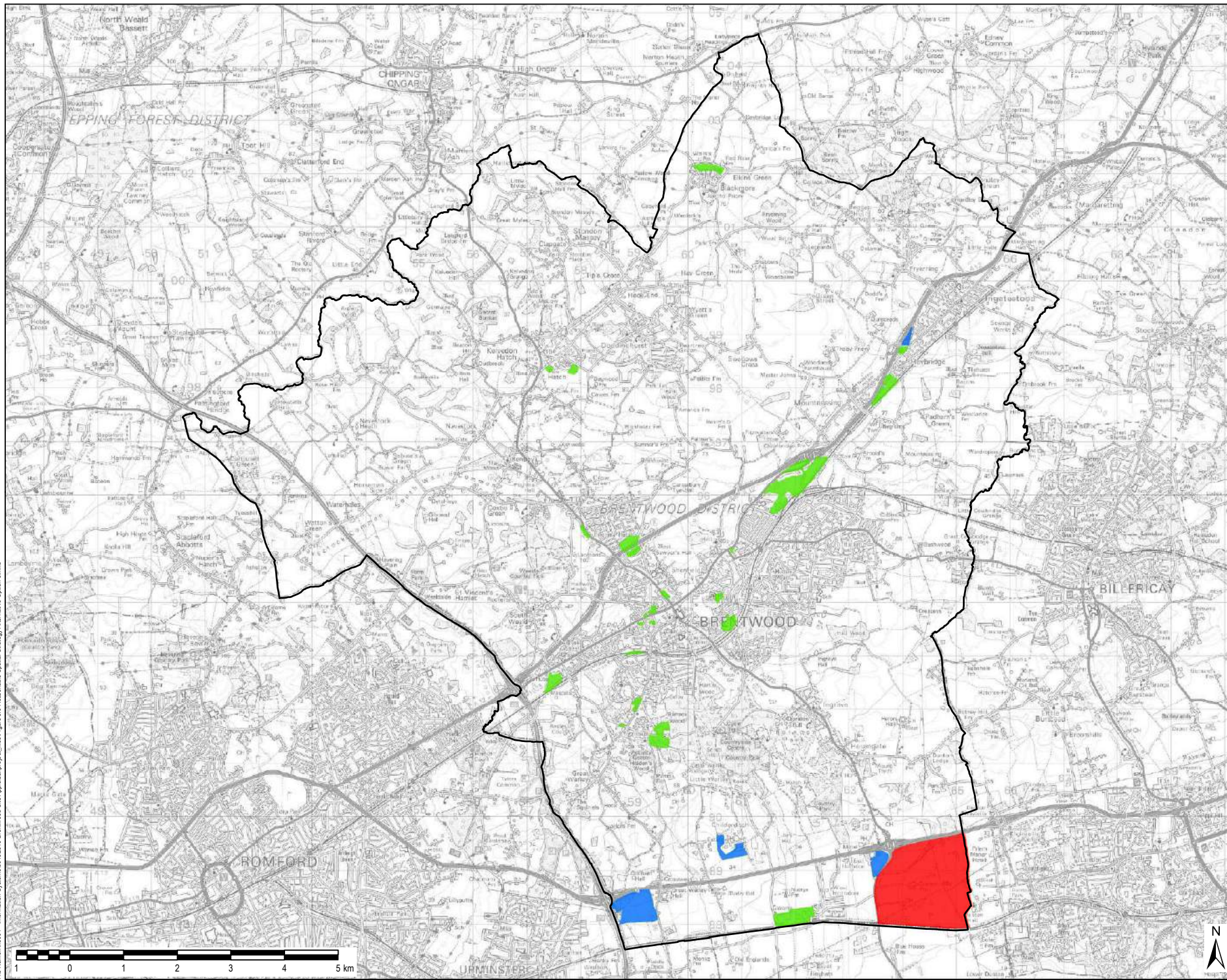
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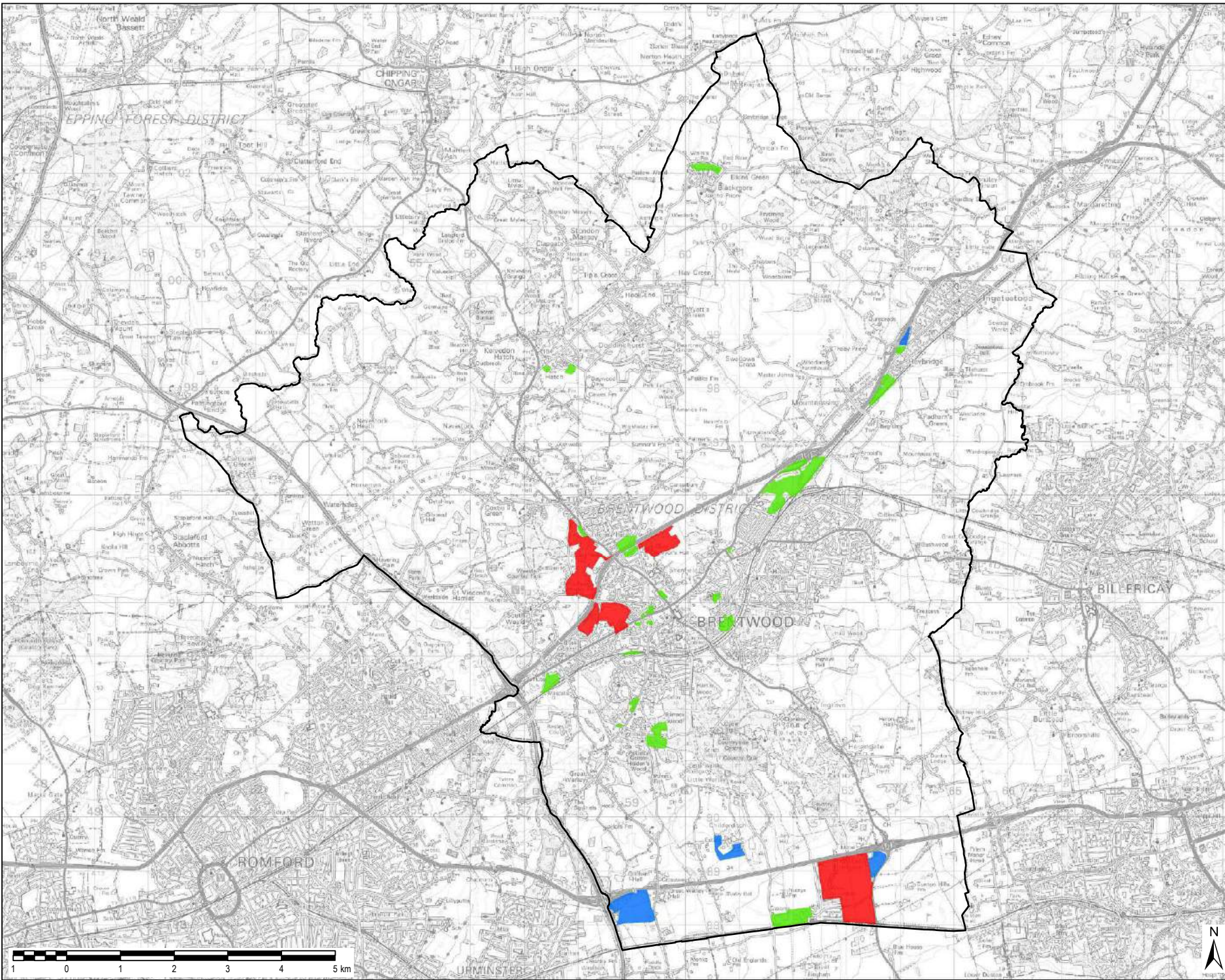
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**FIGURE 5.6**

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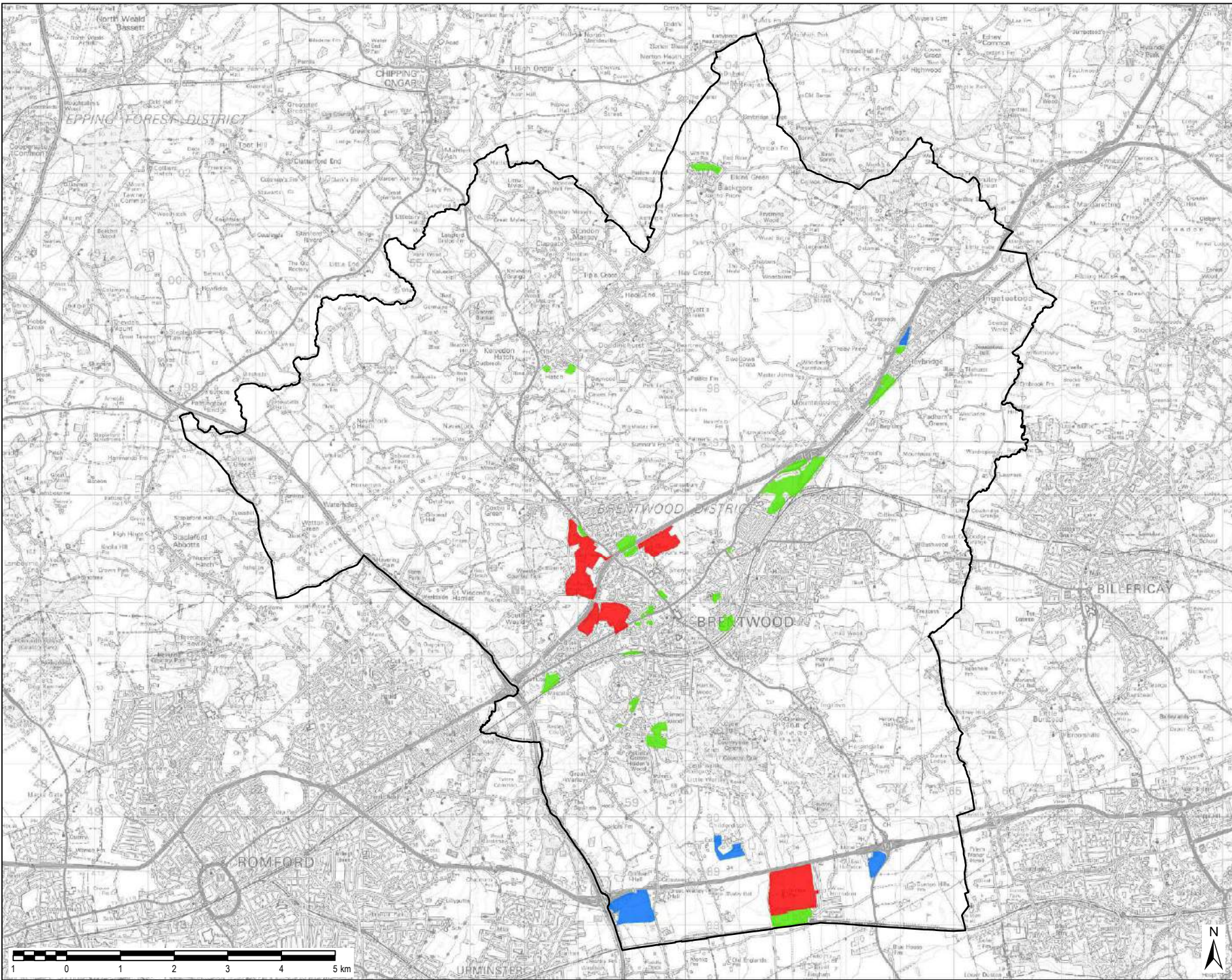
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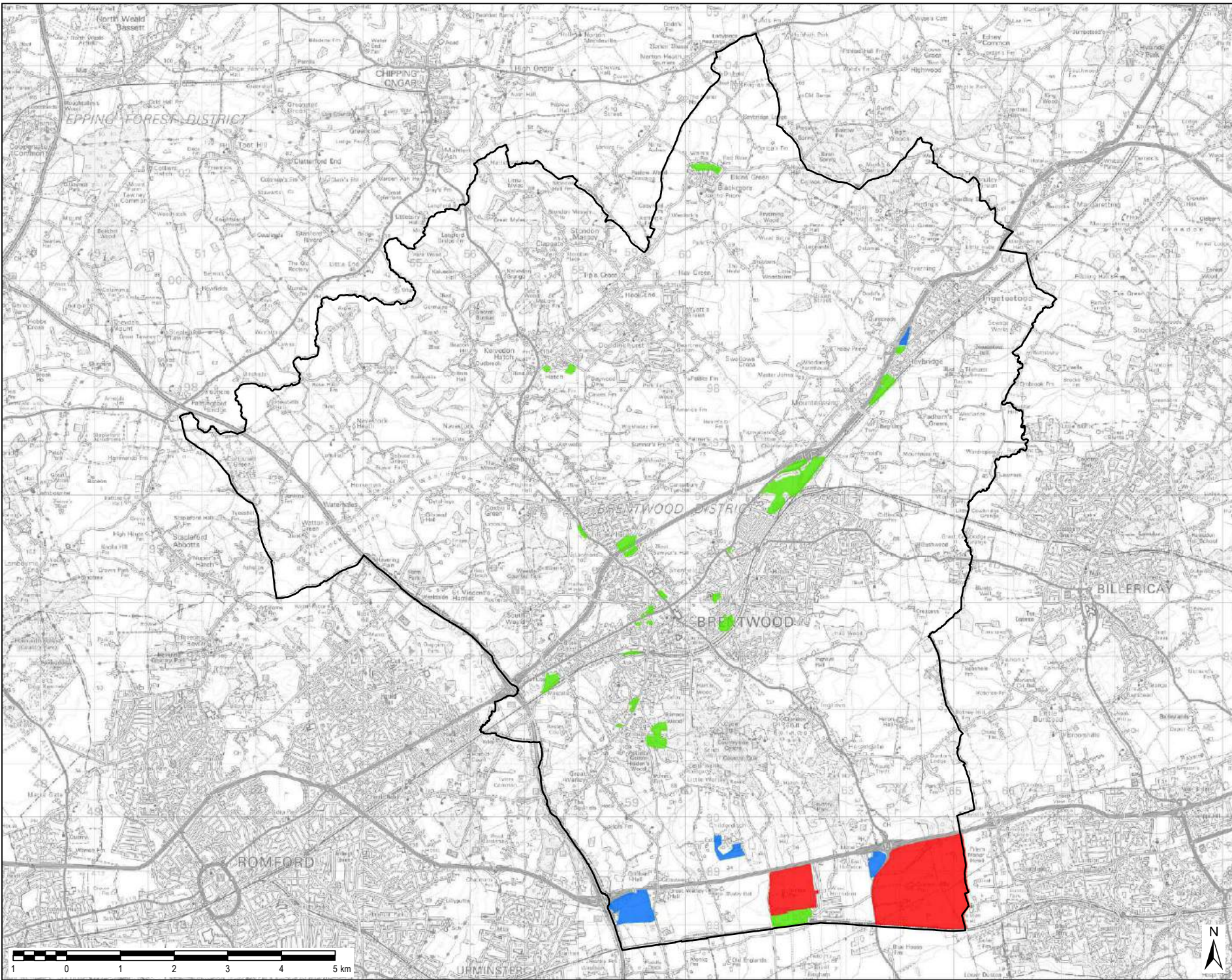
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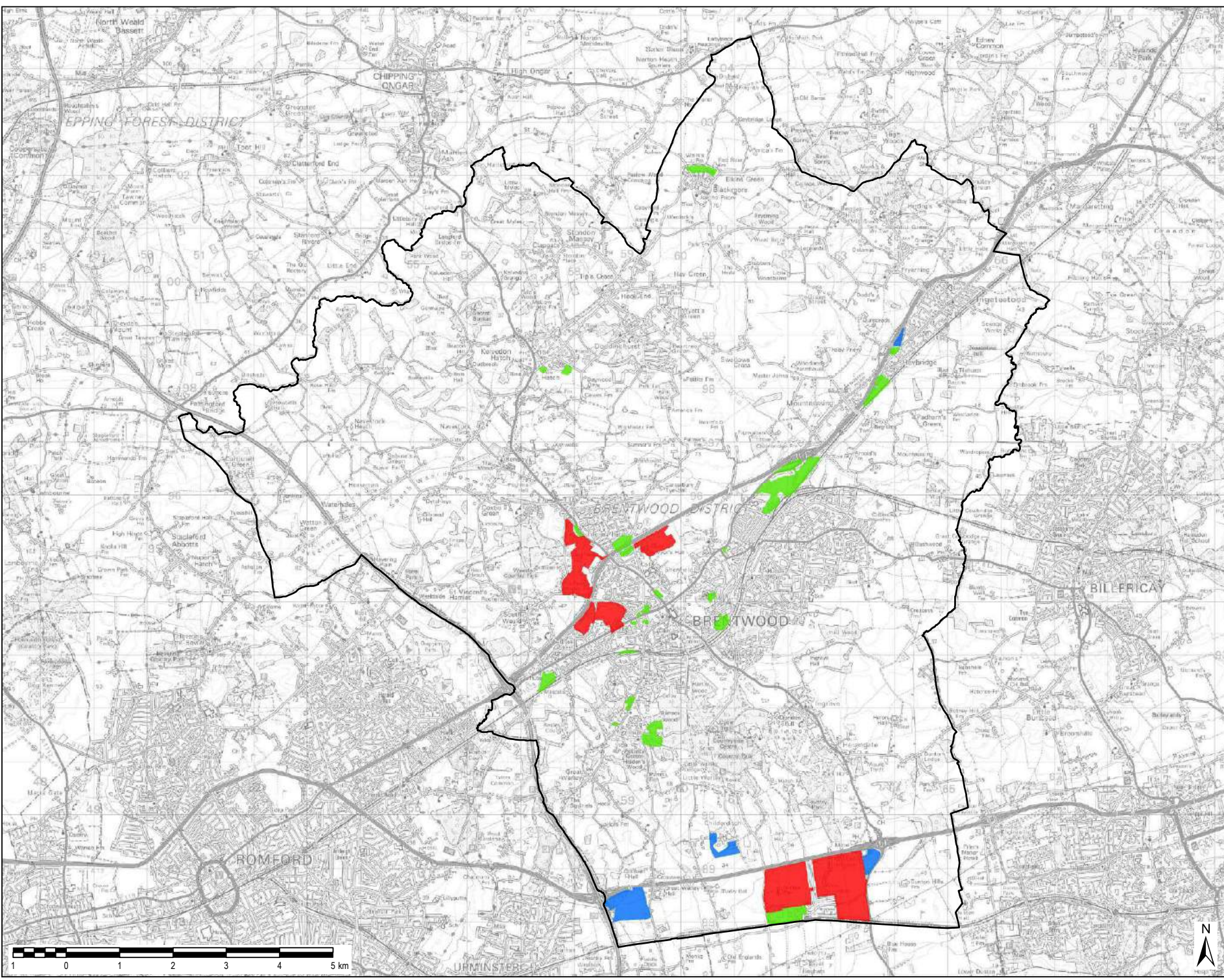
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**FIGURE 5.9**

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File Name: K15004 - Information Systems\60482815 Brentwood Site Appraisal\prop\_d\_ files\Figures 5.0 Researched Spatial Strategy Alternative Option 7.mxd



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**SPATIAL STRATEGY OPTION 7**

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**FIGURE 5.10**

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**6 APPRAISAL OF THE REASONABLE ALTERNATIVES**

**6.1 Summary appraisal findings**

6.1.1 **Table 6.1** presents summary appraisal findings in relation to the alternatives introduced above. Detailed appraisal findings are presented in **Appendix V**.

6.1.2 Detailed appraisal methodology is explained in Appendix V, but in summary: The appraisal table comprises a row for each of the sustainability topics that make up the SA framework (see Table 3.1). Within each row the alternatives are categorised in terms of potential to result in ‘significant effects’ (using **red / green**) and also ranked in order of relative performance (with ‘ = ’ used to denote instances where the alternatives perform on a par, i.e. it not possible to differentiate between them).

*Table 6.1: Summary appraisal of the reasonable spatial strategy alternatives (January 2019)*

Topic	Rank of performance / categorisation of effects						
	Opt 1 WH East WH West	Opt 2 Brentwood	Opt 3 DHGV	Opt 4 Brentwood WH East	Opt 5 Brentwood WH West	Opt 6 DHGV WH West	Opt 7 Brentwood WH East WH West
Air quality	★1	4	2	5	5	3	6
Biodiversity	3	4	★1	6	5	2	7
Climate change	★1	3	★1	3	2	★1	★1
Community & well-being	2	5	★1	5	4	2	3
Cultural heritage	2	2	★1	3	2	★1	3
Economy & employment	2	3	★1	3	2	★1	3
Flooding	=						
Housing	7	6	5	4	3	2	★1
Landscape	★1	2	3	5	4	7	6
Soils	=						
Waste	=						
Water	★1	2	3	4	5	6	7

## Conclusion

A headline conclusion is that a strategy involving one or more strategic allocations within the A127 corridor performs well, relative to the alternative of supporting higher growth at Brentwood, in respect of a number of objectives. It does not automatically follow that a strategy involving higher growth at the Brentwood is relatively unsustainable overall; however, it is an indication. The appraisal has highlighted limited benefits to supporting higher growth at Brentwood, and some significant draw-backs, most notably in respect of 'air quality' and 'biodiversity', with significant negative effects predicted in both respects. However, the appraisal findings do reflect the merits of the particular package of sites assumed to deliver higher growth. There will be alternative packages of sites that perform better in certain respects.

Focusing on growth options within Brentwood, there are essentially three urban extension options that might be considered 'strategic', in that they will be of a scale sufficient to deliver strategic infrastructure upgrades, and hence a degree of 'planning gain' (one of the three sites might alternatively be split into its two component parts, but such an approach is found to perform relatively poorly through the appraisal). One of these three schemes (Honeypot Lane / St Faiths; c.900 homes) potentially stands out as performing well, on the basis of its relative merits in respect of Green Belt containment and proximity to Brentwood Town Centre; however, there are also a range of draw-backs, most notably in terms of traffic/air quality and biodiversity. Also, this area drains to the more constrained Brentwood Waste Water Treatment Works (WwTW).

Focusing on the A127 corridor, a strategy involving DHGV (Option 3) is found to out-perform a strategy involving growth to the east and west of West Horndon (Option 1) other than in respect of -

- Landscape - this finding relates to the fact that Option 1 would involve lower growth overall, relative to Option 3, i.e. growth at DHGV would be on a larger scale (in particular once account is taken of the potential for significant growth beyond the plan period) and also the findings of two key studies that serve to indicate that West Horndon has greater capacity than DHGV, in both landscape (less so land to the northeast of the village) and Green Belt terms. Option 1 would nonetheless result in significant negative effects, given the extent of Green Belt loss and impacts to landscapes at the edge of existing settlements.
- Air quality - West Horndon is judged to be the preferable location from a perspective of wishing to minimise car dependency / distance travelled by car, given the rail station, and in turn is judged to be the preferable location in respect of 'air quality' (noting that growth along the A127 corridor can be expected to lead to increased traffic in the Brentwood town centre Air Quality Management Area, AQMA); however, there is some uncertainty in respect of this conclusion, given the potential to deliver significant upgrades to walking/cycling and public transport infrastructure through a focus at DHGV, as well as to deliver employment and a local centre (to include a secondary school) on-site.

There are three final points to note -

- Housing - the appraisal conclusion in respect 'Housing' reflects the overall quantum of homes provided for, rather than the spatial distribution (as per 'Landscape'). Higher growth options are judged to be preferable given: A) uncertainty in respect of the LHN figure (350 dpa or 454 dpa); B) the need to provide for a 'buffer' over-and-above LHN in order to ensure a robust housing supply trajectory (recognising the risk of unanticipated delays to deliver at one or more sites); and C) the risk (less likely) of the Brentwood Local Plan having to provide for unmet needs arising from elsewhere in South Essex. All options are judged to result in significant positive effects on balance; however, this conclusion is uncertain in respect of the lower growth options, recognising the LHN uncertainty in particular.
- Soils - the alternatives are judged to perform broadly on a par, with all predicted to result in significant negative effects, given the risk of significant loss of best and most versatile agricultural land. It might be suggested that lower growth is preferable; however, this might increase pressure for growth at locations outside of Brentwood Borough where agricultural land quality is higher. The nationally available dataset shows there to be some areas of higher quality (grade 2), and also highest quality (grade 1), agricultural land in South Essex, and there are also extensive areas of higher quality (grade 2) land in Epping Forest and Chelmsford Districts to the north - see Appendix II.
- Water - the Council's WCS serves to suggest that WwTW capacity is a constraint to growth locally, which in turn serves to indicate that lower growth is preferable. Whilst there are a range of mitigation measures that can be implemented, all might be associated with risks and uncertainties, and hence there is an argument for seeking to avoid the problem in the first instance. In respect of spatial distribution, there is some reason to suggest that growth at Brentwood is preferable to growth along the A127 corridor; however, it is difficult to draw strong conclusions. In respect of effect significance, whilst there can be no certainty in the absence of detailed evidence, it is appropriate to 'flag' the risk that higher growth options would result in significant negative effects.

## 7 DEVELOPING THE PREFERRED APPROACH

### 7.1 Introduction

7.1.1 The aim of this Chapter is to present **the response of Brentwood Council Officers** to the alternatives appraisal / reasons for supporting the preferred approach as justified, and appropriate in-light of alternatives.

### 7.2 'Outline reasons' for supporting the preferred option

7.2.1 The preferred approach is Option 3, which involves allocating Dunton Hills Garden Village only, in addition to the sites that are a 'constant' across the reasonable alternatives, and thereby putting in place an overall land supply sufficient to provide for up to 458 dpa.

7.2.2 The appraisal finds Option 3 to have pros and cons, as per all the alternatives; however, it is apparent that Option 3 performs well in terms of the majority of sustainability objectives, which itself is a strong indicator of overall sustainability.

7.2.3 The appraisal highlights certain concerns regarding Dunton Hills Garden Village, but the Council believes there to be good potential to address issues through targeted infrastructure delivery and careful masterplanning. In this respect, the Council would wish to highlight that:

- Work has progressed on a masterplan with facilitated support from Design Council cabé which has resulted in a series of clearly defined 'localised' garden village principles for the site. Some of the principles focus upon the use of the landscape to help inform the future built form and the need to ensure that green infrastructure is central to the scheme.
- Economies of scale to fund infrastructure will be realised, and infrastructure planning from an early stage in the project will ensure facilities such as schools, open spaces, active travel options, recreational and community facilities are built in at the start. One of the clear sustainability benefits of the project is the opportunity to plan comprehensively for infrastructure growth rather than through piecemeal incremental development.
- The concept of the garden village is far removed from 'houses in fields' and requires a real commitment to balancing housing and community needs, the quality of the environment and local employment opportunities. Dunton Hills will deliver housing, a new village centre, supporting infrastructure and new employment space. It is an integrated project and should be viewed holistically.
- A core principle of garden settlements (from their early conceptualisation) is the focus upon public health and creating places which support healthier living. Within the Dunton Hills project there is a focus upon green infrastructure, open spaces, recreation and supporting active travel (cycling and walking). It is built into the core masterplanning ideas and provides a marked departure from traditional urban extension schemes with their reliance upon private cars.
- The new village is located within close proximity to West Horndon railway station and strong cycling and walking linkages will be built between the new village and this public transport hub which will also be supported with an enhanced range of bus services.
- Dunton Hills is strategically well located within the A127 growth corridor and is within close proximity to existing employment opportunities plus major new employment allocations on site and at East Horndon plus within a short distance of the proposed new Brentwood Enterprise Park. The Council is keen to ensure that all the major development opportunities within this corridor are well supported by public transport connections and green transport corridors for cycling and walking.
- Wastewater treatment capacity is a constraint, but the WCS discusses potential measures to address this, including use of high water efficiency standards, which can be achieved through a focus on sustainable design and construction measures at Dunton Hills.

7.2.4 Finally, there is a need to discuss the relative merits of the other (non-preferred) options, as highlighted through the appraisal:

- Lower growth (Options 1 and 2) - there is a need to provide for a land supply significantly in excess of the '2016-based' LHN figure of 350 dpa for the reasons discussed above, including the need to be mindful of the higher '2014-based' LHN figure.
- Additional strategic growth at Brentwood (Options 2, 4, 5 and 7) - a primary concern is in respect of traffic congestion (also noting the two air quality management areas), with a secondary concern relating to the capacity of existing community infrastructure to absorb additional growth. All of the sites available and deliverable at the current time are subject to constraints, and are of an insufficient scale to deliver strategic infrastructure upgrades.
- West Horndon (Options 1, 4, 5, 6, 7) - the Council would favour a strategic scheme involving growth both to the East and West, but equally considers the opportunity associated with growth at West Horndon to be less than the opportunity that presents itself at Dunton Hills Garden Village, where there is the opportunity for a larger and more comprehensive scheme. The Council notes that Thurrock Council is exploring the option of developing West Horndon as a large new settlement, but concludes that this proposal is at such an early stage of formulation that it cannot be considered to be a potential issue or constraint in respect of delivering Dunton Hills Garden Village.

## **PART 2: WHAT ARE SA FINDINGS AT THIS CURRENT STAGE?**



**8 INTRODUCTION (TO PART 2)**

8.1.1 The aim of this part of the report is to present an appraisal of the Pre-submission Plan.

8.1.2 The aim of this introductory chapter is to: A) provide an ‘at a glance’ overview of the Pre-submission Plan; and B) introduce the appraisal methodology.

**8.2 Overview of the Plan**

8.2.1 The Policy Index at the beginning of the plan document shows the scope of the plan to encompass strategic policies, borough-wide thematic development policies and site specific policies to guide development at each of the allocated sites. **Tables 8.1** summarises the proposed housing land supply for the plan period, whilst the proposed allocations are listed in **Tables 8.2 and 8.3**.

*Table 8.1: All sources of housing supply for the 17 year plan period (*

Source				Number of new homes
Completions 2013/14 – 2017/18				363
Commitments (April 2018)				926
Windfall Allowance (2020/21 to 2032/33)				410
Allocations	Within settlements	Brownfield	Main urban area	1,152
			Other locations	580
	Green Belt	Greenfield	Main urban area	75
			Main urban area	1,240
			Ingatestone	218
	Green Belt	Greenfield	Larger villages	123
			Dunton Hills Garden Village	2,700
<b>Total</b>				<b>7,787</b>

*Table 8.2: Proposed housing allocations*

Location / Site	Number of new homes
Brownfield within Brentwood urban area	
The Eagle and Child Public House, Shenfield	20
Chatham Way Car Park, Brentwood	31
Westbury Road Car Park, Brentwood	45
Land at Hunter House, Brentwood	48
Land off Crescent Drive, Shenfield	55

Location / Site	Number of new homes
Wates Way Industrial Estate, Brentwood	80
Railway station car park, Brentwood	100
William Hunter Way car park, Brentwood	300
Ford Headquarters and Council Depot, Warley	473
Brownfield within other locations	
West Horndon Industrial Estate	580
Greenfield within Brentwood urban area	
Land at Priests Lane, Shenfield	75
Green Belt at Brentwood urban area	
Land at Mascalls Lane, Warley	9
Sow & Grow Nursery, Pilgrims Hatch	38
Land at Warley Hill, Warley	43
Land at Nags Head Lane, Brentwood	125
Land off Doddinghurst Road, Pilgrims Hatch/Brentwood	200
Land north of Shenfield	825
Green Belt at Ingatestone	
Land adjacent to the A12, Ingatestone	57
Land South of Ingatestone	161
Green Belt at larger villages	
Brizes Corner Field, Kelvedon Hatch	23
Land off Stocks Lane, Kelvedon Hatch	30
Adjacent sites north of Blackmore	70
Dunton Hills Garden Village	2,700
<b>Total</b>	<b>6,088</b>

Table 8.3: Proposed employment allocations

Location / Site	Hectares
New stand-alone employment site	
Brentwood Enterprise Park (M25 Junction 29 works)	25.85
Land adjacent to Ingatestone by-pass (part bounded by Roman Road)	2.1
Land at East Horndon Hall	5.5
Extension to existing employment site	
Codham Hall	0.6
Childerditch Industrial Estate	5.9
Employment as part of mixed use allocation	
North of A1023 (part of Land North of Shenfield)	2
Dunton Hills Garden Village	5.5
<b>Total</b>	<b>47.4</b>

**8.3 Appraisal methodology**

8.3.1 The appraisal identifies and evaluates ‘likely significant effects’ of the plan on the baseline, drawing on the sustainability topics/objectives identified through scoping (see Table 3.1) as a methodological framework.

8.3.2 Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policies under consideration, and an understanding of the baseline (now and in the future under a ‘no plan’ scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously, and explained within the text (with the aim to strike a balance between comprehensiveness and conciseness/ accessibility to the non-specialist). In many instances, given reasonable assumptions, it is not possible to predict ‘significant effects’, but it is nonetheless possible and helpful to comment on merits (or otherwise) of the Pre-submission Plan in more general terms.

8.3.3 Finally, it is important to note that effects are predicted taking account of the criteria presented within Schedule 1 of the Environmental Assessment of Plans and Programmes Regulations (2004). So, for example, account is taken of the duration, frequency and reversibility of effects as far as possible. Cumulative effects are also considered, i.e. the potential for the Brentwood Local Plan to impact on the baseline when implemented alongside other plans, programmes and projects. These effect ‘characteristics’ are described within the appraisal as appropriate.

**Adding structure to the appraisal**

8.3.4 Whilst the aim is to present an appraisal of the Pre-submission Plan ‘as a whole’, it is appropriate to also give stand-alone consideration to individual elements of the plan. As such, each of the appraisal narratives is broken-down under sub-headings.

N.B. specific policies are referred to only as necessary within the narratives below. It is not necessary to give systematic consideration to the merits of every plan policy in terms of every sustainability topic/objective.

## 9 APPRAISAL OF PRE-SUBMISSION PLAN

### 9.1 Introduction

9.1.1 As introduced above, this chapter presents a series of narratives - one for each of the topic headings that comprise the SA framework (see Chapter 3).

### 9.2 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 spatial strategy

9.2.1 The appraisal of the 2016 Draft Plan concluded -

*“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 (Officers Meadow, Shenfield) is well located, i.e. should enable good potential for ‘modal shift’ away from the private car.”*

9.2.2 The Preferred Allocations consultation document then proposed a notably increased focus of growth at the **main urban area**, before the decision was taken to reduce the focus of growth at the 8<sup>th</sup> November Extraordinary Council meeting (see discussion in Section 5.5).

9.2.3 Of the additional sites added to the strategy following the 2016 Draft Plan stage, one site - William Hunter Way Car Park (300 homes) - is notable for being in close proximity to the town centre AQMA; however, the other sites added to the strategy benefit either from good access to the A12 / M25 (i.e. access that should avoid the need to pass through the town centre AQMA) or good access to one of the two train stations. The two sites added in order to extend the Officers Meadow scheme northwards are beyond 1km of Shenfield Station; however, there should still be good potential to walk/cycle to the train station, and furthermore delivery of a primary school and employment is anticipated. Finally, it is noted that the decision was taken to reduce the allocation at Land off Doddinghurst Road from 250 to 200 homes, and the allocation at Nags Head Lane from 150 homes to 125 homes - positive steps, given the potential for increased traffic through the AQMA.

9.2.4 With regards to the 8<sup>th</sup> November 2018 decision to delete Honeypot Lane and reduce the quantum of homes at Priests Lane by 20 homes (there was also a reduction at Priests Lane between the 2016 Draft Plan and the 2018 Preferred Allocations stages), this is supported from an air quality perspective. This is on the basis that development of either site would lead to increased traffic through the AQMA; however, having said this, both sites are well located in respect of supporting walking and cycling. N.B. Councilors had particular concerns regarding development at Honeypot Lane leading to traffic congestion, but not necessarily at locations with known problematic air quality.

9.2.5 Finally, with regards to proposals for the **A127** corridor, the ambitious growth strategy (which remains broadly unchanged since 2016, with the main change being to reduce the number of homes delivered at West Horndon Industrial Estate by 80 homes, and increase the number of homes at DHGV - in the plan period - by 200 homes) is supported from an air quality perspective, on the basis that there are no AQMAs in the vicinity, although increased car movements through the Brentwood AQMA can be anticipated, and air pollution hot spots in London are a further consideration. New residents at West Horndon will have excellent access to a train service into London, and east to Basildon, whilst numerous measures are proposed to encourage modal shifts amongst new residents of Dunton Hills Garden Village (DHGV), with Policy R01ii (Spatial Design Of Dunton Hills Garden Village) notably requiring:

*“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.”*

- 9.2.6 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.”* There is also discussion of measures to ensure effective bus access to and from West Horndon Station; however, it is noted that bus links to Basildon town centre are not discussed, nor are any other links (e.g. walking/cycling) to locations in Basildon, e.g. Laindon centre. It is **recommended** that this might be addressed.

#### Commentary on thematic policies

- 9.2.7 The achievement of air quality objectives is supported, either directly or indirectly, through a number of thematic policies, notably: **SP01** (Sustainable Development); **SP03** (Health Impact Assessments); **SP05** (Construction Management); **BE12** (Car-limited Development); **BE13** (Sustainable Means of Travel and Walkable Streets); **BE15** (Electric and Low Emission Vehicle); **BE16** (Mitigating the Transport Impact of Development); **HP16** (Buildings Design); and **NE05** (Air Quality).
- 9.2.8 Focusing on Policy NE05 (Air Quality), policy states that any development within an AQMA will require a detailed air quality assessment, and that any development which is determined to have a significant adverse impact on air quality will be rejected. However, it is noted that the policy does not make explicit reference to traffic congestion, which is often the leading contributor to local air pollution. Steps might be taken to align Policy NE05 more closely with Policy BE12 (Car-limited Development) and Policy BE13 (Sustainable Means of Travel...).
- 9.2.9 Finally, it is noted that the following site specific policies (other than policies for DHGV) reference the need to account for noise and air pollution from the A12: Policy R16 & R17 (Land off Doddinghurst road); Policy R21 (Land south of Ingatestone); and Policy R22 (Land adjacent to the A12, Ingatestone).

#### Appraisal of the Pre-submission Plan (January 2019)

- 9.2.10 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.

#### Implications of Focussed Changes (October 2019)

- 9.2.11 The discussion above relates to the version of the plan published for consultation in January 2019. At the current time (October 2019) Focussed Changes to that plan are published for consultation. A detailed appraisal of the Focussed Changes is presented within a stand-alone SA Report Addendum, which reaches the following conclusion:

*“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.”*

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

- 9.2.12 On this basis, there is a need to revisit the conclusion reached in January 2019 in respect of the Pre-submission Plan (see para 9.2.10). Specifically, 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.

### 9.3 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.

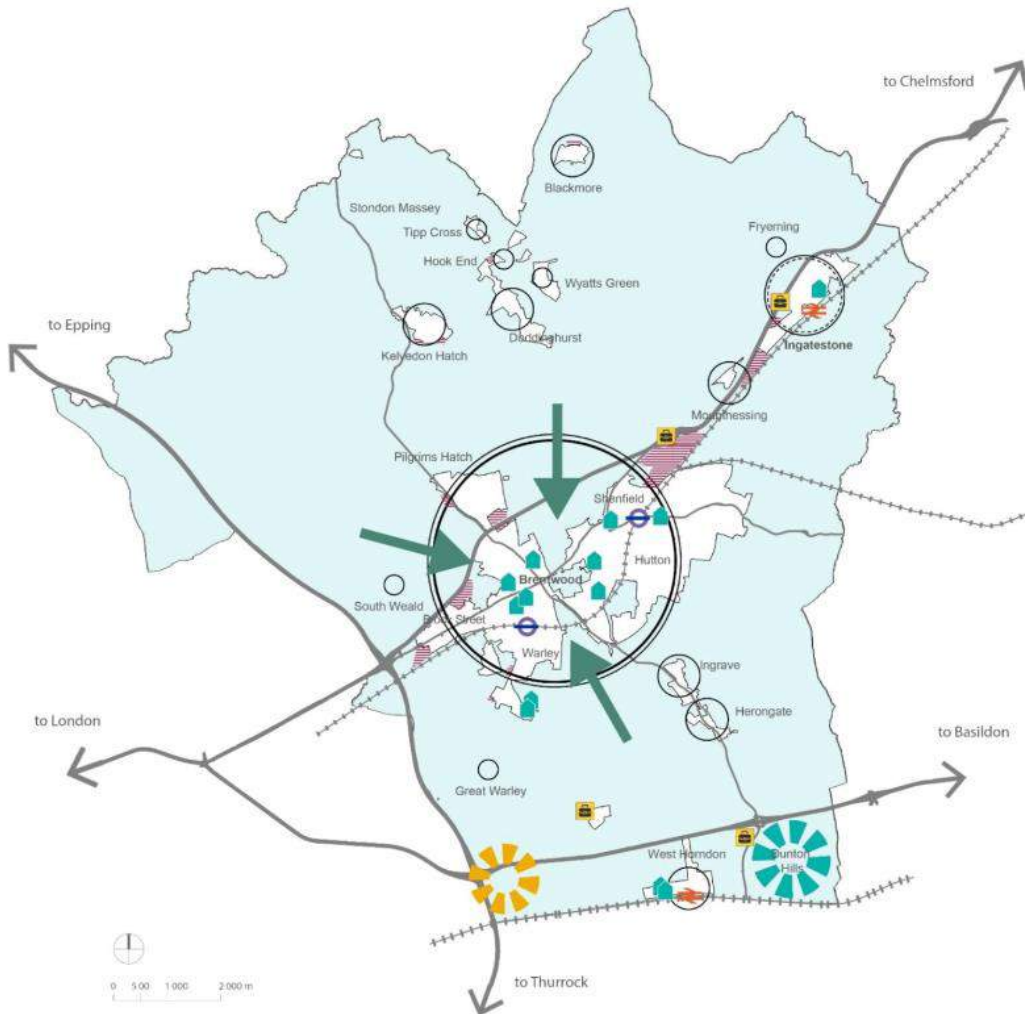
#### Commentary on the spatial strategy

- 9.3.1 The appraisal of the 2016 Draft Plan concluded -
- “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.<sup>46</sup> 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.”*
- 9.3.2 The Preferred Allocations consultation document then proposed a notably increased focus of growth at the **main urban area**, before the decision was taken to reduce the focus of growth at the 8<sup>th</sup> November Extraordinary Council meeting (see discussion in Section 5.5).
- 9.3.3 Of the additional sites added to the strategy following the 2016 Draft Plan stage, most notable is the proposal to allocate land for 473 homes at two adjacent sites to the south of Warley, which lie adjacent to a large ancient woodland LWS and within c.600m of Thorndon Park SSSI; however, these are brownfield sites, which potentially serves to reduce concerns. A new small Green Belt allocation was also proposed at Warley (Land at Warley Hill; 43 homes) on a site that seemingly (on the basis of satellite imagery) includes a high density of mature trees, and which lies adjacent to a small ancient woodland LWS. The two sites added to the strategy, in order to extend the Officers Meadow scheme give rise to limited concerns, including because part of the new proposal involves delivering 90 fewer homes (C3) on the Officers Meadow site, which includes a small ancient woodland LWS. Another notable ‘positive’ is the reduced number of homes assigned to Land at Doddinghurst Road, as this is a site seemingly with a relatively high density of mature hedgerow and other mature vegetation.
- 9.3.4 With regards to the 8<sup>th</sup> November 2018 decision to delete Honeypot Lane, this can be considered a positive step on balance. The Honeypot Lane site had been published for consultation twice with limited biodiversity concerns highlighted; however, the site is associated with one of the three ‘green wedges’ that stretch into the Brentwood/Shenfield urban area, and in turn support landscape scale ecological connectivity (see Figure 9.1). Also of note is the stream running through the site, which is a tributary of the Ingrebourne River (a Thames tributary that forms an important green corridor with SSSI marshland through LB Havering). A draft masterplan submitted by the site promoters had identified existing ‘wet woodland’ running alongside the stream, with proposal being to protect and hence this habitat; however, functioning of the stream corridor would likely be impacted by development.

<sup>46</sup> Natural England responded to the Growth Options consultation, stating that: “SA also needs to consider in more detail the recreational impacts upon the local SSSI network.” However, in response to the Draft Plan consultation Natural England raised no concerns.

9.3.5 Elsewhere, the proposal - first presented at the 2018 Preferred Allocations Stage, and then subsequently subject to adjustment - is to allocate a package of sites at **villages** in the north of the Borough, specifically two small sites at Kelvedon Hatch and two adjacent sites at Blackmore. Kelvedon Hatch is generally the more constrained of the two villages, given the woodland SSSI ('The Coppice') adjacent to the north of the village; however, the two proposed allocations (53 homes in total) are located on the less constrained southern side of the village.

Figure 9.1: The Local Plan Key Diagram - note the arrows indicating 'green wedges'



9.3.6 Finally, with regards to proposals for the **A127** corridor (see discussion above re. changes since 2016, and following the 8<sup>th</sup> November 2018 meeting), 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:*

- a. a highly connected and biodiverse ecological network that incorporates existing habitats of value and natural features... in line with Policy NE01, NE03 and NE04;*
- b. a variety of activity nodes and treatments for recreation and leisure opportunities...;*
- c. a streetscape that continues the green infrastructure through the residential areas...;*
- d. an appropriate amount and depth of green infrastructure screening...;*
- e. well-designed interfaces between the green open space and the built structures... [including] a green infrastructure buffer / wedge on the eastern boundary with Basildon...”*

- 9.3.7 The supporting text then goes on to explain that: *“The existing significant green infrastructure features such as the woodland, fenland and ponds should be retained and/or enhanced and connected to achieve a contiguous green corridor throughout the garden village, achieving **biodiversity net-gain** across the site... As well as establishing an integrated ecological network within the site, the development should demonstrate its **ecological connectivity** to the wider ‘living landscape’ habitats and local wildlife destinations beyond the development boundary, for example Eastlands Spring, Thorndon Country Park to Langdon Hills Country Park. [emphasis added]. This is supported; however, it is **recommended** that ‘net gain’ should be achieved at an appropriate functional scale, which likely means a scale that extends beyond the site boundaries, and as such there should be further information on the ‘ecological connectivity’ issues and opportunities that present themselves, to include mapped information. This additional information will provide confidence that net gain can be achieved.*

#### Commentary on other policies

- 9.3.8 The achievement of biodiversity objectives is supported, either directly or indirectly, through a number of thematic policies, notably: **SP01** (Sustainable Development); **BE05** (Assessing Energy Infrastructure); **BE08** (Sustainable Drainage); **BE18** (Green and Blue Infrastructure); **BE19** (Access to Nature); **BE21** (Protecting Land for Gardens); **HP16** (Buildings Design); **HP18** (Designing Landscape and the Public Realm); **NE01** (Protecting and Enhancing the Natural Environment); **NE02** (Recreational Disturbance Avoidance And Mitigation); **NE03** (Trees, Woodlands, Hedgerows); **NE04** (Thames Chase Community Forest); **NE08** (Floodlighting and Illumination); and **NE09** (Green Belt).
- 9.3.9 Focusing on Policy **NE01** (Protecting and Enhancing the Natural Environment), there are some notable references to ‘net gain’ (and ‘net gains’), which is an important consideration in light of Government’s 25 Year Environment Plan (2017), and the recently published Net Gain Consultation Proposals (2018). It is **recommended** that the policy approach be scrutinised closely to ensure clarity, and that the supporting text is supplemented in order to provide detailed guidance (currently there is no mention of net gain in the supporting text). Currently the policy requirement for “net-gain across all green and blue infrastructure” is not as clear as it might be, and the term ‘net gains’ (plural) should be used with caution. There is essentially a need to establish the scale at which net gain will be measured, and the metric that will be used to measure that net gain.



### Appraisal of the Pre-submission Plan

- 9.3.10 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**.

N.B. A separate Habitats Regulations Assessment (HRA) Report is published at the current time, examining the specific matter of potential impacts to European designated habitats. The HRA focuses on potential impacts to Epping Forest SAC (atmospheric pollution) and Essex Coast European sites (recreational pressure and water quality), but ultimately concludes no likely adverse effects on integrity.

#### Implications of Focussed Changes (October 2019)

- 9.3.11 The discussion above relates to the version of the plan published for consultation in January 2019. At the current time (October 2019) Focussed Changes to that plan are published for consultation. A detailed appraisal of the Focussed Changes is presented within a stand-alone SA Report Addendum, which reaches the following conclusion:

*“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**.”*

- 9.3.12 On this basis, the conclusion reached in January 2019 in respect of the Pre-submission Plan (see para 9.3.10) **broadly holds true** for the Pre-submission Plan plus targeted changes.

## 9.4 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 the spatial strategy

- 9.4.1 The appraisal of the 2016 Draft Plan concluded -

*“With regards to emissions from transport... Work undertaken to date has established that there are considerable opportunities associated with a concentration of growth in the A127 corridor. In particular, there is the potential to achieve new homes and jobs in close proximity, deliver a new bus route linking the A127 corridor to Brentwood town centre, enhance walking/cycling infrastructure between key destinations (including train stations) and also increase the offer at West Horndon (and Laindon) centres. As for A12 urban extension allocations, there would be good potential to walk/cycle to Brentwood town centre or other local centres; however, traffic congestion would be an issue and residents might tend to see longer journeys by car (along the A12) as an attractive option.*

*With regards to emissions from the built environment [the strategy] also performs well. There is support for at least one scheme (Dunton Hills Garden Village) of a large scale such that ambitious decentralised low/renewable heat and/or power generation will become viable (e.g. a biomass fuelled heating or Combined Heat and Power (CHP) system) Also, larger schemes are more likely to deliver ambitious sustainable design/construction measures at the level of individual buildings.”*

- 9.4.2 The Preferred Allocations consultation document then proposed a notably increased focus of growth at the **main urban area**, before the decision was taken to reduce the focus of growth at the 8<sup>th</sup> November Extraordinary Council meeting (see discussion in Section 5.5).
- 9.4.3 Of the additional sites added to the strategy following the 2016 Draft Plan stage, most notable is the additional land to deliver a larger extension to the north of Shenfield (825 homes, rather than 600 homes), which potentially gives rise to some additional opportunity in respect of delivering low carbon decentralised heat/energy generation. Recent work has focused on ensuring delivery of a comprehensively masterplanned scheme across the three component parts of the site, which serves to further increase the opportunity (as does the proposal to ‘consider provision’ of 2 ha of employment land).
- 9.4.4 With regards to the 8<sup>th</sup> November 2018 decision to delete Honeypot Lane and reduce the quantum of homes at Priests Lane by 20 homes, there are potentially implications for the number of trips made by walking/cycling amongst Brentwood residents, and the number/length of car journeys (see discussion above, under ‘air quality’); however, it is not possible to conclude an significant implications for average per capita CO<sub>2</sub> emissions, and in turn climate change mitigation.
- 9.4.5 In a similar fashion, the decision made - subsequent to the 2016 Draft Plan consultation - to allocate a land for a modest number of new homes to rural **villages** in the north of the Borough is less than ideal, from a climate change mitigation perspective, given that car dependency in rural areas is quite unavoidable, but it is difficult to conclude significant implications, given the quantum of homes involved.
- 9.4.6 Finally, with regards to proposals for the **A127** corridor (see discussion above re. changes since 2016, and following the 8<sup>th</sup> November 2018 meeting):
- 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>47</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.

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<sup>47</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.

### Commentary on other policies

- 9.4.7 The achievement of climate change mitigation objectives is supported, either directly or indirectly, through a number of thematic policies, notably: **SP01** (Sustainable Development); **SP05** (Construction Management); **BE02** (Sustainable Construction and Resource Efficiency); **BE03** (Carbon Reduction, Renewable Energy and Water Efficiency); **BE04** (Establishing Low Carbon and Renewable Energy Infrastructure Network); **BE05** (Assessing Energy Infrastructure); **BE06** (Improving Energy Efficiency in Existing Dwellings); **BE07** (Managing Heat Risk; noting that the effect should be to minimise need for air conditioning); **BE08** (Sustainable Drainage); **BE11** (Strategic Transport Infrastructure); **BE12** (Car-limited Development); **BE13** (Sustainable Means of Travel and Walkable Streets); **BE14** (Sustainable Passenger Transport); **BE15** (Electric and Low Emission Vehicle); **BE17** (Parking Standards); and **BE18** (Green and Blue Infrastructure).
- 9.4.8 Focusing on Policy BE02 (Sustainable Construction and Resource Efficiency), it can be seen that point (a) requires maximising ‘principles of energy conservation and efficiency’, whilst point (e) requires “commercial and domestic scale renewable energy and decentralised energy”. The focus on ‘domestic scale’ opportunities is appropriate, recognising that two other policies - BE04 and BE05 - are dedicated to larger-scale opportunities.
- 9.4.9 Policy BE17 (Parking Standards) is perhaps also of particular note, as it provides criteria to guide decisions on when “*the parking standards may be flexible to minimise pressure on land and encourage alternative modes of transport*”.

### Conclusions on the Pre-submission Plan

- 9.4.10 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.

### Implications of Focussed Changes (October 2019)

- 9.4.11 The discussion above relates to the version of the plan published for consultation in January 2019. At the current time (October 2019) Focussed Changes to that plan are published for consultation. A detailed appraisal of the Focussed Changes is presented within a stand-alone SA Report Addendum, which reaches the following conclusion:
- “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**.”*
- 9.4.12 On this basis, the conclusion reached in January 2019 in respect of the Pre-submission Plan (see para 9.4.10) **broadly holds true** for the Pre-submission Plan plus Focussed Changes.

## 9.5 Community and well-being<sup>48</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 spatial strategy

9.5.1 The appraisal of the 2016 Draft Plan concluded -

*“[The plan] proposes a large strategic allocation in the A127 corridor, an area where there are identified opportunities to enhance local centres / community infrastructure, and ensure new communities are able to access key destinations via public transport and walking/cycling infrastructure. Residents of a Dunton Hills Garden Village scheme would have access to a ‘Category 2’ local centre on site (to include ‘schools alongside retail and health facilities’); an improved West Horndon village centre (set to become category 2); a new local centre delivered as part of the proposed West Basildon Urban Extension (to include a GP surgery and with land reserved for the possible future delivery of a secondary school); an improved Laindon town centre c.4-5km to the east; and Brentwood town centre, via a new bus route. The decision to deliver a strategic allocation at Dunton Hills Garden Village rather than West Horndon, performs well from a ‘communities’ perspective given that consultation (since 2013, when the Preferred Option was to develop West Horndon as a strategic growth location) has highlighted the importance of maintaining West Horndon’s ‘village’ status and not ‘over-developing’.*

*However, the A12 corridor is also a focus for growth, through a number of smaller urban extensions. A number of these are well located - e.g. Officer’s Meadow, Shenfield (easily the largest, at 600 homes) is within walking distance of the future Crossrail station; and Land off Doddinghurst Road, either side of A12, Brentwood (250 homes) is in close proximity to Brentwood Community Hospital, which does have capacity - however, capacity of community infrastructure is a concern.*

*Another consideration is that limited development will take place in villages (with the exception of West Horndon, where enhancements will result in this becoming a ‘category 2’ centre, on a par with Shenfield Hutton Road, Ingatestone High Street and Brentwood Station Warley Hill). Public transport, bus services in particular, are centred on Brentwood town centre, making accessibility an issue for villages with infrequent services and lack of evening running.”*

9.5.2 The Preferred Allocations consultation document then proposed a notably increased focus of growth at the **main urban area**, before the decision was taken to reduce the focus of growth at the 8<sup>th</sup> November Extraordinary Council meeting (see discussion in Section 5.5).

9.5.3 Of the additional sites added to the strategy following the 2016 Draft Plan stage, most notable is the additional land to deliver a larger extension to the north of Shenfield (825 homes, rather than 600 homes), which gives rise to the opportunity to deliver a new primary school. Recent work has focused on ensuring delivery of a comprehensively mastepanned scheme across the three component parts of the site, which has served not only to confirm delivery of the primary school, but also delivery of other elements of community infrastructure, notably “diversion of Alexander Lane, creating a quiet lane for pedestrians and cyclists”.

<sup>48</sup> Issues relating to the Gypsy and Traveller community are considered under the ‘Housing’ topic heading.

- 9.5.4 The other strategic growth location added to the plan following the 2016 Draft Plan consultation is at Warley, where two adjacent sites are now being progressed as a joint strategic scheme (Policy R04 And R05: Ford Headquarters And Council Depot). There is a requirement for a joint comprehensive masterplan across the adjacent sites, which is supported; however, the policy requires limited new or upgraded community infrastructure.
- 9.5.5 The following are brief points on other key sites in at the main urban area -
- Policy R06: Land off Nags Head Lane - this site is not ideally located in respect of accessing Brentwood Town Centre, or existing community infrastructure more generally, by walking/cycling; however, the site is well located in respect of accessing the TFL 498 bus service between Brentwood and Romford. Also, it is noted that the policy does require “provision for pedestrian and cycle access through the site, increasing permeability” (a requirement is which is similarly made of a number of other sites).
  - Policy R16 & R17: Land off Doddinghurst Road - the quantum of homes allocated to this site was reduced by 20% following the 2016 Draft Plan consultation, which is potentially supported from a ‘communities’ perspective, including on the basis that this is inherently a sensitive location from a traffic generation perspective (although, on the other hand, it is well located adjacent to the Brentwood Centre and Bishops Hall Park Community Centre).
  - Policy R19: Land at Priests Lane - the quantum of homes directed to this site has been reduced significantly in two iterations, with the original proposal for 130 homes and the current proposal for 75 homes. This should mean the potential to accommodate more open space within the site (which is designated Protected Urban Open Space in the adopted Local Plan, but not publically accessible and no longer in active use). Also of note is the proposal to utilise some of the land for expansion of adjoining Endeavour School. This is one of two specialist schools in Brentwood, and there is a desire to expand in order to accommodate a sixth form.
  - Honeypot lane - is the main site removed from the plan at the 8<sup>th</sup> November Extraordinary Council meeting, and hence warrants mention here. Specifically, it warrants mention that development was potentially associated with an opportunity to support enhanced pedestrian links through St Faiths Park, which links the site to Brentwood town centre.
- 9.5.6 Elsewhere, the proposal - first presented at the 2018 Preferred Allocations Stage, and then subsequently subject to modest adjustment - is to allocate a package of sites at **villages** in the north of the Borough, specifically two small sites at Kelvedon Hatch and two adjacent sites at Blackmore. On one hand, new development will help to ensure a housing mix at these villages, and in turn a mixed community (e.g. to include young families), and all policies will deliver new publically accessible open space; however, on the other hand there are naturally some concerns regarding access to community facilities, notably a primary school (Kelvedon Hatch primary school group is understood to have some capacity constraints). Finally, it is noted that a decision was taken to delete one further site at Hook End at the 8<sup>th</sup> November Extraordinary Council Meeting, with Councillors highlighting that development would involve *“destruction of a long-established playing field, administered by Trustees as a vital integral asset of the adjoining community hall”*.
- 9.5.7 Finally, with regards to proposals for the **A127** corridor (see discussion above re. changes since 2016, and following the 8<sup>th</sup> November 2018 meeting), 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...”*

9.5.8 Staying within the A127 corridor, redevelopment of West Horndon Industrial Estate - which naturally also generates a need to replace the lost employment space through Green Belt allocations nearby in the A127 - is seen as a positive step from a 'communities' perspective. This is on the basis that redevelopment is supportive of objectives for improving West Horndon village centre, and also given the potential to reduce heavy freight traffic passing through the village.

[Commentary on other policies](#)

9.5.9 The achievement of 'community and wellbeing' objectives is supported, either directly or indirectly, through a large number of thematic policies, notably: **SP01** (Sustainable Development); **SP03** (Health Impact Assessments); **SP04** (Developer Contributions); **SP05** (Construction Management); **SP06** (Effective Delivery Of Development); **BE01** (Future Proofing); **BE09** (Communications Infrastructure); **BE10** (Connecting New Developments to Digital Infrastructure); **BE11** (Strategic Transport Infrastructure); **BE12** (Car-limited Development); **BE13** (Sustainable Means of Travel and Walkable Streets); **BE14** (Sustainable Passenger Transport); **BE16** (Mitigating the Transport Impact of Development); **BE17** (Parking Standards); **BE18** (Green and Blue Infrastructure); **BE19** (Access to Nature); **BE20** (Allotments and Community Food Growing Space); **BE22** (Open Space in New Development); **BE23** (Open Space, Community, Sport and Recreational Facilities); **HP04** (Specialist Accommodation); **HP12** (Planning for Inclusive Communities) **HP13** (Creating Successful Places); **HP15** (Permeable and Legible Layout); **HP18** (Designing Landscape and the Public Realm); **PC14** (Protecting and Enhancing Community Assets); **PC15** (Education Facilities); and **PC16** (Buildings for Institutional Purposes).

9.5.10 The following policies are considered to be of particular note -

- Policy SP03 (Health Impact Assessments) - recognises that there is a need to reduce health inequalities within the Borough including a need to provide suitable facilities for older people and to provide better access to services in rural areas. The policy includes a requirement for developments over a discretionary threshold of 50 units to submit an HIA.
- Policies SP04 (Developer Contributions) and PC14 (Protecting and Enhancing Community Assets) - seek to ensure good access to community infrastructure. Policy SP04 outlines how, through Section 106 agreements, necessary related infrastructure, including access, open space and transport connections will be managed, whilst Policy PC14 states the Council's opposition to the loss or degradation of community facilities. A separate policy (Policy PC15: Education Facilities) provides in-principle support for the delivery of new schools, subject to a range of criteria, as well as providing protection for existing schools.
- Policies BE12 (Car-limited Development) and BE13 (Sustainable Means of Travel...) outline the requirement for new development to be located in areas that reduce the need to travel or are either connected, or easily connectable to existing transport links.
- Policy BE22 (Open Space in New Development) - sets out that new development must deliver functional open space or a commuted sum paid to facilitate provision offsite if necessary. Although the policy notes that this requirement will be dependent on the size of the development it does not provide specific thresholds.
- Policy BE23 (Open Space, Community, Sport and Recreational Facilities) - sets out the Council's opposition to the loss of existing open space and community facilities within the Borough. However, the policy also states that if it can be demonstrated that there is an excess of provision of open space, community, sport or recreational facilities, development that results in their loss may be supported. This proviso might be removed, as levels of demand can change due to predictable (i.e. demographic) and unpredictable (e.g. cultural or societal interests) factors, e.g. demand for allotments has increased.
- Policy PC16 (Buildings for Institutional Purposes) - sets out a range of criteria necessary for institutional buildings to receive support; however, the policy might conceivably go further by identifying an indicative threshold at which institutional buildings will be required.

- 9.5.11 Finally, as has already been discussed above under 'air quality, it is noted that several site specific policies (other than policies for DHGV) reference the need to account for noise and air pollution from the A12. It is also the case that removal of the Honeypot Lane site might be considered a positive in this respect, as the site is adjacent to the A12 and a small watercourse running through its centre is a constraint to site layout that might impinge on the ability to maintain a buffer to the A12.

#### Conclusions on the Pre-submission Plan

- 9.5.12 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).

#### Implications of Focussed Changes (October 2019)

- 9.5.13 The discussion above relates to the version of the plan published for consultation in January 2019. At the current time (October 2019) Focussed Changes to that plan are published for consultation. A detailed appraisal of the Focussed Changes is presented within a stand-alone SA Report Addendum, which reaches the following conclusion:

*"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."*

- 9.5.14 On this basis, the conclusion reached in January 2019 in respect of the Pre-submission Plan (see para 9.5.12) **broadly holds true** for the Pre-submission Plan plus Focussed Changes. Whilst the effects of Focussed Changes are positive, they are of limited significance.

## 9.6 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 spatial strategy

- 9.6.1 *The appraisal of the 2016 Draft Plan concluded -*

*"[The plan] makes provision for 5,000 additional jobs over the Plan period, achieved primarily through new employment (B-use) allocations totalling 32.8 hectares, but supported by existing employment sites and appropriate redevelopment where appropriate. This quantity of new employment land will enable some older employment premises in central areas (i.e. Wates Way Industrial Estate, Brentwood; Council Depot, Warley; and West Horndon Industrial Estates) to be redeveloped for housing.*

*The A127 Corridor will see significant economic growth, mainly because of the opportunity to redevelop brownfield land at M25 junction 29, a project known as Brentwood Enterprise Park. This location provides excellent access onto the strategic highway network, making it a very desirable place for businesses. Also, a small extension is proposed to existing nearby employment land at Childerditch Industrial Estate, and there will be provision of new employment land at the eastern end of the A127 as part of the Dunton Hills Garden Village proposal and the opportunity will be taken to formally designate existing employment land around the A127, specifically those close to M25 junction 29. The combined effect should be to strengthen the A127 corridor employment cluster, also recognising that the A127 corridor in Basildon Borough is already seen as an 'Enterprise Corridor', and that the Basildon Borough Local Plan is set to retain, diversify and expand employment here.*

*Policy PC09 (Brentwood Town Centre) is another important policy. The policy seeks to ensure an integrated approach to the redevelopment of William Hunter Way Car Park and the Baytree Centre, through a 'design-led' Town Centre Masterplan."*

- 9.6.2 Latest understanding is that there is a need to provide for an increased quantum of additional employment land (B class uses) through the Local Plan (8.1ha to 20.3ha). After taking into account latest understanding of forecast loss of existing employment land to other uses, this means a need to allocate land for between 33.76ha and 45.96ha.
- 9.6.3 Since the 2016 Draft Plan consultation:
- Land adjacent to Ingatestone by-pass (2.1 ha) is unchanged
  - The scale of the allocation has increased at two sites, namely Brentwood Enterprise Park (up from 23.41ha to 25.85ha) and Childerditch Industrial Estate Extension (up from 2.34ha to 5.87ha).
  - Three additional allocations have been added to the strategy, namely: Land at East Horndon Hall (5.5ha), which is located to the immediate north west of DHGV; North of A1023 (2 ha), which will form part of the North of Shenfield strategic allocation); and a small (0.61 ha) extension to Codham Hall, which is located near M25 J19.
- 9.6.4 In total, the proposal is to allocate land for circa 47ha, i.e. slightly more than the forecast need. It is understood that the resulting 'portfolio' of sites will be suitably diverse in respect of type and quality, with the full range of 'B' uses provided for.
- 9.6.5 In respect of spatial strategy, there is a clear focus on growth along the A127 corridor, with only one new allocation along the A12 corridor (South of Ingatestone), and it is also important to note that some of the proposed employment land to be redeveloped for housing (albeit a small proportion of the total) is located in the A12 corridor.<sup>49</sup> However, there are no omission sites considered reasonably in contention for allocation along the A12 corridor,<sup>50</sup> and the sites proposed for housing / mixed use redevelopment are considered more suitable for that use, noting the scale of housing needs and the need to minimise Green Belt allocations.
- 9.6.6 Furthermore, there is a strategic opportunity to develop the A127 corridor as an employment growth corridor, capitalising on connections to key economic centres in the region (including Tilbury Port, Southend Airport and those in Greater London). All sites will have good or excellent access onto the strategic highway network, and Brentwood Enterprise Park will provide an opportunity for high-end modern premises, along with appropriate ancillary uses, e.g. a hotel. The Enterprise Park will also be well placed to make use of the new Lower Thames Crossing, and may also provide premises for light industrial and distribution businesses relocating out of London (as premises in London come under pressure for redevelopment), helping to bolster the Borough's existing small stock of such uses.

<sup>49</sup> Wates Way Industrial Estate; and Ford Offices / Council Depot, Warley

<sup>50</sup> The only 'deliverable or developable' omission sites listed by the HELAA that are available for employment uses (and indeed lend themselves to employment uses are two sites to the west of Brentwood, namely site 175B (Land at M25, J28, Brook Street, 19.6 ha); and site 312 (Land east of Nags Head Lane Sewage Treatment Works, 3.4 ha); however, both sites are considered to perform poorly in Green Belt terms, given the strategic importance of maintaining a robust Green Belt gap between Brentwood and LB Havering.



- 9.6.7 With regards to site specific policy, the policies for the four employment should support timely and effective delivery. Most notable is the need to deliver major earthworks and landscaping scheme at the Enterprise Park, which is unavoidable given the sensitive Green Belt location. With regards to DHGV, the requirement is quite specific, namely: “a proportionate amount of employment space to accommodate a creative range of employment uses suitable for a vibrant village centre, including use class A1-A5 and appropriate B1”. This approach has evolved through detailed work and stakeholder engagement; however, the Council might wish to consider some additional flexibility, with a view to ensuring achievement of borough-wide employment targets / objectives.
- 9.6.8 Site specific policy in respect of transport and road infrastructure is of particular importance, as there are concerns regarding the cumulative traffic impacts of growth along the A127 corridor. Brentwood Enterprise Park is expected to deliver significant highways works, to ensure good access to M25 J29, and “consideration for improvements to A127 junction” is also a requirement of the Childerditch Industrial Estate policy. Policies for Childerditch Industrial Estate and East Horndon Hall also require “full traffic assessment and Travel Plan to accompany an application”.

#### Commentary on other policies

- 9.6.9 The achievement of ‘economy and employment’ objectives is supported, either directly or indirectly, through a number of thematic policies, notably: **BE10** (Connecting New Developments to Digital Infrastructure); **BE12** (Car-limited Development); **PC01** (Cultivating a Strong and Competitive Economy); **PC02** (Job Growth and Employment Land); **PC03** (Employment Land Allocations); **PC04** (Development and Expansion of Business Space); **PC05** (Employment Development Criteria); **PC06** (Supporting the Rural Economy); **PC07** (Retail and Commercial Leisure Growth); **PC08** (Retail Hierarchy of Designated Centres); **PC09** (Brentwood Town Centre); **PC10** (Mixed Use Development in Designated Centres); **PC11** (Primary Shopping Areas); **PC12** (Non-centre Uses); **PC13** (Night Time Economy); **NE12** (Previously Developed Land in Green Belt); and **NE15** (Re-Use and Residential Conversion of Rural Buildings).
- 9.6.10 Policy PC01 (Cultivating a Strong and Competitive Economy) notably sets out the high-level intention “...to maintain high and stable levels of local economic growth, enabling the Borough’s economy to diversify and modernise through the growth of existing business and the creation of new enterprises.” This is to be secured by the initiatives in points a. – i., primarily through directing major new retail, office and leisure investment to the Borough’s Town Centres (point f.); the intensification of vacant and underutilised sites, the regeneration of previously developed land, and the allocation of new sites (points b and c.); and supporting the Borough’s rural economy and growing agricultural enterprises (point g.).
- 9.6.11 Policy PC10 (Mixed Use Development in Designated Centres) is also of particular note, as it supports the Borough’s intention to maintain a mixture of employment and residential areas in designated centres. Policy NE5 (Re-Use and Residential Conversion of Rural Buildings) similarly addresses a spatially specific issue with a bearing on maintaining a healthy mix of employment across the Borough.

#### Conclusions on the Pre-submission Plan

- 9.6.12 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**.

### Implications of Focussed Changes (October 2019)

9.6.13 The discussion above relates to the version of the plan published for consultation in January 2019. At the current time (October 2019) Focussed Changes to that plan are published for consultation. A detailed appraisal of the Focussed Changes is presented within a stand-alone SA Report Addendum, which reaches the following conclusion:

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

9.6.14 On this basis, the conclusion reached in January 2019 in respect of the Pre-submission Plan (see para 9.6.13) **broadly holds true** for the Pre-submission Plan plus Focussed Changes.

## 9.7 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 spatial strategy

9.7.1 The appraisal of the 2016 Draft Plan concluded -

*“With regards to development in the A127 corridor a concern - raised by Historic England... - 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.*

*As for the A12 urban extension allocations, these do not raise major concerns from a heritage perspective, although it is noted that: the proposed extension at ‘Land east of Nags Head Lane, Brentwood’ is in close proximity to several listed buildings at Brook Street; and also that the large Officers Meadow site at Shenfield will have implications for the Chelmsford Road, along which there are a number of listed buildings. Another consideration will be the potential for indirect impacts on the Brentwood Town Centre Conservation Area (recognising that in the Shenfield area the only Conservation Area is at Hutton).*

*Finally, it is important to recognise that growth in the Rural North and Rural South areas of the Borough (N.B. this does not include the area south of the A127) will be limited to retain local character, with no amendments proposed to Green Belt boundaries. Brownfield opportunities will be encouraged to help ensure villages remain thriving communities, which is important from a heritage perspective.”*

9.7.2 Focusing on proposed changes to the spatial strategy since 2016, points to note are -

- The proposal to increase the scale of the urban extension north of Shenfield gives rise to limited additional concerns.
- The two adjacent sites on the southern edge of Warley (473 homes) lie adjacent to two listed buildings; however, these sites are currently brownfield - with significant built development - hence there should be low risk of further negative impacts to setting.
- The proposed new major brownfield site within Brentwood town centre (William Hunter Way; 300 homes) lies outside of the Conservation Area, and is not in close proximity to any listed buildings (Grade II\* White Hart Inn closest, at c.50m); however, heritage is a consideration nonetheless. This is a key opportunity site within Brentwood Town Centre.
- The proposal to reduce the number of homes delivered at Land east of Nags Head Lane is supported, given proximity to several listed buildings at Brook Street.

- Land west of Warley Hill, Pastoral Way, Warley (43 homes) is notably constrained, with two adjacent listed buildings (one actually within the site boundary) and mature vegetation onsite, and so there is a clear need for sympathetic layout, if this number of homes is to be delivered successfully.
- The small village extension sites at Kelvedon Hatch are seemingly relatively unconstrained, with no listed buildings in close proximity, and no nearby designated conservation area; however, the proposed extension to Blackmore (which is much more substantial, at 70 homes) is constrained by three adjacent or nearby listed buildings, and Blackmore Conservation Area is located c.125m to the south.
- Deletion of Honeypt Lane from the plan is not supported from a heritage perspective, as the site is unconstrained, with no listed buildings nearby.

#### Commentary on other policies

- 9.7.3 The achievement of 'heritage' objectives is supported, either directly or indirectly, through a number of thematic policies, notably: **BE05** (Assessing Energy Infrastructure); **HP14** (Responding to Context); **BE37** (Green and Blue Infrastructure); **HP19** (Conservation and Enhancement of Historic Environment); **HP20** (Listed Buildings); **HP22** (Local Heritage Assets); **HP21** (Conservation Areas); **HP23** (Scheduled Monuments and Archaeological Remains); and **NE01** (Protecting and Enhancing the Natural Environment).
- 9.7.4 Policy HP19 (Conservation and Enhancement of Historic Environment) presents criteria with the aim of "conserving, sustaining and enhancing" heritage assets. Policy HP14 (Responding to Context) is also of particular note, in that it fully recognises the potential for development to impact - both positively and negatively - on heritage assets in an indirect fashion, i.e. via impacts to the setting of the heritage asset.

#### Conclusions on the Pre-submission Plan

- 9.7.5 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.

#### Implications of Focussed Changes (October 2019)

- 9.7.6 The discussion above relates to the version of the plan published for consultation in January 2019. At the current time (October 2019) Focussed Changes to that plan are published for consultation. A detailed appraisal of the Focussed Changes is presented within a stand-alone SA Report Addendum, which reaches the following conclusion:

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

- 9.7.7 On this basis, the conclusion reached in January 2019 in respect of the Pre-submission Plan (see para 9.7.6) **broadly holds true** for the Pre-submission Plan plus Focussed Changes.

## 9.8 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 spatial strategy

9.8.1 The appraisal of the 2016 Draft Plan concluded -

*“Flood risk in Brentwood Borough is not extensive [as] evidenced by the mapped outputs of the Brentwood Strategic Flood Risk Assessment (2010) and the more recent Surface Water Management Plan (SWMP).<sup>51</sup> This SWMP concludes that flooding hotspots (taking into account where existing properties are at risk) are at: West Horndon, Ingatestone and Brentwood town centre.*

*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>52</sup>”*

9.8.2 Proposed changes to the spatial strategy, since 2016, have limited implications for flood risk, although there is a notable degree of surface water flood risk at several sites, including: Land off Doddinghurst Road, Brentwood (where the proposal is to deliver a reduced number of homes); Officer’s Meadow, Shenfield (where the proposal is now to deliver fewer C3 homes); South of Ingatestone (a new site); and Land north of Orchard Piece, Blackmore (a new site).

9.8.3 Also of note is the deletion of the 200 home Honeypot Lane site from the plan, as there is a corridor of surface water flood risk running through the site, associated with a small stream. The proposal had been to integrate this as part of green infrastructure within the site.

9.8.4 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.

### Commentary on other policies

9.8.5 The achievement of ‘flooding’ objectives is supported, either directly or indirectly, through a number of thematic policies, notably: **BE02** (Sustainable Construction and Resource Efficiency); **BE08** (Sustainable Drainage); **BE18** (Green and Blue Infrastructure); and **NE06** (Flood Risk).

9.8.6 Focusing on Policy NE06 (Flood Risk), this policy outlines the requirement for any development at risk of flooding to submit a Flood Risk Assessment (FRA) and cross-references to Policy BE08 (Sustainable Drainage). The policy also makes reference to the need to consider the impacts of climate change, and outlines the conditions upon which

<sup>51</sup> The SWMP (2015) is available at: <http://www.brentwood.gov.uk/index.php?cid=966>.

<sup>52</sup> See Appendix K of the SWMP at: <http://www.brentwood.gov.uk/pdf/22062015121842u.pdf>

development within the floodplain will be considered. These points therefore address the need to consider the increased risk of flooding as a result of climate change and will seek to reduce the risk of flooding for new development. Whilst there is a requirement to safeguard land used for current and future flood management, provision might also be made for the enhancement of current flood management systems, i.e. drainage ditch clearance, or tree or hedgerow planting so as to reduce surface water run-off.

- 9.8.7 With regards to Policy BE02 (Sustainable Construction and Resource Efficiency), it is point (d) that requires developments to incorporate include Sustainable Urban Drainage Systems (SuDS). The policy notably applies to all development proposals; however, an alternative approach might involve a 'sliding scale', with particular requirements - e.g. substantial rainwater attenuation measures, such as a minimum surface area of green walls or roofs - placed on larger schemes.

#### Conclusions on the Pre-submission Plan

- 9.8.8 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 Pre-submission Plan; however, there remains some uncertainty ahead of a detailed DHGV masterplan.

#### Implications of Focussed Changes (October 2019)

- 9.8.9 The discussion above relates to the version of the plan published for consultation in January 2019. At the current time (October 2019) Focussed Changes to that plan are published for consultation. A detailed appraisal of the Focussed Changes is presented within a stand-alone SA Report Addendum, which reaches the following conclusion:

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

- 9.8.10 On this basis, the conclusion reached in January 2019 in respect of the Pre-submission Plan (see para 9.8.9) **broadly holds true** for the Pre-submission Plan plus Focussed Changes. Whilst the effects of Focussed Changes are positive, they are of limited significance.

## 9.9 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 spatial strategy

#### 9.9.1 The appraisal of the 2016 Draft Plan concluded -

*“The [strategy] 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... Other considerations are: addressing variations in housing needs across the Borough; and meeting housing needs in the rural villages. In terms of the former, there is no evidence available to inform a discussion, but it seems likely that this is not a major factor given that the main urban area is central within the Borough. It should be the case that housing delivered in the A127 corridor helps to meet the needs arising from Brentwood/Shenfield and (perhaps to a lesser extent) Ingatestone. In terms of the latter, there are perhaps some concerns relating to the limitation of growth at villages in the Rural North and Rural South areas, although it is noted that opportunities to develop brownfield sites in the Green Belt have been explored.”*

#### 9.9.2 The current preferred approach involves a land supply - i.e. completions, commitments, allocations and a windfall assumption - sufficient to deliver 458 dpa *in theory*, i.e. assuming that site yields are not revised downwards through the planning application process, and assuming no delayed delivery. This contrasts to a LHN figure of 350 dpa, albeit LHN could potentially rise to 454 dpa, pending the outcomes of the current Government consultation (see discussion at para 5.2.7). It is also noted that the SHMA (2018) concluded that need is below, or in the region of, 380 dpa. On this basis, the spatial strategy is considered robust from a ‘housing’ perspective. It *“positively... meet[s] the development needs of [the] area, and [is] sufficiently flexible to adapt to rapid change”* in accordance with NPPF para 11.

#### 9.9.3 Aligned with the proposed housing land supply, Policy SP02 (Managing Growth) proposes to be monitored against a housing trajectory that involves provision for 456 dpa *on average* across the 17 year plan period, but more specifically proposes a ‘stepped’ trajectory involving a monitoring target of 310 dpa for the period to 2022/23 and then 584 dpa for the period 2023/24-2033. Provision of 310 dpa in the early years of the plan period is clearly not ideal from a ‘housing’ perspective, given that LHN is at least 350 dpa; however, the Council believes this to be a pragmatic response to the fact that there is a need to rely on Green Belt allocations, where site promoters can tend to be reticent in respect of progressing evidence to support a planning application, ahead of plan adoption. With regards to the 584 dpa target for the latter part of the plan period, this is considered to be high. The ambition is to be commended from a pure ‘housing’ perspective; however, there is a risk of the target not being achieved (i.e. housing delivery falling below the committed trajectory) such that the Council fails the five year housing land supply test and/or the housing delivery test, as set out within the NPPF. This risk reflects the fact that delivery of DHGV is inherently associated with some risk of slippage, as a large site requiring major infrastructure upgrades, and noting that the committed housing delivery trajectory at the site increased following deletion of Honeypot Lane from the plan at the 8<sup>th</sup> November Extraordinary Council meeting. On balance, it is **recommended** that a slightly less ambitious approach is taken, more in line with approaches being taken elsewhere.<sup>53</sup>

<sup>53</sup> For example, the Basildon Local Plan identifies a land supply to provide for up to 17,791 homes in the plan period, but the proposal is to be monitored against a housing trajectory that is both ‘stepped’ and involves provision for only 15,465 homes in the plan period. A stepped trajectory and a ‘buffer’ of 2,326 homes (or 116 dpa, which contrasts to the proposed Brentwood buffer of 2 dpa) might be criticised as not being suitably ambitious from a ‘housing’ perspective, but equally might be defended as realistic, and necessary to ensure that the Council can maintain a rolling five year housing land meet the housing delivery test throughout the plan period.

N.B. the response to failing the five year housing land supply test and/or the housing delivery test would be that the presumption in favour of sustainable development (or 'tilted balance') applies when considering applications on non-allocated sites, in accordance with NPPF para 11. This could lead to the housing land supply being bolstered through unallocated sites gaining permission, which will tend to be sites that are in sub-optimal locations. However, the situation is not clear cut. A further consideration is that the unallocated sites considered in order to bolster supply would likely be within the Green Belt, which is one of the types of 'protected area' listed within the footnote to NPPF para 11. As such, the threshold for permitting unallocated sites in order to bolster the housing land supply might not be met even after the presumption in favour of sustainable development / tilted balance is applied.

9.9.4 Further points on the spatial strategy are as follows:

- Relative to the 2016 Draft Plan stage, the proposal is to provide for a greater mix of sites, both in respect of site size (for example, 'Land adjacent to Carmel, Mascalls Lane, Warley' is a small greenfield site that is expected to be able to deliver at the start of the plan period) and geographical spread. The proposal to deliver 123 homes in the northern villages should help to ensure that very localised housing needs are met, e.g. should increase the potential for young people forming a new household to remain in their home village. These sites may also lend themselves to development by smaller housebuilders.
- Whilst DHGV is anticipated to deliver 2,700 homes in the plan period, the long term capacity of the site is more in the region of 4,500 homes. Planning now for housing delivery beyond the plan period is supported from a housing perspective.
- There is a clear requirement for four proposed sites to deliver specialist housing, namely a care home in each instance. There is also an expectation that DHGV will deliver specialist housing; however, the policy requirement for DHGV is less clear, with Policy R01i setting only a broad requirement for "specialist accommodation in line with... Policy HP04".
- For the two adjacent sites north of Blackmore (70 homes in total), the 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...*" This approach is broadly supported, on the assumption that sufficient 'local needs' are known to exist. The concern is that viability and in turn deliverability of the sites could be impacted, but this is considered unlikely to transpire, given the strength of the Brentwood housing market.
- At DHGV a strategic aim is to deliver "*homes which are affordable and provide a range of choices in terms of size and tenure, to encourage a mixed and balanced community to establish and flourish.*" Policy then goes on to require "a balanced variety of housing typologies and tenure, including provision of self-build plots in line with Policy HP01" and supporting text refers to delivering "great, affordable homes will be key to making the village distinctive and desirable" and homes that are "well designed and provide a range of choice (dwelling sizes, tenure) to encourage a balanced community from all stages of life to form." It is **recommended** that there might be additional discussion of the specific opportunities that present themselves at DHGV on account of its scale.
- Another key emerging design theme at Dunton Hills is adaptable design. In terms of housing, this means working with developers and housebuilders to ensure that properties can be easily adapted to suit changing personal requirements and family commitments.

- 9.9.5 Finally, in respect provision for Gypsies and Travellers, Policy HP07 requires that, in order to meet identified need for pitches amongst those who meet the national definition of 'travelling' (as set out in the Planning Policy for Traveller Sites, 2012), a total of 13 permanent pitches for Gypsies and Travellers as defined by national planning policy for the period 2016-2033 will be provided through: A) consideration of the regularisation of 8 pitches in accordance with Policy HP08 (Regularising Suitable Existing Traveller Sites); and B) the incorporation of a minimum of 5 serviced Gypsy and Traveller pitches as part of DHGV. On balance this approach is supported, noting that: the need figure reflects a margin of error (10%) to account for the difficulties inherent in identifying needs accurately (i.e. some of those judged not to meet the definition might in fact meet the definition); and, whilst there is a risk that it will not be possible to regularise 8 pitches in practice, the requirement for new pitches at DHGV is a minimum figure. At the 2018 Preferred Allocations stage the proposal was to meet the same need figure via 6 new pitches at Dunton Hill Garden Village and 7 from the regularisation.

#### Commentary on other policies

- 9.9.6 The achievement of 'housing' objectives is supported, either directly or indirectly, through a number of thematic policies, notably: **HP01** (Housing Mix); **HP02** (Protecting Existing Housing Stock); **HP03** (Residential Density); **HP04** (Specialist Accommodation); **HP05** (Affordable Housing); **BE24**: Standards for Housing); **HP07 to HP11**, which deal with Gypsy and Traveller sites; **HP16** (Buildings Design); **HP18** (Designing Landscape and the Public Realm); **PC10** (Mixed Use Development in Designated Centres); **NE08** (Floodlighting and Illumination); **NE9 to NE13** which deal with applications in the Green Belt; **NE14** (Agricultural Workers Dwellings); and **NE15** (Re-Use and Residential Conversion of Rural Buildings).
- 9.9.7 Focusing on Policy HP05 (Affordable Housing), this states that at least 35% affordable housing is required on qualifying sites. Of particular note is the following requirement, which responds fully to a recommendation made within the 2016 Interim SA Report published as part of the Draft Plan consultation: *"Where a site has been sub-divided or is not being developed to its full potential so as to fall under the affordable housing threshold, the Council will seek a level of affordable housing to reflect the provision that would have been achieved on the site as a whole had it come forward as a single scheme for the allocated or identified site."*
- 9.9.8 The policy does make reference to instances where viability considerations could mean that the affordable housing quota is not delivered on specific sites; however, the Council's viability study concludes as follows: *"The Brentwood Borough Council area has a vibrant and active property market. All types of residential and non-residential development are coming forward. In the current market, the analysis in this report shows that delivering affordable housing at 35% is achievable on the types of site identified in the emerging Plan. This report can conclude that the cumulative impact of the policies in the Plan will not put development at serious risk."*<sup>54</sup>
- 9.9.9 Also of particular note is Policy HP01 (Housing Mix), which outlines the thresholds at which: a mix of dwelling types, sizes, tenures and specialist accommodation (six or more dwellings or 0.2 hectares or more); easily adaptable for the elderly or people with disabilities (20 or more dwellings); or self-build (100 or more dwellings) are required.

#### Conclusions on the Pre-submission Plan

- 9.9.10 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.

<sup>54</sup> <http://www.brentwood.gov.uk/pdf/25102018125723000000.pdf>



### Implications of Focussed Changes (October 2019)

- 9.9.11 The discussion above relates to the version of the plan published for consultation in January 2019. At the current time (October 2019) Focussed Changes to that plan are published for consultation. A detailed appraisal of the Focussed Changes is presented within a stand-alone SA Report Addendum, which reaches the following conclusion:

*“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 DHGV 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.”*

- 9.9.12 On this basis, the conclusion reached in January 2019 in respect of the Pre-submission Plan (see para 9.9.10) **broadly holds true** for the Pre-submission Plan plus Focussed Changes. **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.

## 9.10 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 of careful planning.

### Commentary on the spatial strategy

- 9.10.1 The appraisal of the 2016 Draft Plan concluded -

*“With regards to Dunton Hills Garden Village, there are clearly landscape sensitivities, with consultees (notably Thurrock Council) suggesting the potential for impacts to valued landscapes, and loss of Green Belt that serves a clear purpose (particularly in the sense of preventing coalescence and/or sprawl). It is anticipated that there will be good potential to avoid/mitigate effects; however, there is some uncertainty and a need for further work to examine options. It is noted that, whilst there is the potential to make use of some clearly defined physical features (A127, A128, railway line), it may be a challenge to ensure a defensible long term boundary separating the Garden Village from west Basildon (where there is a planned urban extension).*

*With regards to the A12 urban extensions, there are perhaps fewer concerns. This is on the basis that the landscape and Green Belt were primary considerations when selecting the preferred sites. All sites have strong boundaries, which should result in little or no risk of further sprawl in the future. Also, it is noted that two of seven A12 urban extension allocations (albeit two of the smaller ones) are brownfield sites.”*

- 9.10.2 The Preferred Allocations consultation document then proposed a notably increased focus of growth at the **main urban area**, before the decision was taken to reduce the focus of growth at the 8<sup>th</sup> November Extraordinary Council meeting (see discussion in Section 5.5):

- Decisions taken subsequent to 2016 Draft Plan stage - a significant amount of the additional growth was directed towards brownfield sites (two adjacent sites at Warley, 473 homes; and William Hunter Way car park, 300 homes), and two of the four additional proposed Green Belt sites are relatively small (Land adjacent to Carmel, Mascalls Lane, Warley, 9 homes; and Land west of Warley Hill, Pastoral Way, Warley, 43 homes). The other two 'post 2016' additional Green Belt sites are adjacent, and together comprise a significant northern extension to the previously proposed Officers Meadow site, to the north of Shenfield (bringing the total size of the urban extension to 825 homes); however, these sites are relatively unconstrained in landscape terms, given containment by the A12 and railway line, with the Landscape Capacity Study (2019) finding these sites to be relatively unconstrained ("medium to high-medium split" capacity). Finally, it is noted that a decision was taken to reduce the quantum of homes (C3) delivered at all four of the Green Belt sites proposed by the 2016 Draft Plan, namely Land off Doddinghurst Road, Land east of Nags Head Lane, Land at Honeypot Lane and Officers Meadow. The Landscape Capacity Study finds three of these sites to have "medium" capacity, such that a decision to reduce the quantum of homes is tentatively supported; however, Land off Doddinghurst Road is identified as having "medium-high" landscape capacity.
- Decisions taken at the 8<sup>th</sup> November Extraordinary Council meeting - the decision to reduce the quantum of homes at the Priests Lane site is not supported, from a landscape perspective, recognising that this site falls outside the Green Belt / within the defined settlement boundary. With regards to deletion of Honeypot Lane, whilst this site does comprise Green Belt, it can tentatively be identified as relatively non-sensitive. The Landscape Capacity Study (2019) finds the site to have "medium" landscape capacity, as per other extension sites of a similar scale; however, the Green Belt Study (2018) finds the site to contribute to Green Belt purposes only to a "low to moderate" extent, i.e. two a notably lesser extent than other urban extension sites of a similar scale.

9.10.3 Elsewhere, the proposal - first presented at the 2018 Preferred Allocations Stage, and then subsequently subject to adjustment - is to allocate a package of sites at **villages** in the north of the Borough, specifically two small sites at Kelvedon Hatch and two adjacent sites at Blackmore. The Landscape Capacity Study finds all of these sites to have "medium" capacity, whilst the Green Belt study finds all of these sites to contribute to purposes to a "moderate" extent. Finally, it is noted that a decision was taken to delete one further site at Hook End at the 8<sup>th</sup> November Extraordinary Council Meeting. This decision cannot be supported from a 'landscape' perspective, given that the site is identified as having very good capacity through by the Landscape and Green Belt studies; however, the number of homes involved is very modest (10 homes), such that it is difficult to suggest that the effect of deleting the site is to increase the pressure to direct homes to more sensitive locations.

9.10.4 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>55</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 masterplan should respond, albeit the need for flexibility is equally recognised.

<sup>55</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 Uppminster 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..."

- 9.10.5 Finally, there is a need to examine the proposed A127 corridor employment growth strategy, with a headline conclusion from the Green Belt and Landscape Capacity studies being that it is the proposed southern extension to Childerditch Industrial Estate that gives rise to greatest cause for concern. The proposed extension land has “medium-high” landscape capacity; however, it contributes to Green Belt purposes to a “moderate” extent.

#### Commentary on other policies

- 9.10.6 The achievement of ‘landscape’ objectives is supported, either directly or indirectly, through a number of thematic policies, notably: **BE08** (Sustainable Drainage); **BE09** (Communications Infrastructure); **BE18** (Green and Blue Infrastructure); **BE21** (Protecting Land for Gardens); **HP03** (Residential Density); **HP07** (Provision for Gypsy and Travellers); **HP16** (Buildings Design); **HP17** (Paving over Front Garden); **HP18** (Designing Landscape and the Public Realm); **HP21** (Conservation Areas); **NE01** (Protecting and Enhancing the Natural Environment); **NE03** (Trees, Woodlands, Hedgerows); **NE04** (Thames Chase Community Forest); **NE09** (Green Belt); **NE10** (New Development, Extension and Replacement of Buildings in Green Belt); **NE11** (Established Areas of Development and Structures in the Green Belt); **NE12** (Previously Developed Land in Green Belt); **NE13** (New Development, Extension and Replacement of Buildings in Green Belt); **NE14** (Agricultural Workers Dwellings)
- 9.10.7 The need to protect the Borough’s highly valued rural landscape is a focus of Policy NE01 (Protecting and Enhancing the Natural Environment), which sets out the Council’s commitment to safeguard the Borough’s varied landscapes, heritage, biodiversity and habitats. Additionally, Policy NE03 (Trees, Woodlands, Hedgerows) sets out the protection afforded to the rural landscape and features of ecological importance, including trees, woodlands or hedgerows. Policy NE03, in conjunction Policy BE37: Green and Blue Infrastructure, also supports the Essex Wildlife Trust’s Living Landscapes vision to “restore, recreate and connect wildlife habitats”. This approach will help to protect and enhance the Borough’s rural landscapes and their distinctiveness.

#### Conclusions on the Pre-submission Plan

- 9.10.8 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**.

#### Implications of Focussed Changes (October 2019)

- 9.10.9 The discussion above relates to the version of the plan published for consultation in January 2019. At the current time (October 2019) Focussed Changes to that plan are published for consultation. A detailed appraisal of the Focussed Changes is presented within a stand-alone SA Report Addendum, which reaches the following conclusion:
- “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.”*
- 9.10.10 On this basis, the conclusion reached in January 2019 in respect of the Pre-submission Plan (see para 9.10.8) **broadly holds true** for the Pre-submission Plan plus Focussed Changes, and, indeed, the effect of the Focussed Changes is to reinforce this conclusion.

## 9.11 Soils

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

### Commentary on the spatial strategy

- 9.11.1 The appraisal of the 2016 Draft Plan discussed "*evidence of the Council's commitment to maximising brownfield opportunities*" and was ultimately able to find the spatial strategy to perform well, in terms of making best use of brownfield land and protecting the Borough's resource of productive agricultural land.
- 9.11.2 Changes to the strategy since 2016 involve additional release of Green Belt land - the majority of which is in agricultural use - but also an increase in homes directed to brownfield sites.
- 9.11.3 Virtually all preferred greenfield allocations are shown to intersect 'grade 3' land by the nationally available agricultural land quality dataset, meaning that the land may or may not be 'best and most versatile' in practice (the NPPF defines best and most versatile as land that is grade 1, grade 2 or grade 3a). However, one of the allocations introduced subsequent to the 2016 Draft Plan stage - namely Land north of Woollard Way, Blackmore - does intersect land shown as grade 2 by the national dataset. The national data shows numerous patches of grade 2 land in this northern part of the Borough (see Appendix II), and is very low resolution, hence there would seem to be a strong likelihood of one or more of the preferred allocations at the northern villages comprising best and most versatile agricultural land.

N.B. the other available dataset is known as the 'Post 1988' dataset. This dataset is an accurate reflection of agricultural land quality, on the basis that the methodology involves field surveys. However, the data-set is very patchy, with data only being available for a very small proportion of the Borough, and no data available for any of the sites under consideration here. Indeed, the dataset does not show any data points within Brentwood Borough at all - see Appendix II.

### Commentary on other policies

- 9.11.4 Soil and contamination is considered through **Policy NE07: Contaminated Land and Hazardous Substances**. The policy could potentially take a more positive tone, with a view to supporting applications for schemes that would involve the remediation of contaminated land.
- 9.11.5 There is no policy proposed to deal with the matter of protecting best and most versatile agricultural land, which does not lead to any particular concerns. It is difficult to foresee what locally specific policy could be added to NPPF policy.

### Conclusions on the Pre-submission Plan

- 9.11.6 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**.

### Implications of Focussed Changes (October 2019)

- 9.11.7 The discussion above relates to the version of the plan published for consultation in January 2019. At the current time (October 2019) Focussed Changes to that plan are published for consultation. A detailed appraisal of the Focussed Changes is presented within a stand-alone SA Report Addendum, which reaches the following conclusion:

- 9.11.8 *“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.”*
- 9.11.9 On this basis, the conclusion reached in January 2019 in respect of the Pre-submission Plan (see para 9.11.6) **broadly holds true** for the Pre-submission Plan plus Focussed Changes.

## 9.12 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 spatial strategy

- 9.12.1 The appraisal of the 2016 Draft Plan concluded: *“The broad spatial distribution of growth is not likely to have a bearing on waste management related objectives. It is assumed that there is sufficient capacity at waste management processing facilities in Essex to handle waste, and all new development, regardless of location and scale, has the potential to design-in waste management facilities.”*
- 9.12.2 This conclusion broadly stands. There are some waste infrastructure challenges in the Borough - with no composting facility, limited commercial waste recycling facilities (potentially with implications for fly tipping) and capacity constraints at household waste recycling centres - however, it is not clear that the spatial strategy has implications for the delivery of new facilities. The joint Essex County Council and Southend-on-Sea Borough Council Waste Local plan, adopted in 2017, is the current approved planning policy document that guides waste development and determines waste-related planning applications within Essex and Southend.

### Commentary on other policies

- 9.12.3 The achievement of ‘waste’ objectives is supported, either directly or indirectly, through a number of thematic policies, notably: **SP05** (Construction Management); **BE02** (Sustainable Construction and Resource Efficiency); **BE03** (Carbon Reduction, Renewable Energy and Water Efficiency); **HP05** (Standards for New Housing); **HP16** (Buildings Design); and **NE07** (Contaminated Land and Hazardous Substances).
- 9.12.4 It is important to note that whilst the NPPF does not include any policies relevant to waste management within new developments, recommendations, guidance and requirements are set out in the Planning Practice Guidance, Waste Management Plan for England (2013) and the National Planning Policy for Waste (2014). Policy HP05 (Standards for New Housing) notes that *“consideration should be given to how smart infrastructure can be integrated into communal areas, including waste disposal points”*. Whilst this demonstrates some consideration of the practical need to design-in waste management features there is little in the plan to promote moving up the waste hierarchy. The plan would be strengthened with a requirement that developers are encouraged to move up the waste hierarchy (from the preferred reduce → reuse → recycle → recover → disposal [the least preferable option]) wherever possible. In particular, provision should be given for adequate recycling facilities, and where appropriate i.e. on larger developments, or residential developments with a garden, space is allocated for on-site composting of food waste arising.
- 9.12.5 It is noted that Policy BE03 (Carbon Reduction, Renewable Energy and Water Efficiency) requires major development applications to be accompanied by a Sustainability Statement outlining the approach to a number of issues including site waste management. This is likely to help mitigate unnecessary wastage at the construction stage of development.

### Conclusions on the Pre-submission Plan

- 9.12.6 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.**

### Implications of Focussed Changes (October 2019)

- 9.12.7 The discussion above relates to the version of the plan published for consultation in January 2019. At the current time (October 2019) Focussed Changes to that plan are published for consultation. A detailed appraisal of the Focussed Changes is presented within a stand-alone SA Report Addendum, which reaches the conclusion that there are no implications.
- 9.12.8 On this basis, the conclusion reached in January 2019 in respect of the Pre-submission Plan (see para 9.12.6) **broadly holds true** for the Pre-submission Plan plus Focussed Changes.

### 9.13 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 spatial strategy

- 9.13.1 The appraisal of the 2016 Draft Plan concluded -
- “The Water Cycle Study highlights waste water capacity as an issue. Waste water treatment infrastructure in the north of the Borough (treatment works at Doddinghurst and Ingatestone) is operating at capacity and cannot accommodate any further development; whereas in the south of the Borough there is capacity. On this basis [the strategy] performs well, with low growth directed to the Rural North and relatively low growth directed to Ingatestone.*
- In terms of water efficiency, larger scale developments may enable higher standards of water efficiency; however, this is uncertain. In terms of water quality, the SFRA indicates that although the Pilgrims Hatch area is underlain by a minor aquifer (as is most of the Borough) this area does have high potential for groundwater leaching...”*
- 9.13.2 At the current time, the Brentwood Borough Council Water Cycle Study (WCS, 2019) draws two headline conclusions in respect of the preferred allocations (or, more specifically, the strategy submitted to the November 8th Extraordinary Council meeting). Specifically -
- Firstly, there is not predicted to be significant deterioration in water quality at most of the water courses that will receive increased treated wastewater, but there is the potential for a deterioration in water quality at the receiving waters associated with the Doddinghurst and Upminster WwTWs. The former WwTW serves the rural north of the Borough (and is a constraint that has been recognised through iterations of SA over a number of years), whilst the latter serves the southern part of Brentwood (Warley) and the A127 corridor. The WCS explains that there may be measures that can be taken to avoid or mitigate the risk, including through an improvement in discharge quality.
  - Secondly, in respect of the need to remain within dry weather flow (DWF) permit levels, five of the six receiving WwTs lead to concerns, namely all other than Shenfield (which serves Shenfield and also Pilgrims Hatch), and further interrogation (Table 5.2 of the WCS) serves to indicate that the situation is particularly problematic for Brentwood and Ingatestone WwTWs; however, there is potential to avoid/mitigate through “*capacity upgrades, diversion of flows [to other WwTWs] and/or water reduction measures [e.g. measures to increase water efficiency in homes]*”.

- 9.13.3 Other issues relating to water availability and the capacity of the local sewer network are judged to be less significant. In respect of water availability the WCS finds that the Water Resource Management Plans (WRMPs) of both water companies (Affinity Water and Essex and Suffolk Water) suggest capacity, or potential capacity, within each of the water resources zones to accommodate additional development. In respect of the sewer network, the WCS does highlight an issue at Ingatestone, and also quotes Thames Water as having concerns regarding the Brook Street / Pilgrims Hatch / Sawyers Hall Farm area; however, there is likely to be potential for sufficient mitigation at the planning application stage.

#### Commentary on other policies

- 9.13.4 The achievement of 'water' objectives is supported, either directly or indirectly, through a number of thematic policies, notably: **SP01** (Sustainable Development); **BE03** (Sustainable Construction and Resource Efficiency); **BE08** (Sustainable Drainage); **BE18** (Green and Blue Infrastructure); and **NE10** (Flood Risk).
- 9.13.5 In particular, Policy BE02 (Sustainable Construction and Resource Efficiency) requires developments to incorporate water conservation measures and include Sustainable Urban Drainage Systems (SuDS). However, whilst the policy states that these measures apply to all development proposals, there could be an opportunity to expect developments above a certain size, e.g. 20 dwellings, should provide more substantial water management measures, such as grey water harvesting. Reference is made to Policy BE08 (Sustainable Drainage), which contains guidelines on what is expected of developers with regards to SuDS, and a similar approach could be taken towards water conservation measures.
- 9.13.6 Whilst the Local Plan addresses drainage requirements and water consumption targets, there is no reference to preserving, or enhancing waterways. There might be a stand-alone policy that addresses the requirement for the preservation and where possible, enhancement of the ecological and chemical status of waterbodies in line with the Water Framework Directive.

#### Conclusions on the Pre-submission Plan

- 9.13.7 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**.

#### Implications of Focussed Changes (October 2019)

- 9.13.8 The discussion above relates to the version of the plan published for consultation in January 2019. At the current time (October 2019) Focussed Changes to that plan are published for consultation. A detailed appraisal of the Focussed Changes is presented within a stand-alone SA Report Addendum, which reaches the conclusion that there are no implications.
- 9.13.9 On this basis, the conclusion reached in January 2019 in respect of the Pre-submission Plan (see para 9.13.7) **broadly holds true** for the Pre-submission Plan plus Focussed Changes.

## 9.14 Conclusions at this current stage

- 9.14.1 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.
- 9.14.2 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'.
- 9.14.3 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).

### Cumulative effects

- 9.14.4 The SEA Regulations, which underpin the SA process, indicate that stand-alone consideration should be given to 'cumulative effects', i.e. effects of the Local Plan in combination with other plans, programmes and projects that can be reasonably foreseen. The following are some key matters for consideration:
- South Essex sub-region - the Brentwood Local Plan seeks to meet LHNs in full, such that the effect is not to generate any unmet needs that would in turn need to be provided for through the forthcoming South Essex Joint Spatial Plan.
  - A127 Corridor - the Brentwood Local Plan targets significant housing and employment growth to the A127 corridor, which is potentially supportive of the sub-regional objective to develop the A127 as an enterprise corridor; however, there is a need to rely on delivery of significant upgrades to road infrastructure, if problematic traffic congestion is to be avoided.
  - Metropolitan Green Belt - the plan proposes a modest expansion of the Brentwood main urban area westwards in the direction of LB Havering, which is not considered to impinge significantly on the narrow Green Belt gap. The Green Belt gap between London and Basildon, is much more extensive, but the proposal is to develop a large area within this gap (DHGV). It is noted that Thurrock Council is exploring the option of developing West Horndon as a large new settlement, but this proposal is at such an early stage of formulation that is cannot be considered to be a potential issue or constraint in respect of delivering DHGV and maintaining the integrity of the Metropolitan Green Belt.
  - Landscape and biodiversity - the primary consideration is the southeast of the Borough, where DHGV falls in-between two areas associated with a concentration of wooded hills, and is also associated with the extensive fenland landscape to the south. The Basildon Local Plan is proposing limited growth on the western / south-western edge of the town, but opportunities should nonetheless be sought to support landscape-scale connectivity.



## 9.15 Implications of Focussed Changes (October 2019)

9.15.1 The concluding discussion above (Section 9.14) relates to the version of the plan published for consultation in January 2019. At the current time (October 2019) Focussed Changes to that plan are published for consultation. A detailed appraisal of the Focussed Changes is presented within a stand-alone SA Report Addendum, which reaches the following conclusion:

*“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.”*

9.15.2 On this basis, the conclusion reached in January 2019 in respect of the Pre-submission Plan (Section 9.14) **mostly 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.

## **PART 3: WHAT HAPPENS NEXT?**

## 10 INTRODUCTION (TO PART 3)

10.1.1 The aim of this Chapter is to explain next steps in the plan-making / SA process.

## 11 PLAN FINALISATION

11.1.1 Once the period for representations on the Pre-submission Plan / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether in-light of representations received 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 consultation. The Council will also submit the SA Report.

11.1.2 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 (alongside SA) and then subjected to consultation (with an SA Report Addendum published alongside).

11.1.3 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'. At the current time, there is a need to present 'measures envisaged concerning monitoring'.

## 12 MONITORING

12.1.1 The Local Plan explains that: *"The Council recognises that continuous 'horizon scanning' is necessary to maintain a long-term view of the relevance of the policies, in light of the fast-paced technological advances of the built environment sectors and market efficiency in delivering planned development... This is in addition to the day-to-day monitoring of the strategic objectives and policy implementation to reflect on how effective the Plan is in delivering and maintaining a sufficient supply of housing to meet needs... Therefore, we will monitor the implementation of policies and proposals of the Local Plan using key indicators and targets set out in the Monitoring Framework (Appendix 3). An earlier than five-year review may be required to address the implications of the national standardised approach to calculating local housing need, when adopted."*

12.1.2 This statement is broadly supported, and a review of the Council's proposed monitoring framework (Appendix 3 of the plan) shows the list of proposed indicators to be wide-ranging, with indicators proposed covering the great majority of issues/impacts highlighted through appraisal. However, the following are some comments on the proposed framework:

- Agricultural land - there is no proposed monitoring indicator, which reflects the fact that there is no proposed policy. The Council might consider requiring planning applications to submit an agricultural land survey, with a view to monitoring loss of BMV agricultural land.
- Air pollution - the proposal is to monitor "air pollution" through planning applications; however, there is a need to consider whether the Local Plan gives rise to a need for increased strategic air quality monitoring, i.e. additional monitoring at known hotspots.
- Biodiversity - the Council should consider how biodiversity net gain will be monitored, recognising that it is a policy commitment that contributes to the conclusion that the plan will not result in significant negative effects in respect of biodiversity.
- Low carbon infrastructure - the proposal is to monitor "sustainability of design of new development - in line with policy requirement"; however, a commitment to more specific indicators (e.g. amount of low carbon heat/power generated) could be warranted.
- Dunton Hills Garden Village - no specific monitoring indicators are proposed, which might be appropriate given the potential to identify detailed indicators through forthcoming work; however, there would be comfort in early commitment to key monitoring indicators.
- Wastewater treatment works capacity - it is recommended that the Council commit to closely monitoring the latest situation in respect of delivering the necessary mitigation.

## APPENDIX I - REGULATORY REQUIREMENTS

As discussed in Chapter 1, Schedule 2 of the Environmental Assessment of Plans Regulations 2004 explains the information that must be contained in the SA Report; however, interpretation of Schedule 2 is not straightforward. Table A links the structure of this report to an interpretation of Schedule 2 requirements, whilst Table B explains this interpretation.

Table A: Questions answered by this SA Report, in-line with an interpretation of regulatory requirements

		Questions answered	As per regulations... the SA Report must include...
<b>Introduction</b>		What's the plan seeking to achieve?	<ul style="list-style-type: none"> <li>An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes</li> </ul>
		What's the sustainability 'context'?	<ul style="list-style-type: none"> <li>Relevant environmental protection objectives, established at international or national level</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
	What's the SA scope?	What's the sustainability 'baseline'?	<ul style="list-style-type: none"> <li>Relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan</li> <li>The environmental characteristics of areas likely to be significantly affected</li> <li>Any existing environmental problems which are relevant to the plan including those relating to any areas of a particular environmental importance</li> </ul>
		What are the key issues and objectives that should be a focus?	<ul style="list-style-type: none"> <li>Key environmental problems / issues and objectives that should be a focus of (i.e. provide a 'framework' for) assessment</li> </ul>
<b>Part 1</b>	What has plan-making / SA involved up to this point?		<ul style="list-style-type: none"> <li>Outline reasons for selecting the alternatives dealt with (and thus an explanation of the 'reasonableness' of the approach)</li> <li>The likely significant effects associated with alternatives</li> <li>Outline reasons for selecting the preferred approach in-light of alternatives assessment / a description of how environmental objectives and considerations are reflected in the draft plan</li> </ul>
<b>Part 2</b>	What are the SA findings at this current stage?		<ul style="list-style-type: none"> <li>The likely significant effects associated with the draft plan</li> <li>The measures envisaged to prevent, reduce and offset any significant adverse effects of implementing the draft plan</li> </ul>
<b>Part 3</b>	What happens next?		<ul style="list-style-type: none"> <li>A description of the monitoring measures envisaged</li> </ul>

Table B: Questions answered by this SA Report, in-line with regulatory requirements

<u>Schedule 2</u>	<u>Interpretation of Schedule 2</u>	
<i>The report must include...</i>	<i>The report must include...</i>	
(a) an outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes;	An outline of the contents, main objectives of the plan and relationship with other relevant plans and programmes	i.e. answer - <i>What's the plan seeking to achieve?</i>
(b) the relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What's the 'context'?</i>
(c) the environmental characteristics of areas likely to be significantly affected;		
(d) any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance, such as areas designated pursuant to Directives 79/409/EEC and 92/43/EEC;	The relevant environmental protection objectives, established at international or national level	i.e. answer - <i>What's the 'baseline'?</i>
(e) the environmental protection objectives, established at international, Community or Member State level, which are relevant to the plan and the way those objectives and any environmental considerations have been taken into account during its preparation;	The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	
(f) the likely significant effects on the environment including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors;	The environmental characteristics of areas likely to be significantly affected	
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Any existing environmental problems which are relevant to the plan including, in particular, those relating to any areas of a particular environmental importance	i.e. answer - <i>What are the key issues &amp; objectives?</i>
(h) an outline of the reasons for selecting the alternatives dealt with and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information	Key environmental problems / issues and objectives that should be a focus of appraisal	
(i) a description of the measures envisaged concerning monitoring.	An outline of the reasons for selecting the alternatives dealt with (i.e. an explanation of the 'reasonableness of the approach)	i.e. answer - <i>What has Plan-making / SA involved up to this point?</i> <b>[Part 1 of the Report]</b>
	The likely significant effects associated with alternatives, including on issues such as... ... and an outline of the reasons for selecting the preferred approach in light of the alternatives considered / a description of how environmental objectives and considerations are reflected in the draft plan.	
	The likely significant effects associated with the draft plan	i.e. answer - <i>What are the assessment findings at this current stage?</i> <b>[Part 2 of the Report]</b>
	The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects of implementing the draft plan	
	A description of the measures envisaged concerning monitoring	i.e. answer - <i>What happens next?</i> <b>[Part 3 of the Report]</b>

Whilst Tables A and B signpost broadly how/where this report meets regulatory requirements. Table C aims to present a discussion of more precisely how/where regulatory requirements are met.

*Table C: ‘Checklist’ of how and where (within this report) regulatory requirements are being met.*

Regulatory requirement	Discussion of how requirement is met
Schedule 2 of the regulations lists the information to be provided within the SA Report	
a) An outline of the contents, main objectives of the plan or programme, and relationship with other relevant plans and programmes;	Chapter 2 (‘What’s the plan seeking to achieve’) presents this information.
b) The relevant aspects of the current state of the environment and the likely evolution thereof without implementation of the plan or programme;	These matters were considered in detail at the scoping stage, which included consultation on a Scoping Report. The Scoping Report was updated post consultation, and is available on the website.
c) The environmental characteristics of areas likely to be significantly affected;	The outcome of scoping was an ‘SA framework’, and this is presented within Chapter 3 (‘What’s the scope of the SA’). Also, more detailed messages from the Scoping Report (context and baseline review) are presented (in an updated form) within Appendix II.
d) Any existing environmental problems which are relevant to the plan or programme including, in particular, those relating to any areas of a particular environmental importance...;	
e) The environmental protection, objectives, established at international, Community or national level, which are relevant to the plan or programme and the way those objectives and any environmental, considerations have been taken into account during its preparation;	<p>The Scoping Report presents a detailed context review, and explains how key messages from the context review (and baseline review) were then refined in order to establish an ‘SA framework’.</p> <p>The SA framework is presented within Chapter 4 (‘What’s the scope of the SA’). Also, messages from the context review are presented within appendix II.</p> <p>With regards to explaining “<i>how... considerations have been taken into account</i>” -</p> <ul style="list-style-type: none"> <li>• Chapter 5 explains how reasonable alternatives were established in 2018 in-light of earlier consultation and SA.</li> <li>• Chapter 7 explains the Council’s ‘reasons for supporting the preferred approach’, i.e. explains how/why the preferred approach is justified in-light of alternatives appraisal (and other factors).</li> </ul>
f) The likely significant effects on the environment, including on issues such as biodiversity, population, human health, fauna, flora, soil, water, air, climatic factors, material assets, cultural heritage including architectural and archaeological heritage, landscape and the interrelationship between the above factors.	<ul style="list-style-type: none"> <li>• Chapter 6 presents alternatives appraisal findings (in relation to the spatial strategy, which is the ‘stand-out’ plan issue and hence that which should be the focus of alternatives appraisal/ consultation).</li> <li>• Chapter 9 presents at appraisal of Pre-submission Plan.</li> </ul> <p>As explained within the various methodology sections, as part of appraisal work, consideration has been given to the SA scope, and the need to consider the potential for various effect characteristics/dimensions.</p>

Regulatory requirement	Discussion of how requirement is met
g) The measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan or programme;	A range of recommendations were made within the 2016 and 2018 Interim SA Reports. At the current time, Chapter 9 identifies policy areas that might be the subject of further work, and makes a number of specific recommendations.
h) An outline of the reasons for selecting the alternatives dealt with, and a description of how the assessment was undertaken including any difficulties (such as technical deficiencies or lack of know-how) encountered in compiling the required information;	Chapters 4 and 5 deal with 'Reasons for selecting the alternatives dealt with', with an explanation of the reasons for focusing on particular issues and options. Also, Chapter 7 explains the Council's 'reasons for selecting the preferred option' (in-light of appraisal). Methodology is discussed at various places, ahead of presenting appraisal findings, and limitations are also discussed as part of appraisal narratives.
i) description of measures envisaged concerning monitoring in accordance with Art. 10;	Chapter 11 presents measures envisaged concerning monitoring.
j) a non-technical summary of the information provided under the above headings	The NTS is a separate document.
<b>The SA Report must be published alongside the draft plan, in-line with the following regulations</b>	
authorities with environmental responsibility and the public, shall be given an early and effective opportunity within appropriate time frames to express their opinion on the draft plan or programme and the accompanying environmental report before the adoption of the plan or programme (Art. 6.1, 6.2)	As explained by Figure 4.1, five Interim SA Reports have been published alongside plan consultation documents prior to this current report. At the current time, this SA Report is published alongside the Pre-submission Plan, in order to inform the current consultation and plan finalisation.
<b>The SA Report must be taken into account, alongside consultation responses, when finalising the plan.</b>	
The environmental report prepared pursuant to Article 5, the opinions expressed pursuant to Article 6 and the results of any transboundary consultations entered into pursuant to Article 7 shall be taken into account during the preparation of the plan or programme and before its adoption or submission to the legislative procedure.	Past Interim SA Reports, and consultation responses received on those reports, informed preparation of the Pre-submission Plan. At the current time, this SA Report is published alongside the Pre-submission Plan, in order to inform the current consultation and plan finalisation.





Air quality in Essex as a whole is generally considered to be good; however, the Borough features a high proportion of air quality management areas (AQMA) when compared to the rest of the county.<sup>57</sup> In total there are seven AQMAs located in the Borough; however, three are now set to be de-designated on the basis that NO<sub>2</sub> concentrations have not exceeded the annual mean objective value for the past four years.<sup>58</sup> The AQMAs designated in the Borough are predominantly located on the main transport route, the A12. The one exception to this is the AQMA located within Brentwood Town Centre at the A128/A1023 junction.

## Biodiversity

The NPPF and other national policy documents emphasise the need to protect important sites, plan for green infrastructure and plan for ecological networks at 'landscape scales' taking account the anticipated effects of climate change. National policy reflects the commitment to 'halt the loss of biodiversity and the degradation of ecosystem services in the EU by 2020'.

Positive planning for 'green infrastructure' is recognised as part of planning for 'ecological networks'. 'New development should incorporate green space consisting of a 'network of well-managed, high-quality green/open spaces linked to the wider countryside'. These spaces should be of a range of types (e.g. community forests, wetland areas and parks) and be multifunctional, for instance as areas that can be used for walking and cycling, recreation and play, supporting of wildlife, or forming an element of an urban cooling and flood management.

A number of local policy documents also highlight the need to preserve and enhance biodiversity features. The Brentwood Borough Council Green Infrastructure Strategy (2015) provides a set of principles; aims; improvement possibilities and key recommendations. These highlight and prioritise the most needed improvements to local green spaces; and encourage cross collaboration between stakeholders to support networks of multi-functional green infrastructure.

There are three Sites of Special Scientific Interest (SSSI) within the Borough. These are located at Coppice, Kelvedon Hatch; Curtis Mill Green; and Thorndon Park. All of these SSSIs are classified as being in 'unfavourable' condition, but remedial work is being undertaken. Of the sites, two are located within the north-west area of the Borough, whilst one is located to the south.

On a landscape scale, of primary concern is the large corridor of Biodiversity Action Plan (BAP) habitat to the south of Brentwood, running almost as far as the A127, much of which is publically accessible as Thorndon Country Park. Habitats comprise 'Deciduous Woodland' and/or 'Wood Pasture and Parkland', with three patches designated as nationally important SSSI' and other patches designated as Local Wildlife Sites. This whole area is identified by Essex Wildlife Trust as the Thorndon Woods 'Living Landscape' (one of 80 across the County), which does not indicate that human activity should be minimised, but does give pause for thought when considering strategic allocation options. This is particularly the case given that Natural England responded to the Growth Options consultation, stating that: "SA also needs to consider in more detail the recreational impacts upon the local SSSI network."

Other sites of biodiversity interest in the Borough include:<sup>59</sup>

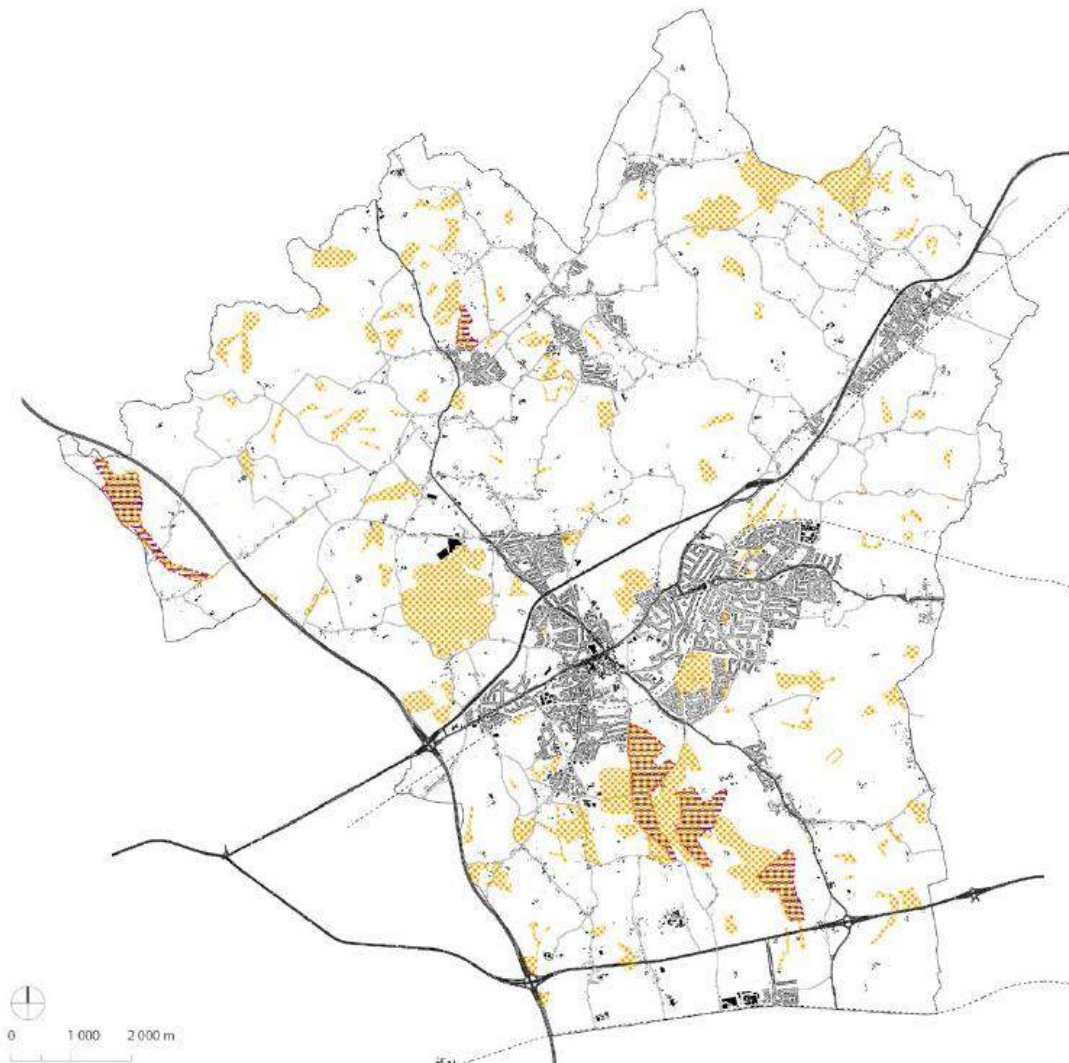
- a statutory Local Nature Reserve (Hutton Country Park), and Warley Place which is managed by Essex Wildlife Trust as a Local Nature Reserve.
- the Thames Chase Community Forest and Red House Lake are both highlighted as sites for protection.
- Numerous Local Wildlife Sites (LWS) and non-designated areas of ancient woodland.

<sup>57</sup> Brentwood Borough Council (2009) Pathway to a sustainable Brentwood: Issues and Options Consultation [online] available at: <http://www.brentwood.gov.uk/pdf/10112009103817u.pdf> (accessed 12/2014)

<sup>58</sup> Defra: AQMA Maps [online] available at: [http://aqma.defra.gov.uk/maps.php?map\\_name=kent&la\\_id=33](http://aqma.defra.gov.uk/maps.php?map_name=kent&la_id=33) (accessed 12/2014)

<sup>59</sup> PMP (2007) Survey and assessment of needs and audit of open space, sport and recreation facilities in Brentwood Borough [online] available at: <http://www.brentwood.gov.uk/pdf/19032008093745u.pdf> (accessed 12/2014)

Designated SSSIs (dark brown) and Local Wildlife Sites (light brown) in Brentwood



### Climate change mitigation

In its 2007 strategy on climate change, the European Commission recommended a package of measures to limit global warming to 2° Celsius. On energy, the Commission recommended that the share of renewable energy grows to 20% by 2020 against the 1990 baseline. In the UK the Climate Change Act 2008 has set legally binding targets on reducing greenhouse gas emissions in the UK by at least 80% by 2050 and 34% by 2020.

The NPPF emphasises the key role for planning in securing radical reductions in greenhouse gas emissions, including in terms of meeting the targets set out in the Climate Change Act 2008. Plan-making should, for example, support efforts to:

- Reduce transport emissions, by concentrating new developments in existing cities and large towns and/or ensuring they are well served by public transport;
- Deliver infrastructure such as low-carbon district heating networks; and
- Increase energy efficiency in the built environment.

The Brentwood Declaration on Climate Change acknowledges the increasing impact that climate change will have on the community during the 21st century and commits to tackling the causes and effects of a changing climate. The declaration commits to developing plans with partners and local communities to progressively address the causes and the impacts of climate change.

Total domestic and commercial energy consumption in the Borough was below the average for Essex as a whole in 2005<sup>60</sup>. With the possible exception of some small scale domestic solar panels, the Borough had no renewable energy schemes in place in 2009, and no planning applications were received regarding renewable energy schemes over the course of 2010/11. There may, however, have been the installation of solar panels on individual residential properties in the Borough, for which planning permission is not required.<sup>61</sup>

Per capita emissions of CO<sub>2</sub> in the Borough have been falling in recent years. Total emissions per capita have fallen from 8.3 tonnes in 2005 to 7.2 tonnes in 2012 with a decline in transport emissions (0.5 tonnes), domestic emissions (0.3 tonnes) and industrial emissions (0.4 tonnes) over the same period. Emissions per capita still remain above the 2012 Essex (5.9 tonnes), East of England (6.4 tonnes) and national (6.2 tonnes) averages.<sup>62</sup>

In 2001, 57% of the Borough's population travelled to work by car (below the national average); a higher than average number of people commuted by train (20%); and 1% of residents cycled to work (below the regional and national average). Approximately 20% of residents travel greater than 20km to work; however the number of borough residents working from home is slightly higher than average.<sup>60</sup>

### Community and well-being

A core planning principle is to 'take account of and support local strategies to improve health, social and cultural well-being for all'. The NPPF also emphasises the need to: facilitate social interaction and create healthy, inclusive communities; promote retention and development of community services / facilities; ensure access to high quality open spaces and opportunities for sport and recreation; and promote vibrant town centres.

Brentwood is one of the most affluent areas in England, within the least deprived 10% of the country, but there remains a need to plan carefully to ensure the wellbeing of existing residents and residents of new communities. A primary consideration is sustainable access to community infrastructure (with capacity). In this respect, the following comment made by NHS England, through the Growth Options consultation (2015) is of considerable note:

*"It is important to acknowledge that, dependent upon the location of the growth, existing GP practices do not have capacity to accommodate significant growth... Delivery of essential infrastructure via developer funded projects would be the most effective scenario for meeting the intended growth... It is suggested that a single large site necessitating the need for new facilities specific to that development would be more sustainable than dispersing growth in many settlements. Numerous smaller extensions could have impacts on existing infrastructure left unmitigated, or the level of contribution falling short of the requirements to provide adequate healthcare."*

Other considerations relate to access to town and local centres, access to education and access to open space and sport/leisure facilities.

As highlighted by the NPPF, a key driver of health outcomes is access to open space / and sport and recreation. In this respect, the Brentwood Borough Sport, Leisure and Open Space Assessment 2015 (working draft) highlights that there are relatively good levels of access to green space and sport provision in Brentwood, although that there are areas of concern about quality. It states that: "Local community surveys show that green spaces and sport facilities are valued highly by Brentwood residents and that they add significantly to the quality of life in the Borough".

In the Borough, there is a higher proportion of the population classed as having 'good' health than in England as a whole. Life expectancy is higher than the national average. Over the period 2008-10 this stood at 81.1 for men and 84.3 for women in comparison to 78.2 and 82.3 respectively in England. In the Borough's most deprived areas life expectancy is 9.4 years lower for men and 6.4 years lower for women than in the least deprived areas.<sup>63</sup>

<sup>60</sup> Brentwood Borough Council (2009) Pathway to a sustainable Brentwood: Issues and Options Consultation [online] available at: <http://www.brentwood.gov.uk/pdf/10112009103817u.pdf> (accessed 12/2014)

<sup>61</sup> Brentwood Borough Council (2012) Annual Monitoring Report 2010/11 [online] available at: <http://www.brentwood.gov.uk/pdf/18012012112208u.pdf> (accessed 12/2014)

<sup>62</sup> DECC (2014) Local Authority Carbon Dioxide Figures [online] available at: <https://www.gov.uk/government/statistics/local-authority-emissions-estimates> (accessed 12/2014)

<sup>63</sup> DoH (2012) Health Profile: Brentwood [online] available at [www.apho.org.uk/resource/view.aspx?RID=117177](http://www.apho.org.uk/resource/view.aspx?RID=117177) (accessed 12/2014)

The Joint Essex Health and Wellbeing Strategy 2018-2022 is a key element of the policy context. The priorities within this are:

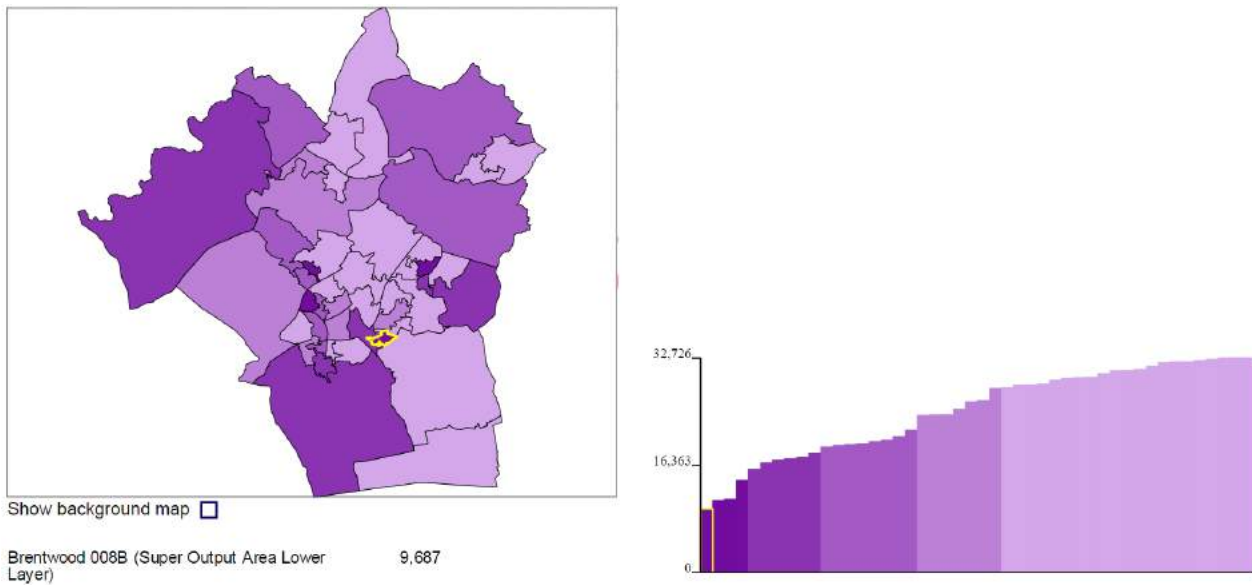
- i. improving mental health and wellbeing;
- ii. addressing obesity, improving diet and increasing physical activity;
- iii. influencing conditions and behaviours linked to health inequalities; and
- iv. enabling and supporting people with long-term conditions and disabilities.

With regards to education facilities, secondary schools locally have capacity locally; however, primary schools are generally at capacity with relatively limited opportunities for expansion (particularly within the Brentwood urban area). Levels of attainment in education are considered to be relatively high, with a slightly higher than average proportion of 15 year old pupils achieving GCSEs or equivalent in 2007. The average number of people achieving no qualifications was also slightly lower than average.<sup>60</sup> 23% of the Borough's population have no qualifications, compared to 29.1% in England.<sup>61</sup>

The Borough is home to a number of community facilities, providing both social and cultural services. Examples include the Brentwood Centre's International Hall, Brentwood Theatre, Merrymeade House, and a number of Parish and Village halls. The Borough has three libraries. These are located in Ingatestone, Shenfield and Brentwood. In terms of sports and recreation, a number of large facilities are available.

'Multiple deprivation', as measured by the Index of Multiple Deprivation 2010 dataset, varies across Brentwood. The unit of measurement is the Super Output Area (SOA). The figure below shows the output of the IMD 2015 dataset. The most deprived SOA (highlighted in the figure below) ranks 9,687 nationally (where 1 is most deprived), whilst the least deprived ranks 32,726<sup>th</sup> (out of 32,844 nationally).

IMD 2015 (with most deprived SOA highlighted)



**Economy and employment**

The planning system can make a contribution to building a strong, responsive economy by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation; and by identifying and coordinating development requirements, including infrastructure provision. The NPPF also emphasises the need to: Capitalise on 'inherent strengths', and meet the 'twin challenges of global competition and of a low carbon future'; Support new and emerging business sectors, including positively planning for 'clusters or networks of knowledge driven, creative or high technology industries'; and Support competitive town centre environments, and only consider edge of town developments in certain circumstances.

Brentwood is part of the South East Local Enterprise Partnership (LEP) which contains the three counties of Essex, Kent and East Sussex. The LEP aims to 'create the most enterprising economy in England' and key to achieving this is addressing three 'barriers to growth': tackling congestion on the transport network, improving skills and reducing deprivation. Other objectives of the LEP are to strengthen the rural economy through opportunities in the food sector, tourism and universal super-fast broadband.

The Heart of Essex: Economic Futures Study (2012) identifies land, transport, storage and professional services; administrative and support services; and education as particular areas for growth. The study notes that 'supporting local businesses and attracting inward investment by creating the right conditions for growth will be critical to achieving the service-led growth that is forecast'; and strategic transport and communications infrastructure will be crucial to creating the right conditions for growth.

Following on from the Earlier Heart of Essex: Economic Futures Study, The Brentwood Economic Futures 2015-2030 document (2014) was produced in order to update the economic evidence base for the Brentwood LDP. Brentwood has recorded strong levels of job growth over the last 17 years (30%) and this document forecasted three different scenarios for future job growth in Brentwood.

The overall job growth associated with these scenarios range from 5,750 jobs to 7,440 jobs, over the period 2015/16 to 2029/30. Each of the scenarios indicates a lower level of future job growth in Brentwood than has been achieved in the recent past. The majority of job growth under each scenario is expected to be for office-based jobs, with some additional distribution jobs; and an anticipated decline in manufacturing jobs.

The Brentwood retail and commercial leisure study (2014) provides a qualitative analysis of the existing retail and leisure facilities within the Borough, and an assessment of the need for new retail, leisure and other main town centre uses. The study notes that: "*The short to medium term capacity figures up to 2020 suggest surplus of available convenience goods expenditure could support an additional 2,151 sq.m net (3,074 sq.m gross), primarily concentrated in Brentwood town centre*".

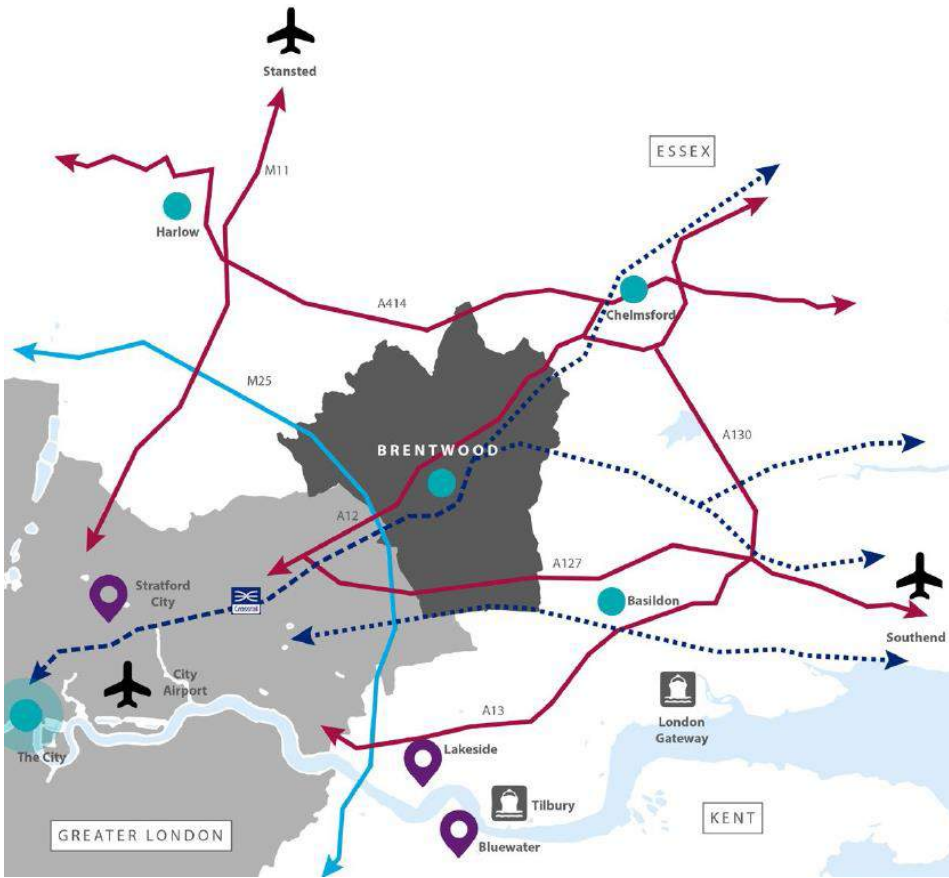
The Borough has low unemployment and has recorded strong levels of job growth over the last 17 years (30%; with the number of B-Class jobs having increased by 40%). However, there is currently an imbalance between skills and jobs because of the population working in London, which indicates a need to support further employment growth. Also, there are clear indications that delivery of new employment land in Brentwood would support the regional economy, including that of Greater London (where employment land is increasingly being lost to housing).

In the past employment growth in Brentwood has been driven by consumption sectors including residential care and social work, business services, education, healthcare and construction. However, there is now a need to focus on 'B-class' jobs growth, that is growth at dedicated employment sites. Having said this, there is also a need to take a 'discerning' approach, e.g. recognising that a strategy of simply responding to market demand for distribution warehousing would not be appropriate.

The borough is closely connected to London's economy and in 2011 contributed £1.5 billion to the UK economy and despite the local economy shrinking by 4.6% in 2007/08 and a further 3.1% in 2009 due to the global economic crisis, overall the Borough's gross value added (GVA) has been on the rise with its contribution expected to exceed 2006 levels by 2014.<sup>64</sup>

<sup>64</sup> Nathaniel Lichfield & Partners / Experian (2012) The Heart of Essex: Economic Futures Study [online] available at: <http://www.brentwood.gov.uk/pdf/06082012104212u.PDF> (accessed 12/2014)

*Brentwood's location on the regional transport network*



**Flooding**

The NPPF calls for development to be directed away from areas highest at risk, with development ‘not to be allocated if there are reasonably available sites appropriate for the proposed development in areas with a lower probability of flooding’. Where development is necessary, it should be made safe without increasing levels of flood risk elsewhere. The NPPF also states that local planning authorities should avoid ‘inappropriate development in vulnerable areas or adding to the impacts of physical changes to the coast’ in order to reduce the risk from coastal change.

The Flood and Water Management Act highlights that alternatives to traditional engineering approaches to flood risk management include: Incorporating greater resilience measures into the design of new buildings, and retro-fitting at risk properties (including historic buildings); Sustainable drainage systems (SuDS); Utilising the environment, such as management of the land to reduce runoff and harnessing the ability of wetlands to store water; Identifying areas suitable for inundation and water storage to reduce the risk of flooding elsewhere; and planning to roll back development in coastal areas.

The Brentwood Strategic Flood Risk Assessment (SFRA) (2011) characterised flood risk throughout the Borough of Brentwood based on a range of sources. It highlighted that surface water flooding, resulting from surface water run off exceeding road drains and sewer capacity was the most significant cause of flooding in the Borough. The SFRA recommends that:

*“As a minimum, all new development over 0.25 hectares in size (and all development in Flood Zones 2 and 3) should employ Sustainable Drainage Systems (SuDS) with the aim of reducing runoff”; and that:*

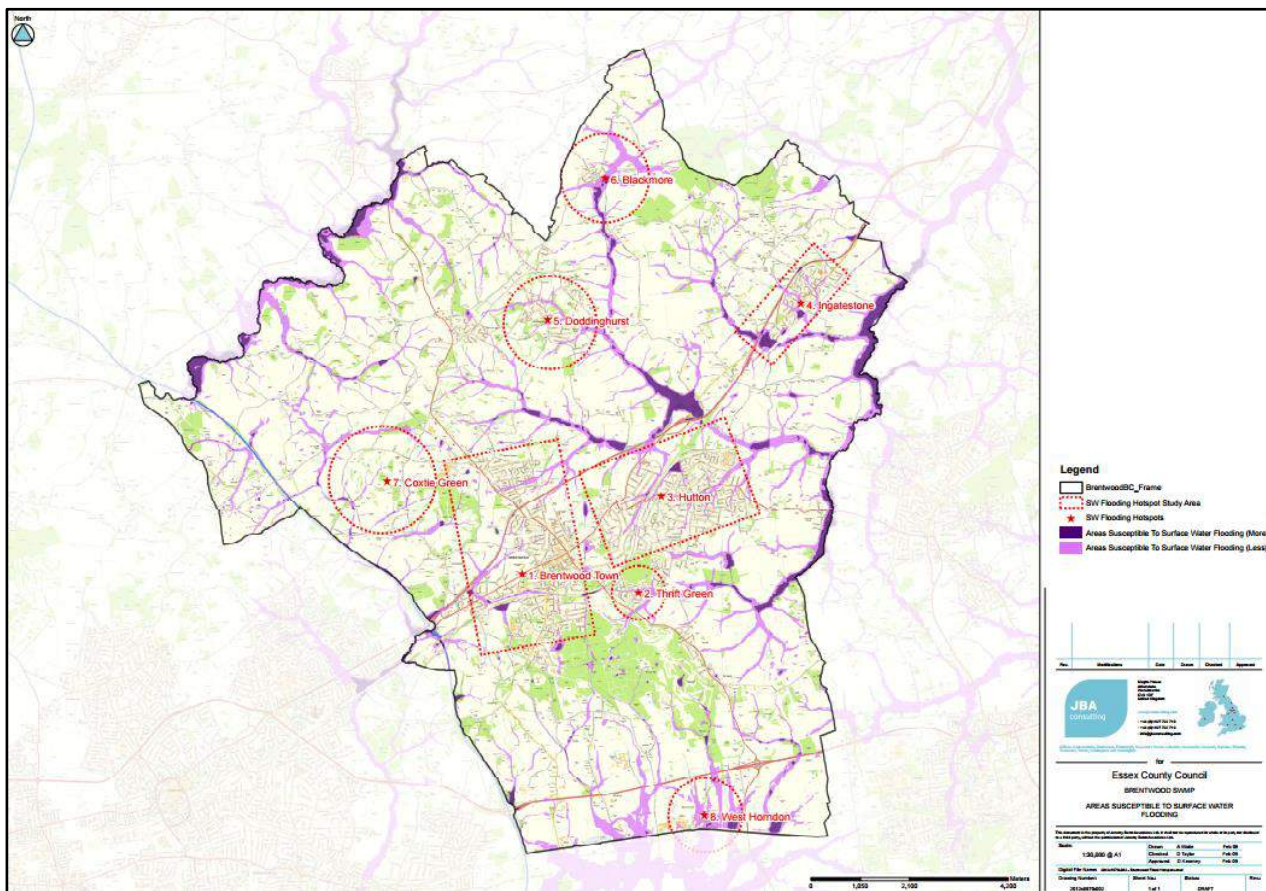
*“for much of the urban area of Brentwood the infiltration potential of soils is high, meaning that infiltration SuDS are likely to be suitable. Infiltration options control runoff at source and are high up in the SuDS hierarchy. The feasibility of infiltration on site will need to be determined through a site specific flood risk assessment, however.”*

The extent of fluvial flood risk is limited with the majority of areas categorised as Flood Zones 2 and 3 found in rural areas; although Heybridge and Ingatestone and areas to the west and east of the Brentwood urban area are most at risk of flooding. The most significant area of fluvial flood risk is in the north-west of the Borough in the vicinity of the River Roding.<sup>60</sup>

Surface water flooding is associated with drains and sewers becoming overwhelmed during intense rainfall events; and is likely to be the most significant cause of flooding in the Borough<sup>65</sup>. Surface water flood risk is higher in urban areas.<sup>65</sup> Surface water flooding is likely to continue to be the primary source of flood damage in Brentwood. Such occurrences may become more serious as a result of climate change, which may lead to increasingly intense rainfall events.

The figure below shows the areas within Brentwood which have been identified by the recent Surface Water Management Plan as susceptible to flooding.

*Areas susceptible to surface water flooding within Brentwood*



Additionally, in response to the Flood Risk Regulations (2009) and the Flood and Water Management Act (2010), and in light of the SFRA findings and the need to develop a strategy for flood risk management, Essex County Council commissioned JBVA Consulting to complete a Surface Water Management Plan (SWMP). A SWMP is a plan which enables local communities and different organisations to better understand flood risk and outlines the preference surface water management strategy which should be implemented at the given location. Based on the key areas identified by the SFRA and Essex County Council a number options and measures were identified for reducing flood risk.

<sup>65</sup> Entec (2011) Brentwood Level 1 Strategic Flood Risk Assessment [online] available at: <http://www.brentwood.gov.uk/pdf/21032011162645u.pdf> (accessed 12/2014)

## Heritage

There is a need to set out a 'positive strategy' for the 'conservation and enjoyment of the historic environment', including those heritage assets that are most at risk. Heritage assets should be recognised as an 'irreplaceable resource' that should be conserved in a 'manner appropriate to their significance', taking account of 'the wider social, cultural, economic and environmental benefits' of conservation, whilst also recognising the positive contribution new development can make to local character and distinctiveness.

In the context of the Brentwood evidence base; the Brentwood Town Centre Regeneration Strategy Final Report (2010) highlights that as part of the regeneration strategy a key objective is: "*Protecting and enhancing the town's heritage and many listed buildings*". The Strategy document also notes that a review of conservation policy and applying the findings of the Conservation Area Appraisal would help achieve some key aims in addressing and conserving Brentwood's heritage.

Altogether there are 13 conservation areas, 518 listed buildings and 12 scheduled monuments to be found spread across the Borough. In addition, there are three historic parks and gardens, with these being: Thorndon Park, Weald Park and Warley Place.<sup>60</sup>

There are two listed buildings in the Borough which are listed on English Heritage's Heritage at Risk Register.<sup>66</sup> These are: Chantry Chapel and Mausoleum (Grade II\* listed building; poor condition) and Thoby Priory ruins (Grade II listed building / Scheduled Monument; very bad condition).

## Housing

Local planning authorities should significantly boost the supply of housing and seek to ensure that 'full, objectively assessed needs for market and affordable housing' are met. With a view to creating 'sustainable, inclusive and mixed communities' authorities should ensure provision of affordable housing onsite or externally where robustly justified. Plans for housing mix should be based upon 'current and future demographic trends, market trends and the needs of different groups in the community'. Larger developments are suggested as sometimes being the best means of achieving a supply of new homes.

The housing market is delivering much less specialist housing for older people than is needed. Central and local government, housing associations and house builders need urgently to plan how to ensure that the housing needs of the older population are better addressed and to give as much priority to promoting an adequate market and social housing for older people as is given to housing for younger people.<sup>67</sup>

Planning policy for traveller sites (2012) sets out the Government's planning policy for traveller sites and should be used in conjunction with the NPPF. It aims to ensure travellers are treated in a fair and equal manner that facilitates their traditional and nomadic way of life, whilst also respecting the interest of the settled community. Local authorities are called upon to make their own assessment of need for traveller sites - using a robust evidence base and effective engagement with stakeholder groups and other local authorities – and to allocate sites accordingly.

The Brentwood Replacement Local Plan (2005) which this plan will supersede sought to negotiate 35% affordable housing (30% social rented, 5% other affordable housing) on all suitable sites above the thresholds of 20 units and above or on suitable residential sites of 0.66 hectares or more within the Brentwood Urban Area, and on sites of 5 units and above or on suitable sites of 0.16 hectares or more within defined settlements elsewhere in the Borough.

One and two bedroom properties make up a relatively small proportion of the total of the existing housing stock in Brentwood. In the context of longer life expectancy, more household break ups and a growing proportion of young people choosing to live alone, the lack of one and two bedroom properties affects affordability and choice of housing. This can result in the loss of young, economically active, elements of the population and an imbalance in the population structure over the long term. The SHMA recommends that 70% of social rented housing should be one and two bedroom properties, while for intermediate market housing 95% should be one and two bedroom properties.

<sup>66</sup> English Heritage, Brentwood Heritage Risk Register [online] available at: <http://risk.english-heritage.org.uk/register.aspx?rs=1&rt=0&pn=1&st=a&di=Brentwood&ctype=all&crit=> (accessed 12/2014)

<sup>67</sup> Select Committee on Public Service and Demographic Change (2013) Ready for Ageing? [online] available at: <http://www.parliament.uk/business/committees/committees-a-z/lords-select/public-services-committee/report-ready-for-ageing/> [accessed 12/2014]



## Landscape

The European Landscape Convention (ELC; 2007) defines landscape as: “An area, as perceived by people, whose character is the result of the action and interaction of natural and/or human factors.” It recognises that the quality of all landscapes matters – not just those designated as ‘best’ or ‘most valued’. The NPPF refers to the need to protect and enhance valued landscapes and identifies that major development should be avoided in designated areas, unless in the public interest.

The majority of the Borough is of a rural character, with built up areas making up less than 20% of the Borough. The borough’s rural areas comprise villages set in a largely attractive rolling landscape, which comprises a mix of agricultural land, woodland, and parks. Three distinct landscape types have been identified within the Borough all of which are regarded as having a relatively high sensitivity to change. These are: River Valley (to the north-west), Wooded Farmland (the majority of the Borough) and Fenland (to the south).<sup>60</sup>

All land outside of settlements in the Borough falls within the London Metropolitan Green Belt. Local authorities with Green Belt should establish boundaries in their local plan, and, once established, Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the local plan. At that time, authorities should consider boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. Local authorities should also plan positively to enhance the beneficial use of the Green Belt, notably to ‘retain and enhance landscapes, visual amenity and biodiversity’.

## Soil and contamination

There is a need to encourage the effective use of land through the reuse of land which has been previously developed, provided that this is not of high environmental value. The NPPF requires an approach to housing density that reflects local circumstances.

The NPPF calls upon the planning system to protect and enhance soils. It expects local planning authorities ‘to take into account the economic and other benefits of the best and most versatile agricultural land. Where significant development on agricultural land is necessary, local planning authorities should seek to use areas of poorer quality land in preference to that of a higher quality.

New or existing development should also be prevented from being ‘adversely affected’ by the presence of ‘unacceptable levels’ of soil pollution or land instability and be willing to remediate and mitigate ‘despoiled, degraded, derelict, contaminated and unstable land, where appropriate’.

Since 2001, Brentwood has achieved a consistently high proportion of residential developments on previously developed land (PDL)<sup>68</sup> averaging 99% over the 11 years to 2012.<sup>69</sup>

There are currently no entries on the Council’s Contaminated Land Register.<sup>70</sup>

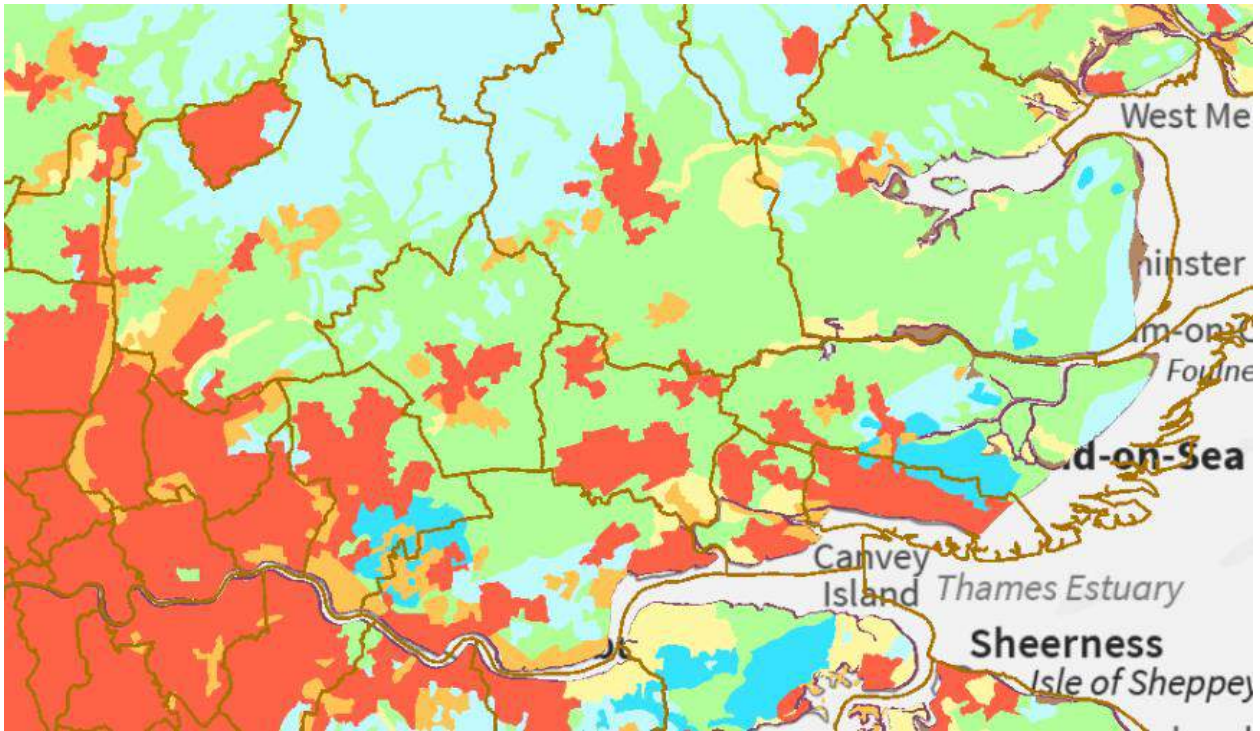
The majority of agricultural land is classed as being of Grade 3 quality. There are some areas of higher quality (Grade 2) land, mainly located in the north of the Borough. This data comes from the nationally available ‘provisional’ agricultural land quality dataset, which is very low resolution and does not differentiate between grade 3a and 3b agricultural land. None of the Borough’s agricultural has been surveyed in detail, in order to ascertain with certainty whether or not it is ‘best and most versatile’, i.e. of grade 1, 2 or 3a quality.

<sup>68</sup> NB In June 2010 the definition of PDL was changed by government. Residential gardens are now to be classified as Greenfield land in residential use. Garden land or land adjoining residential properties makes up a significant amount of the Boroughs housing supply.

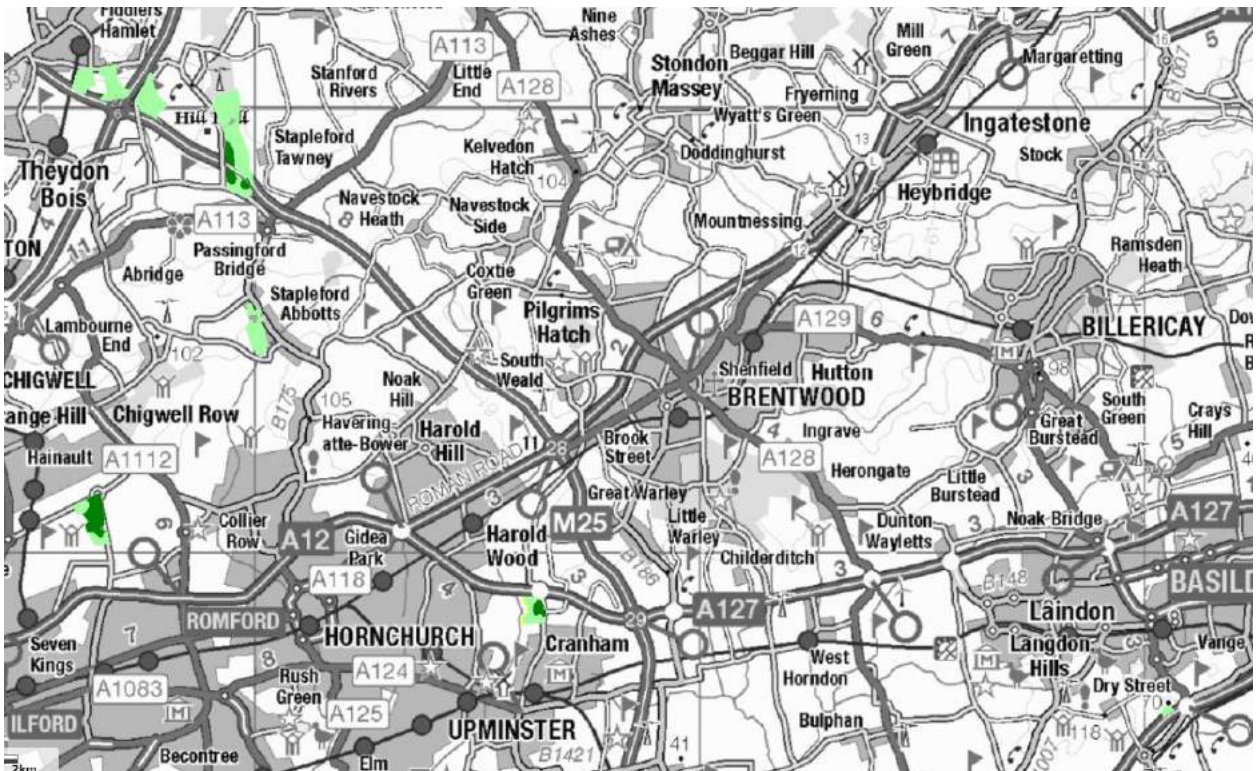
<sup>69</sup> Brentwood Borough Council -Annual Monitoring Reports (2004-2012) [online] available at <http://www.brentwood.gov.uk/index.php?cid=880> (accessed 12/2014)

<sup>70</sup> Contaminated Land Study [online] available at: <http://www.brentwood.gov.uk/index.php?cid=718> (accessed 12/2014)

National agricultural land quality dataset showing part of Greater London, Essex and North Kent



Land in the vicinity of Brentwood where agricultural land quality has been surveyed in detail



**Waste**

National Planning Policy for Waste was recently published, and it is the intention that it should be read in conjunction with the NPPF, the National Waste Management Plan for England and national policy statements for waste water and hazardous waste. All local planning authorities should have regard to its policies when discharging their responsibilities to the extent that they are appropriate to waste management. The National Policy emphasises: by driving waste management up the waste hierarchy; ensuring that waste management is considered alongside other spatial planning concerns, such as housing and transport; providing a framework in which communities and businesses are engaged with and take more responsibility for their own waste; helping to secure the re-use, recovery or disposal of waste without endangering human health and without harming the environment; and ensuring the design and layout of new residential and commercial development and other infrastructure complements sustainable waste management, including the provision of appropriate storage and segregation facilities to facilitate high quality collections of waste.

**Water quality and water resources**

The EU’s ‘Blueprint to Safeguard Europe’s Water Resources’ highlights the need for Member States to reduce pressure on water resources, for instance by using green infrastructure such as wetlands, floodplains and buffer strips along water courses. This would also reduce the EU’s vulnerability to floods and droughts. It also emphasises the role water efficiency can play in reducing scarcity and water stress.

The NPPF states that local authorities should produce strategic policies to deliver the provision of a variety of infrastructure, including that necessary for water supply and should encourage and incentivise water efficiency measures at the demand side<sup>71</sup>.

The following table presents the ‘action plan’ that is a key output of the Brentwood Borough Water Cycle Study (2018):

WwTW	Water Body ID and Water Body Name	Operational Catchment	Now	By 2020	By 2025	By 2030	Examples of measures
Doddinghurst	GB105037028720 - Doddinghurst Brook	Chelmer		Update permit levels for ammonia	WwTW capacity upgrade		Divert flows to nearby WwTW or undertake a combination of review of consent limits and water reduction measures
Shenfield	GB105037028680 - Wid (Doddinghurst Brook - Shenfield STW)	Chelmer					
Ingatestone	GB105037028690 - Wid (Ingatestone Hall - Margaretting Hall)	Chelmer	WwTW capacity upgrade				Divert flows to nearby WwTW or undertake a combination of review of consent limits and water reduction measures
Upminster	GB106037028080 - Mardyke (West Tributary)	Mardyke		Update permit levels for ammonia	WwTW capacity upgrade		Divert flows to nearby WwTW or undertake a combination of review of consent limits and water reduction measures
Brentwood	GB106037028130 - Ingrebourne	Roding Beam and Ingrebourne	WwTW capacity upgrade				Divert flows to nearby WwTW or undertake a combination of review of consent limits and water reduction measures

<sup>71</sup> Defra (2011) Water for life (The Water White Paper) [online] available at: <http://www.official-documents.gov.uk/document/cm82/8230/8230.pdf> (accessed 12/2014)

## APPENDIX III - SITE OPTIONS APPRAISAL

### Introduction

As explained within Chapters 4 and 5, one work-stream has involved subjecting site options to appraisal using a GIS-based methodology. The aim of this appendix is to -

- 1) explain the methodology; and then
- 2) present appraisal findings.

N.B. the term ‘appraisal’ is used loosely. Whilst an aim of this SA Report is to present a formal appraisal of ‘reasonable alternatives’, it does not follow that an aim is to present a formal appraisal of site options. This is because site options are not reasonable alternatives (see para 4.1.7). The aim of site options appraisal is to contribute to “an outline of the reasons for selecting the alternatives dealt with” (Schedule 2(8)).

### Developing the methodology

It was not possible to simply apply the SA framework (i.e. the list of SA topics/objectives presented in Table 3.1, above) given the number of site options, limited data availability and the imperative importance of maintaining objectivity (‘a level playing field’).

As such, work was undertaken to develop a criteria-based methodology suited to the appraisal of site options using GIS software.

The broad scope of the site options appraisal criteria are introduced in **Table A**, below. The table aims to demonstrate that the criteria reflect the SA framework as closely as possible.

**Table B** then lists the criteria concisely alongside the rules that have been applied to categorise the performance of sites. The performance of sites is categorised on the following scale - <sup>72</sup>

Dark green	Site performs particularly well
Light green	Site performs well
No shading	No issue in terms of this criterion
Amber	Site performs poorly
Red	Site performs particularly poorly

**N.B.** it is important to be clear that the aim of categorising the performance of site options is to aid differentiation, i.e. to highlight instances of site options performing relatively well / poorly.

The intention is not to indicate an effect with any particular significance.

<sup>72</sup> It is important to be clear that the aim of categorising the performance of site options is to aid differentiation, i.e. to highlight instances of site options performing relatively well / poorly. The intention is not to indicate whether a ‘significant effect’ is predicted.

Table A: Scope of the site options appraisal methodology

Topic	Relevant criteria (Location in relation to...)	Notes
Air quality	<ul style="list-style-type: none"> <li>• Air Quality Management Area (AQMAs)</li> </ul>	<p><b>Good data</b> exists to inform the appraisal, as AQMAs are designated where air quality is problematic. However, there is only the potential to measure proximity to an AQMA (i.e. there is not potential to model traffic flows between sites and AQMAs).</p>
Biodiversity	<ul style="list-style-type: none"> <li>• Site of Scientific Interest (SSSI)</li> <li>• Locally Wildlife Sites (LWS)</li> <li>• Ancient Woodland</li> <li>• Local Nature Reserves</li> <li>• Other woodland</li> </ul>	<p><b>Good data</b> is available to inform the appraisal. It is fair to assume that sites in close proximity are sensitive, e.g. because development can lead to recreational impacts.</p> <p>However, it has not been possible to draw on any locally commissioned work to identify further areas of constraint/opportunity (e.g. particularly sensitive locally designated wildlife sites).</p>
Climate change mitigation	<p><b>No data</b> is available to inform the appraisal. Whilst some site options may well have greater potential to incorporate on-site low carbon and renewable energy technologies (including on account of the scale and density of development or the terrain and aspect of the site), or link to a decentralised source of low carbon / renewable energy, there is insufficient evidence to enable robust analysis.</p>	
Community and well-being	<ul style="list-style-type: none"> <li>• GP surgery</li> <li>• Primary school</li> <li>• Secondary school</li> </ul>	<p><b>Limited</b> data is availability of data to inform the appraisal. Proximity to community infrastructure is important, particularly for residents who are less mobile (e.g. the elderly); however, there are few available borough-wide datasets. Also, data is not available to show the location of facilities outside the Borough, which could prejudice against sites near to the Borough boundary. Also, a limitation relates to there being no ability to take into account the potential for development at a particular site to put additional pressures on community infrastructure locally, or for the analysis to evaluate the potential for development to fund new infrastructure.</p> <p>N.B. distances have been calculated <b>by road</b>, rather than 'as the crow flies'.</p>
Cultural heritage	<ul style="list-style-type: none"> <li>• Conservation area</li> <li>• Registered park or garden</li> <li>• Scheduled monument</li> <li>• Listed building</li> </ul>	<p><b>Limited</b> data is available to inform the appraisal. Whilst there is good potential to highlight where development in proximity to a heritage asset might impact negatively on that asset, or its setting, a limitation relates to the fact that it has not been possible to gather views from heritage specialists on sensitivity of assets / capacity to develop sites. This is a notable limitation as potential for development to conflict with the setting of historic assets / local historic character can only really be considered on a case-by-case basis rather than through a distance based criteria. It will also sometimes be the case that development can enhance heritage assets.</p>

Topic	Relevant criteria (Location in relation to...)	Notes
Economy and employment		<b>No data</b> exists to inform the appraisal. It is not deemed appropriate to measure the distance between housing sites and employment sites, as an indicator of how well a housing site option performs from a perspective of supporting economy/employment objectives.
Flooding	<ul style="list-style-type: none"> <li>• Fluvial flood risk zone</li> </ul>	<b>Good data</b> exists to inform the appraisal in terms of flood risk, although the available data relates to fluvial (river) flood risk only. It is a challenge to meaningfully assess a large number of site options in respect of surface water flood risk, as the risk zones are extensive.
Housing		<b>No data</b> exists to inform the appraisal. It would not be appropriate to suggest that a large site performs better than a small site simply because there is the potential to deliver more homes. Housing objectives could be met through the delivery of numerous small sites, or through delivery of a smaller number of large sites (albeit it is recognised that financial viability, and hence the potential to deliver affordable housing, can be higher at large sites).
Landscape	<ul style="list-style-type: none"> <li>• Special Landscape Area (SLA)</li> <li>• Green Belt</li> </ul>	<b>Limited data</b> is available to inform the appraisal. SLAs are designated through the current adopted Local Plan, but it is not proposed to take forward this designation within the new Local Plan. It is used tentatively.
Soil and contamination	<ul style="list-style-type: none"> <li>• High quality agricultural land<sup>73</sup></li> </ul>	<b>Limited data</b> is available to inform the appraisal. The only dataset available for the whole plan area is the national ‘provisional agricultural land quality’ dataset, which is very low resolution and does not differentiate between grades 3a and 3b.
Waste		<b>No data</b> exists to inform the appraisal. It would not be appropriate to assume that larger schemes, or residential development in close proximity to recycling centres, will necessarily lead to better waste management.
Water quality and water resources		<p><b>No data</b> is available to inform appraisal in terms of water quality; however, this is not a major issue for the appraisal.<sup>74</sup> Whilst water pollution sensitivity may vary spatially (including relating to issues associated with the capacity of Waste Water Treatment Works), in the absence of a detailed Water Cycle Study there is no mapped data. It is also the case that issues can often be appropriately addressed through masterplanning/ design measures, and so are appropriately considered at the planning application stage. The same can be said for drainage issues.</p> <p>In terms of water resource availability, this does not vary significantly within the Borough, and hence need not be a consideration here. It is also not possible to appraise site options in terms of the potential to support water efficiency. Whilst it might be suggested that larger development schemes might be more able to deliver higher standards of sustainable design (including water efficiency measures) this assumption will not always hold true.</p>

<sup>73</sup> Agricultural land is classified into five grades, with grade one being of the best quality. High quality agricultural land is a finite resource, in that it is difficult if not impossible to replace it.

<sup>74</sup> It is unnecessary to appraise site options in terms of groundwater ‘source protection zones’ and ‘primary aquifers’. The presence of a groundwater source protection zone or aquifer does not represent a major constraint for most (non-polluting) types of development.

Table B: Site appraisal criteria with performance categories

Criteria (Location in relation to...)	Performance categories	Notes
1 Air Quality Management Area (AQMA)	<p><b>R</b> = AQMA covering or adjacent to the site</p> <p><b>A</b> = &lt;1,000m</p>	<p>Impact thresholds are unknown, and so the RAG thresholds reflect the spread of the data.</p> <p><b>N.B.</b> There is no potential to take into account the size of the site option involved, i.e. make the assumption that large sites are problematic. This rule also applies to other criteria below. If small sites were shown to perform relatively well, despite being in close proximity to a sensitive location, there would be a risk that numerous small sites would come forward in close proximity leading to negative effects.</p>
2 Site of Scientific Interest (SSSI)	<p><b>R</b> = &lt;800m of SSSI</p> <p><b>A</b> = &lt;2,000m</p>	<p>Natural England has defined SSSI Impact Risk Zones for the three SSSIs present in the Borough. Impact Risk Zones relating to residential developments of 100 residential units or more tend to extend to 2km from the SSSIs' boundaries. However a further threshold of 800m is added to reflect the number of sites within an Impact Risk Zone.</p>
3 Local Nature Reserve	<p><b>G</b> = &lt;2,000m</p> <p><b>R</b> = Intersect</p>	<p>People are unlikely to travel far to access a LNR, and so it is only appropriate to flag sites green where they are within 2km. Given LNRs' biodiversity sensitivity, it is also appropriate to flag as red those sites which intersect with an LNR.</p>
4 Ancient Semi Natural Woodland	<p><b>R</b> = Intersect</p> <p><b>A</b> = &lt;400m</p>	<p>The thresholds reflect an understanding that County Wildlife Sites and ASNWs have relatively low sensitivity. 400m is a walkable distance.</p>
5 Local Wildlife Site	<p><b>R</b> = Intersect</p> <p><b>A</b> = &lt;400m</p>	
6 Woodland	<p><b>A</b> = Intersect</p>	<p>The threshold reflects an understanding that non-designated woodland tends to have lower sensitivity.</p>
7 GP surgery	<p><b>R</b> = &gt;1.5km</p> <p><b>A</b> = 800m-1.5km</p> <p><b>G</b> = &lt;800m</p>	<p>Department for Transport guidance<sup>75</sup> suggests 800m as a walkable distance for those accessing a primary school or GP surgery. Secondary school children will tend to be comfortable travelling a longer distance.</p> <p><b>N.B.</b> The distance calculated is <b>by road</b>, rather than 'as the crow flies'.</p>
8 Primary school	<p><b>R</b> = &gt;1.5km</p> <p><b>A</b> = 800m-1.5km</p> <p><b>G</b> = &lt;800m</p>	

<sup>75</sup> WebTag (January 2014) Unit A4.2 paragraph 6.4.5, Department for Transport

Criteria (Location in relation to...)		Performance categories	Notes
9	Secondary school	<p><b>R</b> = &gt;3km</p> <p><b>A</b> = &lt;1.5 - 3km</p> <p><b>G</b> = &lt;1.5km</p>	
10	Conservation Area	<p><b>R</b> = Intersect</p> <p><b>A</b> = &lt;400m</p>	It is appropriate to 'flag' a red where a site is within, intersects or is adjacent to a Conservation Area. It is also appropriate to flag sites that might more widely impact on the setting of a Conservation Area. A 400m threshold is assumed.
11	Scheduled Monument	<p><b>R</b> = &lt;100m</p>	It is appropriate to 'flag' sites that intersect, are adjacent or within 100m of a Scheduled Monument.
12	Registered Park or Garden	<p><b>R</b> = &lt;100m</p> <p><b>A</b> = &lt;400m</p>	It is appropriate to 'flag' sites that intersect, are adjacent or within 100m of a Registered Park or Garden. It is also appropriate to flag sites that might more widely impact on the setting of a Registered Park or Garden. A 400m threshold is assumed.
13	Listed building	<p><b>R</b> = &lt;5m</p> <p><b>A</b> = &lt;50m</p>	It is appropriate to 'flag' sites that intersect, are adjacent or within 5m of a listed structure. It is also appropriate to flag sites that might more widely impact directly on the setting of a listed structure. A 50m threshold is assumed.
14	Flood risk zone	<p><b>R</b> = &gt; 10% of site intersects a flood risk zone</p> <p><b>A</b> = 1 - 10% of site intersects a flood risk zone</p>	The extent of flood risk zone 2 does not extend far beyond the extent of flood risk zone 3. As such, it is appropriate to consider the two together. The thresholds also reflect the fact that small areas of flood risk can be left undeveloped.
15	Special Landscape Area	<p><b>A</b> = Intersect</p>	The criteria reflect potential effects on landscape character in these areas.
16	Green Belt	<p><b>A</b> = Intersect</p>	The Green Belt is not specifically a landscape designation, and hence does not have a setting.
17	Agricultural land	<p><b>R</b> = Grade 2</p> <p><b>A</b> = Grade 3</p>	<p>No sites are covered by land classified as Grade 1 agricultural land.</p> <p>N.B. The agricultural land dataset is of a poor resolution, so much so that it shows entire settlements to be comprised of agricultural land. Some of the sites 'flagged' as red or amber are in fact brownfield or non-agricultural.</p>



Site options appraisal findings

Table C presents an appraisal of all site options in terms of all the appraisal criteria introduced above.

Notes on the table -

- All sites considered through the Council’s HELAA are shown, except those that are now a commitment, i.e. have planning permission.
- Proposed allocations (January 2019) are highlighted in **green** whilst shortlisted omission sites discussed in Section 5.5 are highlighted in **amber**.

Table C: Site options appraisal findings

Site	Name	Use	Ha.	Flood risk	SSSI	Local Wildlife Site	Local Nature Reserve	Ancient woodland	Woodland	Green Belt	Conservation area	Scheduled Monument	Registered Park/Garden	Listed building	Special landscape area	AQMA	Agricultural land	GP	Primary school	Secondary school	
155	Brentwood School, Middleton Hall Lane, Brentwood	Community	20.26																		
238	Land between Navestock and Green Lane, Navestock		4.79																		
085A	Tipps Cross Community Hall, Blackmore Road, Tipps Cross		0.19																		
101Aii	Brentwood Enterprise Park (M25 Works Site at A127/M25 junction 29)	Employment	35.47																		
112A	Childerditch Industrial Estate		11.25																		
177	Land at Wash Road, south of Lower Road, Hutton		10.54																		
101C	Codham Hall Farm		9.62																		
187	Land south of East Horndon Hall		8.7																		
112E	Childerditch Industrial Estate		7.05																		
114B	Hubert Road Industrial Estate, Brentwood		3.78																		
118	BT Centre		3.59																		

Site	Name	Use	Ha.	Flood risk	SSSI	Local Wildlife Site	Local Nature Reserve	Ancient woodland	Woodland	Green Belt	Conservation area	Scheduled Monument	Registered Park/Garden	Listed building	Special landscape area	AQMA	Agricultural land	GP	Primary school	Secondary school	
312	Land east of Nags Head Lane Sewage Treatment Works, Brentwood	Employment	3.39																		
116	Warley Hill Business Park		3.22																		
113A	Hallsford Bridge Industrial Estate		2.81																		
111	Upminster Trading Park		2.63																		
112D	Childerditch Industrial Estate		2.34																		
079C	Land adjacent to Ingatestone by-pass (part bounded by Roman Road)		2.06																		
127	Land at M25 Junction 28, Brook Street, Brentwood		1.17																		
175A	Land at M25 J28, Brook Street, Brentwood (inc. buildings), and surrounding land		0.84																		
115B	Brook Street Employment Area		0.67																		
113B	Hallsford Bridge Industrial Estate		0.59																		
115A	Brook Street Employment Area		0.58																		
119	OCE offices, Chatham Way, Brentwood		0.45																		
028C	Land east of Running Waters, Brentwood		Housing	349.7																	
192	Heron Hall, Herongate, Brentwood	239.1																			
038B	Land East of Thorndon Avenue, West Horndon	68.56																			
028B	Land east of Running Waters, Brentwood	58.33																			
302C	Land off Ongar Road, Pilgrims Hatch	53.04																			
287	Land to the east of Mascalls Lane	48.27																			
296	Land between A12 and Hall Lane, Shenfield	38.72																			
268A	Land to the east of Wash Road, Brentwood	27.68																			
028A	Land east of Running Waters, Brentwood	26.57																			

Site	Name	Use	Ha.	Flood risk	SSSI	Local Wildlife Site	Local Nature Reserve	Ancient woodland	Woodland	Green Belt	Conservation area	Scheduled Monument	Registered Park/Garden	Listed building	Special landscape area	AQMA	Agricultural land	GP	Primary school	Secondary school	
314	Land to the south of Rayleigh Road, Hutton	Housing	24.99																		
203	Land to the West of Blackmore, off Blackmore Road		24.57																		
316	Land to the South Side of Hook End Road, Doddinghurst		21.29																		
034	Officer's Meadow, land off Alexander Lane, Shenfield		20.8																		
024B	Sawyers Hall Farm, Sawyers Hall Lane/Doddinghurst Road, Brentwood		19.58																		
126	Land East of West Horndon, South of Station Road		19.47																		
303A	Land at Orchard Farm, Little Warley		19.03																		
264	Land at Havering Grove Farm, Rayleigh Road, Hutton		17.76																		
299	Land at Weald Road and Honeypot Lane (land adj. to former site of St Faiths Hospital)		15.62																		
254D	Land at Bennetts Farm, Weald Road, South Weald		14.08																		
324	Land at Oakhurst Farm, Coxtie Green Road		13.76																		
290	Land to the east of Hall Lane, Shenfield		13.18																		
218A	Land East of Hall Lane, Shenfield		12.42																		
325	Tylers Hall Farm, Nags Head Lane		11.43																		
277A	Land at Drury's Farm, Roman Road, Mountnessing		11.39																		
008B	Woodlands School, Rayleigh Road, Hutton		11.22																		
243	Parklands, High Street, Ingatestone		11.18																		
022	Land at Honeypot Lane, Brentwood		10.93																		
268B	Land to the east of Wash Road, Brentwood		10.87																		
317	Land and buildings south west of Rayleigh Road, Hutton		10.81																		
291B	Land North West of Shenfield, access via Hallwood Crescent		10.65																		
220	Collins Farm, Goodwoods Ave, Hutton		10.24																		

Site	Name	Use	Ha.	Flood risk	SSSI	Local Wildlife Site	Local Nature Reserve	Ancient woodland	Woodland	Green Belt	Conservation area	Scheduled Monument	Registered Park/Garden	Listed building	Special landscape area	AQMA	Agricultural land	GP	Primary school	Secondary school	
263	Land east of Chelmsford Road, Shenfield	Housing	9.85																		
303B	Land at Orchard Farm, Little Warley		9.71																		
289	Land to the east of Goodwood Avenue, Hutton		9.49																		
282	Land north east of Church Road, Watton's Green		9.41																		
201	Land to West of Place Farm Lane, Kelvedon Hatch		9.35																		
245	Land at Hook End Farm, Hook End		9.29																		
283A	Land to the east of Warley Street		8.2																		
212	Coombe Woods, Beredens Lane, Warley		7.96																		
038A	Land East of Thorndon Avenue, West Horndon		7.91																		
141	Brentwood Leisure Park at Warley Gap		7.84																		
315	Land to the south of Sylvia Avenue, Hutton		7.4																		
254B	Land at Bennetts Farm, Weald Road, South Weald		6.88																		
117A	Ford Warley - Southern Site		6.81																		
291A	Land North West of Shenfield, access via Hall Lane		6.47																		
254C	Land at Bennetts Farm, Weald Road, South Weald		6.41																		
323	Land lying to the north west side of Murthering Lane, Navestock		6.25																		
254A	Land at Bennetts Farm, Weald Road, South Weald		6.16																		
156A	Greenacres Riding Stables & land opposite, Beads Hall Lane, Pilgrims Hatch		6.16																		
023A	Land off Doddinghurst Road, either side of A12, Brentwood		5.99																		
199	Land to the East Of Ingatestone Road, Blackmore		5.95																		
032	Land east of Nags Head Lane, Brentwood	5.88																			
204	Land to North of Blackmore Road, Blackmore Road, Kelvedon Hatch	5.83																			

Site	Name	Use	Ha.	Flood risk	SSSI	Local Wildlife Site	Local Nature Reserve	Ancient woodland	Woodland	Green Belt	Conservation area	Scheduled Monument	Registered Park/Garden	Listed building	Special landscape area	AQMA	Agricultural land	GP	Primary school	Secondary school	
198	Land to South of Doddinghurst Road, Pilgrim Hatch	Housing	5.69																		
253	Land north of Bakers Farm, Roman Road, Mountnessing		5.51																		
277B	Land south of Drury's Farm, Roman Road, Mountnessing		5.27																		
183	Former sewage pumping station at Ingrave Hall, Ingrave		5.07																		
273	Chivers, Chivers Road, Kelvedon Hatch		4.89																		
088	Bishops Hall Community Centre and Land		4.84																		
106	Site adjacent to Ingatestone Garden Centre (former A12 works site)		4.64																		
261	Chindits Lane, Warley		4.63																		
174	Land south of Hook End Road, Doddinghurst		4.56																		
044	Land at Priests Lane (west), Brentwood		4.51																		
297	Land to the west of Hall Wood, Shenfield		4.51																		
211	Land and building on the West of Church Lane, Hutton		4.23																		
162	Little Warley Hall Farm, Little Warley Hall Lane, Little Warley		4.1																		
218B	Land East and West of Hall Lane, Shenfield		4.07																		
304	681 Rayleigh Road, Hutton, Brentwood		3.83																		
248	Wyevale Garden Centre, Ongar Road		3.82																		
310	Land at Dagwood Lane, Doddinghurst		3.82																		
090	Land rear of St. Thomas of Canterbury School, Sawyers Hall Lane, Brentwood		3.82																		
008C	Land adjacent Woodlands School, Rayleigh Road, Hutton		3.68																		
292C	Suffolk House Yard, Ashwells Road, Pilgrims Hatch		3.59																		
104	Land at Stondon Massey scrapyard, Clapgate, Chivers Road, Stondon Massey		3.58																		
279	Land to the south east of Bird Lane, Great Warley		3.5																		

Site	Name	Use	Ha.	Flood risk	SSSI	Local Wildlife Site	Local Nature Reserve	Ancient woodland	Woodland	Green Belt	Conservation area	Scheduled Monument	Registered Park/Garden	Listed building	Special landscape area	AQMA	Agricultural land	GP	Primary school	Secondary school	
164	North of Hay Green Lane, Wyatts Green	Housing	3.46																		
128	Ingatestone Garden Centre, Roman Road, Ingatestone		3.45																		
313	Land between 55 Middle Road and Brookside Farm, Ingrave		3.43																		
295	Pottagers Land, Hunters Chase Garden Centre, Rayleigh Road, Hutton, Brentwood		3.42																		
286	Long Plantation, Brentwood Road, Herongate		3.39																		
077	Land south of Redrose Lane, north of Woollard Way, Blackmore		3.3																		
190	Gardeners, Ongar Road, Kelvedon Hatch		3.29																		
270	Hartswood Road Allotments		3.28																		
301	Land to the east of Sawyers Hall Farm, Brentwood		3.26																		
053B	Land rear of 146-148 Hatch Road, Pilgrims Hatch		3.23																		
281A	Land north of Pilgrims Hatch		3.1																		
189	Former Catrina Nursery, Ongar Road, Pilgrims Hatch		2.98																		
081	Council Depot, The Drive, Warley		2.98																		
159	Land off Crow Green Lane, Pilgrims Hatch		2.82																		
219	Land to the East of Hutton Village, Hutton		2.82																		
016B	Woodlands School, Warley Street, Great Warley		2.77																		
095B	The Water Meadows, Mountnessing		2.76																		
202B	Land to the South of Blackmore, off Blackmore Road		2.73																		
011B	Land to the North of Ongar Road, Pilgrims Hatch		2.67																		
318	Land east of Honeypot lane, Brentwood		2.65																		
056B	Land at Hayden and Ardsliia, Wyatts Green Road, Wyatts Green	2.51																			
071	Wyatts Field, Wyatts Green	2.49																			

Site	Name	Use	Ha.	Flood risk	SSSI	Local Wildlife Site	Local Nature Reserve	Ancient woodland	Woodland	Green Belt	Conservation area	Scheduled Monument	Registered Park/Garden	Listed building	Special landscape area	AQMA	Agricultural land	GP	Primary school	Secondary school	
195	Birchwood, School Road, Kelvedon Hatch	Housing	2.47																		
281B	Land north of Pilgrims Hatch		2.47																		
266	Land adjacent Tye Lodge, Doddinghurst Road, Pilgrims Hatch		2.45																		
030A	Land at Bayleys Mead, off Hanging Hill Lane, Hutton		2.36																		
166	La Plata Grove, Brentwood		2.35																		
025	Land at Ingrave Road (198, 198a, 198b & 176), Brentwood		2.21																		
083	Land west of Warley Hill, Pastoral Way, Warley		2.21																		
023B	Land off Doddinghurst Road, either side of A12, Brentwood		2.2																		
272	Park Road Allotments		2.17																		
075B	Land off Stocks Lane, Kelvedon Hatch		2.15																		
179	Land adj. Wybarns Farm and Mount Pleasant Cottage, Chelmsford Road, Shenfield		2.13																		
214	Land North West Side of Blackmore Road, Stondon Massey		2.1																		
288B	Land to the north west of Roman Road, Ingatestone		2.05																		
153	Land to South of Fryerning Lane, Ingatestone		1.99																		
069	Land west of Nine Ashes Road, Stondon Massey		1.96																		
142	(Land North-East of Thoby Farm) St Annews Road, Mountnessing, Brentwood		1.95																		
143	Land East of Peartree Lane and North of Peartree Close		1.94																		
058B	Hall Lane Farm, Little Warley		1.92																		
308	Berendens Lane, Great Warley		1.88																		
067B	Salmonds Farm, Salmonds Grove, Ingrave		1.88																		
262	Land adjcant to the Hirst, Church Lane, Doddinghurst	1.87																			
188	Land at Ashwells Lodge, Blackmore Road, Doddinghurst	1.86																			

Site	Name	Use	Ha.	Flood risk	SSSI	Local Wildlife Site	Local Nature Reserve	Ancient woodland	Woodland	Green Belt	Conservation area	Scheduled Monument	Registered Park/Garden	Listed building	Special landscape area	AQMA	Agricultural land	GP	Primary school	Secondary school	
078	Land at Parklands, High Street, Ingatestone	Housing	1.83																		
031	Home Meadow, land adjacent to 12 Tyburns, Hutton		1.82																		
309	Lorropark, Church Ln, Doddinghurst		1.77																		
196	Land to North West of Lowes Farm, Wyatts Green Road, Wyatts Green		1.76																		
087	Land at Alexander Lane, Shenfield		1.73																		
206	Land to North of Reeves Close, Stondon Massey		1.71																		
076	Land south of Redrose Lane, north of Orchard Piece, Blackmore		1.69																		
283B	Land to the east of Warley Street		1.66																		
251	Land at Elm Farm, Spriggs Lane, Blackmore		1.56																		
230	Bowmer (Waste Disposal), Magpie Lane, Little Warley		1.55																		
186	Land at Crescent Drive, Brentwood		1.54																		
156B	Greenacres Riding Stables & land opposite, Beads Hall Lane, Pilgrims Hatch		1.52																		
074	Land at Church Road, Kelvedon Hatch		1.49																		
057B	Meadowside, Swallows Cross Road, Mountnessing		1.47																		
167	Land adjacent Hill Cottage, Warley Road, and Mill House, Mascalls Lane, Warley		1.45																		
217	Eagle Field, Kelvedon Hatch		1.44																		
079A	Land adj. to Ingatestone by-pass (part bounded by Roman Road, south of flyover)		1.39																		
257	Warley Auto Salvage, Warley Street, Great Warley		1.36																		
235	Land to the north of Alexander Lane, Shenfield		1.36																		
197	Land to rear of 31-40 Nags Head Lane, Brentwood		1.34																		
008A	Woodlands School, Rayleigh Road, Hutton	1.32																			
033	Land to the south of Lodge Close, east of Hutton	1.31																			



Site	Name	Use	Ha.	Flood risk	SSSI	Local Wildlife Site	Local Nature Reserve	Ancient woodland	Woodland	Green Belt	Conservation area	Scheduled Monument	Registered Park/Garden	Listed building	Special landscape area	AQMA	Agricultural land	GP	Primary school	Secondary school	
280	Straight Mile Nursery, Ongar Road	Housing	1.29							Yellow							Yellow	Red	Green	Red	
117B	Ford Warley - Northern Site		1.28		Red	Yellow		Yellow										Yellow	Red	Green	Red
073	Land adjacent to Mountnessing Primary School		1.23				Green				Yellow					Yellow		Yellow	Red	Green	Red
079B	Land adjacent to Ingatestone by-pass (part bounded by Roman Road)		1.22								Yellow							Yellow	Red	Green	Red
285	Land rear of Grange Close, Ingrave		1.21		Yellow	Yellow			Yellow		Yellow			Yellow		Yellow		Yellow	Red	Green	Red
010	Sow & Grow Nursery, Ongar Road, Pilgrims Hatch		1.2			Yellow					Yellow			Yellow				Yellow	Red	Green	Red
281C	Land north of Pilgrims Hatch		1.17			Yellow			Yellow		Yellow							Yellow	Red	Green	Red
288A	Land to the north west of Roman Road, Ingatestone		1.17						Yellow		Yellow					Yellow		Yellow	Red	Green	Red
241	Land to the rear of Hillcrest Nursery, off Thorndon Approach, Ingrave		1.17		Red	Yellow			Yellow		Yellow	Red	Red					Yellow	Red	Green	Red
210	11-12 Church Road, Kelvedon Hatch, Brentwood, Essex		1.16		Red	Yellow			Yellow		Yellow							Yellow	Red	Green	Red
223B	Land Adjacent to iChitralt, Wyatts Green Road, Swallows Cross Mountnessing		1.11								Yellow			Yellow				Yellow	Red	Green	Red
269	Hartwood Hospital, Eagle Way, Warley		1.11		Yellow	Yellow					Yellow			Yellow				Yellow	Red	Green	Red
250	Post Field, Redrose Lane, Blackmore		1.11								Yellow							Yellow	Red	Green	Red
002	Brentwood railway station car park		1.07		Yellow												Yellow	Yellow	Red	Green	Red
319	The Hurst, Church Lane, Doddinghurst		1.07		Yellow	Yellow			Yellow	Yellow								Yellow	Red	Green	Red
244	Land between Billericay Road and Heron Court, Herongate		1.03		Red	Yellow			Yellow		Yellow	Red		Yellow				Yellow	Red	Green	Red
070	Land adjacent to St. Margaret's Church, Doddinghurst		1		Yellow	Yellow			Yellow		Yellow							Yellow	Red	Green	Red
305	Little Corston, Thoby Lane, Mountnessing		0.94				Green				Yellow					Yellow		Yellow	Red	Green	Red
067A	Salmonds Farm, Salmonds Grove, Ingrave		0.94		Yellow						Yellow			Yellow				Yellow	Red	Green	Red
185	Land at Rectory Chase, Doddinghurst		0.94		Yellow				Yellow									Yellow	Red	Green	Red
224	Hermes, Brook Lane, Doddinghurst	0.91			Yellow					Yellow							Yellow	Red	Green	Red	
209	Land to South of Blackmore Road, Doddinghurst	0.87		Yellow				Yellow		Yellow			Yellow				Yellow	Green	Yellow	Red	

Site	Name	Use	Ha.	Flood risk	SSSI	Local Wildlife Site	Local Nature Reserve	Ancient woodland	Woodland	Green Belt	Conservation area	Scheduled Monument	Registered Park/Garden	Listed building	Special landscape area	AQMA	Agricultural land	GP	Primary school	Secondary school	
194	Brizes Corner Field, Blackmore Road, Kelvedon Hatch	Housing	0.87	Red	Yellow					Yellow							Yellow	Red	Yellow	Red	
284	Land adjacent 7 Hanging Hill Lane, Hutton		0.87		Yellow			Yellow						Yellow				Yellow	Red	Yellow	Green
320	41 Shenfield Road, Shenfield		0.86		Yellow							Yellow					Yellow		Green	Yellow	Green
300	Land to the South East of Hall Wood, Shenfield		0.84			Red		Yellow										Yellow	Green	Green	Green
246	Wrightsbridge Farm, Weald Road, South Weald		0.83	Red		Yellow	Green								Yellow	Yellow		Yellow	Red	Red	Red
001B	St Georges Court Highwood Close		0.81			Yellow		Yellow				Yellow					Red		Green	Yellow	Green
072	Land adjacent to Whitelands, Wyatts Green		0.81							Yellow								Yellow	Red	Yellow	Red
108	Old Pump Works, Great Warley Street		0.79		Yellow	Yellow									Yellow			Yellow	Red	Red	Red
145	Land at Doddinghurst Road adjacent Brickhouse Wood, Pilgrims Hatch		0.79			Yellow			Yellow									Yellow	Red	Red	Yellow
221	Crown Corner Country Store, Ongar Road, Kelvedon Hatch		0.77		Yellow													Yellow	Red	Yellow	Red
036	Land opposite Button Common, Brentwood Road, Herongate		0.76		Red	Red				Yellow		Red		Red		Yellow		Yellow	Red	Yellow	Red
058A	Hall Lane Farm, Little Warley		0.76		Yellow	Yellow											Yellow	Yellow	Red	Red	Red
019	Land at the Rectory, Church Lane, Doddinghurst		0.74		Yellow	Yellow			Yellow					Yellow				Yellow	Yellow	Green	Red
146	Land adjacent Hillcrest Nursery, Herongate/Ingrave		0.74		Yellow					Yellow		Yellow		Red		Yellow		Yellow	Red	Green	Yellow
148	Land at Moat Farm, 48 Crow Green Road, Pilgrims Hatch		0.73															Yellow	Red	Yellow	Yellow
168	Land at Searchlight Farm, School Road, Kelvedon Hatch		0.73		Red	Yellow			Yellow									Yellow	Red	Green	Red
140	Land at Birley Grange, Hall Lane, Shenfield		0.72			Yellow			Yellow	Yellow				Yellow				Yellow	Yellow	Green	Green
024A	Sawyers Hall Farm, Sawyers Hall Lane/Doddinghurst Road, Brentwood		0.67														Yellow		Green	Yellow	Green
240	Land north of White House, Ongar Road, Kelvedon Hatch		0.65		Red	Yellow			Yellow									Yellow	Red	Green	Red
265	Clementine Farm, Murthering Lane		0.64		Red	Yellow								Yellow				Yellow	Red	Red	Red
149	Land at Thriftwood Scout Campsite adjoining Beech Ave, Cherry Ave & Knights Way	0.63		Red	Red		Red	Yellow										Red	Yellow	Green	
011C	Land to the North of Ongar Road, Pilgrims Hatch	0.63			Yellow					Yellow			Yellow				Yellow	Red	Yellow	Yellow	

Site	Name	Use	Ha.	Flood risk	SSSI	Local Wildlife Site	Local Nature Reserve	Ancient woodland	Woodland	Green Belt	Conservation area	Scheduled Monument	Registered Park/Garden	Listed building	Special landscape area	AQMA	Agricultural land	GP	Primary school	Secondary school	
035A	Land at Spital Lane, Brentwood	Housing	0.63	Red		Yellow	Green		Yellow							Yellow		Red	Yellow	Green	
130	Hunter Avenue Car Park, Shenfield		0.62				Green												Green	Green	Green
247	Land north of Rayleigh Road, Adjacent North Drive, Hutton		0.62				Green			Yellow								Yellow	Red	Red	Red
178	Land at Priests Lane (east) adjacent Bishops Walk, Brentwood		0.61		Yellow	Yellow		Yellow									Yellow		Yellow	Green	Green
276	Oak Hurst, Chelmsford Road, Shenfield		0.55				Green		Yellow	Yellow								Yellow	Red	Yellow	Green
215	7 Church Road, Kelvedon, Hatch, Brentwood, Essex. CM14 5TJ		0.54		Red	Yellow		Yellow		Yellow						Yellow			Red	Green	Red
099	Victoria Court, Victoria Road, Brentwood		0.5		Yellow												Yellow		Yellow	Green	Green
016A	Woodlands School, Warley Street, Great Warley		0.49		Yellow	Red	Green	Yellow		Yellow						Yellow		Yellow	Red	Red	Red
239	Land to the rear of 109 Roman Road, Mountnessing		0.49				Green			Yellow						Yellow	Yellow		Red	Green	Yellow
207	Land to North of Blackmore Road, Stondon Massey		0.48		Yellow					Yellow									Yellow	Red	Red
001A	Land north of Highwood Close, Brentwood		0.47			Yellow			Yellow	Yellow	Yellow						Red		Green	Yellow	Yellow
225	The Nutshell, Stock Lane, Ingatestone		0.46							Yellow		Yellow				Yellow	Yellow		Green	Yellow	Green
205	Land to East of Nine Ashes Road, Nine Ashes Road, Stondon Massey		0.44		Yellow					Yellow					Yellow				Yellow	Red	Red
147	Land at Joy Fook restaurant, adjacent Bentley Golf Club, Ongar Road		0.43		Yellow					Yellow									Red	Yellow	Red
082	Land fronting Warley Street, near Great Warley		0.42		Yellow	Red		Yellow		Yellow					Yellow				Red	Red	Red
278	75 Peartree Lane, Doddinghurt		0.42			Yellow				Yellow									Red	Yellow	Red
191	Pettits, Frog Street, Kelvedon Hatch, Brentwood		0.4		Yellow	Yellow				Yellow									Red	Yellow	Red
271	River Road Allotments		0.4			Yellow	Green	Yellow								Yellow	Yellow		Red	Yellow	Yellow
029	Three Oaks Meadow, Hanging Hill Lane, Hutton		0.4		Yellow	Yellow		Yellow		Yellow					Yellow				Red	Red	Green
105	Land between 339 and 361 Roman Road, Mountnessing (north of No. 361)		0.39				Green			Yellow					Yellow	Yellow			Red	Green	Yellow
292B	Suffolk House Yard, Ashwells Road, Pilgrims Hatch	0.39							Yellow								Yellow	Red	Yellow	Red	
066	Greenways, School Road, Kelvedon Hatch	0.38		Red	Yellow		Yellow										Yellow	Red	Green	Red	

Site	Name	Use	Ha.	Flood risk	SSSI	Local Wildlife Site	Local Nature Reserve	Ancient woodland	Woodland	Green Belt	Conservation area	Scheduled Monument	Registered Park/Garden	Listed building	Special landscape area	AQMA	Agricultural land	GP	Primary school	Secondary school	
157	4 Nags Head Lane, Brentwood	Housing	0.38				Green			Yellow						Yellow	Yellow	Red	Red	Red	
057A	Meadowside, Swallows Cross Road, Mountnessing		0.36							Yellow							Yellow	Yellow	Red	Red	Red
184	Former Saxton 4x4 garage, Rayliegh Road		0.36				Green				Yellow						Yellow	Yellow	Red	Red	Yellow
234	Keys Hall Shopping Parade, Eagle Way		0.36		Red	Yellow			Yellow						Yellow				Yellow	Yellow	Yellow
009	Woodlands, School Road, Kelvedon Hatch		0.34		Red	Yellow			Red		Yellow							Yellow	Red	Green	Red
227	144 Crow Green Road, Pirlgrims Hatch		0.34								Yellow							Yellow	Red	Yellow	Red
027	Land adjacent to Carmel, Mascalls Lane, Warley		0.34			Yellow	Yellow			Yellow	Yellow					Yellow		Yellow	Yellow	Yellow	Yellow
193	Land on the north side of Church Lane, Warley Street		0.33					Green			Yellow						Yellow	Yellow	Red	Red	Red
040	Chatham Way/Crown Street Car Park, Brentwood		0.33			Yellow						Red			Yellow		Yellow		Green	Yellow	Green
085B	Land adjacent to Tipps Cross Community Hall, Blackmore Road, Tipps Cross		0.33			Yellow					Yellow							Yellow	Green	Red	Red
294	Chestnut Field, Backmore Road, Hook End		0.33			Yellow					Yellow							Yellow	Green	Red	Red
097	Harewood Road bungalows, Pilgrims Hatch		0.32				Yellow										Yellow		Red	Green	Yellow
004	Land rear of The Bull Public House, Brook Street, Brentwood		0.31					Green	Yellow						Yellow		Yellow		Red	Yellow	Yellow
165	Keys Hall, Eagle Way, Brentwood		0.31			Red	Yellow		Yellow										Yellow	Yellow	Yellow
322	17 South Weald Road, Brentwood		0.3							Yellow									Yellow	Yellow	Yellow
014	The Gables, Essex Way, Warley		0.28			Yellow	Yellow		Yellow										Yellow	Green	Yellow
133	Maple Cross Garages, Hutton, Brentwood		0.28			Red	Yellow		Yellow										Red	Yellow	Green
035B	Land at Spital Lane, Brentwood		0.28		Red			Green			Yellow						Yellow	Yellow	Red	Yellow	Yellow
213	Land Adjoining Crescent Cottage, Nines Ashes Road, Stondon Massey		0.27			Yellow	Yellow				Yellow							Yellow	Red	Red	Red
039	Westbury Road Car Park, Westbury Road, Brentwood		0.27			Yellow					Yellow				Yellow		Yellow		Green	Yellow	Green
056A	Land at Hayden and Ardsliia, Wyatts Green Road, Wyatts Green	0.26				Yellow			Yellow	Yellow							Yellow	Red	Yellow	Red	
098	Ingleton House, Stock Lane, Ingatestone	0.26									Yellow					Yellow	Yellow	Green	Yellow	Green	

Site	Name	Use	Ha.	Flood risk	SSSI	Local Wildlife Site	Local Nature Reserve	Ancient woodland	Woodland	Green Belt	Conservation area	Scheduled Monument	Registered Park/Garden	Listed building	Special landscape area	AQMA	Agricultural land	GP	Primary school	Secondary school	
068	Land off Penny Pots Barn, Ongar Road, Stondon Massey	Housing	0.24		Yellow					Yellow							Yellow	Yellow	Red	Red	
011	Land rear of 10-20 Orchard Lane, Pilgrims Hatch		0.24			Yellow									Red			Yellow	Red	Yellow	Yellow
311	The Eagle and Child Public House, Chelmsford Road, Shenfield		0.24			Yellow									Yellow				Green	Green	Green
176	Land at former Bentley Zoo, Hulleys Lane, Brentwood		0.23								Yellow				Yellow			Yellow	Red	Yellow	Red
293	Pondfield Yard, Ashwells Road, Pilgrims Hatch		0.22								Yellow							Yellow	Red	Yellow	Red
041	Land at Hunter House, Western Road, Brentwood		0.21		Yellow							Yellow			Yellow		Yellow		Green	Yellow	Green
326	Land adjacent 41 St.Nicholas Grove, Ingrave		0.21		Yellow						Yellow			Yellow		Yellow		Yellow	Red	Green	Yellow
292A	Suffolk House Yard, Ashwells Road, Pilgrims Hatch		0.2								Yellow							Yellow	Red	Yellow	Red
208	Land at the West of Ongar Road, Stondon Massey, Brentwood		0.2		Yellow						Yellow							Yellow	Yellow	Red	Red
080	Land adjoining 'The Surgery' Outings Lane, Doddinghurst		0.18		Yellow	Yellow			Yellow						Yellow				Green	Yellow	Red
063	Land adjacent to Gayland, Thorndon Approach, Herongate		0.17		Yellow						Yellow			Yellow		Yellow			Red	Green	Red
094	Land between 375 and 361 Roman Road, Mountnessing (south of No. 361)		0.16					Green			Yellow					Yellow		Yellow	Red	Green	Yellow
249	Land adjoining Lodge Cottages, Ingatestone Road, Blackmore		0.16		Red	Yellow				Yellow	Yellow	Red						Yellow	Red	Green	Red
129	Friars Avenue Car park Shenfield		0.15																Green	Yellow	Green
163	Old Mill Site, Hay Green Lane, Wyatts Green		0.15								Yellow							Yellow	Yellow	Red	Red
006	Land adjacent Adult Education Centre, Rayleigh Road, Hutton		0.14				Red	Green		Yellow									Green	Green	Yellow
131	Land at Brookfield Close, Hutton		0.14			Yellow		Green											Yellow	Green	Green
050	Land between 31-45 Goodwood Avenue, Hutton		0.11					Green				Yellow							Red	Yellow	Yellow
091	Land at end of Greenshaw, Brentwood		0.11			Yellow				Yellow	Yellow						Yellow	Yellow	Yellow	Red	Yellow
093	Land at Fielding Way, Hutton (rear of Rayleigh Road shopping parade)		0.11			Yellow		Green											Yellow	Green	Green
132B	Land at Albany Road, Pilgrims Hatch	0.11			Yellow											Yellow		Red	Green	Yellow	
134	Gloucester Road Garages, Pilgrims Hatch	0.11														Yellow		Red	Green	Yellow	

Site	Name	Use	Ha.	Flood risk	SSSI	Local Wildlife Site	Local Nature Reserve	Ancient woodland	Woodland	Green Belt	Conservation area	Scheduled Monument	Registered Park/Garden	Listed building	Special landscape area	AQMA	Agricultural land	GP	Primary school	Secondary school	
200	Dunton Hills Garden Village	Mixed use	256.6	Yellow	Red	Red		Red	Yellow	Yellow				Red			Yellow	Green	Yellow	Red	
037D	Land West of Thorndon Avenue, West Horndon		64.71	Yellow	Red	Yellow		Yellow			Yellow							Yellow	Green	Green	Red
231	Land to the north of the A127		64.59	Yellow	Red	Red		Red	Yellow					Red		Yellow		Yellow	Red	Red	Red
089	Brentwood Centre and land		20.01			Yellow		Yellow										Yellow	Yellow	Yellow	Yellow
175C	Land at M25 J28, Brook Street, Brentwood (inc. buildings), and surrounding land		15.53	Yellow			Green		Yellow								Red	Yellow	Red	Red	Red
175B	Land at M25, J28, Brook Street, Brentwood (inc. buildings), and surrounding land		13.69			Yellow	Green	Yellow							Yellow		Red	Yellow	Red	Yellow	Yellow
037E	Land West of Thorndon Avenue, West Horndon		12.02		Yellow	Red					Yellow					Yellow		Yellow	Red	Red	Red
021	Horndon Industrial Estate, Station Road, West Horndon		10		Yellow						Yellow							Yellow	Green	Green	Red
020	West Horndon Industrial Estate, Childerditch Lane, West Horndon		6.45		Yellow						Yellow							Yellow	Red	Red	Red
158	Land North of A1023 Chelmsford Road, Shenfield		4.45			Yellow	Green	Yellow							Yellow			Yellow	Red	Yellow	Green
321	McColl's House, Ashwells Road, Brentwood		2.62			Yellow			Yellow									Yellow	Red	Green	Red
100	Baytree Centre, Brentwood		1.34		Yellow							Red	Red		Red			Yellow	Green	Yellow	Green
102	William Hunter Way car park, Brentwood		1.2		Yellow							Yellow	Red					Yellow	Green	Yellow	Green
180	Land at Brook Street & Wigley Bush Lane, Brentwood (Vauxhall garage)		1.08	Yellow		Yellow	Green	Yellow	Yellow						Yellow			Yellow	Red	Yellow	Yellow
003	Wates Way Industrial Estate, Ongar Road, Brentwood		0.99		Yellow							Yellow					Red	Yellow	Green	Green	Green
152	Land East of Horndon Industrial Estate		0.8		Yellow												Yellow	Yellow	Green	Green	Red
017	Telephone Exchange, Ongar Road, Brentwood		0.53		Yellow							Red			Yellow		Red	Yellow	Green	Green	Green
173	BP Garage & McDonald's Restaurant, A1023 Chelmsford Road (A12 J12)		0.23			Yellow	Green	Yellow	Yellow		Yellow							Yellow	Red	Yellow	Yellow
232	Multi-storey car park, Coptfold Road, Brentwood		0.22		Yellow							Yellow					Yellow	Yellow	Green	Yellow	Green
258	Hutton Service Station, Rayleigh Road, Hutton		0.13					Green											Green	Green	Green
259	91-105 Hutton Road, Shenfield	0.13																Green	Yellow	Green	

## **APPENDIX IV - BRENTWOOD/SHENFIELD OMISSION SITES**

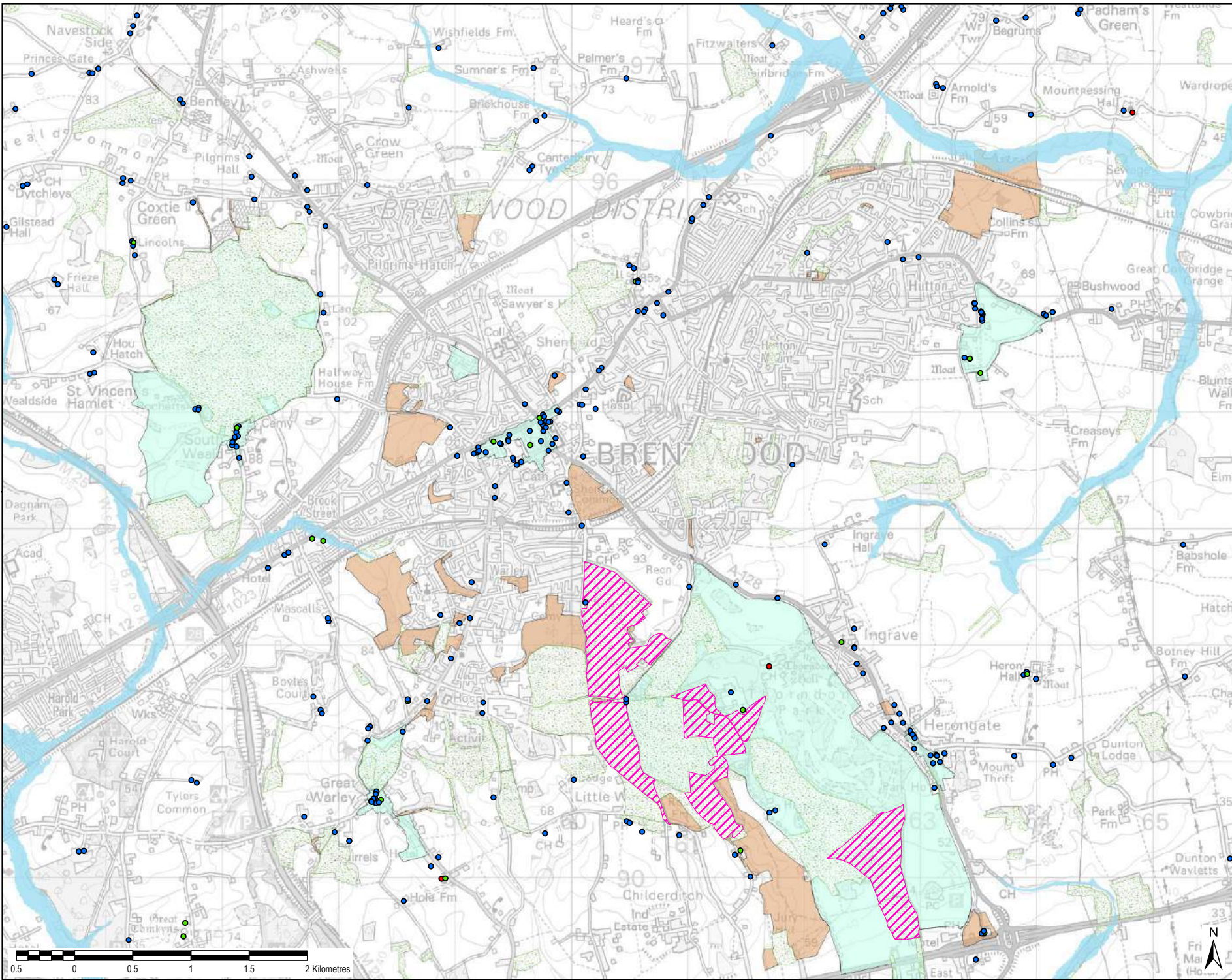
Section 5.5 explains that the HELAA lists a number of omission sites - i.e. sites not supported for allocation - as nonetheless 'deliverable or developable'. The aim of this appendix is to consider this shortlist of sites, with a view to identifying a small number to take forward into a final shortlist for further analysis. Four further sites - i.e. sites not listed by the HELAA as deliverable or developable, are also considered, namely: 088 Bishops Hall Community Centre; 089 the Brentwood Centre; 287 East of Mascalls Lane; and 299 St. Faiths.

Table A considers shortlisted omission sites are in turn, according to the broad area around the Brentwood main urban area within which they are located. Some of the broad areas do not contain any shortlisted omission sites.

Maps showing the locations of the sites referenced can be found in Appendix 7 of the HELAA - see <http://www.brentwood.gov.uk/index.php?cid=966>

Figure A sets the scene by showing key constraints surrounding the Brentwood main urban area.

File Name: \\bs-wp-004-scott\hobson.co.uk\4100 - Management Services\5004 - Information Systems\6043815\Brentwood Site Appraisal\project files\Figure 6.3 Brentwood Site Options.mxd



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**LEGEND**

- Listed Buildings
  - Grade I
  - Grade II
  - Grade II\*
- ▨ SSSI
- Conservation Area
- Flood Zone 2
- Informal Natural Open Space
- Local Wildlife Site

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**BRENTWOOD LOCAL PLAN SA**

Drawing Title  
**BRENTWOOD/SHENFIELD  
 URBAN AREA CONSTRAINTS**

Drawn VC	Checked ST	Approved MF	Date 26/01/2018
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Table A: Analysis of shortlisted Brentwood main urban area omission sites

Area	Commentary on the area and shortlisted omission sites	Progress to final shortlist (Table 5.2)?
North of Shenfield	A large area of land is bounded by the railway line to the east, and the A1023 to the west; plus there is a parcel of land to the north of the A1023, bounded by the A12. There are relatively few designated constraints, although considerations include a spur of Arnolds Wood LWS, and proximity to the railway and main roads. This land parcel comprises a large Preferred Allocation (HELAA 034, 087, 158, 235, 263, 276).	N/a (no sites)
	Land to the east of the railway is more constrained, notably by LWS woodland patches and the floodplain of the River Wid; and this land does not link well to the existing urban edge to the south, given the railway and woodland.	N/a (no sites)
NE of Hutton	Hutton Country Park comprises the land south of the railway line (to Billericay) / east of Hutton Industrial Estate. This 36 ha site has been owned and managed as a Local Nature Reserve by the Borough Council since 1997.	N/a (no sites)
	To the south of the Country Park is a series of fields is a shortlisted omission site (HELAA 220; 10.2ha) comprising four fields seemingly separated by mature hedgerows. The Green Belt Study identifies this site as contributing to purposes only to a 'moderate' extent; however, the site does not relate well to the settlement edge, in that it would extend a modest cul-de-sac, potentially leading to problematic traffic. The site is also distant from the centre of Shenfield (and Brentwood beyond), although there are primary schools in Hutton. N.B. another omission site immediately to the south (HELAA 289) is ruled-out as unavailable. This site makes a higher ('moderate-high') contribution to GB purposes, seemingly with a weak boundary at its eastern edge, which would give rise to a concern of 'sprawl' eastwards along the Rayleigh Road.	<b>No</b>
East of Hutton	Hutton Village Conservation Area (CA) comprises the land to the south of the A129, stretching as far south as Hutton Hall and All Saints Church. Two shortlisted omission sites (HELAA 219, 317) comprise the areas of open land; however, both are heavily constrained in heritage terms. Maintaining the landscape gap between Hutton (Brentwood/Shenfield) and Billericay is a further consideration.	<b>No</b>
	To the west of the CA, north of Hall Lane, is an area of formal sports pitches, home to Hutton CC and Hutton FC.	N/a (no sites)
	To the south of Hall Green Lane is a large arable field that is the western extent of a very extensive site (HELAA 028c) ruled-out by the HELAA as unavailable. This site is discussed briefly as a feasible strategic site option, within Section 5.3 of this report.	N/a (no sites)
	To the west of the large arable field discussed above are the grounds of St. Martins Secondary School.	N/a (no sites)
	To the south, the land adjacent to the urban edge is a complex patchwork of small fields (etc.) several small shortlisted omission sites (HELAA 029, 030a, 031, 284, 315), all of which are assessed by the Green Belt Study as making a 'moderate' contribution to GB purposes. Focusing on the two larger sites - 030a (2.4ha) and 315 (7.4ha) - the former site (to the north) seems relatively well contained in the landscape, in that there is development to the north and west, a lane / farm track to the south and a narrow woodland belt to the east; however, there is significant mature vegetation on site; the latter site (to the south) is less well contained in the landscape, and is constrained by a listed building at its western extent. Both sites are beyond easy walking distance of Brentwood or Shenfield centres, nor is there a primary school nearby (although St. Martins Secondary School is nearby).	<b>No</b>

Area	Commentary on the area and shortlisted omission sites	Progress to final shortlist (Table 5.2)?
	<p>The final stretch of Shenfield/Hutton urban edge, stretching as far south as the A128 Ingrave Road is abutted a large shortlisted omission site (HELAA <b>028a</b>; 26.6ha). The Green Belt Study finds only a 'moderate' contribution to GB purposes; however, there is currently quite a 'hard' edge to the urban area along this stretch, in the form of Running Waters and Hanging Hill Lane, and seemingly very few landscape features to bound a modest housing scheme. N.B. another omission site immediately to the east (HELAA 028b) is ruled-out as unavailable. It would give rise to a risk of coalescence with Ingrave, and is judged to make a 'high' contribution to Green Belt purposes accordingly.</p>	<p><b>No</b></p>
<p>S / SE of B'wood</p>	<p>The sector of land between the A128 and B186 is heavily constrained by Thorndon Park CA and Registered Park/Garden, and extensive areas of ancient woodland designated as either nationally important (SSSI) or locally important (LWS). The only area with fewer onsite constraints is the area of sports pitches, allotments and large private gardens at the northern edge of the sector (within 1km of Brentwood town centre).</p>	<p>N/a (no sites)</p>
<p>Warley</p>	<p>Of the five 'deliverable or developable' sites surrounding Warley, four are preferred allocations (HELAA 027, 081, 083, 117a) whilst the other (<b>261</b>; 4.6ha) is an omission site. The Green Belt Study finds only a 'moderate' contribution to GB purposes; however, the site is set-back from 'The Drive', from which it would need to gain access and development would lead to the loss of playing fields in active uses; furthermore, there is a need to caution against over-allocation at Warley, and proximity to locally designated woodlands is a further consideration.</p>	<p><b>No</b></p>
	<p>To the west of Warley (between Warley and Brook Street) is a large discounted HELAA site (<b>287</b>; 48.3ha), which warrant close consideration here on account of its scale, its relationship to the Brentwood Main Urban Area and the feasibility of establishing a defensible Green Belt boundary. The site is unavailable due to restrictive covenants on the land, including on the northeastern-most 21ha, which was established as Warley Country Park in 2001 (following Warley Hospital's development for housing). Furthermore, there is extensive scrub / secondary woodland, and there are also thought to be extensive views to the north (potentially South Weald).</p>	<p><b>No</b></p>
<p>Brook Street</p>	<p>At the very western extent of the urban area is Brook Street, which extends along the A1023 in the direction of the M25 junction. The HELAA lists three deliverable or developable sites, comprising one small site to the north of the road, and two larger sites to the south. The south-eastern most site is a preferred allocation (032), whilst the other two (<b>175b</b>; 19.6ha; and <b>180</b>; 1.1ha) are shortlisted omission sites.</p> <p>Beginning with the smaller site to the north of Brook Street (180), this mainly comprises brownfield land (current Vauxhall garage), but could give rise to challenges from an access perspective. The large omission site to the south of the road (175b) is found by the Green Belt Study to contribute to GB purposes to a 'moderate-high' extent, although it would benefit from hard boundaries on all sides. A clear sensitivity is the need to maintain a Green Belt gap to LB Havering, and another constraint is potentially proximity to the M25 and railway. The site is also distant from Brentwood town centre (c.2km) and the nearest primary school is beyond 1km distant.</p>	<p><b>No</b></p>
<p>West of B'wood</p>	<p>There is quite a large area of open land that stretches as far west as the A12, the eastern part of which begins only c.200m west of Brentwood town centre. This site comprises one 'deliverable or developable' omission site (<b>022</b>; 10.9ha) and a second site (<b>299</b>; 15.6ha) that is ruled-out by the HELAA as unsuitable, but which warrants consideration here nonetheless on account of its close proximity to Brentwood town centre means. The Green Belt Study finds the former site to make only a 'low-moderate' contribution to Green Belt purposes, which was a key reason why this site was a preferred allocation ('Honeypot Lane') until it was removed from the plan at the November 8<sup>th</sup> Extraordinary Council meeting. The latter site makes a 'moderate' contribution to GB purposes, and benefits from excellent proximity to Brentwood Town Centre; however, it is a proposed LWS, and is identified as an informal open space by the Sport, Leisure and Open Space Assessment (2016).</p>	<p><b>Yes</b></p>

Area	Commentary on the area and shortlisted omission sites	Progress to final shortlist (Table 5.2)?
Pilgrims Hatch	To the west/south west, the parcel of land between the A12, A128 and Sandpit Lane mostly comprises a preferred allocation (HELAA 010; 1.2ha) and large shortlisted omission site ( <b>302c</b> ; 53ha), which is being promoted for 800 homes (with the scheme comprising most of the HELAA site plus a small additional area of land directly to the south, stretching down to Weald Lane). The site contributes to Green Belt purposes to a 'moderate-high' extent, and the site is significantly constrained in heritage, biodiversity and potentially landscape terms; however, the scheme promoters are offering to make land available for a primary school.	Yes
	The northern edge of Pilgrims Hatch is a patchwork of smaller fields and paddocks, with six small shortlisted omission sites ( <b>011b, 011c, 053b, 156a, 156b, 159</b> ). There are limited strategic constraints, and the Green Belt Study assesses all sites as contributing to GB purposes only to a 'moderate' extent; however, there are a number of specific concerns regarding defensible Green Belt boundaries, aligned with a general concern regarding piecemeal growth of Pilgrim's Hatch. Distance to Brentwood town centre (c.2km) is a further (related) consideration.	No
	East of Pilgrims Hatch are two sites, either side of Doddinghurst Road, ruled-out by the HELAA, but which nonetheless warrant detailed consideration - <b>088</b> (4.8ha); and <b>089</b> (20ha). To the west of the road, site 088 is an area seemingly used for recreation, associated with Bishops Hall Community Centre; whilst 089 to the east comprises the extensive grounds of the Brentwood Centre (leisure centre). The fact that this is Council owned land, and there might feasibly be the potential for housing development to fund upgrades to the existing community infrastructure, means that this area warrants further consideration.	Yes
North of B'wood and S'field	<p>This is a large 'green wedge' comprising the land between the northern edge of Brentwood and the A12. This is the area of land that has been considered at past plan-making / SA stages as the location for a potential 'North Brentwood' strategic development.</p> <p>The land is mostly in agricultural use, although there are a number of wooded areas. The agricultural fields vary in size considerably, as do the nature of field boundaries. There is quite a low density of public footpaths, but nonetheless the likelihood of significant green infrastructure value. The eastern sector is most constrained, given an ancient woodland LWS, and also the cluster of listed buildings, and a church, which represents the location of the historic village of Shenfield.</p> <p>At the very eastern extent, HELAA <b>218a</b> (12.4ha) is a shortlisted omission site contributing to Green Belt purposes to a 'moderate-high' extent, and with uncertain access arrangements (and traffic concerns more generally), with no detailed scheme having been submitted. N.B. a further similar sized site immediately to the north (also directly east of Halls Lane) is ruled-out by the HELAA as unavailable.</p>	No
	To the west of Hall Lane, more directly associated with the existing urban edge, are two further shortlisted omission sites - <b>291a</b> (6.5ha) and <b>291b</b> (10.7ha). These sites are associated with constraints, but warrant further consideration given proximity to Brentwood and Shenfield.	Yes
	A final site in this area is HELAA <b>320</b> (0.8ha), which is a small site that would gain access directly from the A1023. The Green Belt Study finds the site to have only 'moderate' sensitivity, but a concern relates to the lack of a defensible boundary at the site's northern edge. Were the site to extend further north, then it would border a LWS woodland.	No
	The final shortlisted omission site is at the very northwestern extent of this area - <b>024b</b> (19.6ha). Again, this site is subject to constraint but warrants closer examination as a detailed scheme is being actively promoted, which includes potential for upgrades to community infrastructure.	Yes

## APPENDIX V - VILLAGE OMISSION SITES

Section 5.5 explains that the HELAA lists a number of omission sites - i.e. sites not supported for allocation - as nonetheless ‘deliverable or developable’. The aim of this appendix is to consider this shortlist of omission sites, with a view to identifying whether any should be taken forward for further analysis.

Maps showing the locations of the sites referenced can be found in Appendix 7 of the HELAA - see <http://www.brentwood.gov.uk/index.php?cid=966>

N.B. the analysis is undertaken in the knowledge that there are limited strategic arguments for higher growth at villages.

Table A: Analysis of shortlisted village omission sites

Village	Commentary	Progress any omission sites to Section 5.5? <sup>76</sup>
Blackmore	<p>There are two preferred allocations at Blackmore, such that there is limited further argument for considering further sites:</p> <ul style="list-style-type: none"> <li>• The best performing of the omission sites would appear to be HELAA site <b>199</b> (6ha), to the east of the village, which is assessed by the Green Belt Study as making only ‘moderate’ contribution to purposes (as per the preferred allocations). However, the site seemingly has weak boundaries, with the southern edge passing through the middle of a field. More generally, the site relates relatively poorly to the built form of the village, and it is also noted that the southern edge abuts the St. Peter’s Way footpath.</li> <li>• The other shortlisted omission site is <b>202b</b> (2.7ha); however, this site partially intersects the conservation area, significantly intersects land shown to be at risk of surface water flooding<sup>77</sup> and is assessed by the Green Belt Study as making ‘moderate-high’ contribution to purposes. Furthermore, St. Peter’s Way long distance footpath crosses the site, and desire lines elsewhere indicate use for dog-walking.</li> <li>• Finally, site <b>203</b> (34.6ha), to the west of the village, is worthy of note on account of its scale, despite being ruled-out by the HELAA as unavailable (i.e. there has been no active promotion). The site is assessed by the Green Belt Study as making only ‘moderate’ contribution to purposes, but there is seemingly a weak field boundary (sporadic trees, rather than a hedgerow). The site does benefit from being adjacent to the primary school and village hall, and might deliver new community infrastructure; however, the existing school would appear to have land to expand, if needed.</li> </ul> <p>In <b>conclusion</b>, no omission sites are considered in contention for allocation, in light of site specific considerations as well as strategic considerations, namely the vision for the District as a ‘borough of villages’ aligned with the fact that there are preferred allocations set to deliver 70 new homes.</p>	No

<sup>76</sup> To reiterate the point made at para 5.5.42, the decision not to progress sites for further consideration also reflects the fact that there is limited strategic argument for allocating at villages (particularly those that benefit from good access to Brentwood/Shenfield).

<sup>77</sup> See <https://flood-warning-information.service.gov.uk/long-term-flood-risk/map>

Village	Commentary	Progress any omission sites to Section 5.5 <sup>76</sup>
Doddinghurst / Hook End	<p>There are no preferred allocations in this area, such that omission sites warrant close consideration.</p> <ul style="list-style-type: none"> <li>• Firstly, there is a need to consider adjacent sites <b>085b</b> and <b>294</b> (0.6ha), which together did form preferred allocation prior to this site being removed by Councilors at the 8<sup>th</sup> November 2018 Extraordinary Council. This land is assessed by the Green Belt Study as contributing to Green Belt purposes only to a ‘low-moderate’ extent, and is assessed by the Landscape Capacity and Sensitivity Study as one of just three sites in the Borough with ‘high’ capacity that should be ‘preferentially prioritised’ (the other two being preferred allocations); however, Councilors highlighted that development would involve <i>“destruction of a long-established playing field, administered by Trustees as a vital integral asset of the adjoining community hall”</i>.</li> <li>• Next there is a need to examine site <b>316</b>, which is a notably large site (21.3ha) comprising the majority of the cluster of fields that is almost entirely surrounded by the villages of Doddinghurst, Wyatts Green and Hook End. As such, it benefits, in Green Belt terms, from being well contained; however, it is nonetheless judged to contribute to purposes to a ‘moderate-high’ extent by the Green Belt study. The site is crossed by only one footpath; however, there would clearly be a significant impact to the character of this group of villages. Furthermore, development at this scale might well fall short of the critical mass necessary to enable delivery of a new primary school.</li> <li>• Two shortlisted omission sites are assessed by the Green Belt study as contributing to GB purposes to only a ‘moderate’ extent: site <b>188</b> (1.9ha), is constrained by a listed farmhouse (grade II) immediately opposite; and site <b>309</b> (1.8ha) does not relate well to the village, and partially intersects a Local Wildlife Site</li> <li>• Two shortlisted omission sites are assessed by the Green Belt study as contributing to GB purposes to a ‘moderate-high’ extent: site <b>262</b> (1.9ha), which also intersects a LWS and is subject to surface water flood risk; and 185 (0.9ha) is adjacent to a LWS and is subject to surface water flood risk.</li> <li>• The remaining three shortlisted omission sites are not assessed by the Green Belt study:             <ul style="list-style-type: none"> <li>• site <b>070</b> (1ha) is seemingly constrained by on-site mature trees and vegetation that might have some biodiversity value, given the nearby complex of locally designated woodland patches/corridors, along with some potential highways access issues;</li> <li>• site <b>319</b> (1.1ha) is adjacent to a site (262) assessed as contributing to Green Belt purposes to a ‘moderate-high’ extent, is adjacent to a LWS and is subject to surface water flood risk;</li> <li>• adjacent sites <b>143</b> and <b>278</b> (2.3ha in total) have not been assessed by the Green Belt study, but could potentially offer a degree of containment with relatively robust boundaries (more so site 143, to the south); however, access constraints, existing on-site built form and trees, and residential character in this area, could necessitate a very modest scheme; and the centre of the village is over 1km walking distance.</li> </ul> </li> </ul> <p>In <b>conclusion</b>, no omission sites are considered in contention for allocation, on balance. The Council recognises that this cluster of villages could potentially benefit from allocations to deliver a small number of new homes over the plan period, in order to meet local housing needs and support the vitality of village services and facilities; however, no site stands-out as sufficiently suitable.</p>	No

Village	Commentary	Progress any omission sites to Section 5.5 <sup>76</sup>
Kelvedon Hatch	<p>There are two preferred allocations at Kelvedon Hatch, such that there is limited further argument for considering further sites. The two shortlisted omission sites are assessed by the Green Belt Study as contributing to Green Belt purposes only to a ‘moderate’ extent (as per the preferred allocations); however, all are judged as performing less well than the preferred allocations for the following reasons:</p> <ul style="list-style-type: none"> <li>• Site <b>074</b> (1.5ha) has a weak southern boundary, indeed there is no existing feature to form a southern boundary to the site. It is also close to a cluster of listed buildings, and does not relate well to the existing built form of the village.</li> <li>• Site <b>168</b> (0.9ha) is a small site that relates well to the village centre (primary school, village hall, sports clubs).</li> </ul> <p>In <b>conclusion</b>, site 168 does stand-out as a site that potentially has some merit; however, on balance the site is not considered to be in contention for allocation, as the two proposed allocations are judged to be more preferable, and a higher growth strategy could conflict with the vision for the District as a ‘borough of villages’. The preferred strategy for Kelvedon Hatch has twice been published for consultation, with all consultation response duly taken on-board.</p>	No
Mountnessing	<p>There are no preferred allocations in this area; however, an allocation is proposed at sites 106/128, which comprise the land between Mountnessing and Ingatestone.</p> <ul style="list-style-type: none"> <li>• Firstly, there is a need to consider adjacent sites <b>095b</b> and <b>239</b> (3.3ha), which are assessed as making a ‘low-moderate’ contribution to Green Belt purposes. The sites are relatively well contained, bounded on one side by existing properties, and on another other by the A12; however, there could be some risk of ‘creep’ to the north. Proximity to the A12 is a consideration, although it is noted that there is mature vegetation along the road here. Access is proposed along a lengthy driveway to the south, which would run close to a number of existing properties, and meet Church Road at the end of the bridge over the A12.</li> <li>• Site <b>253</b> (5.5ha) is assessed as contributing to Green Belt purposes only to a ‘moderate’ extent, and might feasibly fill a gap in the existing development frontage along the road, and the site includes two large ponds that presumably could be made more publically accessible (footpaths do already run alongside). However, there would be a need to rely on soft boundaries, i.e. the existing hedgerows, and the majority of the site is affected by surface water flood risk limiting opportunities for comprehensive development.</li> <li>• Site <b>277a</b> (11.4ha) is assessed as contributing to Green Belt purposes to a ‘moderate-high’ extent site. It is also constrained by two on-site grade 2 listed buildings and other listed buildings nearby. There is also onsite vegetation, including a hedgerow and a small group of mature trees.</li> <li>• Site <b>073</b> (1.2ha) site is not assessed by the Green Belt Study, but would appear to be well contained, with built development or mature tree belts on all sides. However, there are potential highway access issues, in that the site would be reliant on using an existing a small estate road and demolishing a bungalow (within the site promoters control).</li> </ul> <p>In <b>conclusion</b>, site 073 does stand-out as a site that potentially has some merit; however, the preferred allocation at ‘Land south of Ingatestone’ will in practice relate as closely to Mountnessing as it does to Ingatestone, and a higher growth strategy for this area could conflict with the vision for the District as a ‘borough of villages’. The preferred strategy for Ingatestone/Mountnessing has been published for consultation, with all consultation response duly taken on-board.</p>	No

Village	Commentary	Progress any omission sites to Section 5.5 <sup>76</sup>
Ingrave & Herongate	<p>There are no preferred allocations in this area, such that omission sites warrant close consideration.</p> <ul style="list-style-type: none"> <li>• Three sites are assessed as contributing to Green Belt purposes only to a 'moderate' extent: site <b>313</b> (3.4ha) would extend Ingrave north, with a need to rely on soft boundaries (hedgerows) to prevent sprawl, and the access road is a single track lane; whilst adjacent sites <b>285</b> (1.2ha), <b>067a</b> (0.9ha) and <b>067b</b> (1.9ha) would extend the village to the east, without offering a suitably robust/defensible new Green Belt boundary.</li> <li>• Three sites are assessed as contributing to Green Belt purposes to a 'moderate-high' extent: site <b>286</b> (3.4ha) falls within the Thorndon Park Conservation Area and comprises existing woodland (not designated); site <b>146</b> (0.7ha site) contributes to the narrow gap that remains between Ingrave and Herongate; and site <b>244</b> (0.7ha) is adjacent to a conservation area.</li> <li>• One site - <b>036</b> (0.75ha) is not assessed by the Green Belt Study, but is clearly constrained, in that it intersects one conservation area, and is adjacent to another. There are also potential access issues.</li> </ul> <p>In <b>conclusion</b>, no omission sites are considered in contention for allocation, in light of site specific considerations as well as strategic considerations, namely the vision for the District as a 'borough of villages' aligned with the fact that proposed Dunton Hills Garden Village is in close proximity (also the Brentwood/Shenfield urban area).</p>	No

## APPENDIX VI - SPATIAL STRATEGY ALTERNATIVES APPRAISAL

### Introduction

As explained within ‘Part 1’ above, a focus of work has been on the development and appraisal of spatial strategy alternatives, with a view to informing determination of the preferred strategy. Chapter 6 presents summary appraisal findings, whilst the aim of this appendix is to present detailed appraisal findings.

The reasonable spatial strategy alternatives are as follows -

				Opt 1	Opt 2	Opt 3	Opt 4	Opt 5	Opt 6	Opt 7
Completion				363	363	363	363	363	363	363
Commitments				926	926	926	926	926	926	926
Windfall				410	410	410	410	410	410	410
Allocations	Constants	Brentwood / Shenfield	Urban brownfield	1,152	1,152	1,152	1,152	1,152	1,152	1,152
			Urban greenfield	75	75	75	75	95	95	95
			Green Belt	1240	1240	1240	1240	1240	1240	1240
		West Horndon	Urban brownfield	580	580	580	580	580	580	580
			Villages	Ingatestone GB	218	218	218	218	218	218
		Northern Village GB		123	123	123	123	133	133	133
	Variables	Brentwood	Honeypot Lane	200	200		200			
			Sawyers Hall Farm	450	450		450	450		450
			St. Faiths	750	750		750	750		750
			West of Ongar Road	800	800		800	800		800
		A127	West Horndon East	600			600			600
			West Horndon West		900	900	900	900	900	900
			DHGV			2700			2500	
	<b>Total</b>				<b>6587</b>	<b>7287</b>	<b>7787</b>	<b>7887</b>	<b>8187</b>	<b>8687</b>
<b>Total p.a.</b>				<b>387</b>	<b>429</b>	<b>458</b>	<b>463</b>	<b>482</b>	<b>511</b>	<b>517</b>

### Appraisal methodology

For each of the options, the assessment identifies / evaluates ‘likely significant effects’ on the baseline, drawing on the sustainability topics/objectives identified through scoping (see Table 3.1) as a methodological framework.<sup>78</sup>

**Green** is used to indicate significant positive effects, whilst **red** is used to indicate significant negative effects. Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration. The ability to predict effects accurately is also limited by understanding of the baseline (now and in the future under a ‘no plan’ scenario). In light of this, there is a need to make considerable assumptions regarding how scenarios will be implemented ‘on the ground’ and what the effect on particular receptors will be.<sup>79</sup> Where there is a need to rely on assumptions in order to reach a conclusion on a likely effect, this is made explicit in the appraisal text.

<sup>78</sup> N.B. The framework has been modified slightly for the purposes of appraisal, as per the approach taken previously. Specifically, the ‘Climate change’ topic has been modified slightly to ensure a focus on ‘Climate change mitigation’, recognising that climate change adaptation is a cross-cutting issue that is best discussed under other topic headings (with flood risk issues being most appropriately discussed under the ‘Water’ heading). Also, ‘Economic growth’ and ‘Employment and skills’ are discussed under a single heading.

<sup>79</sup> Considerable assumptions are made regarding infrastructure delivery, i.e. assumptions are made regarding the infrastructure (of all types) that will come forward in the future alongside (and to some extent funded through) development.



Where it is not possible to predict likely significant effects on the basis of reasonable assumptions, efforts are made to comment on the relative merits of the alternatives in more general terms and to indicate a **rank of preference**. This is helpful, as it enables a distinction to be made between the alternatives even where it is not possible to distinguish between them in terms of ‘significant effects’.

Finally, it is important to note that effects are predicted taking into account the criteria presented within Regulations (Schedules 1 and 2). For example, account is taken of the duration, frequency and reversibility of effects. Cumulative effects are also considered (i.e. the effects of the plan in combination with other planned or on-going activity).

**Appraisal findings**

Appraisal findings are presented below within 12 separate tables (each table dealing with a specific sustainability topic) with a final table drawing conclusions. Within each table the performance of alternatives is categorised in terms of ‘significant effects (using red / green) and also ranked in order of preference. Also, ‘ = ’ is used to denote instances of all alternatives performing on a par.

Sustainability Topic: <u>Air quality</u>							
	Opt 1 WH East WH West	Opt 2 Brentwood	Opt 3 DHGV	Opt 4 Brentwood WH East	Opt 5 Brentwood WH West	Opt 6 DHGV WH West	Opt 7 Brentwood WH East WH West
Rank	★ 1	4	2	5	5	3	6
Significant effects?	No	Yes	No	Yes	Yes	No	Yes
Discussion	<p>Options focusing growth at <b>Brentwood</b> perform poorly given existing traffic congestion and designated Air Quality Management Areas (AQMA) along the A12 and within Brentwood town centre. There is seemingly limited potential to address issues through road infrastructure upgrades; rather, the likelihood is that development traffic seeking to reach the A12 or M25 would worsen traffic congestion and air quality along the A1023, including at the A128 junction.</p> <p>There would appear to be limited potential for growth along the <b>A127</b> corridor to impact on an AQMA, other than within London (where the majority of boroughs are covered by a blanket AQMA). There are arguments to suggest that West Horndon is the preferable location from a perspective of minimising traffic, with knock-on positive implications for air quality, including because a train station would be within easy walking distance. However, there may also be significant opportunities at DHGV - around minimising the need to travel, and supporting low carbon means of travel - including on the basis that the scheme has Garden Village status. There would be good potential to access destinations by walking, cycling or public transport,<sup>80</sup> and the site has good access to the strategic road network in this area. There is, however, a risk of traffic from the site impacting on Basildon town centre, or other sensitive junctions in Basildon, in combination with other planned growth locations around the town.</p> <p>In <b>conclusion</b>, Options 1 and 3 perform notably well, as traffic through AQMA in Brentwood would be minimised. Option 6 performs less well, recognising that growth along the A127 would increase traffic in Brentwood town centre. Other options perform relatively poorly, and it is appropriate to ‘flag’ the potential for significant negative effects, given the potential for increased traffic through the AQMA (also taking into account the preferred allocations that are a constant across the alternatives).</p>						

<sup>80</sup> DHGV residents would have access to a ‘Category 2’ local centre on site (to include ‘schools alongside retail and health facilities’); an improved West Horndon village centre (set to become category 2); a new local centre delivered as part of the proposed West Basildon Urban Extension (to include a GP surgery and with land reserved for the possible future delivery of a secondary school); an improved Laindon Town Centre c.4-5km to the east; and Brentwood Town Centre, via a new bus route.

**Sustainability Topic: Biodiversity**

	<b>Opt 1</b> WH East WH West	<b>Opt 2</b> Brentwood	<b>Opt 3</b> DHGV	<b>Opt 4</b> Brentwood WH East	<b>Opt 5</b> Brentwood WH West	<b>Opt 6</b> DHGV WH West	<b>Opt 7</b> Brentwood WH East WH West
Rank	<b>3</b>	<b>4</b>	 <b>1</b>	<b>6</b>	<b>5</b>	<b>2</b>	<b>7</b>
Significant effects?	<b>No</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>	<b>Yes</b>	<b>No</b>	<b>Yes</b>

The **A127** corridor is sensitive given proximity to the woodlands of Thorndon Park to the north, with small ‘fingers’ of ancient woodland stretching south of the A127, into West Horndon East. Another consideration is the importance of the landscape in respect of maintaining ecological connectivity between Thorndon Living Landscape (as identified by the Wildlife Trusts) and the Langdon Hills and/or the Bulphan Fen Living Landscapes to the south. In this respect, it is DHGV that is most constrained, although 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). It is noted that Essex Wildlife Trust commented (in response to Growth Options, 2015) that: *“Strategic options to the west of West Horndon would have the least harmful impact on important wildlife habitats. We would consider these options to be preferable. Strategic options to the east of West Horndon are unacceptable as they would adversely impact on priority ancient woodlands and wood pasture and parkland habitats which function as necessary linkage between Thorndon and Langdon.”*

The January 2018 Interim SA Report discussed Brentwood North as a relatively unconstrained potential growth location; however, two of the four sites now assumed to deliver higher growth at **Brentwood** are significantly constrained by the presence of on-site habitats identified as being of local importance. Specifically: West of Ongar Road comprises the eastern extent of the Havering and Brentwood Ridge Living Landscape, as defined by the Wildlife Trusts, contains an ancient woodland patch designated as a LWS and is adjacent to the extensive LWS that covers Weald Country Park; and St. Faiths is mostly a proposed LWS (specifically that part which is not an existing employment site), with the Brentwood Local Wildlife Site Review (2012) stating: *“The Site represents a significant block of unintensively managed, reasonably species-rich grassland with good public access over much of it. The matrix of such grasslands with thick, old hedgerows is fast becoming a rare sight in the modern landscape.”*<sup>81</sup> Also, Honeypot Lane is potentially subject to a degree of constraint, noting the stream running through the site, and which flows into the Ingrebourne River (a Thames tributary that forms an important green corridor with SSSI marshland through LB Havering) a short distance to the west. A draft masterplan submitted by the site promoters had identified existing ‘wet woodland’ running alongside the stream, with proposal being to protect and hence this habitat; however, functioning of the stream corridor would likely be impacted by development.

In **conclusion**, Option 3 performs notably well, as DHGV is considered to be relatively unconstrained in biodiversity terms, with work having been completed to establish how to deliver biodiversity net gain through delivery of onsite green infrastructure. Option 6 also performs well, as West Horndon West is also a relatively unconstrained site, albeit the potential for in-combination impacts on the sensitive landscapes to the north would be a consideration.<sup>82</sup> Options involving the additional package of sites at Brentwood perform poorly, and are predicted to result in significant negative effects, given unavoidable impacts to locally designated sites (see NPPF para 174). Loss of a LWS at St. Faiths is a particular concern, noting that the site promoters have proposed a relatively high density scheme (36 dph).

<sup>81</sup> <http://www.brentwood.gov.uk/pdf/17072013120644u.pdf>

<sup>82</sup> A number of the ‘units’ that comprise the Thorndon Park SSSI are in ‘unfavourable’ condition; however, Natural England’s condition report does not make reference to recreational pressures, instead highlighting issues around management and invasive species. See <https://designatedsites.naturalengland.org.uk/ReportUnitCondition.aspx?SiteCode=S1004248&ReportTitle=THORNDON%20PARK>

Sustainability Topic: <u>Climate change mitigation</u>							
	Opt 1 WH East WH West	Opt 2 Brentwood	Opt 3 DHGV	Opt 4 Brentwood WH East	Opt 5 Brentwood WH West	Opt 6 DHGV WH West	Opt 7 Brentwood WH East WH West
Rank	★ 1	3	★ 1	3	2	★ 1	★ 1
Significant effects?	<b>No</b>						
Discussion	<p>There is a need to consider the performance of the alternatives both in terms of minimising per capita greenhouse gas (GHG) emissions from transport, and also per capita GHG emissions from the built environment.</p> <p>With regards to <b>transport emissions</b>, it is difficult to differentiate the alternatives. Within the A127 corridor there is the potential to achieve new homes and jobs in close proximity, deliver a new bus route linking the A127 corridor to Brentwood, enhance walking/cycling infrastructure (including to train stations) and also increase the offer at West Horndon and Laindon local centres. However, on the other hand, growth within walking/cycling distance of Brentwood town centre and, in particular, Brentwood Crossrail station is to be supported (albeit two of the four sites assumed to deliver higher growth are beyond 1km of Brentwood town centre).</p> <p>With regards to <b>built environment emissions</b>, there is essentially a need to support large scale schemes where ambitious low carbon measures can be implemented, including decentralised low/renewable heat and/or power generation schemes (e.g. a biomass fuelled Combined Heat and Power system). This is a factor in support of DHGV and/or strategic growth at West Horndon (assuming that there is the potential to masterplan growth at West Horndon as a whole, and noting proposed redevelopment of West Horndon Industrial Estate, and the possibility of growth to the south of the village, in Thurrock).</p> <p>In <b>conclusion</b>, options involving a concentration of growth along the A127 corridor perform best, along with Option 7, which is a higher growth options that could feasibly reduce pressure for growth at locations to the east within South Essex where commuting by train to London is less attractive as an option. It is difficult to differentiate between the option of strategic growth at West Horndon versus strategic growth at Dunton Hills Garden Village: residents at West Horndon might have lower per capita CO<sub>2</sub> emissions from transport, given the rail station; however, the very large scale nature of the growth opportunity at DHGV (up to 4,500 homes in the long term, i.e. beyond the plan period), aligned with funding made available from Government, should mean excellent potential to deliver low carbon infrastructure.</p> <p>It is not possible to conclude that any option would result in significant effects, either positive or negative, recognising that climate change mitigation is a global issue (i.e. local actions have only limited significance).</p>						

Sustainability Topic: <u>Community and well-being</u>							
	Opt 1 WH East WH West	Opt 2 Brentwood	Opt 3 DHGV	Opt 4 Brentwood WH East	Opt 5 Brentwood WH West	Opt 6 DHGV WH West	Opt 7 Brentwood WH East WH West
Rank	2	5		5	4	2	3
Significant effects?	<b>No</b>						
Discussion	<p>A primary consideration is access to community infrastructure (with capacity), both for new and existing residents, which in the Brentwood context is understood to mean supporting a large scale new scheme, which can deliver new strategic community infrastructure.<sup>83</sup></p> <p>The first point to make is that maximising growth within the A127 corridor would increase the likelihood of delivering new <b>strategic community infrastructure</b>, to include a new secondary school (improvements to West Horndon village centre and train station might also result from strategic growth), whilst there are more limited opportunities associated with growth at the Brentwood. The promoters of 'West of Ongar Road' propose to make land available for a primary school; however, no equivalent proposal is associated with the other three sites. Honeypot Lane and St. Faiths might conceivably be delivered in combination, such that a critical mass is reached sufficient to deliver a primary school; however, this is not an option that has been examined in any detail. With regards to Sawyers Hall Farm, there are some proposals for upgrades to community infrastructure,<sup>84</sup> but strategic significance is not clear (the site does also benefit from proximity to a cluster of existing schools, and also the Brentwood Centre, which is in need of upgrades).</p> <p>Another consideration is the direct <b>impacts to existing residents</b> that would result from growth, e.g. in respect of amenity and traffic congestion, including during construction. In this respect growth at Brentwood potentially leads to greatest concerns, given traffic congestion that exists currently, the likelihood of the situation worsening in the future (including as a result preferred allocations that are a constant across the alternatives) and the possibility of 'rat-running' through villages; however, it is recognised that there are also concerns regarding impacts to local residents resulting from growth along the A127 (noting potential Basildon growth locations). Focusing on Brentwood, there are limited opportunities for strategic road upgrades to address congestion, short of a major scheme changing the nature of access onto the A12. However, one scheme that has been mooted would involve addressing the concerns regarding traffic congestion arising from development at Honeypot Lane (this is the main reason that led elected Councillors to remove the site from the plan at the 8<sup>th</sup> November Extraordinary Council meeting) by delivering Honeypot Lane and St. Faiths in combination. This might feasibly enable a new link road connecting the existing signalised junction onto London Road (currently utilised by the BT offices) with a new access onto Weald Road, with a view to relieving pressures of traffic travelling down Honeypot Lane to connect onto London Road, such that it can in turn take additional traffic from the Honeypot Lane site. However, no traffic modelling to substantiate this theory has taken place.</p>						

<sup>83</sup> The following comment made by NHS England, through the Growth Options consultation (2015) is of considerable note: "Delivery of essential infrastructure via developer funded projects would be the most effective scenario for meeting the intended growth... Of the five options advocated [through] Sustainability Appraisal, it is suggested that a single large site necessitating the need for new facilities specific to that development would be more sustainable than dispersing growth in many settlements. Numerous smaller extensions could have impacts on existing infrastructure left unmitigated, or the level of contribution falling short of the requirements..."

<sup>84</sup> A relocated animal sanctuary with café / visitor centre; a new school pick-up/drop-off zone to address an existing problem; and 'potentially' small scale new shops or a village hall



With regards to **DHGV**, there is a need to consider the fact that the scheme has Garden Village status, which leads to something of an opportunity. 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.”

With regards to **West Horndon**, there is not known to be the same opportunity to deliver a strategic, coordinated scheme, with schemes to the east and west of the village being promoted in isolation. However, it is recognised that there could, and probably would, be coordinated deliver in practice. Furthermore, it is important to note the recently published option of a large new settlement at West Horndon, as understood from the Thurrock Local Plan Issues and Options 2 consultation document. The Thurrock consultation document does not note the possibility of cross-border development, but presumably there would be opportunities to be realised through cross-border development that cannot be realised through a scheme in Thurrock only (noting the extent of flood risk to the south of West Horndon).

In **conclusion**, options involving a concentration of growth along the A127 corridor perform best, with DHGV preferable to West Horndon noting uncertainty regarding the potential to deliver and masterplan sites at West Horndon in combination. The Thurrock West Horndon new settlement option is noted, and it is recognised that this feasibly lends support for focusing growth at Brentwood (Option 1), and deferring planning for the A127 corridor to the South Essex Local Plan; however, on balance the Thurrock Local Plan proposals are considered insufficiently advanced at this stage.

Significant positive effects are not predicted, even for options likely to deliver a secondary school, and even after having taken account of preferred allocations that are a constant across the alternatives. 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).

**Sustainability Topic: Cultural heritage**

	<b>Opt 1</b> WH East WH West	<b>Opt 2</b> Brentwood	<b>Opt 3</b> DHGV	<b>Opt 4</b> Brentwood WH East	<b>Opt 5</b> Brentwood WH West	<b>Opt 6</b> DHGV WH West	<b>Opt 7</b> Brentwood WH East WH West
Rank	<b>2</b>	<b>2</b>	<b>1</b> 	<b>3</b>	<b>2</b>	<b>1</b> 	<b>3</b>
Significant effects?	<b>No</b>						
Discussion	<p>The <b>A127</b> corridor is relatively unconstrained from a historic environment perspective, with a primary consideration being adjacent Thorndon Hall Registered Park and Garden (Grade II* listed) and Thorndon Park Conservation Area, which primarily constrains West Horndon East (indeed, the designated land intersects the potential development area, to a small extent).</p> <p>A single Grade II listed building does fall within centre of the <b>DHGV</b> site, which will inevitably be impacted through loss of its rural setting; however, means to mitigate impact are being explored, e.g. through sensitive integration of the listed building into a local centre (such that residents would experience and appreciate the listed building), or through integration with green infrastructure stretching to the south east (potentially enabling a degree of connectivity with the two listed buildings at the edge of the site, and heritage assets beyond including the Plotlands Museum, which forms part of the Langdon Centre, run by Essex WT).</p>						

There are wide ranging heritage constraints at **Brentwood**; however, only one of the package of sites assumed to deliver higher growth is notably constrained, namely West of Ongar Road, which is highly constrained at its western extent by a Scheduled Monument, two listed buildings and the eastern extent of the Weald Conservation Area / Registered Park and Garden. There would also be a need to consider the possibility of increased traffic congestion impacting on the Brentwood Conservation Area.

In **conclusion**, West Horndon West is considered to be the least constrained location, followed by DHGV, which leads to a conclusion that Options 3 and 6 perform best. Options 4 and 7 perform poorly as there would be a risk of impacts to two conservation areas (one of which is also a registered park/garden) and several listed buildings; however, it is not possible to conclude significant negative effects - even after having considered the impacts that will result from preferred allocations that are a constant across the alternatives - given potential to avoid/mitigate effects through careful masterplanning and design (e.g. West Horndon East site promoters have submitted a scheme that seeks to respond to the constraints). Greatest concern potentially relates to the setting of the Weald Conservation Area / Registered Park and Garden and associated specific assets (listed buildings and a SAM).

**Sustainability Topic: Economy and employment**

	<b>Opt 1</b> WH East WH West	<b>Opt 2</b> Brentwood	<b>Opt 3</b> DHGV	<b>Opt 4</b> Brentwood WH East	<b>Opt 5</b> Brentwood WH West	<b>Opt 6</b> DHGV WH West	<b>Opt 7</b> Brentwood WH East WH West
Rank	<b>2</b>	<b>3</b>	 <b>1</b>	<b>3</b>	<b>2</b>	 <b>1</b>	<b>3</b>
Significant effects?	<b>No</b>						

Discussion

There is a need to support an approach to housing growth that in turn supports delivery of significant new employment land along one or both corridors, both of which are of potentially of regional importance, given proximity to London. N.B. to be clear, under all options there is an assumption that provision is made for 5,000 additional jobs over the Plan period, including through allocation of land to deliver a total of circa 48.89 ha of new employment land.

The main opportunity to support additional delivery of employment land would be at **DHGV**; and the effect could well be to strengthen the emerging A127 corridor employment cluster in Brentwood (the assumption is that land is also allocated to deliver a new 25.85ha 'Brentwood Enterprise Park' a 5.9ha extension to Childerditch Industrial Estate and a 5.5ha site at East Horndon Hall, albeit the existing 16ha West Horndon Industrial Estate would be redeveloped), also recognising that the A127 corridor in Basildon Borough is seen as an 'Enterprise Corridor'.

The representation received from the **West Horndon West** promoter also suggests some potential to deliver small-scale employment on-site; however, there is no clear commitment.

With regards to the cluster of **Brentwood** sites, there would be merit to delivering new housing in close proximity to Brentwood town centre and Crossrail Station; however, none of the schemes would deliver new employment land. Indeed, there is a concern that delivery of the St. Faiths site could impact on the functioning of the BT Centre designated employment site.


In **conclusion**, Options 3 and 6 perform best, as they would deliver significant new employment land at DHGV. There is some reason to suggest that Option 6 performs best as there might also be some additional employment land delivered at West Horndon West; however, there could equally be increased concerns regarding A127 traffic congestion.

It is challenging to draw conclusions regarding effect significance. Past SA iterations have concluded the likelihood of significant positive effects; however, latest evidence serves to highlight serious concerns regarding traffic congestion at M25 J29, and also at junctions along the A127. Taking a precautionary approach, significant positive effects are not predicted.

**Sustainability Topic: Flooding**

	<b>Opt 1</b> WH East WH West	<b>Opt 2</b> Brentwood	<b>Opt 3</b> DHGV	<b>Opt 4</b> Brentwood WH East	<b>Opt 5</b> Brentwood WH West	<b>Opt 6</b> DHGV WH West	<b>Opt 7</b> Brentwood WH East WH West
Rank	=	=	=	=	=	=	=
Significant effects?	<b>No</b>						
Discussion	<p>It should be possible to avoid fluvial flood risk zones, and the worsening of flood risk offsite (through increased surface water run-off) under all options. An area of fluvial flood risk intersects the west of the Dunton Hills Garden Village site; however, given the extent of the site, it should be possible to leave this area, and a sufficient buffer, undeveloped.</p> <p>With regards to surface water flood risk, all of the sites in question (i.e. those that are a 'variable' across the alternatives) are affected to some extent, with West Horndon East (reflecting the location of the site at the northern extent of the fenland landscape that extends south through Thurrock) and Honeypot Lane (see discussion of the stream passing through the site above, under 'Biodiversity') seemingly most affected; however, there tends to be good potential to avoid or mitigate risk through masterplanning and delivery of Sustainable Drainage Systems (SuDS). In both instances the site promoter have submitted schemes that seeks to respond to the constraints that exist.</p> <p>In <b>conclusion</b>, the alternatives perform on a par, and significant effects are not predicted (also having taken into account the preferred allocations that are a constant across the alternatives).</p>						

**Sustainability Topic: Housing**

	<b>Opt 1</b> WH East WH West	<b>Opt 2</b> Brentwood	<b>Opt 3</b> DHGV	<b>Opt 4</b> Brentwood WH East	<b>Opt 5</b> Brentwood WH West	<b>Opt 6</b> DHGV WH West	<b>Opt 7</b> Brentwood WH East WH West
Rank	<b>7</b>	<b>6</b>	<b>5</b>	<b>4</b>	<b>3</b>	<b>2</b>	
Significant effects?	<b>Yes</b>						
Discussion	<p>All options would involve a land supply - i.e. completions, commitments, allocations, windfall - sufficient to <i>potentially</i> deliver well in excess of 5,950 homes over the plan period, which is the <b>LHN</b> figure (350 dpa x 17). A degree of headroom is appropriate, given the risk that one or more sites might be subject to unanticipated delays to delivery, and given a need to ensure a smooth delivery trajectory over the plan period, or at least not avoid major dips in the trajectory that could lead to a situation whereby the Council experience difficulties in respect of demonstrating a five year housing land supply, or meeting the Housing Delivery Test.</p> <p>The amount of headroom, or '<b>buffer</b>' would be lowest under Options 1 and 2, but the mix of sites involved (i.e. no reliance on DHGV, which is at greatest risk of delay, amongst the sites under consideration) leads to confidence regarding the robustness of the supply trajectory. There would be greatest risk under Option 1 (14% buffer, with reliance on growth at both East and West of West Horndon), but this buffer is considered sufficient. This degree of reliance on strategic schemes, aligned with a buffer of this scale, is in accordance with good practice.</p>						

The higher growth options, and specifically Options 4 to 7, perform best as the scale of headroom is potentially larger than that which is necessary to deliver the LHN figure (after also having taken account of the mix of sites), such that the Council could potentially commit to a **housing target/requirement** in excess of LHN. Such an approach is supported, from a ‘Housing’ perspective, given that the additional supply would (likely) go towards meeting the unmet needs likely to arise from elsewhere in South Essex, or (less likely) go towards meeting affordable housing needs arising from within Brentwood more fully.

Alternatively, higher growth options can be seen to perform well on the basis that understanding of LHN might well increase (prior to submission of the plan, or during the course of the plan’s examination) - see discussion in Section 5.2.

In **conclusion**, all options would lead to significant positive effects, and it is possibly rank the alternatives according to the scale of the buffer / quantum of homes provided for.

N.B. there are other factors besides housing quantum - e.g. the need to focus housing on the Brentwood/Shenfield area, as the sub-area with highest need; or the fact that DHGV would deliver significant additional housing beyond the plan period, thereby giving confidence regarding housing supply in the long term; or the potential for some sites to suited to delivering specialist accommodation (e.g. supported housing) and/or the full quota of affordable housing - however, these factors are judged to be of lesser significance.

Sustainability Topic: <u>Landscape</u>							
	Opt 1	Opt 2	Opt 3	Opt 4	Opt 5	Opt 6	Opt 7
	WH East WH West	Brentwood	DHGV	Brentwood WH East	Brentwood WH West	DHGV WH West	Brentwood WH East WH West
Rank	★ 1	2	3	5	4	7	8
Significant effects?	<b>Yes</b>						
Discussion	<p>There are no nationally important designated landscapes within the Borough; however, around 89% of the Borough is designated Green Belt, which is designated in order to perform a number of ‘purposes’, one of which is to maintain ‘openness’.</p> <p>Drawing upon information available from three key studies,<sup>85</sup> key points are as follows -</p> <ul style="list-style-type: none"> <li>• DHGV falls within the Horndon Fenland character area, which has “moderate” sensitivity to change, and is judged as having “medium to low-medium” landscape capacity. With regards to Green Belt, it contributes to purposes to a “moderate-high” extent.</li> <li>• Land surrounding West Horndon falls within the same character area; however, the majority of land (c.70%) is judged to have notably (two increments) higher landscape capacity than DHGV (“medium to high”). The remaining c.30% is judged to have “medium to low-medium” landscape capacity, as per DHGV. With regards to Green Belt, all land at West Horndon contributes to purposes to a “moderate” extent, i.e. to a lesser extent than land at DHGV.</li> <li>• Honeypot Lane - has “medium” landscape capacity, and is judged by the Green Belt Study to contribute to Green Belt purposes to a “low to moderate” extent.</li> <li>• Sawyers Farm - has “medium to high” landscape capacity, but is judged by the Green Belt Study to contribute to Green Belt purposes to a “moderate-high” extent.</li> </ul>						

<sup>85</sup> Mid Essex Landscape Character Assessment (2006); Brentwood Borough Landscape Capacity and Sensitivity Study (2018; and Brentwood Borough Green Belt Study (2018).



- St. Faiths - has “medium” landscape capacity (as per adjacent Honeypot Lane), and is judged by the Green Belt Study to contribute to Green Belt purposes to a “moderate” extent (i.e. to a greater extent than Honeypot Lane, but to a lesser extent than Sawyers Hall Farm).
- West of Ongar Road - has “low to medium to low split” landscape capacity (i.e. very poor capacity, indeed lowest capacity of all sites examined), and is judged by the Green Belt Study to contribute to Green Belt purposes to a “moderate-high” extent”.

Further site-specific considerations are as follows -

- DHGV - has led to concerns raised by both Basildon and Thurrock Councils. 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...”* However, there are potentially counter arguments, e.g. the ridge discussed within the Thurrock response will also serve to shield development to the west from the edge of Basildon to the east, and development to the east of the ridge may be lower density, including in response to the gas line that passes through this area. Also, there is a need to recognise that contribution to fenland landscape character is reduced on account of much of the site currently being a golf course. Furthermore, there is a need to note the presence of roads and railways, and a solar farm directly to the south of the site.
- West Horndon - as discussed above, mostly gives rise to fewer concerns than DHGV, other than the north-eastern area, which is constrained to a similar extent as DHGV. Whilst there are some extensive views across the site from A-roads, as a flat site there should be good potential for effective screening (which, of course, might not preclude significant visual impacts in the shorter term, ahead of vegetation maturing).
- Honeypot Lane - as discussed, performs relatively well amongst the Brentwood urban extension options. The site is relatively flat and low-lying, and screened from views from most locations. There is a robust hedgerow screening the site from Honeypot Lane, although there are at least glimpsed views, including a view of the small stream passing through the site, with associated riparian vegetation. The A12 is in a cutting along this stretch, which prevents views into the site other than at its western extent.
- Sawyers Farm - as discussed, is judged to be less constrained than Honeypot Lane in landscape terms (two increments), but more constrained in Green Belt terms (one increment). It is a flat site with limited obvious receptors in the vicinity (e.g. no footpaths) other than motorists on the A12, noting that the road is not in a cutting along this stretch, and that screening vegetation appears relatively weak. However, there are clear concerns in respect of ability to achieve a long-term defensible Green Belt boundary, i.e. the need to rely on soft boundaries (hedgerows / narrow ditches) gives rise to a risk of ‘sprawl’ over time.
- St Faiths - as discussed, is judged to perform the same as adjacent Honeypot Lane in landscape terms; however, there are perhaps reasons to suggest it might be more sensitive. There would appear to be fairly good screening vegetation along much of Weald Road and Honeypot Lane (although there are at least some glimpsed views up-hill towards the built-up area of Brentwood); however, there is formal access to much of this site, which might give rise to a degree of landscape sensitivity, noting that this is rising land, with views into and out of the higher part of the site, potentially stretching as far as South Weald. With regards to Green Belt, the site is relatively well contained in the Brentwood Borough context; however, the western part of the site would rely on a soft boundary to two unavailable fields.

- West of Ongar Road - as discussed, is heavily constrained in landscape terms. It is visible from locations along the existing Pilgrims Hatch settlement edge (although screening vegetation - i.e. trees and hedgerows - appears to be fairly strong), from Weald Road (which links Brentwood to the village of South Weald, and along which screening vegetation appears less strong) and from along the length of Sandpit Lane, which is a narrow lane with a rural character (with a mature hedgerow, but with at least one notable gap providing a view across the site uphill to the built-up area of Brentwood). There might be views of the site from within Weald Country Park, although this is uncertain.

In **conclusion**, Option 1 is judged to perform best as it would involve minimal housing growth directed to generally less sensitive locations around West Horndon. It is difficult to differentiate Options 2 and 3, noting that Option 2 would involve lower growth, but is also assumed to involve allocation of one notably constrained site, namely West of Ongar Road; however, on balance Option 3 is judged to perform less well, noting the higher growth strategy and the “medium to low-medium” landscape capacity assigned to DHGV. With regards to Options 4 and 5, Option 4 is judged to perform worse, noting that West Horndon East has lower landscape capacity than West Horndon West. Options 6 and 7 are higher growth options that perform poorly, with Option 6 judged to perform worse, given the risk of cumulative effects resulting from growth at both West Horndon and DHGV. This part of the A127 corridor has strategic importance as a landscape gap between London and Basildon, and in particular the importance of the gap between West Horndon and Basildon, has been highlighted by stakeholders, including Thurrock Council and Basildon District Council.

Taking a precautionary approach, and in the absence of detailed evidence, it is appropriate to conclude that all alternatives would lead to significant negative effects. Brentwood Borough, as a whole, is sensitive from a landscape perspective.

**Sustainability Topic: Soils**

	<b>Opt 1</b> WH East WH West	<b>Opt 2</b> Brentwood	<b>Opt 3</b> DHGV	<b>Opt 4</b> Brentwood WH East	<b>Opt 5</b> Brentwood WH West	<b>Opt 6</b> DHGV WH West	<b>Opt 7</b> Brentwood WH East WH West
Rank	=	=	=	=	=	=	=
Significant effects?	<b>Yes</b>						
Discussion	<p>There is a need to avoid loss of higher quality (‘best and most versatile’) agricultural land. In this respect, the great majority of undeveloped land in Brentwood is Grade 3 (good to moderate quality) in the Agricultural Land Classification, according to the nationally available ‘Provisional Agricultural Land Quality’ dataset. The data-set is of very low resolution, which means that it is difficult to apply it to the appraisal of individual sites, or spatial strategy alternatives (i.e. alternative combinations of sites); however, it is apparent that all of the sites currently under consideration - i.e. all that are a variable across the alternatives - are shown to be Grade 3 by the dataset.</p> <p>The other available dataset is known as the ‘Post 1988’ dataset. This dataset is an accurate reflection of agricultural land quality, on the basis that the methodology involves field surveys. However, the data-set is very patchy, with data only being available for a very small proportion of the Borough, and no data available for any of the sites under consideration here. Indeed, the dataset does not show any data points within Brentwood Borough at all - see Appendix II.</p> <p>In <b>conclusion</b>, the alternatives are judged to perform broadly on a par. It might be suggested that lower growth is preferable; however, this might increase pressure for growth at locations outside of Brentwood Borough where agricultural land quality is higher. The nationally available dataset shows there to be some areas of higher quality (grade 2), and also highest quality (grade 1), agricultural land in South Essex, and there are also extensive areas of higher quality (grade 2) land in Epping Forest and Chelmsford Districts to the north - see Appendix II.</p>						


In respect of effect significance, it is difficult to draw a conclusion, but on balance it is appropriate to conclude that all options would lead to significant negative effects, given the risk of significant loss of best and most versatile agricultural land.

N.B. Another consideration relates to the sterilisation of known mineral resources, taking account of areas safeguarded by the Essex Minerals Plan 2014; however, none of the sites in question are constrained in this respect.

**Sustainability Topic: Waste**

	<b>Opt 1</b>	<b>Opt 2</b>	<b>Opt 3</b>	<b>Opt 4</b>	<b>Opt 5</b>	<b>Opt 6</b>	<b>Opt 7</b>
	WH East WH West	Brentwood	DHGV	Brentwood WH East	Brentwood WH West	DHGV WH West	Brentwood WH East WH West
Rank	=	=	=	=	=	=	=
Significant effects?	<b>No</b>						
Discussion	The broad spatial distribution of growth is not likely to have a bearing on waste management related objectives, nor is the total growth quantum. It is assumed that there is sufficient capacity at waste management processing facilities in Essex to handle waste under any reasonably foreseeable scenario. All new development, regardless of location and scale, would likely design-in some waste management facilities.						

**Sustainability Topic: Water quality and water resources**

	<b>Opt 1</b>	<b>Opt 2</b>	<b>Opt 3</b>	<b>Opt 4</b>	<b>Opt 5</b>	<b>Opt 6</b>	<b>Opt 7</b>
	WH East WH West	Brentwood	DHGV	Brentwood WH East	Brentwood WH West	DHGV WH West	Brentwood WH East WH West
Rank	 <b>1</b>	<b>2</b>	<b>3</b>	<b>4</b>	<b>5</b>	<b>6</b>	<b>7</b>
Significant effects?	<b>No</b>			<b>Yes</b>			
Discussion	<p>The Brentwood Borough Council Water Cycle Study (WCS, 2019) draws two headline conclusions in respect of the preferred allocations (specifically, the strategy submitted to the November 8<sup>th</sup> Extraordinary Council meeting, which was subsequently amended in order to arrive at Option 3), as discussed on page 4 of the report. Specifically -</p> <ul style="list-style-type: none"> <li>Firstly, there is not predicted to cause significant deterioration in water quality at most of the water courses that will receive increased treated wastewater, but that there is the potential for a deterioration in water quality at the receiving waters associated with the Doddinghurst and Upminster WWTWs. The former WWTW serves the rural north of the Borough (and is a constraint that has been recognised through iterations of SA over a number of years), whilst the latter serves the southern part of Brentwood (Warley) and the A127 corridor. The WCS explains that there may be measures that can be taken to avoid or mitigate the risk, including through an improvement in discharge quality.</li> </ul>						

- Secondly, in respect of the need to remain within dry weather flow (DWF) permit levels, five of the six receiving WwTs lead to concerns, namely all other than Shenfield (which serves Shenfield and also Pilgrims Hatch), and further interrogation (Table 5.2) serves to indicate that the situation is particularly problematic for Brentwood and Ingatestone WwTWs; however, there is potential to avoid/mitigate through “capacity upgrades, diversion of flows [to other WwTWs] and/or water reduction measures [e.g. measures to increase water efficiency in homes]”.

These conclusions do appear to differ somewhat from the conclusion reached by the October 2018 Interim Information Note: *“Initial results... indicate that there should be no significant deterioration in water quality in discharge waters due to housing growth. The main issue identified is operational capacity of the WwTW and ability to receive sewage flows. Provisional recommendations state that both Brentwood and Ingatestone WwTWs review volumetric capacity to manage future DWF as a result of increased housing growth within their respective catchment areas. A diversion of flows to nearby WwTW could be considered or a combination of review of consent limits and water reduction measures.”*

In **conclusion**, there appear to be significant issues in respect of WwTW capacity that serve to indicate that lower growth is preferable. Whilst there are a range of mitigation measures that can be implemented, all might be associated with risks and uncertainties, and hence there is an argument for seeking to avoid the problem in the first instance.

In respect of spatial distribution, it is difficult to draw strong conclusions. There is some reason to suggest that growth at Brentwood (given the sites assumed to deliver that growth, and on the assumption that the two northern sites would drain to the relatively unconstrained Shenfield WwTW) is preferable to growth along the A127 corridor (noting that the Upminster WwTW is discussed, above, as being constrained in respect of both water quality and DWF); however, on balance the evidence is not sufficiently clear. The WCS does not highlight the Upminster WwTW as being the most constrained of the WwTWs overall.

In respect of effect significance, whilst there can be no certainty in the absence of detailed evidence, it is appropriate to ‘flag’ the risk that higher growth options, and specifically options involving growth over-and-above Option 3, which is the option examined (in a modified form) through the WCS, would result in significant negative effects.

N.B. other issues relating to water availability and the capacity of the local sewer network are judged to be less significant, and do not have a bearing on the appraisal. In respect of water availability the WCS finds that the Water Resource Management Plans (WRMPs) of both water companies (Affinity Water and Essex and Suffolk Water) suggest capacity, or potential capacity, within each of the water resources zones to accommodate additional development. In respect of the sewer network, the WCS does highlight an issue at Ingatestone, and also quotes Thames Water as having concerns regarding the Brook Street / Pilgrims Hatch / Sawyers Hall Farm area; however, for the purposes of this appraisal the assumption is that it would be possible to implement sufficient mitigation under all options.

Summary appraisal of the reasonable spatial strategy alternatives (January 2019)

Topic	Rank of performance / categorisation of effects						
	Opt 1 WH East WH West	Opt 2 Brentwood	Opt 3 DHGV	Opt 4 Brentwood WH East	Opt 5 Brentwood WH West	Opt 6 DHGV WH West	Opt 7 Brentwood WH East WH West
Air quality	★1	4	2	5	5	3	6
Biodiversity	3	4	★1	6	5	2	7
Climate change	★1	3	★1	3	2	★1	★1
Community & well-being	2	5	★1	5	4	2	3
Cultural heritage	2	2	★1	3	2	★1	3
Economy & employment	2	3	★1	3	2	★1	3
Flooding	=						
Housing	7	6	5	4	3	2	★1
Landscape	★1	2	3	5	4	7	6
Soils	=						
Waste	=						
Water	★1	2	3	4	5	6	7

## Conclusion

A headline conclusion is that a strategy involving one or more strategic allocations within the A127 corridor performs well, relative to the alternative of supporting higher growth at Brentwood, in respect of a number of objectives. It does not automatically follow that a strategy involving higher growth at the Brentwood is relatively unsustainable overall; however, it is an indication. The appraisal has highlighted limited benefits to supporting higher growth at Brentwood, and some significant draw-backs, most notably in respect of 'air quality' and 'biodiversity', with significant negative effects predicted in both respects. However, the appraisal findings do reflect the merits of the particular package of sites assumed to deliver higher growth. There will be alternative packages of sites that perform better in certain respects.

Focusing on growth options within Brentwood, there are essentially three urban extension options that might be considered 'strategic', in that they will be of a scale sufficient to deliver strategic infrastructure upgrades, and hence a degree of 'planning gain' (one of the three sites might alternatively be split into its two component parts, but such an approach is found to perform relatively poorly through the appraisal). One of these three schemes (Honeypt Lane / St Faiths; c.900 homes) potentially stands out as performing well, on the basis of its relative merits in respect of Green Belt containment and proximity to Brentwood Town Centre; however, there are also a range of draw-backs, most notably in terms of traffic/air quality and biodiversity. Also, this area drains to the more constrained Brentwood WwTW.

Focusing on the A127 corridor, a strategy involving DHGV (Option 3) is found to out-perform a strategy involving growth to the east and west of West Horndon (Option 1) other than in respect of -

- Landscape - this finding relates to the fact that Option 1 would involve lower growth overall, relative to Option 3, i.e. growth at DHGV would be on a larger scale (in particular once account is taken of the potential for significant growth beyond the plan period) and also the findings of two key studies that serve to indicate that West Horndon has greater capacity than DHGV, in both landscape (less so land to the northeast of the village) and Green Belt terms. Option 1 would nonetheless result in significant negative effects, given the extent of Green Belt loss and impacts to landscapes at the edge of existing settlements.
- Air quality - West Horndon is judged to be the preferable location from a perspective of wishing to minimise car dependency / distance travelled by car, given the rail station, and in turn is judged to be the preferable location in respect of 'air quality' (noting that growth along the A127 corridor can be expected to lead to increased traffic in the Brentwood town centre Air Quality Management Area, AQMA); however, there is some uncertainty in respect of this conclusion, given the potential to deliver significant upgrades to walking/cycling and public transport infrastructure through a focus at DHGV, as well as to deliver employment and a local centre (to include a secondary school) on-site.

There are three final points to note -

- Housing - the appraisal conclusion in respect 'Housing' reflects the overall quantum of homes provided for, rather than the spatial distribution (as per 'Landscape'). Higher growth options are judged to be preferable given: A) uncertainty in respect of the LHN figure (350 dpa or 454 dpa); B) the need to provide for a 'buffer' over-and-above LHN in order to ensure a robust housing supply trajectory (recognising the risk of unanticipated delays to deliver at one or more sites); and C) the risk (less likely) of the Brentwood Local Plan having to provide for unmet needs arising from elsewhere in South Essex. All options are judged to result in significant positive effects on balance; however, this conclusion is uncertain in respect of the lower growth options, recognising the LHN uncertainty in particular.
- Soils - the alternatives are judged to perform broadly on a par, with all predicted to result in significant negative effects, given the risk of significant loss of best and most versatile agricultural land. It might be suggested that lower growth is preferable; however, this might increase pressure for growth at locations outside of Brentwood Borough where agricultural land quality is higher. The nationally available dataset shows there to be some areas of higher quality (grade 2), and also highest quality (grade 1), agricultural land in South Essex, and there are also extensive areas of higher quality (grade 2) land in Epping Forest and Chelmsford Districts to the north - see Appendix II.
- Water - the Council's WCS serves to suggest that WwTW capacity is a constraint to growth locally, which in turn serves to indicate that lower growth is preferable. Whilst there are a range of mitigation measures that can be implemented, all might be associated with risks and uncertainties, and hence there is an argument for seeking to avoid the problem in the first instance. In respect of spatial distribution, there is some reason to suggest that growth at Brentwood is preferable to growth along the A127 corridor; however, it is difficult to draw strong conclusions. In respect of effect significance, whilst there can be no certainty in the absence of detailed evidence, it is appropriate to 'flag' the risk that higher growth options would result in significant negative effects.