

Sustainability Appraisal (SA) of the Brentwood Local Plan

Interim SA Report

January 2018

REVISION SCHEDULE

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INTRODUCTION

1 BACKGROUND

- 1.1.1 AECOM is commissioned to undertake Sustainability Appraisal (SA) in support of the emerging Brentwood Local Plan. SA is a mechanism for considering and communicating the likely effects of a draft plan, and alternatives, with a view to avoiding and mitigating adverse effects and maximising the positives. SA of Local Plans is a legal requirement.¹

2 SA EXPLAINED

- 2.1.1 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.²
- 2.1.2 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’.³ The report must then be taken into account, alongside consultation responses, when finalising the plan.
- 2.1.3 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 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**?
 - What steps will be taken to finalise the plan?
 - What measures are proposed to monitor plan implementation?

2.2 This Interim SA Report⁴

- 2.2.1 At the current stage of plan-making the Council is consulting on ‘Preferred Site Allocations’, which broadly equates to consulting on an *early* draft plan. This ‘Interim’ SA Report is therefore produced with the intention of informing the consultation and subsequent preparation of the final draft (‘proposed submission’) plan.

Structure of this Interim SA Report

- 2.2.2 Despite the fact that this is an ‘Interim’ SA Report, and does not need to provide the information required of the SA Report, it is nonetheless helpful to structure this report according to the three questions listed above.
- 2.2.3 Before answering Question 1, there is a need to further set the scene, by answering two initial questions: *What is the plan seeking to achieve?*; and *What is the scope of the SA?*

¹ 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, 2012). 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

² *Procedurally* SA and SEA are one and the same, on the basis that there is 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 (environment, social and economic), whilst SEA involves a degree of focus on the environmental pillar. SA can therefore be said to ‘incorporate’ SEA.

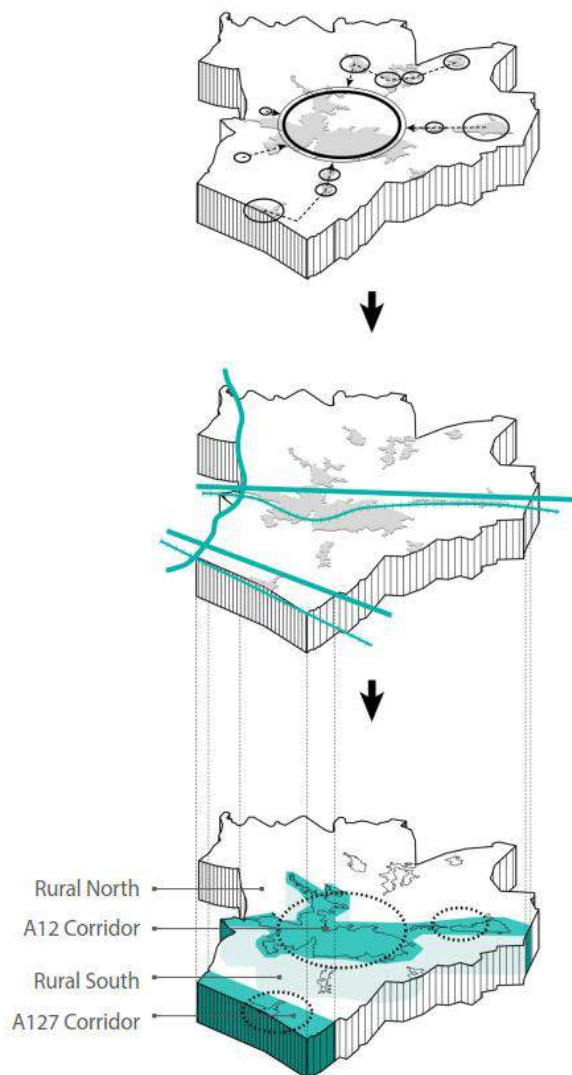
³ Regulation 12(2) of the Environmental Assessment of Plans and Programmes Regulations 2004.

⁴ 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.

3 WHAT IS THE PLAN SEEKING TO ACHIEVE?

- 3.1.1 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 3.1** shows the plan area.
- 3.1.2 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.

Figure 3.1: The settlement hierarchy, transport links and sub-areas



3.2 Objectives of the Local Plan

3.2.1 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 objectives listed in **Table 3.1**.

Table 3.2: The plan objectives

Plan theme	Plan objective
Managing growth	<ul style="list-style-type: none"> • Ensure that we maximise sustainable growth opportunities within our built-up areas and on brownfield sites. • Direct development growth to the Borough's transport corridors and urban areas in locations well served by existing and proposed local services and facilities. • Support the sustainable growth of our existing larger villages to provide improved housing choice and protect services and facilities. • Create a new well-connected community and garden village at Dunton Hills, which is recognised for its high-quality place-making, range of services and facilities, sustainability and culture of innovation. • Manage development growth to that capable of being accommodated by existing or proposed infrastructure, services and facilities.
Sustainable communities	<ul style="list-style-type: none"> • Plan for housing that meets the needs of the Borough's population and contributes to creating inclusive, balanced, sustainable communities. • Support our new community at Dunton Hills with appropriate community engagement and governance arrangements and ensure long-term stewardship is a core priority.
Economic prosperity	<ul style="list-style-type: none"> • Foster a prosperous, vibrant and diverse local economy by attracting new commercial investment in order to maintain high and stable levels of economic and employment growth. • Expand and enhance Brentwood Town Centre's retail offer in particular opportunities for high quality niche shopping. • Promote and encourage the continued success of Brentwood Town Centre and local centres to provide a high quality public realm and mixed use developments. • Optimise the social and economic benefits that arise from Crossrail for the benefit of residents, businesses and visitors to the Borough. • Promote and support a prosperous rural economy. • Protect our core office market from potential erosion where there is a strong economic case. • Provide opportunities to support small businesses, including local SME housebuilders through small site allocations.
Environmental protection and enhancement	<ul style="list-style-type: none"> • Safeguard the Green Belt from inappropriate development and enhance its beneficial use. • Protect and enhance valuable landscapes and the natural and historic environments. • Establish a rich connected network of Green Infrastructure across the Borough and reaching beyond.

Plan theme	Plan objective
Quality of life and community infrastructure	<ul style="list-style-type: none"> • Protect and nurture existing leisure, cultural and recreational assets such as the Borough's Country Parks for residents and visitors to the Borough and promote and enhance social inclusion, health and wellbeing. • Secure the delivery of essential infrastructure, including education, health, recreation and community facilities to support new development growth throughout its delivery. • Provide opportunities for people to take an active role in the development and management of their communities, including Dunton Hills Garden Village and support self-build housing in sustainable locations across the Borough.
Transport and movement	<ul style="list-style-type: none"> • Improve public transport infrastructure and ensure development sites are well connected to bus and/or rail connections. • Improve cycling and walking facilities across the Borough and establish a grid or network of green transport corridors. • Secure the delivery of new infrastructure to support a lower carbon future including electric vehicles charging points and other measures.

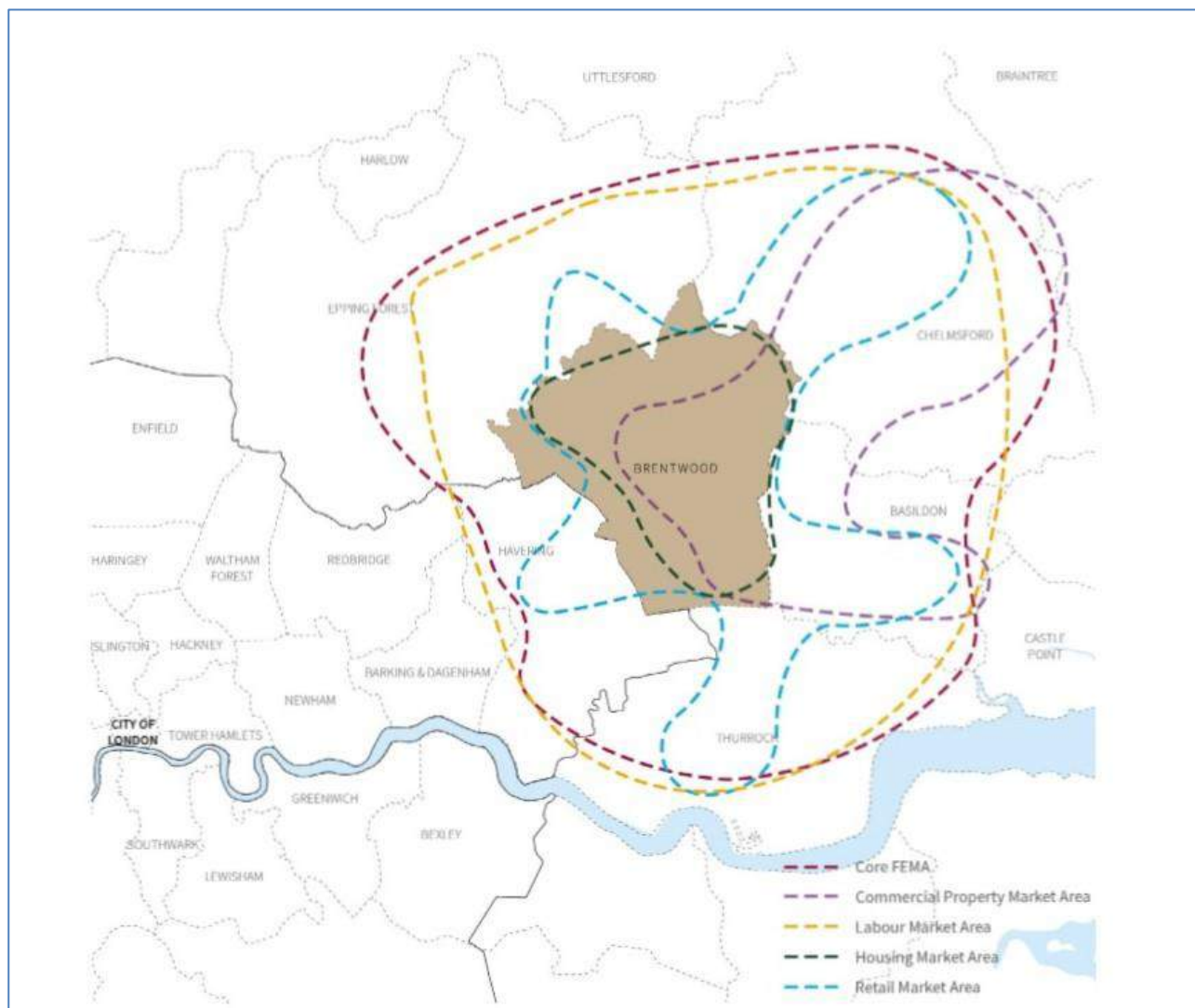
3.3 Legislative and policy context

- 3.3.1 The plan is being prepared under the Town and Country (Local Planning) Regulations 2012, mindful of the main underpinning primary legislation: the Planning and Compulsory Purchase Act 2004 and the Localism Act 2011. It must reflect current government policy as set out in the National Planning Policy Framework (NPPF, 2012) and Planning Policy for Traveller Sites (2015), and also be in accordance with Government's online Planning Practice Guidance (PPG). In particular, the NPPF requires local authorities to take a positive approach to development and for an up-to-date local plan to be produced which meets objectively assessed needs as far as is consistent with sustainable development.
- 3.3.2 The plan is also being prepared taking account of objectives and policies established by various organisations at the national and local level, in accordance with the Duty to Cooperate established by the Localism Act 2011. For example, context is provided by the strategic growth aspirations of the South East Local Enterprise Partnership (LEP), and Essex County Council (HCC) strategy - notably in relation to transport, minerals and waste, education and health/social care. Brentwood must also cooperate with neighbouring boroughs and districts, particularly those with a shared functional economic market area (FEMA) - see **Figure 3.2**.

3.4 What is the Local Plan not seeking to achieve?

- 3.4.1 The plan will be strategic in nature, and hence naturally omit consideration of some detailed issues in the knowledge that they 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.
- 3.4.2 The strategic nature of the Local Plan is reflected in the scope of the SA.

Figure 3.2: Neighbouring authorities with functional links to Brentwood



4 WHAT'S THE SCOPE OF THE SA?

4.1 Introduction

- 4.1.1 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. *Detailed* information on the scope of the SA is presented in **Appendix I**.

Consultation on the scope

- 4.1.2 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.⁵ As such, these authorities were consulted on the SA scope in 2013.

4.2 Key issues / objectives

- 4.2.1 Table 4.1 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.

N.B. Stakeholders are welcome to comment on the SA scope at the current time. Any comments received will be taken into account when undertaking **further work** in the build-up to the Draft ('Proposed Submission') Plan / SA Report consultation. The list of objectives presented in Table 4.1 could potentially be subject to a degree of refinement.⁶

Table 4.1: Sustainability topics and objectives (the SA framework)

Topic	Objectives
Air quality	<ul style="list-style-type: none"> Air pollution (and associated risks to health) must be an on-going consideration particularly that which results from traffic congestion in Brentwood Town Centre. The health of those in the Borough must be protected from the adverse effects of development through avoidance or mitigation measures.
Biodiversity	<ul style="list-style-type: none"> The Borough's existing natural assets need to be protected from the impacts of future development and where possible enhanced. The Borough's network of green infrastructure 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.
Climate change mitigation	<ul style="list-style-type: none"> With regionally high levels of domestic GHG emissions, it will be necessary to improve the energy efficiency of all buildings in the Borough. A shift towards low carbon forms of transport will be required in order to reduce per capita transport related emissions. An opportunity exists to obtain a greater proportion of energy from renewable sources. Development should be constructed and situated in order to minimise resource use and to maximise the opportunities for reuse and recycling. Businesses in the Borough should contribute to the creation of a low-carbon economy, including reduced levels of energy use in buildings and from transport.

⁵ 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.'*

⁶ Chapter 10 ('Appraisal of the preferred allocations') of this report presents the objectives in a refined form (see blue boxes), although appraisal work was nonetheless undertaken mindful of the precise objectives as established through scoping.

Topic	Objectives
Community and well-being	<ul style="list-style-type: none"> • Reduce health inequalities, and inequalities more generally, with a particular focus on those areas suffering from the highest levels of deprivation. • 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. • Ensure that Gypsy and Traveller communities have suitable access to services and healthcare and that sufficient sites are available to meet demand. • Improve levels of educational performance in certain areas; and ensure that there is sufficient provision of education facilities across the Borough. • Improve access to services and facilities in rural areas of the Borough. • Improved open spaces and recreation facilities are a requirement in certain areas, with a particular focus on youth facilities needed in many places.
Economy and employm't	<ul style="list-style-type: none"> • Protect and support the Borough's smaller centres and parades. • 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. • Support investment that leads to high value, knowledge-based employment activities. • Consider future opportunities and consequences associated with the Shenfield and Brentwood Crossrail link. • Support a thriving town centre focused on Brentwood High Street through a good balance of retail (comparison and convenience), services, employment and residential.
Flooding	<ul style="list-style-type: none"> • Reduce flood risk, including as climate change may increased risk. • Protect and enhance existing natural flood risk management infrastructure and ensure all development incorporates SuDS to minimise flood risk.
Heritage	<ul style="list-style-type: none"> • The Borough's heritage assets must be given protection relative to their importance. • Areas of identified historic character should be protected as should the historic buildings that contribute most to local character. • Development must be of an appropriate scale and design, respecting existing character.
Housing	<ul style="list-style-type: none"> • 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. • 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 their circumstances change.
Landscape	<ul style="list-style-type: none"> • The Borough includes highly valued rural landscapes that require protection and careful management with a view to supporting distinctiveness. • Urban fringe landscapes should also be a focus of careful planning.
Soils	<ul style="list-style-type: none"> • Make best use of brownfield land and protect the resource of productive agricultural land.
Waste	<ul style="list-style-type: none"> • A primary concern is to promote the integration of facilities to enable efficient recycling as part of new developments. • Developers should be encouraged to adopt sustainable construction practices, including handling waste arisings, recycling, and disposal in a sustainable manner.
Water	<ul style="list-style-type: none"> • Water quality is a concern, with a need to improve the ecological status of waterways. • Deliver water efficiency measures, given serious water stress regionally.

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

5 INTRODUCTION (TO PART 1)

- 5.1.1 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 consultation (also Regulation 18), and four Interim SA Reports having been published - see **Figure 5.1**.

Figure 5.1: Key steps in the plan-making / SA process

	Plan-making	SA
2009 - 2013	Early plan-making steps, SA scoping and informal appraisal	
2013	Preferred Options consultation	Interim SA Report
2015	Strategic Growth Options consultation	Interim SA Report
2015	Dunton Hills Garden Village consultation	Interim SA Report*
2016	Draft Plan consultation	Interim SA Report
2017 - 2018	Further work to consider options / alternatives	
January 2018	Preferred Site Allocations consultation	Interim SA Report
Mid 2018	Publication (Reg 19)	SA Report
Late 2018	Submission to Secretary of State	

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

- 5.1.2 The aim here, within Part 1, is not to recount in detail the entire 'story' of plan-making to date, but to explain how work was undertaken to develop and then appraise **reasonable alternatives** prior to finalising the current 'Proposed Allocations' consultation document.⁷
- 5.1.3 More specifically still, this part of the report presents information regarding the consideration of reasonable alternative approaches to housing growth, or '**spatial strategy alternatives**'. It is clear that allocating land for **housing** is a central plan objective (see Chapter 3).⁸

What about other land uses?

- 5.1.4 In addition to allocating land to meet housing needs, the Local Plan will, in all likelihood, also allocate land to meet other needs, in particular needs for specialist accommodation, including Gypsy and Traveller pitches, and employment land. The discussion of spatial strategy alternatives presented below is 'bricks and mortar housing-led'; however, it also provides a forum for examining the subject of providing for other land uses. The subject is also discussed within Chapters 9 and 10, which deal with the emerging preferred approach. Consultees are welcome to suggest issues/options that should be subject to detailed appraisal as part of **further SA work** subsequent to the current consultation.

What about other plan issues?

- 5.1.5 The plan will set policy to address a range of thematic, borough-wide issues, and also site-specific issues; however, these matters are not the focus of the current 'preferred allocations' consultation. Consultees are welcome to suggest issues/options that should be subject to detailed appraisal as part of **further SA work** subsequent to the current consultation.

⁷ There is a requirement for the SA Report to present an appraisal of 'reasonable alternatives' and 'an outline of the reasons for selecting the alternatives dealt with'. The aim is to inform the consultation, and subsequent plan finalisation.

⁸ The Regulations require that, when determining what should be a focus of alternatives appraisal, account is taken of 'the plan objectives'. Recent case-law has established that planning authorities may apply discretion and planning judgement in this regard.

What about site options?

- 5.1.6 Site options are not ‘reasonable alternatives’ where there is no mutually exclusive choice to be made between them; however, it is naturally the case that there is a need to examine site options when arriving at reasonable spatial strategy alternatives. As such, site options are discussed in Chapter 6 (“Establishing the reasonable alternatives”).

What about SA work from past stages?

- 5.1.7 Appraisal findings from the past Interim SA Reports are not repeated here, but rather are discussed as an input to the establishment of reasonable spatial strategy alternatives. Previous reports have been superseded, but remain available on the Council’s website.

Structure of this part of the report

- 5.1.8 The remainder of Part 1 is structured as follows -

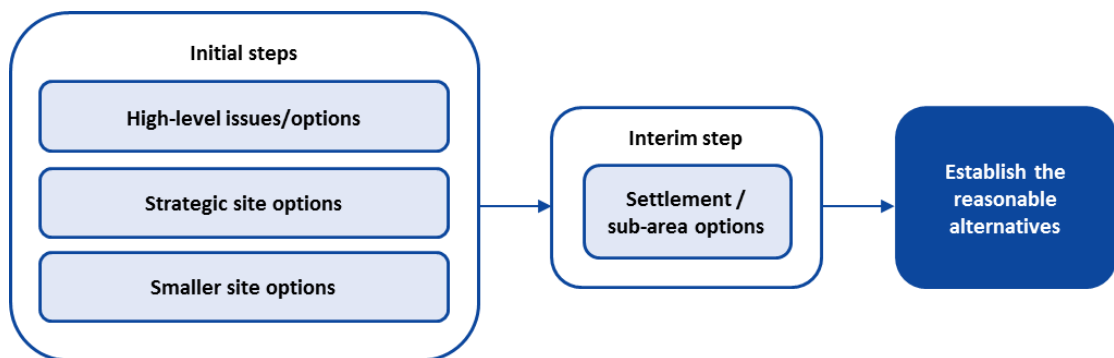
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| Chapter 6 - | explains the process of establishing the reasonable alternatives , undertaken by the Council and AECOM working in collaboration |
| Chapter 7 - | presents AECOM’s appraisal of the reasonable alternatives |
| Chapter 8 - | explains the Council’s reasons for establishing the preferred option , in light of the appraisal of reasonable alternatives |

6 ESTABLISHING THE REASONABLE ALTERNATIVES

6.1 Introduction

- 6.1.1 The aim here is to discuss the key steps undertaken in late 2017 / early 2018 that led to the development of reasonable spatial strategy alternatives for appraisal and consultation.
- 6.1.2 Ultimately, the aim of this chapter is to present ‘an outline of the reasons for selecting the alternatives dealt with’, in accordance with the Regulations.⁹
- 6.1.3 Specifically, this chapter explains how reasonable alternatives were established subsequent to certain ‘initial’ and ‘interim’ steps - see **Figure 6.1**.

Figure 6.1: Establishing reasonable spatial strategy alternatives



Structure of this chapter

- 6.2 - Discusses **high-level issues/options**
- 6.3 - Discusses **strategic site options**
- 6.4 - Discusses **smaller site options**
- 6.5 - Discusses **settlement / sub-area options**
- 6.6 - Explains how understanding was drawn upon to establish **the reasonable spatial strategy alternatives**.

⁹ Schedule II of the Environmental Assessment of Plans and Programmes ('SEA') Regulations 2004

6.2 High-level issues/options

- 6.2.1 As a first step, when seeking to establish reasonable alternatives in 2017, there was a need to consider the ‘top down’ factors with a bearing on the quantum of homes to be provided for the through the new Brentwood Local Plan, and the broad distribution of these homes.
- 6.2.2 With regards to ‘**quantum**’, there is a strong argument to suggest that the Local Plan must provide for Objectively Assessed Housing Need (OAHN), in order to align with Government Policy (NPPF para. 47). This would mean providing for circa 380 dwellings per annum (dpa), or circa 7,600 dwellings across the plan period (2013-33) - see **Box 6.1**. However, there is also a need to give consideration to lower and higher growth options.
- 6.2.3 With regards to lower growth, officers have explored the option of providing for a proportion of Brentwood’s OAHN within neighbouring local authorities that are less constrained by national designations (the entirety of the Borough’s countryside is Green Belt, and development opportunities within the urban areas are very limited); however, to date, these ‘Duty to Cooperate’ discussions have not highlighted any significant opportunities.
- 6.2.4 With regards to higher growth options, there are several factors to consider -
- Calculating OAHN is not an exact science, with Government currently consulting on a standardised national methodology which, were it to be adopted as national policy,¹⁰ would indicate a higher OAHN figure for Brentwood Borough (454 dpa).¹¹
 - Whilst Brentwood has a self-contained housing market, and Duty to Co-operate discussions have confirmed that immediate neighbouring authorities are aiming to meet OAHN within their boundaries, there is always the possibility of Brentwood being asked by a nearby authority to provide for unmet housing needs.
 - Government’s Planning Practice Guidance (PPG) states that: “*An increase in the total housing figures included in the local plan should be considered where it could help deliver the required number of affordable homes.*” Affordable housing delivery in the Borough has not kept pace with targets, which potentially suggests a need to consider providing for ‘above OAHN’ in order to boost the supply of affordable housing (recognising that market housing delivery is the primary source of funding/delivering affordable housing). That said, it is not clear that this is the case. The viability of housing development is strong in Brentwood, indicating good potential to require all developments (including potentially small developments, subject to further viability analysis) to provide for a high proportion of affordable housing.
- 6.2.5 With regards to ‘top down’ messages on the matter of **broad distribution**, the picture is somewhat clearer, in 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. The matter of balancing growth between the corridors is returned to below, as is the matter of directing a small proportion of growth to other locations.
- 6.2.6 Finally, with regards to broad distribution, there is a need to reiterate a point made above, regarding the necessity of providing for OAHN *within the Borough*, rather than seeking to export a proportion of OAHN. There might feasibly be increased sub-regional cooperation in the future, on the matter of distributing housing needs to locations that are least constrained by national designations; however there is no certainty regarding the timescales for this (whilst the urgency of adopting the Brentwood Local Plan is well understood).

¹⁰ The ‘Planning for the right homes in the right places’ consultation document states that, where plans have not yet been published, the new standardised method should be used, unless the plan will be submitted for examination on or before the 31 March 2018, or before the revised NPPF is published (whichever is the later).

¹¹ It is important to note that 454 dpa is a ‘capped’ figure. The Government’s proposed standard methodology involves applying a cap of 40% above the extant Local Plan housing target in order to “ensure that the proposed housing need is as deliverable as possible”. The rate of past house building in the Borough is c.150 dpa, which serves to indicate that a cap is appropriate in the Brentwood context; however, there are also indications of strong development viability in Brentwood. The uncapped figure is 494 dpa.

Box 6.1: Calculating Objectively Assessed Housing Need (OAHN)

The Draft Local Plan (2016) set out to provide for an OAHN figure of 362 dpa, or 7,240 dwellings in total (2013-33). OAHN was arrived at on the basis of the Strategic Housing Market Assessment (SHMA; 2015), which was prepared by consultants Peter Brett Associates (PBA).

Subsequently, the Office for National Statistics (ONS) and Department for Communities and Local Government (CLG; now MHCLG) released new housing data, most notably the 2014 based household projections. The 2014 based projection for Brentwood Borough suggests a higher housing need than the 2012 based projection applied as part of SHMA work in 2015/16.

In line with National Planning Practice Guidance, the latest household projection should provide a starting point for SHMA studies. PBA therefore undertook further work to account for the latest data, and also -

- compared CLG's relatively short-range projection to longer range projections;
- considered whether there is a need to provide additional housing (i.e. over-and-above projections), in order to meet employment needs locally; and
- considered whether there is a need to provide additional housing in order to address market signals (e.g. house prices, rents, overcrowding and concealed households).

PBA's recent SHMA work concludes -

- It is appropriate to use a longer term demographic projection in place of the CLG projection, thereby suppressing the influence of an off-trend spike in migration that occurred in 2014. The result is a demographic need for 280 dpa, rather than the 348 dpa figure suggested by the CLG projection.
- There is no need for a further 'employment' uplift, but there is a need to uplift the 280 dpa figure to account for market signals, specifically worsening 'affordability' (the ratio of house prices to salaries) and increasing rental costs. PBA concluded the need for a 30% uplift.
- There is a need for a small contingency of 6% to allow for the possibility of a new official projection indicating a different position to that indicated by the 2014 projection.

In conclusion, OAHN is now understood to stand at 280 plus 36%, or circa **380 dpa**. This equates to circa 7,600 dwellings across the plan period (2013-33).

6.3 Strategic site options

6.3.1 The desire to deliver at least one large-scale, strategic site (likely for a mix of uses, to include both housing and employment) is quite well established, recognising: A) limited opportunities within settlements; B) no potential to export 'unmet needs' (as discussed); and C) the alternative of piecemeal Green Belt development dispersed widely has significant draw-backs (this option was appraised within the 2013 Interim SA Report).

6.3.2 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 contenders for allocation through the Local Plan -

- **Dunton Hills Garden Village** - 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 Garden Village featured as a central part of the spatial strategy proposed by the 2016 Draft Plan, and whilst significant concerns were raised through the consultation, support for the scheme was given a major 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). The site borders two neighbouring authorities - Basildon and Thurrock - giving rise to Duty to Cooperate (DtC) considerations.

- **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 and 2016 Interim SA Reports. The scheme did not feature as part of the spatial strategy proposed by the 2016 Draft Plan; however, a scheme did feature as a central element of the 2013 Preferred Options consultation document (somewhat superseded, recognising that it pre-dated the emergence of Dunton Garden Suburb/Village proposals). SA work completed in 2015 and 2016 highlighted some potential benefits of expansion at West Horndon; however, the scheme is notable for the level of opposition from local residents. By way of further introduction, key matters to account for include -
 - There are DtC considerations, given that the southern boundary of West Horndon is the borough boundary with Thurrock, and given functional linkages with Basildon.
 - A strategic scheme might feasibly be delivered to the north west of the village, to the north east of the village or across both parcels of land.
 - There is the potential for expansion to impact ‘in-combination’ with: redevelopment of West Horndon Industrial Estate; growth elsewhere along the A127, notably at Dunton Garden Village (also employment growth at M25 J29); and feasibly growth within Thurrock (the Thurrock Local Plan is in an early stage of development).
- **North of Brentwood** - 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 and 2016 Interim SA Reports. By way of introduction, key matters to account for include -
 - Proposals are not advanced, with land ownership being fragmented, and some parcels of land currently not being actively promoted for development.
 - Major road infrastructure upgrades would be required, recognising the imperative of not worsening traffic congestion and air quality within Brentwood Town Centre; however, there is uncertainty regarding what is achievable.
 - There is the potential for expansion to impact ‘in-combination’ with other potential extensions to the urban Brentwood/Shenfield area, most notably the potential 510 homes on land at Officers Meadow (directly to the east); and the potential 200 home ‘Land at Doddinghurst Road’ scheme (directly to the west).

6.3.3 Two other strategic site options have been the focus of SA work in the past, but are now deemed to be ‘unreasonable’, given planning/sustainability considerations and also deliverability considerations. Specifically -

- East of the Brentwood urban area - A very large site named “Land to the East of Running Waters, Hutton” has been submitted; however, this parcel of land does not relate well to the existing urban edge, with no proposed scheme layout having been submitted by the site promoter. Furthermore, no information has been submitted to address the concerns raised through analysis presented within the 2015 and 2016 Interim SA Reports.
- Pilgrims Hatch - There is potentially a strategic opportunity to deliver targeted enhancements to community infrastructure; however, proposals are not advanced, and it is difficult to envisage a scheme, on the basis of sites identified through the HELAA. Furthermore, as per north of Brentwood, there is uncertainty regarding precisely how necessary road infrastructure upgrades would be achieved.

6.3.4 Other strategic growth options have also been discussed, during meetings between Officers and AECOM, including: options involving strategic expansion to the west of Brentwood; the option of strategic expansion at Ingatestone; and options in the north of the Borough. However, all of these options were judged to have clear drawbacks (including in respect of delivery), such that they undoubtedly perform sequentially poorly as options. They are unreasonable, and indeed ‘non-starter’, options for the current Local Plan. N.B. see Box 6.2 for discussion of further growth opportunities around the main urban area.

6.4 Smaller site options

Introduction

6.4.1 In addition to the strategic site options discussed within Section 6.3, there is a need to give consideration to the large number of smaller site options that have been submitted to the Council. A package of smaller site options formed part of the spatial strategy proposed by the 2016 Draft Plan; however, consultation responses received, and subsequent work (notably through the Council's Housing and Employment Land Availability Assessment–HELAA), served to identify a need to re-examine the approach to small site allocations.

6.4.2 As such, this section discusses work that has been completed to appraise site options in isolation, applying a GIS based methodology. This section presents summary information, with supplementary information presented in **Appendix III**. The work discussed within this section builds upon the work reported within Appendix II of the 2016 Interim SA Report.

Appraisal methodology

6.4.3 All sites examined by the Council through the HELAA process were entered into a Geographical Information System (GIS) and subjected to analysis through the application of wide-ranging sustainability criteria. All criteria related to the distance between the sites and various other features mapped within the GIS (e.g. doctors surgeries, flood risk zones, listed buildings).¹² Appendix III further explains the criteria applied.

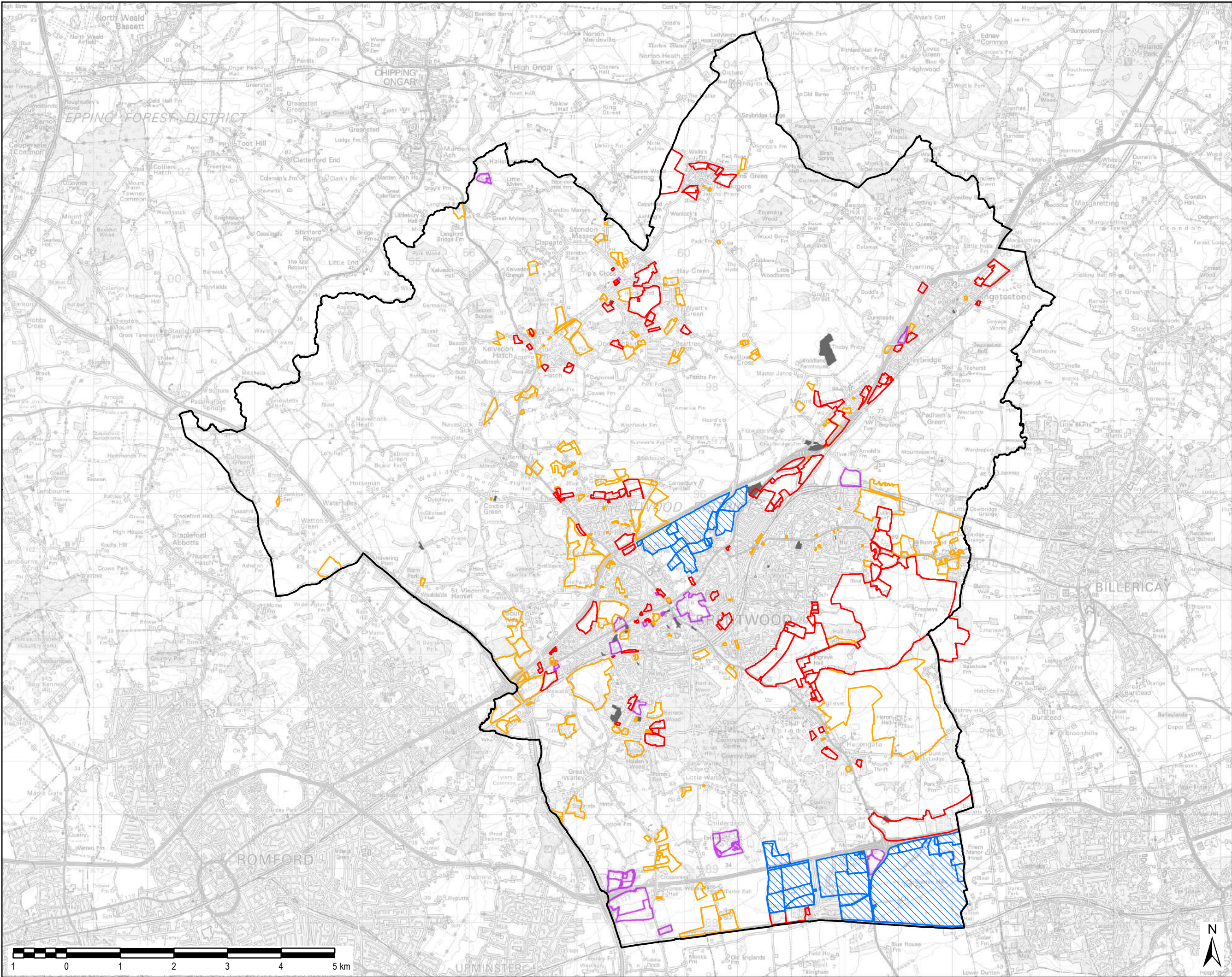
N.B. to be clear, *all HELAA sites* were subjected to the GIS analysis, including: those that form part of one of the strategic site options discussed in Section 6.3, those being promoted solely for employment uses; and those sites discounted through the HELAA process (e.g. on the basis of being unavailable, undeliverable or not associated with a settlement within the top three tiers of the settlement hierarchy). **Figure 6.2** shows all site options.

Summary appraisal findings

6.4.4 Readers interested in understanding more about the merits of a particular site option, or a particular sub-set of site options (e.g. sites at a particular settlement) should turn to Appendix III of this report. A spreadsheet of appraisal findings is also available upon request.

¹² This work-stream might be described as 'SA', on the basis that the GIS criteria-based methodology was developed to reflect the established SA framework as closely as possible; however, this terminology should be applied with caution, recognising that there is no requirement to appraise site options, through the SA process. Site options are not 'reasonable alternatives' where there is no mutually exclusive choice to be made between them.

File Name: K:\5004 - Information Systems\60482815 Brentwood Site Appraisal\deliverables\Figure 1 Brentwood_Site_Options.mxd



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- LEGEND**
- Brentwood Borough Boundary
 - Strategic Site Option
 - Site Option
 - Discounted
 - Non-Housing Option
 - Commitment

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Purpose of Issue

Client
BRENTWOOD BOROUGH COUNCIL

Project Title
BRENTWOOD LOCAL PLAN SA

Drawing Title
SITE OPTIONS

Drawn JW	Checked BB	Approved MF	Date 11/01/2018
AECOM Internal Project No. 60482815		Scale @ A3 1:65,000	

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6.5 Sub-area options

Introduction

- 6.5.1 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 alternatives.
- 6.5.2 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.

Brentwood/Shenfield urban area

- 6.5.3 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; 1,287 homes). In total, the proposal was to allocate sites to deliver c.2,030 homes.
- 6.5.4 Since the Draft Plan stage: four brownfield sites have been identified by the Council as unable to deliver homes (or a net increase in homes, with this being specifically the case for two sites that currently comprise sheltered accommodation housing) in the plan period; and closer examination of the four greenfield sites has found that, whilst all remain potentially suitable, there is a need to reduce the number of homes delivered (i.e. reduce the ‘yield’).
- 6.5.5 However, the Council’s work to examine site options - including through detailed Green Belt review - has also led to the identification of additional supply. Specifically, since the Draft Plan stage, detailed work to examine site options has led to the identification of: the potential to deliver additional housing at four of the brownfield sites previously supported; six additional suitable brownfield sites; and four additional Green Belt sites.
- 6.5.6 The net effect, of the Council’s work to examine site options, is a proposal to allocate 20 sites to deliver **c.2,685 homes**; an increase of c.750 homes relative to the Draft Plan stage (once account is taken of two recent planning permissions).
- 6.5.7 There is a need to consider **lower growth** options; however, it is difficult to conceptualise precisely what sites would, and would not, feature. It is worthwhile comparing the current proposed approach to the 2016 Draft Plan approach, and this comparison is a focus of the appraisal presented in Chapter 10 (“Appraisal of the Preferred Allocations”); however, there are clearly other lower growth options that might be explored. There will be a need for further detailed work subsequent to the current consultation.
- 6.5.8 There is also a need to consider **higher growth** options, i.e. options involving allocations for more than 2,685 homes. Whilst there are concerns regarding the cumulative impacts of growth, including with regards to traffic and air quality, there is also something of a growth opportunity, including because the urban area will see a significant boost in the near future with the arrival of Crossrail. There is also the ‘wider picture’ to consider, namely the understanding that higher growth along the A12 corridor would reduce the pressure for growth along the A127 corridor. This being the case, **Box 6.2** presents a ‘points of the compass’ discussion of land surrounding the Brentwood/Shenfield urban area. The outcome is a conclusion that, at the current time, the main opportunity for higher growth is seemingly through strategic growth to the North of Brentwood. Whilst subject to constraints, there would be the potential to achieve a critical mass that enables strategic infrastructure delivery. As such, as per the view in 2016, when seeking to establish reasonable alternatives in 2017/18, there was deemed a need to explore higher growth involving ‘North Brentwood’.
- 6.5.9 In summary, there are **two options** for the Brentwood/Shenfield urban area -
- Option 1 - allocations for 2,685 home at the preferred brownfield and greenfield (mostly Green Belt) sites identified by the Council;
 - Option 2 - as per Option 1, but with additional allocation of a strategic site at North Brentwood (c.2,500 homes) resulting in c. 5,185 homes in total.

Box 6.2: Introducing site options around the Brentwood/Shenfield urban area

As discussed above, there is a need to give careful consideration to growth opportunities at Brentwood/Shenfield urban area (including Warley, Brook Street and Pilgrims Hatch). Brownfield opportunities are limited; hence there is a need to examine Green Belt urban extension options.

All land around the urban area is given brief consideration below, with reference to the site options (see Figure 6.2) and the designated constraints (see Figure 6.3) that exist. N.B. this text should not be read as an 'appraisal', with many issues/impacts (e.g. traffic) outside the scope of this discussion.

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 Local Wildlife Site (LWS), and proximity to the railway and main roads. This land parcel comprises three HELAA sites, all of which are preferred allocations at the current time (Officer's Meadow; Land east of A1023; and Land north of A1023).

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 severance created by the railway and woodland. Only the eastern part has been considered as a HELAA site, and this is being promoted for employment uses only.

North east of Shenfield

Hutton Country Park comprises the land south of the railway line (to Billericay) / east of Hutton Industrial Estate. This 36 ha site is designated as a Local Nature Reserve, but not a Local Wildlife Site. The site has been owned by the Borough Council since 1997, prior to which it was agricultural land.

To the south of the Country Park is a series of five fields (four smaller fields to the north, and a larger field to the south), which stretch as far south as the A129 Rayleigh Road. There are no onsite strategic designations; however, Hutton Village Conservation Area is adjacent to the south. More generally, the land is 2km from Shenfield Station, and development could risk 'sprawl'. This land comprises two HELAA sites.

East of Shenfield

There is quite a complex picture to the east of Shenfield -

- 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. HELAA sites comprise the areas of open land.
- To the west of the CA, north of Hall Lane, is an area of formal sports pitches, home to Hutton CC and Hutton FC. This land has not been considered through the HELAA.
- To the south of Hall Lane is a large arable field that is the western extent of a very extensive HELAA site - stretching 2km to the east and 1.5 km to the south. This is such a large site that it is difficult to comment, without further information on development concepts. Focusing on the possibility of a modest scheme directly south of Hall Lane, constraints include the open landscape and the adjacent CA.
- To the west of the large arable field discussed above are the grounds of St. Martins Secondary School. This land has not been considered through the HELAA.
- To the south, the land adjacent to the urban edge is a complex patchwork of small fields (etc.), comprising seven HELAA sites. There are seemingly limited strategic constraints, although there is a high density of mature trees in this area, and at least two of the HELAA sites appear heavily vegetated.
- The final stretch of Shenfield's urban edge, stretching as far south as the A128 Ingrave Road is abutted by four more expansive open fields, which have been divided into two HELAA sites - one abutting the urban edge and the other comprising the remaining area of land, stretching almost to Ingrave. 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. A larger scheme would risk coalescence with Ingrave, and give rise to heritage concerns, given adjacent listed buildings and Thorndon Park Conservation Area, which is directly to the south of the A128.

South / south east of Brentwood/Shenfield

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; however, nationally important constraints are adjacent. Within this less constrained area are two small discounted HELAA sites.

Warley

There are extensive woodlands to the east of Warley, which link to the woodlands of Thorndon Country Park; however, much of the woodland is undesignated. On eastern edge of Warley are several smaller HELAA sites, some of which are discounted for reasons including current use as a recreation ground. The largest opportunity is at the southern edge of Warley, where three adjacent brownfield urban sites - including the Ford offices and a Council Depot - are preferred allocations at the current time (473 homes).

At the southern and western edge of Warley are two small sites that are discounted by the HELAA; and then there are two smaller HELAA sites which are closely associated with the urban area (but are in fact currently designated as Green Belt). These two sites are preferred allocations at the current time.

To the west of Warley is a large discounted HELAA site, partly comprising Warley Country Park. This is sloping land and quite heavily wooded, although the woodland is mostly undesignated.

Brook Street

At the very western extent of the urban area is Brook Street, which extends along the A1023 in the direction of the M25 junction. Land to the north (bounded by the A12) and to the south (bounded by the railway line) is considered through the HELAA, with one preferred allocation at the current time: Land east of Nags Head Lane. There are limited strategic constraints in this area, although proximity to the A12 and M25 are important considerations, as is the matter of maintaining a Green Belt gap to LB Havering.

West of Brentwood

There is quite a large area of open land that stretches as far west as the A12. The eastern part - which begins only c.200m west of Brentwood town centre - is identified as an informal open space by the Sport, Leisure and Open Space Assessment (2016), and hence is a discounted HELAA site; whilst the western part is a preferred allocation (200 homes), which will act as a northern extension to Brook Street.

Pilgrims Hatch

To the west/south west, the parcel of land between the A12, A128 and Sandpit Lane mostly comprises a large, discounted HELAA site. This is quite high, rising land, and there is an onsite constraint in the form of a small LWS woodland, plus the western edge is constrained by the adjacent Weald Park CA.

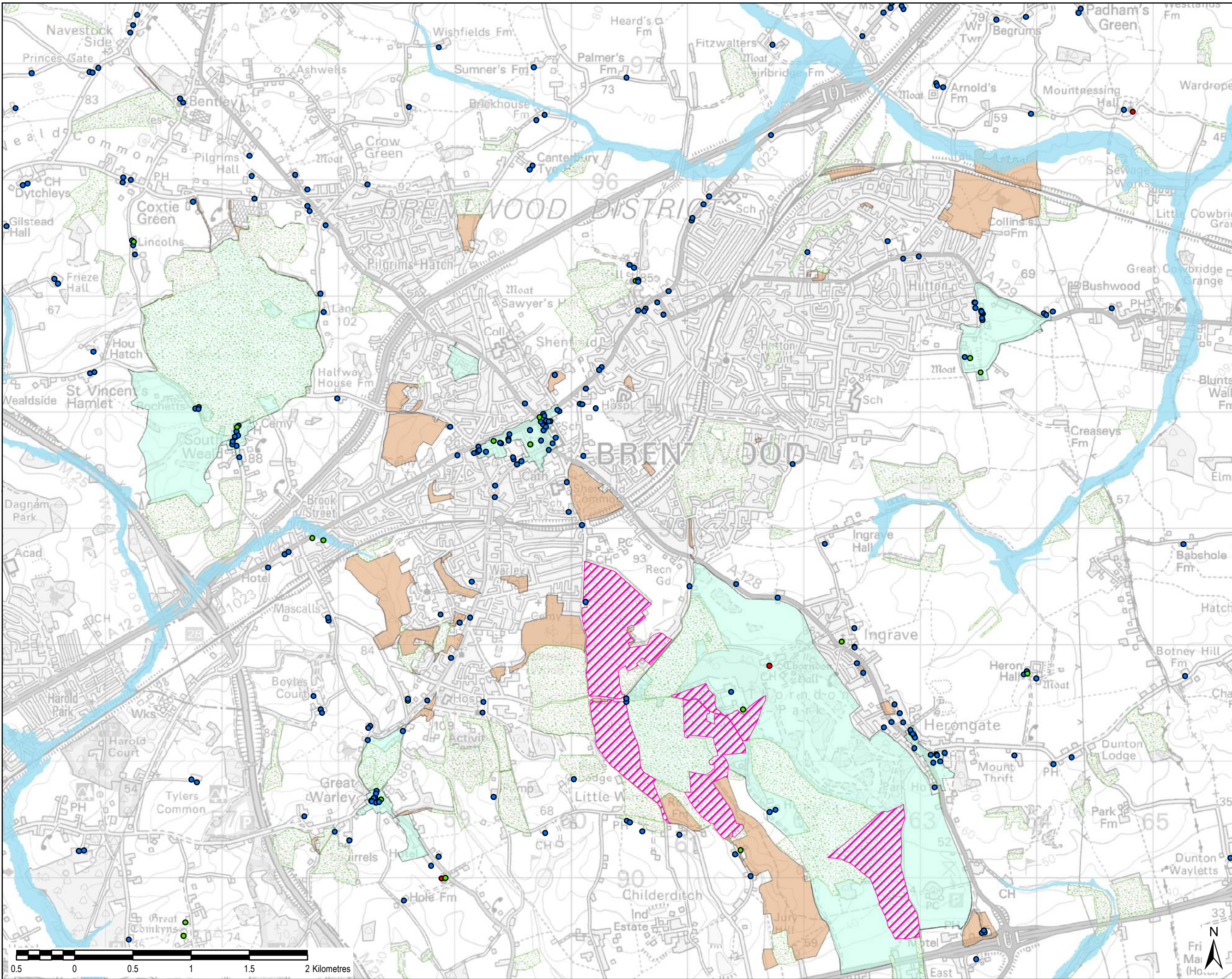
The northern edge of Pilgrims Hatch is a patchwork of small to medium sized fields and paddocks, with several small HELAA sites. There are limited strategic constraints, although it is noted that one of the HELAA sites seemingly has quite extensive mature vegetation.

East of Pilgrims Hatch there are two large discounted HELAA sites either side of Doddinghurst Road. To the west of the road is an area seemingly used for recreation, associated with Bishops Wood Community Centre; whilst to the east is the extensive Bishops Hall Park, associated with the Brentwood Centre (leisure centre). There are limited strategic designations, but obvious community and Green Belt value.

North of Brentwood

This is a large 'green wedge' comprising the land between the northern edge of Brentwood and the A12. 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. There are numerous HELAA sites, with several being promoted for stand-alone schemes; however, not all land is known to be available.

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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

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BRENTWOOD/SHENFIELD
URBAN AREA CONSTRAINTS

Drawn VC	Checked ST	Approved MF	Date 26/01/2018
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The A127 Corridor

- 6.5.10 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.
- 6.5.11 Since the Draft Plan stage, closer examination of the West Horndon Industrial Estate site has led to identification of the opportunity to deliver an additional 80 homes, meaning 580 homes in total. With regards to Dunton Hills Garden Village, this scheme is still supported by the Council, and much detailed work has been completed and remains ongoing, with a view to developing a masterplan, but the assumption remains that c.2,500 homes are deliverable within the plan period. The total capacity is likely to be higher, perhaps 3,500 to 4,000 homes, and it may transpire that there is the potential to accelerate delivery within the plan period (i.e. deliver above 2,500 homes); however, this is subject to further detailed analysis.
- 6.5.12 In conclusion, the Council's work to examine site options, since the Draft Plan stage, has not identified the need for any major shift in spatial strategy for the A127 corridor. The proposal is to allocate sites to deliver **c.3,080 homes** in total.
- 6.5.13 With regards to **lower growth** options, whilst the redevelopment of the Industrial Estate is quite widely supported (recognising that there are opportunities elsewhere, nearby within the A127 corridor, to deliver major new employment sites that more than compensate for its loss), the Dunton Hills Garden Village proposal has its critics. In particular, Thurrock Council argue strongly that all open land within the corridor serves an important Green Belt function (as a gap between Basildon and London), and that the Local Plan should instead direct growth to the A12 corridor / main urban area to the north. As such, as per the view in 2016, when seeking reasonable reasonable alternatives in 2017/18, there was deemed a need to explore lower growth involving lower growth or nil growth at Dunton Hills Garden Village.
- 6.5.14 There are also other options that would involve West Horndon, either in place of Dunton Hills (thereby delivering **lower growth** for the corridor as a whole, given a maximum capacity of c. 2,200 homes) or in addition to Dunton Hills (thereby delivering **higher growth** for the corridor as a whole). Key considerations are: A) development of the eastern parcel could well conflict with / act to foreclose the Dunton Hills Garden Village opportunity (given the importance of maintaining a Green Belt gap); and B) significant local opposition to the strategic expansion of West Horndon suggests a need to explore options that would involve a less intensive scheme, that is a scheme with lower density housing and/or large areas of land left open as green infrastructure.
- 6.5.15 In summary, there are **several options** for the A127 corridor. See further discussion below, within Section 6.6 ("Establishing the reasonable alternatives").

Ingatestone and Mounthessing

- 6.5.16 The 2016 Draft Plan proposed allocation of land for 128 homes across two Green Belt sites and two small urban brownfield sites. Since the Draft Plan stage -
- one of the brownfield sites has gained planning permission, whilst the other is now understood to be unavailable for redevelopment within the plan period;
 - both of the Green Belt sites have been identified by the Council as being suitable for delivering a greater number of homes; and
 - one additional Green Belt site has been identified by the Council as suitable for allocation.
- 6.5.17 The net effect, of the Council's work to examine site options, is a proposal to allocate smaller sites to deliver **218 homes**; an increase of 94 homes relative to the Draft Plan stage (once account is taken of the one planning permission for 16 homes).

- 6.5.18 There is a need to consider **lower growth** options; however, it is difficult to conceptualise precisely what sites would, and would not, feature. It is worthwhile comparing the current proposed approach to the 2016 Draft Plan approach, and this comparison is a focus of the appraisal presented in Chapter 10 ("Appraisal of the Preferred Allocations"); however, there are clearly other lower growth options that might be explored. There will be a need for further detailed work subsequent to the current consultation. There may also be a need to consider **higher growth** options, i.e. options involving allocations for more than 218 homes; however, there are limited strategic arguments for higher growth, and Green Belt review work does not support the other development opportunities that exist and/or there are other sustainability concerns.

Ingrave and Herongate

- 6.5.19 The 2016 Draft Plan did not propose allocation of any sites; and subsequent detailed work by the Council to examine site options did not lead to the identification of any additional potentially suitable and deliverable opportunities. As well as Green Belt, this area is relatively sensitive in landscape, biodiversity and heritage terms. Equally, there are considered to be limited strategic arguments in favour of allocation. As such, there is limited argument for examining higher growth options in detail. There will be the opportunity to review this position subsequent to the current consultation.

Northern villages

- 6.5.20 The 2016 Draft Plan did not propose allocation of any sites; however, subsequent detailed work by the Council to examine site options - including through detailed Green Belt review - led to the identification of several development opportunities. There is also a strategic context, in light of the 2017 Housing White Paper, which supports smaller sites and growth at villages, and *"expect(s) 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."*
- 6.5.21 Specifically, the Council identified seven HELAA sites with development potential (several being adjacent), with a total capacity of **169 homes**. The most significant proposal involves delivery of 96 homes at two adjacent sites to the north of Blackmore.
- 6.5.22 There is a need to consider **lower growth** options; however, it is difficult to conceptualise precisely what sites would, and would not, feature. It is worthwhile comparing the current proposed approach to the 2016 Draft Plan approach, and this comparison is a focus of the appraisal presented in Chapter 10 ("Appraisal of the Preferred Allocations"); however, there are clearly other lower growth options that might be explored. There will be a need for further detailed work subsequent to the current consultation. There may also be a need to consider **higher growth** options, i.e. options involving allocations for more than 169 homes; however, there are limited strategic arguments for higher growth, and Green Belt review work does not support the other development opportunities that exist and/or there are other sustainability concerns.

6.6 Establishing the reasonable alternatives

Introduction

- 6.6.1 In light of the three 'initial' steps discussed above (Sections 6.2 to 6.4) and the 'interim' step discussed within Section 6.5 (see Figure 6.1 for a summary of the step-wise approach), Officers and AECOM (working in collaboration) were able to establish reasonable spatial strategy alternatives - i.e. a series of alternative packages of site allocations - for appraisal.
- 6.6.2 When establishing the reasonable spatial strategy alternatives, there was firstly a need to consider which site allocations should be a 'constant' across all alternatives, and which should be a 'variable', i.e. allocated under certain options only.

Constants

- 6.6.3 As per the approach taken when arriving at reasonable alternatives in 2016 (as reported within the 2016 Interim SA Report), it was determined appropriate to treat the approach to **non-strategic sites** as a constant. Specifically, it was determined appropriate to treat the preferred allocations identified through the Council's site-specific work as a constant. Whilst there are important choices to be made - perhaps most notably regarding the approach to Green Belt development at Brentwood/Shenfield and at the northern villages - at the current time it is difficult to envisage an alternative package of sites, and the option of nil greenfield / Green Belt urban extensions is considered to be unreasonable. There will be the opportunity to review this position subsequent to the current consultation, i.e. ahead of development reasonable alternatives for publication at the Regulation 19 stage.¹³

Variables / options

- 6.6.4 As per the approach taken when arriving at reasonable alternatives in 2016 (as reported within the 2016 Interim SA Report), it was determined appropriate to treat the approach to **strategic sites** as a variable. The variables / options to potentially reflect across the alternatives are shown in **Table 6.1**.

Table 6.1: Variables and potential options

Variable	Options*
North Brentwood	<ul style="list-style-type: none"> • 2,500 homes • Nil homes
Dunton Hills Garden Village	<ul style="list-style-type: none"> • 2,500 homes • Nil homes
West Horndon West	<ul style="list-style-type: none"> • 1,200 homes • 600 homes • Nil homes
West Horndon East	<ul style="list-style-type: none"> • 1,000 homes • 500 homes • Nil homes

* Dwelling figures are 'ball park' at the current time.

¹³ It is also important to note that Chapter 10 ('Appraisal of the Preferred Allocations') presents an appraisal of the preferred allocations against the baseline, which is assumed to involve nil development. Also, within Chapter 10 the opportunity is taken to compare and contrast the merits of the current preferred allocations to those presented within the 2016 Draft Plan.

The reasonable alternatives

- 6.6.5 There are a large number of feasible permutations of these options; however, many of the permutations can be ruled out as unreasonable on the basis of one of the following **rules** -
- Too few homes - there is a need to allocate sufficient land to deliver OAHN plus a contingency, or 'buffer', to account for the risk of one or more sites not delivering the anticipated number of homes within the plan period.
 - West Horndon East - the assumption is that this site -
 - A) would only ever be deemed suitable for allocation in addition to West Horndon West, reflecting the fact that it is a more constrained site, and also that its allocation could foreclose the option of a strategic scheme at Dunton Hills; and
 - B) could not be allocated in addition to Dunton Hills Garden Village.
 - Too many homes - it is deemed unreasonable to examine options that would involve allocating land to deliver in excess of 500 dpa, recognising that a scenario whereby the Government standard OAHN methodology is adopted would result in Brentwood's OAHN increasing to 454 dpa (capped; see discussion at para 6.2.4).
- 6.6.6 This list of variables, options and rules led to the identification of the reasonable spatial strategy alternatives presented below - see **Table 6.2**.

Table 6.2: The reasonable spatial strategy alternatives

			Option 1	Option 2	Option 3	Option 4	Option 5	Option 6	Option 7	Option 8	Option 9	Option 10
			West Horndon West and East	North Brentwood	Dunton Hills GV	North Brentwood plus West Horndon West (low)	Dunton Hills GV plus West Horndon West (low)	North Brentwood plus West Horndon West (low) and East (low)	North Brentwood plus West Horndon West	Dunton Hills GV plus West Horndon West	North Brentwood plus West Horndon West (low) and East	North Brentwood plus West Horndon West and East (low)
Completions (already built)			527	527	527	527	527	527	527	527	527	527
Commitments (already consented)			825	825	825	825	825	825	825	825	825	825
Forecast completions/commitments			250	250	250	250	250	250	250	250	250	250
Windfall			507	507	507	507	507	507	507	507	507	507
Allocations	Constants	Main urban area (brownfield)	1152	1152	1152	1152	1152	1152	1152	1152	1152	1152
		Main urban area (greenfield)	95	95	95	95	95	95	95	95	95	95
		Main urban area Green Belt	1437	1437	1437	1437	1437	1437	1437	1437	1437	1437
		West Horndon urban	580	580	580	580	580	580	580	580	580	580
		Ingatestone Green Belt	218	218	218	218	218	218	218	218	218	218
		Northern villages Green Belt	169	169	169	169	169	169	169	169	169	169
	Variables	North Brentwood		2500		2500		2500	2500		2500	2500
		West Horndon West	1200			600	600	600	1200	1200	600	1200
		West Horndon East	1000					500			1000	500
		Dunton Hills Garden Village			2500		2500			2500		
Total			7960	8260	8260	8860	8860	9360	9460	9460	9860	9960
Total p.a.			398	413	413	443	443	468	473	473	493	498
Total above OAHN			360	660	660	1260	1260	1760	1860	1860	2260	2360
% over OAHN			5%	9%	9%	17%	17%	23%	24%	24%	30%	31%

7 APPRAISAL OF THE REASONABLE ALTERNATIVES

7.1 Introduction

- 7.1.1 The aim of this chapter is to present appraisal findings in relation to the reasonable alternatives introduced above.

Methodology

- 7.1.2 Appraisal findings are presented as a discussion under each of the sustainability topic headings that comprise the SA Framework (as established at the SA 'scoping' stage; see further explanation within Chapter 4). A final heading also presents a brief conclusion.
- 7.1.3 Each narrative compares and contrasts the merits of the alternatives, before drawing conclusions on a broad order of preference (with **green/red** text used to highlight options standing out as performing relatively well or relatively poorly). The opportunity is also taken to predict significant effects, where this can be done with a degree of confidence.¹⁴

N.B. this approach to reporting appraisal findings is a variation on that completed at the Draft Plan stage, when the opportunity was taken to formally rank all alternatives in an order of preference. The methodological approach presented below is suited to the alternatives at hand. The methodology will be revisited as part of future SA work (i.e. ahead of preparing the SA Report for publication).

7.2 Air quality

- 7.2.1 A focus of growth along the A127 corridor performs well, with options focusing growth at North Brentwood performing poorly given traffic congestion and two designated Air Quality Management Areas (AQMAs). There could be the potential to address issues through major road infrastructure upgrades; however, there is currently no certainty. Options for upgrading the A12 north of Brentwood are being discussed; however, discussions are at an early stage, and it is not clear what the implications might be for A12 junctions at Brentwood.
- 7.2.2 With regards to the approach to growth within the A127 corridor, 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 Dunton Hills Garden Village - around minimising the need to travel, and supporting low carbon means of travel - including on the basis that the scheme has Garden Village status. Detailed work to explore options is ongoing. There will be a need to take into account the potential for air pollution hotspots to become established - also taking into account possible in combination effects with other nearby growth locations - however, it is noted that there are no AQMAs in Basildon, and there is generally good access to the strategic road network in this area.
- 7.2.3 In conclusion, **Options 1, 3, 5 and 8** perform notably well, in respect of air quality, as the need to develop North Brentwood would be avoided. Other options perform less well, and it is considered appropriate to 'flag' **Options 9 and 10** as performing notably poorly, with the potential for **significant negative effects**, recognising that growth at West Horndon (which would be high under these options, in addition to growth at North Brentwood) would also impact on traffic and air pollution in Brentwood town centre.

¹⁴ Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the alternatives 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 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). 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 alternatives in more general terms.

7.3 Biodiversity

- 7.3.1 Whilst it is difficult to draw strong conclusions, on balance options involving a focus to the North of Brentwood, and minimal growth along the A127 corridor, are judged to perform best. 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. In this respect it is the East of West Horndon site that is notably constrained.
- 7.3.2 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 the Dunton Hills Garden Village site 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).
- 7.3.3 In conclusion, **Option 7** performs notably well, as North Brentwood and West Horndon West are seemingly relatively unconstrained sites, from a biodiversity perspective. However, there is considerable uncertainty ahead of further investigation (in particular in respect of North Brentwood). Significant negative effects are not predicted for those options that perform less well, as there will be very good opportunity to design-in effective green infrastructure (including, it is assumed, at the East of West Horndon site under a 1,000 home scenario).

7.4 Climate change mitigation

- 7.4.1 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.
- 7.4.2 With regards to transport emissions, 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, equally, many homes at North of Brentwood would be within walking distance of Brentwood town centre, and the Crossrail station at Shenfield.
- 7.4.3 With regards to GHG emissions from the built environment, 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)
- 7.4.4 In conclusion, **Option 10** performs best as it would involve the greatest concentration of growth (i.e. a concentration of growth at both North Brentwood and West Horndon). 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.

7.5 Communities and wellbeing

- 7.5.1 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. Maximising growth within the A127 corridor would increase the likelihood of delivering a new secondary school, whilst a North Brentwood scheme could deliver targeted enhancements to community infrastructure to complement what is currently available across the urban area.
- 7.5.2 In this respect, Option 4 performs notably poorly on the basis that it would involve only a 600 home (i.e. lower density) urban extension to West Horndon in the A127 corridor. This scale of growth could likely deliver a primary school; however, it would likely not deliver a new or improved local centre for the village.

7.5.3 Furthermore, there are tensions in respect of growth to the North of Brentwood, and at West Horndon, as growth would be in the form of an urban extension, with direct impacts to local residents (e.g. in respect of amenity and traffic congestion, including during construction). Also, both schemes would be of a limited scale (2,000 to 2,500 homes) such that funding for infrastructure would be limited.

7.5.4 Also, and in contrast to Dunton Hills Garden Village, neither scheme would qualify for national funding as a Garden Village, which could represent something of a missed 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

"Provided they are supported by the necessary infrastructure, they are often more popular with local communities than piecemeal expansion of existing settlements."

"The Government... will work with... garden communities to ensure that development and infrastructure investment are as closely aligned as possible..."

"[The Government will] strengthen local representation and accountability, and increase opportunities for [garden] communities to benefit from land value capture."

7.5.5 In conclusion, whilst there is an argument to suggest that Option 8 performs best as it would involve maximum growth within the A127 corridor, there are concerns regarding expansion at West Horndon, from a communities perspective, and so on balance **Option 3** - which would involve support for Dunton Hills Garden Village only - is judged to perform best. **Option 4** performs notably least well, as it would involve somewhat piecemeal expansion at West Horndon. Significant effects are not predicted at this stage - either positive or negative - recognising that detailed proposals for all the sites in question are still in development.

7.6 Economy and employment

7.6.1 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 regional importance, given the proximity to London.

7.6.2 Under all options there is an assumption that a strategic cluster of employment land will be supported along the A127 corridor, with the focus being on a large 'Brentwood Enterprise Park' scheme adjacent to M25 junction 29. The only potential to directly support additional delivery of employment land would be at Dunton Hills Garden Village; and the effect could well be to strengthen the A127 corridor employment cluster, also recognising that the A127 corridor in Basildon Borough is already seen as an 'Enterprise Corridor'. With regards to North Brentwood, there would be merit to delivering new housing in close proximity to Brentwood Town Centre and Shenfield Crossrail Station.

7.6.3 In conclusion, **Option 3** performs best, as it would deliver new employment land along the A127 corridor. Given established objectives in relation to the A127 as a priority corridor for employment growth, it is possible to conclude the likelihood of **significant positive effects**. Options 5 and 8 might perform equally well, but there is perhaps a risk of traffic congestion impacting businesses along the corridor.

7.7 Flooding

7.7.1 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.

7.7.2 In conclusion, the alternatives are judged to perform broadly **on a par**, and significant effects are not predicted.

7.8 Heritage

- 7.8.1 The A127 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).
- 7.8.2 A single Grade II listed building does fall within centre of the Dunton Hills Garden Village 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 and its curtilage structures), or through integration with green infrastructure stretching to the south east. The latter approach might enable a degree of connectivity with the two listed buildings at the edge of the site (one being Grade II St. Mary's Church, built in 1873 and now disused) and heritage assets beyond (including the Plotlands Museum, which forms part of the Langdon Centre, run by Essex Wildlife Trust).
- 7.8.3 North Brentwood is potentially more constrained, given the adjacent cluster of listed buildings, including a Grade II* listed church, which represents the small historic core of Shenfield (pre-train station). The possibility of increased traffic congestion impacting on the Brentwood Town Centre Conservation Area is another consideration.
- 7.8.4 In conclusion, **Options 3, 5 and 8** perform best as the need to develop North Brentwood and West Horndon East would be avoided. On this basis, **Option 9** performs least well; however, it is not possible to conclude the likelihood of significant negative effects.

7.9 Housing

- 7.9.1 Higher growth options perform best as the effect could well be to deliver 'above OAHN' in practice (even once account is taken of the possibility of one or more sites not delivering the anticipated number of homes in the plan period). This would mean that affordable housing needs are met more fully, and the effect could also be to reduce the risk of unmet needs arising at the sub-regional scale (recognising that whilst Brentwood is a self-contained housing market area, there are functional links to surrounding housing market areas).
- 7.9.2 Deliverability of housing is another important consideration, and in this respect it is noted that little or no detailed work has been completed in respect of delivering a North Brentwood scheme, and that major road infrastructure upgrades would be required. Spatial distribution of housing is another consideration, with there being an argument to suggest that housing growth should be focused at the main urban area, from where needs arise; however, this is considered to be less important factor.
- 7.9.3 In conclusion, **all options** would lead to **significant positive effects**, although there is considerable uncertainty in respect of Option 1, which would involve providing for only a 5% buffer over-and-above the OAHN (380 dpa). **Options 7 to 10** are judged to perform best, as they are the higher growth options, and indeed options that would involve providing for a number of homes in excess of 454 dpa, which is the figure suggested by the Government's draft standardised methodology (due to be finalised in summer 2018).

7.10 Landscape

- 7.10.1 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'.
- 7.10.2 The strategic importance of the A127 corridor 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, notably CPRE and Thurrock Council. However, work has been completed to ascertain how landscape impacts associated with Dunton Hills Garden Village could be mitigated and minimised, and West Horndon is a flat landscape that should lend itself to relatively effective screening.
- 7.10.3 With regards to North Brentwood, this is not thought to be a particularly high quality landscape; however, this large 'green wedge' extending into the urban area is valued locally. There is not a high density of public rights of way (e.g. there is no route north from Brentwood town centre, through the 'green wedge' to the countryside beyond); however, there might feasibly be the potential to enhance its green infrastructure role in the future.
- 7.10.4 In conclusion, **Option 1** is judged to perform best as it would involve minimal housing growth, and it follows that **Options 9 and 10** perform worst, as the highest growth options. Taking a precautionary approach, in the nascence 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.

7.11 Soil

- 7.11.1 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. However, the national data-set is of very low resolution, which means that it is difficult to apply it to the appraisal of individual sites, and in turn difficult to apply it to the appraisal of the spatial strategy alternatives.
- 7.11.2 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 strategic site options in question here.
- 7.11.3 In conclusion, the alternatives are judged to perform broadly **on a par**. 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.
- 7.11.4 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.

7.12 Water

- 7.12.1 There are known to be wastewater capacity constraints in the north of the Borough, associated with Doddinghurst and Ingatestone waste water treatment works; however, this does not have a bearing on the appraisal. There are also localised surface water and foul water drainage constraints; however, again this does not have a bearing on the appraisal.
- 7.12.2 On this basis, the alternatives are judged to perform broadly **on a par** and significant effects are not predicted; however, there is considerable uncertainty as work completed to date, in respect of wastewater treatment capacity, has not involved examining high growth scenarios (or concentrations of growth) of the nature under consideration here.

N.B. with regards to other 'water' issues, namely issues around the use of scarce potable water supplies and water quality within rivers and groundwater, there is no potential to differentiate the alternatives. In respect of potable water supply, it is not possible to conclude that lower growth in Brentwood is a preferable option, as this is a regional issue and Brentwood is not known to be any more constrained than neighbouring authorities. In respect of water quality, there are not known to be any strategic constraints - e.g. particular river systems that are sensitive or in need of improvement - and there is always good potential to address matters at the development management stage, e.g. through designing-in sustainable drainage systems (SuDS).

7.13 Appraisal conclusion

- 7.13.1 The appraisal serves to highlight that all options are associated with pros and cons, in respect of sustainability objectives. Option 3 is found to perform well in terms of the greatest number of objectives (air quality, communities, heritage, employment); however, there are certain draw-backs, including in respect of biodiversity, landscape and housing. Option 1 (low growth) is found to perform best from a 'landscape' perspective; however, there are draw-backs from a 'housing' perspective, as provision would be made for just a small (5%) buffer over-and-above OAHN. The high growth options (Options 9 and 10) perform very well from a 'housing' perspective; however, the appraisal highlights draw-backs in respect of a number of issues/objectives, most notably 'air quality' (with 'significant negative effects' predicted), as well as uncertainties in respect of some other issues/objectives (e.g. 'soils' and 'water').
- 7.13.2 There is a need for plan-makers to make a decision regarding how best to balance, or 'trade-off', competing objectives, and in turn decide which option best represents sustainable development overall.

8 DEVELOPING THE PREFERRED APPROACH

8.1 Introduction

- 8.1.1 The aim of this Chapter is to present **the response of Officers** to the alternatives appraisal / reasons for developing the preferred approach in-light of alternatives appraisal.

8.2 'Outline reasons' for supporting the preferred option

- 8.2.1 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 (assuming no delayed delivery) for 413 dpa.

- 8.2.2 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. The appraisal highlights certain concerns regarding Dunton Hills Garden Village, but notes that there is 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 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 need to ensure that Green Infrastructure is a central feature of the scheme.
- Central to the principles is also the concept of community engagement and ultimately the management and ownership of assets for future generations. Effective infrastructure planning from an early stage in the project is considered essential, to 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 the principles of a garden settlement with its focus upon balancing housing, 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.

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

9 INTRODUCTION (TO PART 2)

9.1.1 The aim of this part of the report is essentially to present an appraisal of the 'Preferred Allocations', as understood from the current consultation document..

9.1.2 The aim of this introductory chapter is to: A) provide an 'at a glance' overview of the Preferred Allocations; and B) introduce the appraisal methodology.

9.2 Overview of the consultation document

9.2.1 The consultation document is in two parts -

- Part 1 introduces and explains the proposed spatial strategy, i.e. the preferred housing (including specialist accommodation) and employment land allocations;
- Part 2 presents a 'proforma' for each of the preferred allocations, including a location map and brief discussion of issues and opportunities.

9.2.2 Part 1 begins by introducing the Local Plan, including its vision and objectives. It then goes on to explain housing needs and the sequential approach that has been taken to arriving at the preferred package of **housing allocations**. The sequential approach essentially involves: A) avoiding loss of Green Belt as far as possible; B) directing growth broadly in accordance with the settlement hierarchy; and C) recognising that strategic scale development can be preferable to piecemeal urban extensions. The role of alternatives appraisal in arriving at the preferred allocations is explained, as per Part 1 of this report.

9.2.3 The consultation document then presents the preferred spatial strategy / allocations across two tables, which are repeated here as **Tables 9.1 and 9.2**. A third table is also presented within the consultation document, which breaks down the distribution of housing by settlement.

Table 9.1: All sources of housing supply, including preferred allocations

Source				Number of new homes	% of total (rounded)
Completions 2013/14 – 2016/17				527	6
Extant permissions (April 2017)				825	10
Additional permissions (1st April 2017 to 31st March 2018)				250	3
Windfall Allowance (2020/21 to 2032/33)				507	6
Allocations	Within settlements	Brownfield	Main urban area	1,152	14
			Other locations	580	7
		Greenfield	Main urban area	95	1
	Green Belt	Main urban area		1,437	17
		Ingatestone		218	3
		Larger villages		169	2
	Dunton Hills Garden Village			2,500	30
	Total				8,260

Table 9.2: Preferred allocations

Location / Site	No. homes
Brownfield within Brentwood urban area	
The Eagle and Child Public House (Shenfield)	20
Chatham Way/Crown Street Car Park	31
Westbury Road Car Park	45
Land at Hunter House, Western Road	48
Land at Crescent Drive	55
Wates Way Industrial Estate, Ongar Road	80
Brentwood railway station car park	100
William Hunter Way car park	300
Cluster of sites south of Warley (Ford Offices, Eagle Way, 350 homes; Council Depot, The Drive, 123 homes)	473
Brownfield within other locations	
West Horndon Industrial Estate	580
Greenfield within Brentwood urban area	
Land at Priests Lane (Shenfield)	95
Green Belt at Brentwood urban area	
Land adjacent to Carmel, Mascalls Lane (Warley)	9
Sow & Grow Nursery, Ongar Road (Pilgrims Hatch)	38
Land west of Warley Hill, Pastoral Way (Warley)	43
Land east of Nags Head Lane (Brook Street)	125
Land off Doddington Road (Pilgrims Hatch/Brentwood)	200
Land at Honey Pot Lane (Brentwood/Brook Street)	200
Cluster of sites north of Shenfield (Land North of A1023 Chelmsford Road, 100 homes; Land east of Chelmsford Road, 215 homes; Officers Meadow, 510 homes)	825
Green Belt at Ingatestone	
Land adjacent to Ingatestone by-pass (part bounded by Roman Road, south of flyover)	57
Cluster of sites south of Ingatestone (Ingatestone Garden Centre, Roman Road, 120 homes; Site adjacent to Ingatestone Garden Centre (former A12 works site), 41 homes)	161
Green Belt at larger villages	
Cluster of sites at Hook End / Tipps Cross (Land adjacent to Tipps Cross Community Hall, Blackmore Road; and Chestnut Field, Blackmore Road)	20
Brizes Corner Field, Blackmore Road, Kelvedon Hatch	23
Land off Stocks Lane, Kelvedon Hatch	30
Cluster of sites north of Blackmore (Land south of Redrose Lane, north of Orchard Piece; and Land south of Redrose Lane, north of Woollard Way)	96
Dunton Hills Garden Village	2,500
Total	6,154

- 9.2.4 Part 1 of the consultation document then goes on to describe the preferred approach to meeting **specialist accommodation needs**.
- 9.2.5 With regards to older persons accommodation, the published SHMA identifies a forecast requirement for 424 spaces (excluding current planning applications) within Registered Care to be provided between 2013-2033 (21.2 spaces per year). Work is ongoing at the current time to determine precisely how needs will be met, but the consultation document lists the following larger allocations that may include new 'C2' use class housing -
- Dunton Hills Garden Village (two large homes – 204 beds in total);
 - West Horndon industrial estates redevelopment (~60 beds);
 - Officer's Meadow and surrounds, Shenfield (~60 beds);
 - Ford / Council Depot, Warley (~60 beds);
 - Honeypot Lane, Brentwood/Brook Street (~40 beds);
 - Priests Lane, Brentwood (~40 beds).
- 9.2.6 With regards to Gypsies and Travellers, there is a need for 78 pitches across the plan period to meet the need of travelling Gypsy and Travellers (12 pitches) and Gypsy and Travellers who do not meet the planning definition but who still require access to more specialist accommodation or pitches (66 pitches). The consultation document describes the preferred approach arrived at following sequential consideration of sites, as summarised in **Table 9.3**.
- 9.2.7 Part 1 of the consultation document then concludes by presenting the preferred **employment allocations**. The preferred approach is summarised within Section 10.7, below.
- 9.2.8 With regards to Part 2 of the consultation document, the point to note is that - whilst constraints and opportunities are discussed - the proformas do not go as far as to propose site specific policy, to be taken into account at the planning application stage.

Table 9.3: Preferred approach to Gypsy and Traveller accommodation

Sequential step	Pitches	Commentary / sites
1. Commitments	0	No commitments from the base date of the GTAA (2016)
2. Vacant/available pitches	0	No known vacant pitches
3. Existing sites with expired planning permission	7	Two options at Horsemanside Navestock; both preferred allocations on the basis of the sequential approach.
4. Un-authorised existing sites	13	Three options; all preferred allocations on the basis of the sequential approach - <ul style="list-style-type: none"> • Hunters Green, Albyns Lane, Navestock (1); • Lizvale Farm, Goatswood Lane, Navestock (6); • Plot 3, Oaktree Farm, Chelmsford Road (6).
5. Existing site intensification	0	Sites have been assessed, but no opportunities identified.
6. Existing site extension	0	
7. New sites within larger preferred allocations	58	Various options, but the following preferred, as the four largest preferred allocations - <ul style="list-style-type: none"> • Council Depot / Ford Headquarters Site (8); • West Horndon Industrial Estate (10); • Officers Meadow (10); • Dunton Hills Garden Village (30).

9.3 Appraisal methodology

- 9.3.1 There is a desire to present an appraisal of ‘the plan’, as a whole, in accordance with the regulatory requirement (see para 2.1.2). However, not all components of the plan are in draft form at the current time, most notably -
- Site specific policy is yet to be drafted; and
 - Thematic policy published within the 2016 Draft Plan can no longer be assumed to be entirely up-to-date, i.e. there may be a need for refinements ahead of publication.
- 9.3.2 As such, the focus of the appraisal presented below is on the preferred package of allocations, first and foremost. The preferred approach is appraised against the baseline (i.e. a no-plan scenario), and the opportunity is also taken to compare and contrast the current preferred approach to that presented within the 2016 Draft Plan.
- 9.3.3 In summary, the appraisal is presented as a series of eleven narratives - one for each of the topic headings that comprise the SA framework (see Chapter 4) - with each narrative split-up under sub-headings in order to give stand-alone consideration to -
- **preferred allocations** - including how the proposed approach performs relative to the 2016 Draft Plan approach;
 - **policy priorities** - an opportunity to recap on policy proposed by the 2016 Draft Plan, and recommend policy areas/issues, and specific policy measures, that should be given consideration ahead of finalising the proposed submission plan for publication; and
 - **conclusions on the emerging draft plan** - an opportunity to discuss the likelihood of ‘the plan as a whole’ resulting in significant effects, both positive and negative.¹⁵
- 9.3.4 The final section of Chapter 10 presents a discussion of **overall conclusions**, and the opportunity is also taken to present a stand-alone discussion of ‘cumulative effects’, i.e. the potential for the draft plan to impact an aspect of the baseline when implemented alongside other plans, programmes and projects.
- 9.3.5 Finally, in accordance with the SEA Regulations, there is a need to make a statement regarding **methodological limitations** -
- Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the proposals under consideration, and 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). 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 preferred applications / the emerging plan in more general terms.

¹⁵ In accordance with the SEA Regulations, the intention is to identify and evaluate ‘likely significant effects’ of the plan on the baseline, drawing on the sustainability issues and objectives identified through scoping as a methodological framework. Effects must be predicted taking into account the criteria presented within Schedule 1 of the Regulations; for example, taking account of the duration, frequency and reversibility of effects. Cumulative effects are also a consideration, i.e. the potential for the draft plan to impact an aspect of the baseline when implemented alongside other plans, programmes and projects.

10 APPRAISAL OF THE DRAFT PLAN

10.1 Introduction

- 10.1.1 As introduced above, this chapter presents eleven narratives - one for each of the topic headings that comprise the SA framework (see Chapter 4) - with each narrative split-up under sub-headings in order to give stand-alone consideration to: preferred allocations; policy priorities; and conclusions on the emerging draft plan.

10.2 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 preferred allocations

- 10.2.1 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.”

- 10.2.2 The current proposal is to increase the focus of growth at the **Brentwood/Shenfield** urban area, notably through: 225 additional homes north of Shenfield, through additional allocation of two Green Belt sites to the north of the previously proposed Officers Meadow site (with the proposal being to reduce the quantum of homes at Officers Meadow by 90 homes); 473 additional homes south of Warley, at two adjacent brownfield sites; and 400 additional homes at two brownfield sites within Brentwood town centre. Of these sites, William Hunter Way Car Park (300 homes) is notable for being in close proximity to the town centre AQMA; however, the other sites 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 that will 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. Furthermore, the proposal is to reduce the quantum of housing (C3) at three sites (135 homes reduction in total) that do give rise to a risk of increased traffic through the AQMA, namely: Honeypot Lane, Land off Doddinghurst Road and Land at Priests Lane.

Commentary on policy priorities

- 10.2.3 The preferred allocations serve to highlight the importance of robust policy on -
- Air quality - building upon Policy 10.11 (Air quality) as presented within the 2016 Draft Plan. As recommended within the 2016 Interim SA Report, there is a need to ensure that careful consideration is given to the implications of development proposals in combination for traffic congestion, and in turn air quality. In light of the Government’s recently published Air Quality Plan for NO₂¹⁶ the Council may choose to prepare a local air quality plan, taking account of the following Government advice -

¹⁶ See <https://www.gov.uk/government/publications/air-quality-plan-for-nitrogen-dioxide-no2-in-uk-2017>

“In developing their local plans to tackle the causes of air pollution, local authorities should consider a wide range of innovative options, exploring new technologies and seeking to support the government’s industrial strategy so that they can deliver reduced emissions in a way that best meets the needs of their communities and local businesses. Their plans could include a wide range of measures such as: changing road layouts at congestion and air pollution pinch points; encouraging public and private uptake of ULEVs; using innovative retrofitting technologies and new fuels; and, encouraging the use of public transport. If these measures are not sufficient, local plans could include access restrictions on vehicles, such as charging zones or measures to prevent certain vehicles using particular roads at particular times...”

- Sustainable Transport - building upon Policy 10.1 (Sustainable transport) as presented within the 2016 Draft Plan. The emerging preferred approach serves to highlight the importance of nearby development schemes coordinating approaches to transport infrastructure delivery/upgrades, most notably at the three sites north of Shenfield. The Council should also explore the potential to require design measures aimed at supporting a high degree of ‘modal shift’, e.g. cycle parking/storage.

Conclusions on the emerging draft plan as a whole

- 10.2.4 The Draft Plan (2016) appraisal highlighted some concerns, but concluded no significant effects. The proposal to increase the focus of growth at Brentwood/Shenfield gives rise to some additional concerns, albeit most (not all) of the new sites proposed are relatively well located in air quality terms. It is recommended that further work focuses on maximising the number of homes at those locations best suited to walking/cycling, and least likely to worsen traffic congestion; and that robust policy is established covering air quality and sustainable transport. Assuming that this is the case, then it should be possible for the forthcoming SA Report to conclude **no significant effects** in relation to the Proposed Submission Plan; however, there is considerable uncertainty at the current time ahead of further work (including transport modelling).

10.3 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 preferred allocations

- 10.3.1 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.¹⁷ 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.”

¹⁷ 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.

- 10.3.2 The current proposal to increase the focus of growth at the **Brentwood/Shenfield** urban area gives rise to limited concerns. 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. It is also noted that a new small Green Belt allocation is proposed at Warley (Land west of Warley Hill, Pastoral Way; 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 proposal to expand the urban extension to the north of Shenfield gives rise to limited concerns, including because part of the proposal is to deliver 90 fewer homes (C3) on the Officers Meadow site, which includes a small ancient woodland LWS. Another notable 'positive' is the proposal to reduce the number of homes delivered at Land at Doddinghurst Road by 50, as this is a site seemingly characterised by a relatively high density of mature hedgerow and other mature vegetation.
- 10.3.3 Elsewhere, the proposal to allocate several sites at the larger villages in the north of Brentwood (163 homes in total; in comparison to the 2016 Draft Plan approach of nil allocations) gives rise to very limited concerns. The main proposed focus of growth is at two adjacent sites to the north of Blackmore (96 homes), which are unconstrained by nature conservation designations. **Kelveden Hatch** is notably more constrained, 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.
- 10.3.4 Finally, it is important to note that the proposed strategy for the **A127 corridor** remains broadly unchanged. Work has been ongoing to examine green infrastructure issues and opportunities associated with Dunton Hills Garden Village and the wider area; however, detailed findings are yet to emerge. There is a need for further detailed examination of issues/impacts and opportunities. An important consideration is the maintenance of 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. 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).

Commentary on policy priorities

- 10.3.5 The appraisal of the 2016 Draft Plan recommended that Policy 9.2 (Wildlife and Nature Conservation) be supplemented in order to increase policy support for undesignated habitats and green infrastructure. This recommendation stands.
- 10.3.6 It is also recommended that the Council take careful account of the Government's recently published 25 Year Environment Plan, including proposals for achieving net biodiversity gains. The Council will need to give careful consideration to the scale at which net gains are sought, which will mean giving considerations to questions such as -
- Should net biodiversity gains be sought at the scale of the two adjacent brownfield sites to the south of Warley (473 homes) or at the scale of the Thorndon Park Living Landscape?
 - Should net biodiversity gains be sought at the scale of Dunton Garden Village, or the scale of the A127 corridor?
 - Should net biodiversity gains be sought at the scale of Officers Meadow (the proposed 510 home scheme north of Shenfield), at the 'North of Shenfield' scale (i.e. at the scale of the three adjacent sites proposed for 825 homes in total) or at the wider landscape scale?

Conclusions on the emerging draft plan as a whole

- 10.3.7 The Draft Plan (2016) appraisal highlighted some concerns, but concluded no significant effects. Proposed changes to the spatial strategy give rise to limited concerns, although there is a risk of growth to the south of Warley impacting on locally and nationally designated habitats. It is recommended that further work focuses on borough-wide and site specific policy aimed at ensuring development schemes, in combination, lead to net biodiversity gains at appropriate landscape scales (e.g. the scale of the Thorndon Park Living Landscape). Assuming that this is the case, then it should be possible for the forthcoming SA Report to conclude **no significant effects** in relation to the Proposed Submission Plan.

N.B. A separate Habitats Regulations Assessment (HRA) Screening Report is published at the current time, examining the specific matter of potential impacts to European designated habitats, notably Epping Forest Special Area of Conservation (SAC).

10.4 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 preferred allocations

- 10.4.1 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."

- 10.4.2 Proposed changes to the spatial strategy - and in particular the proposal to deliver a larger extension to the **north of Shenfield** (825 homes, rather than 600 homes) - potentially give rise to some additional opportunity in respect of delivering low carbon decentralised heat/energy generation. However, it is noted that the proposed extension north of Shenfield is comprised of three separate sites, which could prove a barrier, in respect of planning for the area as a whole, and achieving a critical mass.

Commentary on policy priorities

- 10.4.3 The appraisal of the 2016 Draft Plan highlighted the importance of Policy 10.1 (Sustainable Transport) and Policy 10.3 (Sustainable Construction and Energy). The appraisal highlighted the potential to increase the scope of Policy 10.3 in particular, and this recommendation stands. For example, it is recommended that provision is made to require developers to reduce, or reuse as much waste material as possible within new developments. This could be achieved through logistical measures, such as 'just in time' deliveries, or through reusing aggregate or other materials, such as off-cuts in landscaping or alternate development schemes. This is just one example of a potential policy measure that might be implemented, and the Council should give consideration to wide ranging measures that might lead to reduced CO₂ emissions from the built environment, ahead of finalising the policy for publication. Good development viability in Brentwood, and the proposal to concentrate growth at a number of large schemes (including a Garden Village) should lead to opportunities.

Conclusions on the emerging draft plan as a whole

- 10.4.4 The Draft Plan (2016) identified some positives, but concluded no significant effects. Proposed changes to the spatial strategy 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. There is a need for further work - in respect of both spatial strategy, thematic policy and site specific policy - ahead of preparing the proposed submission plan - in order to ensure that opportunities (for reducing per capita CO₂ emissions from both transport and the built environment) are realised. However, it should be possible for the forthcoming SA Report to conclude **no significant effects** in relation to the Proposed Submission Plan.

10.5 Community and well-being¹⁸

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 preferred allocations

- 10.5.1 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'.

¹⁸ Issues relating to the Gypsy and Traveller community are considered under the 'Housing' topic heading.

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 Doddington 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."

- 10.5.2 The current proposal is to increase the focus of growth at the **Brentwood/Shenfield** urban area, including through delivering a larger (825 home rather than 600 home) urban extension to the north of Shenfield. It is understood that this expanded scheme should help to secure delivery of new primary school, albeit there may still be some uncertainty, recognising that the scheme comprises three separate sites, with the potential for joint masterplanning uncertain. It is also noted that this site benefits from being in close proximity to Shenfield High School, which has capacity to accept new pupils.
- 10.5.3 Also at the Brentwood/Shenfield urban area, a new focus of growth is proposed at the southern edge of Warley, with two adjacent brownfield sites proposed to deliver 473 homes in total. It is understood that there is the potential to masterplan the two sites in conjunction, and the potential to deliver 'mixed uses'; however, no further detail is known at this stage.
- 10.5.4 Other notable proposals at the main urban area include -
- Land at Priests Lane, Shenfield (95 homes) - is currently designated Protected Urban Open Space in the adopted Local Plan (2005), and hence development naturally gives rise to concerns in respect of ensuring the health and wellbeing of local communities; however, the current proposal is to deliver a reduced number of homes (C3), which *could* result in greater potential to design-in green infrastructure / open space (N.B. this is uncertain at the current time, ahead of a decision on C2 use, i.e. a residential institution).
- Also, on a positive note, there is the potential option 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.
- The three other larger proposed urban extensions - Honeypot Lane, Land off Doddington Road and Land east of Nags Head Lane - are all also proposed for a reduced number of homes (C3) relative to the 2016 Draft Plan stage. None of these sites are expected to deliver a mix of uses, or support strategic upgrades to community infrastructure; however, it is not thought that this is related to the decision to reduce the number of homes (C3) delivered. One of these sites - Honeypot Lane - is potentially associated with an opportunity to support enhanced pedestrian links through St Faiths Park, which is adjacent to the east of the site, and links the site to Brentwood Town Centre.
 - Three sites - Land north of Chelmsford Road (which is the northern-most part of the linked proposed extension north of Shenfield), Land off Doddington Road and Land at Honeypot Lane - are adjacent to the A12, which gives rise to concerns in respect of noise and potentially air pollution. Land north of Chelmsford Road is a new site, whilst the other two were proposals at the Draft Plan stage, with the latest proposal being to deliver a reduced number of homes onsite, which may help to ensure that a suitable buffer to the A12 can be achieved. Land at Honeypot Lane is associated with a small watercourse running through its centre, which serves to highlight that there will be factors other than a desire to maintain a buffer to the A12 that must be taken into account when arriving at a layout.

- 10.5.5 Elsewhere, the proposal to allocate several sites at the **larger villages** in the north of Brentwood (163 homes in total; in comparison to the 2016 Draft Plan approach of nil allocations) gives rise to some notable considerations. 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); however, on the other hand there are naturally some concerns regarding access to community facilities, notably a primary school. The current consultation document identifies the “Doddinghurst and Kelvedon Hatch” primary school group as having some capacity constraints, and states the need to *“identify opportunities for permanent and / or bulge cohort expansions... a criteria based policy may be required to support the development of schools located within Green Belt locations.”*
- 10.5.6 Another important point to mention is increased understanding - since the 2016 Draft Plan stage - regarding the ‘opportunity’ at **Dunton Hills Garden Village**. As discussed within Chapter 8, 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. Central to the principles are -
- the concept of community engagement and ultimately the management and ownership of assets for future generations;
 - effective infrastructure planning from an early stage in the project, including facilities such as schools, open spaces, active travel options and recreational facilities; and
 - a focus upon public health and creating places which support healthier living. There is a focus upon green infrastructure, open spaces, recreation and active travel.
- N.B. see Section 10.9 for a discussion of the implications of the preferred allocations for Gypsy and Traveller communities.
- [Commentary on policy priorities](#)
- 10.5.7 The appraisal of the 2016 Draft Plan highlighted Policy 10.7 (Infrastructure and Community Facilities) as a key policy, and recommended that the policy might be supplemented, potentially with a view to restricting the loss or degradation of community facilities. This recommendation stands.
- 10.5.8 The appraisal also recommended that a dedicated policy is developed which addresses levels of health and health inequalities within the Borough, potentially with a focus on providing suitable facilities for older people and better access to services in rural areas. This recommendation also stands.
- 10.5.9 Furthermore, the appraisal highlighted Policy 10.16 (Buildings for Institutional Purposes), and recommended that this might be supplemented with reference to when institutional buildings will be encouraged, e.g. when the development site exceeds a certain number of homes. This will be particularly relevant in order to address issues of health inequalities and to provide sufficient educational facilities.
- 10.5.10 A further policy of note, from the 2016 Draft Plan, is Policy 10.9 (Open Space, Community, Sport and Recreational Facilities), which sets out the Councils opposition to the loss of 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. The 2016 appraisal recommended that this proviso is removed, as levels of demand can change due to predictable (i.e. demographic) and unpredictable (e.g. cultural or societal interests) factors. For example, demand for allotments increased fourteen-fold between 1996 and 2011,¹⁹ which demonstrates how significantly public demand for local services and facilities can change.

¹⁹ Campbell, M., and Campbell, I. (2013); Allotment Waiting Lists in England 2013.

Conclusions on the emerging draft plan as a whole

- 10.5.11 The Draft Plan (2016) identified some positives, but concluded no significant effects. Proposed changes to the spatial strategy potentially give rise to some additional opportunity in respect of delivering new and upgraded community infrastructure; however, there remains considerable uncertainty at this current stage. Work is ongoing to understand community infrastructure issues and opportunities (working with partner organisations, e.g. ECC and Basildon and Brentwood Clinical Commissioning Group), and hence we will be in a better position to conclude on significant effects at the time of preparing the SA Report for publication alongside the proposed submission plan. Effects are **uncertain** at the current time.

10.6 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 preferred allocations

- 10.6.1 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 8.6 (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.”

- 10.6.2 Latest understanding is that there is a need deliver an increased quantum of employment (B class uses) through the Local Plan, in order to meet the forecast of 8.1ha to 20.3ha. After taking into account latest understanding regarding forecast loss of existing employment land to other uses, this means a need to allocate land for between 33.76ha and 45.96ha.

- 10.6.3 The proposal is to allocate land for circa 47ha, i.e. slightly more than the forecast need. The sites proposed for allocation in the 2016 Draft Plan remain proposed for allocation at the current time, with additional capacity has identified at certain sites, most notably at Brentwood Enterprise Park (up from 23.41ha to 25.85ha) and Childerditch Industrial Estate (up from 2.34ha to 5.87ha). In addition, a small number of new sites are proposed for allocation, namely land near Codham Hall (0.61ha); land at East Horndon Hall (5.5ha; to the immediate north west of Dunton Hills Garden Village) and a small potential, allocation north of the A1023 (2.0ha). It is understood that the resulting 'portfolio' of sites will be suitably diverse in respect of type and quality, with other 'b uses' for example – manufacturing (B1c/B2) and warehousing / logistics (B8) - provided for. It is also noted that the exact range and type of employment development at Dunton Hills is still subject to detailed site masterplanning.

Commentary on policy priorities

- 10.6.4 The appraisal of the 2016 Draft Plan recommended that Policy 8.1 (Strong and Competitive Economy) might be supplemented in order to provide increased support for knowledge-based employment developments, e.g. by requiring high-speed Broadband for key areas.
- 10.6.5 Policy 8.2 (Brentwood Enterprise Park) was also a focus of the 2016 Draft Plan appraisal, and it is now the case that the increased quantum of growth proposed at the site serves to increase the importance of this policy. It is noted that almost 55% of total land proposed for new allocations is linked to the proposed Brentwood Enterprise Park.
- 10.6.6 The following text contained within the current consultation document also serves to highlight policy areas that will need to be the focus of continued work, ahead of the publication stage -
- *“With the introduction by Government of permitted development rights which enable offices to convert to residential this is forecast to have an impact on the office market in Brentwood... One of the challenges the Borough faces moving forward is to develop an effective strategy and measures to retain an active urban office market (B1a/b) which is currently well supported by local SMEs within Brentwood – with high occupancy rates and premises located near local services, facilities and transport connections. The erosion of this important market may have a negative impact on the local economy.”*
 - *“...there is a clear need to ensure that strategic investment sites are well connected through public transport an active travel infrastructure to support their overall sustainability. Employment sites such as East Horndon and Dunton Hills will also need to be well connected to existing and new housing sites, including Dunton Hills Garden Village.”*
 - *“The new Plan will also need to effectively manage the period of transition for a number of current employment sites (such as West Horndon) moving from traditional employment uses to residential led-developments to ensure a clear pipeline of available employment land is achievable to meet the needs of businesses relocating to new premises within the Borough. The early delivery of strategic sites within the A127 corridor will be important to maintain an effective stock of employment land.”*

Conclusions on the emerging draft plan as a whole

- 10.6.7 The Draft Plan (2016) appraisal concluded the likelihood of significant positive effects, on the basis that “[t]he spatial strategy includes a focus on maximising opportunities along the A127 corridor, which has the potential to become an employment cluster of regional significance.” This conclusion broadly holds true at the current time, and so it should be possible for the forthcoming SA Report to conclude **significant positive effects** in relation to the Proposed Submission Plan, although there is some uncertainty in the absence of detailed transport modelling.

10.7 Heritage

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

Commentary on preferred allocations

10.7.1 The appraisal of the 2016 Draft Plan concluded -

“With regards to development in the A127 corridor a concern -raised by Historic England through the 2015 Strategic Growth Options consultation] - 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.”

10.7.2 Focusing on proposed changes to the spatial strategy, 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, as 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 the Brentwood Town Centre Design Plan.
- 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 newly proposed small village extension sites at Kelvedon Hatch and Hook End / Tipps Cross 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 96 homes) is constrained by three adjacent or nearby listed buildings, and Blackmore Conservation Area is located c.125m to the south.

Commentary on policy priorities

- 10.7.3 The appraisal of the 2016 Draft Plan highlighted Policy 9.5 (Listed Buildings) as one of several key policies, and recommended that the policy might be supplemented with additional policy support for locally important/listed buildings, in addition to nationally listed buildings. As explained within the supporting text to the policy, a list of locally important heritage assets will be compiled, with a view to affording the same protection as those that are nationally listed. Another recommendation was that Policy 9.7 (Ancient Monuments and Archaeological Remains) might be supplemented with reference to Archaeological Priority Areas.

Conclusions on the emerging draft plan as a whole

- 10.7.4 The Draft Plan (2016) identified some positives, and some potential draw-backs, but overall concluded no significant effects. Proposed changes to the spatial strategy similarly give rise to a 'mixed picture' in respect of impacts to heritage assets and the historic environment. There will be a need to take careful account of the views provided by Historic England, through the current consultation, when finalising the spatial strategy and preparing development management / site-specific policy. Sensitive masterplanning informed by Heritage Assessments should shape the proposals for development. Assuming that this is the case, then it should be possible for the forthcoming SA Report to conclude **no significant effects** in relation to the Proposed Submission Plan.

10.8 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 preferred allocations

- 10.8.1 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).²⁰ 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.²¹"*
- 10.8.2 Proposed changes to the spatial strategy have limited implications for flood risk. The plan document describes a degree of surface water flood risk at several sites, including -
- Land off Doddinghurst Road, either side of A12, Brentwood - where the proposal is now to deliver a reduced number of homes;
 - Officer's Meadow, Shenfield - where the proposal is now to deliver fewer of homes (C3);
 - Site adjacent to Ingatestone Garden Centre (former A12 works site) - a new site; and
 - Land south of Redrose Lane, north of Orchard Piece, Blackmore - a new site.

²⁰ The SWMP (2015) is available at: <http://www.brentwood.gov.uk/index.php?cid=966>.

²¹ See Appendix K of the SWMP at: <http://www.brentwood.gov.uk/pdf/22062015121842u.pdf>

Commentary on policy priorities

- 10.8.3 The appraisal of the 2016 Draft Plan recommended that Policy 10.3 (Sustainable Construction and Energy) might be supplemented with a requirement for developments above a certain size to provide rainwater attenuation measures, such as a minimum surface area of green walls or roofs. Also, the appraisal recommended that Policy 10.6 (High Quality Design Principles) might cross reference to Policy 10.3 so that the role of SUDs is reiterated, lending further support to measures to reduce the risk of flooding, and slow the rate of surface water runoff.

Conclusions on the emerging draft plan as a whole

- 10.8.4 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 Dunton Hills Garden Village. It highlighted the importance of policy to guide masterplanning and design, including policy on Sustainable Drainage Systems (SuDS). There is a need to examine thematic policy further, and also site-specific policy for those sites with a degree of fluvial flood risk (i.e. Dunton Hills Garden Village) or surface water flood risk. Assuming that the necessary work is completed, then it should be possible for the forthcoming SA Report to conclude **no significant effects** in relation to the Proposed Submission Plan.

10.9 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 preferred allocations

- 10.9.1 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.”*
- 10.9.2 The current preferred approach similarly involves providing for **OAHN**, and indeed the proposal is now to provide for a significant ‘buffer’ over-and-above OAHN, which will help to ensure that OAHN is provided for in practice (i.e. even under a scenario whereby delivery of one or more sites is delayed).
- 10.9.3 Also of note is the proposal to deliver a greater **mixture 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 163 homes in the northern villages should help to ensure that very localised housing needs are met, i.e. should increase the potential for young people forming a new household to remain their home village, should they wish. It is also the case that these sites may lend themselves to development by smaller housebuilders.

- 10.9.4 Another important point to mention is increased understanding - since the 2016 Draft Plan stage - regarding the 'opportunity' at **Dunton Hills Garden Village**. The current policy position is a minimum of 35% affordable housing, with the Council is looking at options to deliver housing directly and through supporting Registered Social Landlords, community land trust providers and collective self-build projects to contribute to the overall mix and diversity of affordable housing. It is also recognised that there is a need to pepper-pot affordable housing across the village and ensure that any affordable housing (however developed) maintains a strong cohesive design theme and identify.
- 10.9.5 Another key emerging design themes 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.
- 10.9.6 Finally, in respect of **specialist accommodation needs**, the preferred approach has evolved considerably since the Draft Plan stage, but there remains the need for further work. In particular, there is a need to identify sites to deliver older persons accommodation, albeit initial work has been completed to confirm that there should be good potential at several of the larger proposed allocations.
- 10.9.7 With regards to Gypsy and Traveller accommodation, the preferred approach performs well in that the proposal is to provide for 78 pitches across the plan period to meet the need of travelling Gypsy and Travellers (12 pitches) and Gypsy and Travellers who do not meet the planning definition but who still require access to more specialist accommodation or pitches (66 pitches). The proposal is to provide the majority (58 pitches) as part of new sites within larger preferred allocations - e.g. Dunton Hills Garden Village - and so careful masterplanning will need to be completed, in order to ensure successful integration of travelling and 'bricks and mortar' communities.

Commentary on policy priorities

- 10.9.8 A clear priority is in respect of determining a policy on affordable housing that is effective at redressing the current barriers to housing in the Borough, but equally not so stringent that development becomes unviable (including for smaller housebuilders). More generally, the Council should explore innovative methods for delivery of affordable housing at Dunton Hills Garden Village (see discussion above) and then consider wider applicability to the Borough.

Conclusions on the emerging draft plan as a whole

- 10.9.9 The Draft Plan (2016) appraisal concluded the likelihood of significant positive effects on the basis of the proposal to meet OAHN, and also to provide for specialist accommodation needs. Proposed changes to the strategy serve to reinforce this conclusion, with the current proposal being to provide for a 'buffer' over-and-above OAHN, and also deliver a greater diversity of sites. It is also noted that Dunton Hills Garden Village is providing an opportunity to explore innovative approaches to housing delivery. It should be possible for the forthcoming SA Report to conclude **significant positive effects** in relation to the Proposed Submission Plan.

10.10 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 preferred allocations

10.10.1 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.”

10.10.2 The current proposal is to increase the focus of growth at the **Brentwood/Shenfield** urban area; however, much of the proposed additional growth is directed towards brownfield sites (two adjacent sites at Warley, 473 homes; and William Hunter Way car park, 300 homes). There are four newly proposed Green Belt sites; however, two of these are relatively small (Land adjacent to Carmel, Mascalls Lane, Warley, 9 homes; and Land west of Warley Hill, Pastoral Way, Warley, 43 homes) and give rise to relatively few landscape concerns. The other two new 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 would appear to be relatively unconstrained in landscape terms, given containment by the A12 and railway line. Finally, it is noted that the proposal is now 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. This *could* be a positive step, from a landscape perspective, as the outcome *could* be lower density development, with increased open/green space; however, there is uncertainty at this stage, as some land may be used for C2 (residential institutions) use class.

10.10.3 Elsewhere, the proposal to allocate several sites at the **larger villages** in the north of Brentwood (163 homes in total) naturally gives rise to some landscape concerns. The sites at Blackmore and Hook End / Tipps Cross benefit from being well contained by a road; however, the two sites at Kelvedon Hatch are seemingly less strongly contained within the landscape.

10.10.4 Another important point to mention is increased understanding - since the 2016 Draft Plan stage - regarding the issues/opportunities at **Dunton Hills Garden Village**. Green infrastructure is likely to play a strong role in defining the character of the new village and ensuring wildlife assets are protected and developed. At a strategic level there are opportunities to connect Thorndon Country Park to the north through the site and onwards to Langdon Hills Country Park to the south. One of the emerging key design principles for Dunton Hills is its focus upon ‘working with the landscape’ to take advantage of level differences across the site and sensitively plan for flood alleviation and new natural features.

Commentary on policy priorities

- 10.10.5 The appraisal of the 2016 Draft Plan highlighted the importance of Policy 10.10 (Green Infrastructure), particularly in respect of supporting the Essex Wildlife Trust's Living Landscapes vision to "restore, recreate and connect wildlife habitats". The importance of robust policy is brought into focus by the proposal to deliver a 473 home housing scheme on the edge of the Living Landscape, albeit on brownfield land.

Conclusions on the emerging draft plan as a whole

- 10.10.6 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 (in particular in relation to growth at West Horndon) and that detailed work has been completed to enable the identification of A12 urban extension sites that are best performing from a landscape / Green Belt perspective. Proposed changes to the spatial strategy give rise to limited additional concerns, with the primary consideration being the proposal to deliver several small (to medium, in the case of Blackmore) scale extensions to three villages in the rural north of the Borough. There will be a need for further work to identify the developable parts of sites, and requirements for strategic open space and landscaping. Assuming that this is the case, then it may be possible for the forthcoming SA Report to conclude no significant effects in relation to the Proposed Submission Plan. However, at the current time it is appropriate to 'flag' the risk of **significant negative effects**.

10.11 Soil and contamination

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

Commentary on preferred allocations

- 10.11.1 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.
- 10.11.2 At the current time, the proposal is to release additional Green Belt land - the majority of which is in agricultural use - but also to increase the number of homes directed to brownfield sites.
- 10.11.3 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 new proposed allocations - Land south of Redrose Lane, north of Woollard Way - 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, 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.

Commentary on policy priorities

- 10.11.4 The appraisal of the 2016 Draft Plan recommended that Policy 10.15 (Contaminated Land and Hazardous Substances) might be supplemented such that there is support for development proposals that seek to remediate, and bring back to a usable standard, areas of contaminated land. This policy stands.

Conclusions on the emerging draft plan as a whole

- 10.11.5 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**.

10.12 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 preferred allocations

- 10.12.1 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."*
- 10.12.2 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 policy priorities

- 10.12.3 The appraisal of the 2016 Draft Plan recommended that Policy 10.6 (High Quality Design Principles) be supplemented in respect of on-site waste management infrastructure. Specifically, it might require provision of sufficient space for waste storage and separation (potentially including composting) and/or require submission of an operational waste management strategy alongside larger applications. This recommendation stands.
- 10.12.4 Furthermore, it was recommended that a standalone policy is developed which outlines the requirement for sustainable waste management and the need for developers to move up the waste hierarchy, during refurbishment, demolition, excavation and construction activities and once the development is complete and operational, with a focus on reducing waste wherever possible. This recommendation also stands.

Conclusions on the emerging draft plan as a whole

- 10.12.5 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, it should be possible for the forthcoming SA Report to conclude **no significant effects** in relation to the Proposed Submission Plan.

10.13 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 preferred allocations

10.13.1 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...”

10.13.2 The proposal to allocate several sites at the **larger villages** in the north of Brentwood (163 homes in total) gives rise to some concerns, given known wastewater capacity constraints. There may be a need for further investigation, ahead of plan finalisation and publication, with a view to ensuring that the necessary upgrades to treatment works can be achieved ahead of housing delivery. There may also be a need to re-evaluate existing capacity / potential for timely upgrades to capacity **across the Borough**, given how the strategy has evolved.

N.B. in respect of potable water supply, it is not possible to conclude that the proposal to provide for a higher quantum of new homes (relative to the 2016 Draft Plan stage) leads to concerns, as this is a regional issue and Brentwood is not known to be any more constrained than neighbouring authorities. In respect of water quality, there are not known to be any strategic constraints - e.g. particular river systems that are sensitive or in need of improvement - and there is always good potential to address matters at the development management stage, e.g. through designing-in sustainable drainage systems (SuDS).

Commentary on policy priorities

10.13.3 The appraisal of the 2016 Draft Plan recommended that Policy 10.3 (Sustainable Construction and Energy) might require developments above a certain size, e.g. 20 dwellings, to deliver ‘exemplar’ water management measures, such as grey water harvesting. It was also recommended that water efficiency should be referenced within Policy 10.6 (High Quality Design Principles). These recommendations stand.

10.13.4 With regards to water quality, the appraisal of the 2016 Draft Plan recommended that a new stand-alone policy is developed 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. This recommendation also stands.

Conclusions on the emerging draft plan as a whole

10.13.5 The Draft Plan (2016) appraisal concluded no significant effects; however, the proposal to allocate land for 163 homes at the villages in the north of Brentwood raises certain questions. This is a relatively small quantum of growth; however, there will be a need for detailed examination of wastewater treatment capacity nonetheless. There are fewer concerns regarding water quality and water use/efficiency; however, there will be a need for further work to ensure that robust development management policy is in place, recognising that the East of England is a water stressed region and that good development viability in Brentwood should mean that it is sometimes possible to achieve standards over and above national requirements. At the current time, it is appropriate to flag **uncertain effects**.

10.14 Conclusions at this current stage

- 10.14.1 The appraisal presented above identifies the likelihood of significant effects in respect of several sustainability issues/objectives, although there is considerable uncertainty at this stage, given that the current consultation document presents preferred allocations only, without associated policy.
- 10.14.2 With regards to significant positive effects, the appraisal highlights -
- Housing - the proposal is to provide for a 'buffer' over-and-above OAHN, and also deliver a greater diversity of sites than was the case at the 2016 Draft Plan stage. It is also noted that Dunton Hills Garden Village is providing an opportunity to explore innovative approaches to housing delivery.
 - Economy - as per the appraisal at the 2016 Draft Plan stage, the proposal to support delivery of required new employment land, and in particular realisation of opportunities for the A127 corridor to develop as an employment cluster, is strongly supported.
- 10.14.3 With regards to significant negative effects, the appraisal highlights -
- Landscape - the strategy clearly seeks to respond to the landscape constraints that exist - which are extensive across Brentwood - including on the basis that preferred allocations have been selected on the basis of detailed Green Belt review findings. It is also noted that detailed work is ongoing to ensure that Dunton Hills Garden Village is a 'landscape-led' scheme, which integrates into the landscape as far as possible, and indeed delivers targeted landscape enhancements. However, it is nonetheless appropriate to 'flag' the risk of significant negative effects at the current time, ahead of further understanding of detailed scheme layouts and site specific policies.
 - Soils - since the 2016 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'.
- 10.14.4 The appraisal also highlights 'uncertain' effects in respect of -
- Community and wellbeing - proposed changes to the spatial strategy potentially give rise to some additional opportunity in respect of delivering new and upgraded community infrastructure; however, there remains considerable uncertainty at this current stage. Work is ongoing to understand community infrastructure issues and opportunities (working with partner organisations, e.g. ECC and Basildon and Brentwood Clinical Commissioning Group), and hence we will be in a better position to conclude on significant effects at the time of preparing the SA Report for publication alongside the proposed submission plan.
 - Water - The Draft Plan (2016) appraisal concluded no significant effects; however, the proposal to allocate land for 163 homes at the villages in the north of Brentwood raises certain questions. This is a relatively small quantum of growth; however, there will be a need for detailed examination of wastewater treatment capacity nonetheless.
- 10.14.5 Some more minor concerns are also highlighted in respect of air quality, biodiversity, cultural heritage, and in respect of climate change mitigation it is suggested that the recent evolution of the spatial strategy may give rise to some additional minor opportunity (in respect of minimising per capita CO2 emissions from both the built environment and transport).
- 10.14.6 Finally, it is important to note that a range 'policy priorities' are highlighted within the appraisal, and a number of specific policy recommendations are made. The Council should give consideration to these recommendations, as well as the appraisal findings more generally, when preparing the Proposed Submission Plan for publication.

PART 3: WHAT HAPPENS NEXT?

11 INTRODUCTION (TO PART 3)

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

12 PLAN FINALISATION**12.1 Preparation of the Proposed Submission Plan**

- 12.1.1 Subsequent to the current consultation it is the intention to prepare the proposed submission version of the plan for publication in-line with Regulation 19 of the Local Planning Regulations 2012. The proposed submission plan will be that which the Council believes is 'sound' and intends to submit for Examination. Preparation of the Proposed Submission Plan will be informed by the findings of this Interim SA Report, responses to the current consultation and potentially further appraisal work (potentially to include further appraisal of alternatives and/or site options - see references to possible 'further work' in Chapters 4 and 5, above).
- 12.1.2 The SA Report will be published alongside the Proposed Submission Plan. It will provide all of the information required by the SEA Regulations 2004.

12.2 Submission and examination

- 12.2.1 Once the period for representations on the Proposed Submission Plan / SA Report has finished the main issues raised will be identified and summarised by the Council, who will then consider whether 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.
- 12.2.2 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).
- 12.2.3 Once found to be 'sound' the Plan will be formally adopted by the Council. At the time of Adoption a 'Statement' must published that sets out (amongst other things) 'the measures decided concerning monitoring'.

13 MONITORING

- 13.1.1 The SA Report must present 'measures *envisaged* concerning monitoring'. As such, AECOM will work with the Council ahead of preparing the Draft Plan / SA Report, examining the Council's existing monitoring framework and considering its suitability in light of draft plan appraisal findings.
- 13.1.2 At the current time, in-light of the initial draft plan appraisal findings (i.e. predicted effects and uncertainties) presented in Part 2 above, it is suggested that monitoring efforts might focus on:
- perceptions of landscape;
 - loss of best and most versatile agricultural land;
 - community infrastructure delivery and capacity;
 - wastewater treatment works capacity;
 - air quality within Brentwood town centre and at other locations of concern;
 - achievement of 'biodiversity net gains' at appropriate scales;
 - impacts to the setting of listed buildings; and
 - delivery of decentralised low carbon heat/energy generation, and other measures for minimising CO₂ emissions from the built environment and transportation.

APPENDIX I - REGULATORY REQUIREMENTS

As discussed in Chapter 2 above, 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.

N.B. This report is not the SA Report, but aims to present the required information nonetheless.

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

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

Schedule 2	Interpretation of Schedule 2		
The report must include...	The report must include...		
(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 The relevant environmental protection objectives, established at international or national level	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 aspects of the current state of the environment and the likely evolution thereof without implementation of the plan'	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 environmental characteristics of areas likely to be significantly affected		
(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;	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 & objectives?</i>	
(g) the measures envisaged to prevent, reduce and as fully as possible offset any significant adverse effects on the environment of implementing the plan;	Key environmental problems / issues and objectives that should be a focus of appraisal		
(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	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> [Part 1 of the Report]	
(i) a description of the measures envisaged concerning monitoring.	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> [Part 2 of the Report]	
	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> [Part 3 of the Report]	

Whilst Tables A and B signpost broadly how/where this report meets regulatory requirements. As a supplement, it is also helpful to present a discussion of more precisely how/where regulatory requirements are met - see Table C. **N.B.** To reiterate, this report is not the SA Report, but aims to present the required information nonetheless.

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 3 ('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 4 ('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"> • Chapter 6 explains how reasonable alternatives were established in late 2017 in-light of earlier consultation and SA. • Chapter 8 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).
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"> • Chapter 7 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). • Chapter 10 presents at appraisal of Preferred Allocations.. <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 Interim SA Report. At the current time, Chapter 10 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 5 and 6 deal with 'Reasons for selecting the alternatives dealt with', with an explanation of the reasons for focusing on particular issues and options. Also, Chapter 8 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 13 presents measures envisaged concerning monitoring.
j) a non-technical summary of the information provided under the above headings	The NTS is a separate document.
The SA Report must be published alongside the draft plan, in-line with the following regulations	
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 5.1, several Interim SA Reports have been published alongside plan consultation documents prior to this current report. At the current time, this Interim SA Report is published alongside the Proposed Submission Plan, in order to inform the current consultation and plan finalisation.
The SA Report must be taken into account, alongside consultation responses, when finalising the plan.	
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 identification of the preferred allocations published at the current time. As discussed within Chapter 12, appraisal findings presented within this Interim SA Report will inform plan finalisation, i.e. preparation of the Proposed Submission Plan for publication and submission. The SA Report will be prepared for publication alongside the Proposed Submission Plan, with a view to informing representations and any modifications made to the plan post submission, i.e. during the Examination in Public.

APPENDIX II - CONTEXT AND BASELINE REVIEW

Introduction

As discussed in Chapter 4 ('What's the scope of the SA?') the SA scope is primarily reflected in a list of topics and objectives ('the SA framework'), which was established subsequent to a review of the sustainability 'context' / 'baseline' and consultation. The aim of this appendix is to present summary outcomes from the context / baseline review, as the detailed issues discussed helpfully supplement the SA framework, i.e. serve to identify specific issues that should be a focus of appraisal under the SA framework.

Air quality

The EU Thematic Strategy on Air Pollution aims to cut the annual number of premature deaths from air pollution-related diseases by almost 40% by 2020 (using 2000 as the base year), as well as substantially reducing the area of forests and other ecosystems suffering damage from airborne pollutants.

The NPPF makes clear that planning policies should be compliant with and contribute towards EU limit values and national objectives for pollutants; and states that new and existing developments should be prevented from contributing to, or being put at unacceptable risk from, or being adversely affected by unacceptable levels of air pollution. This includes taking into account Air Quality Management Areas (AQMAs) and cumulative impacts on air quality.

Government has recently published an Air Quality Plan for NO₂²² which makes the following important statement -

"Unlike greenhouse gases, the risk from NO₂ is focused in particular places: it is the build-up of pollution in a particular area that increases the concentration in the air and the associated risks. So intervention needs to be targeted to problem areas, fewer than 100 major roads which national modelling suggests will continue to have air pollution problems in 2021, mostly in cities and towns. The effort to reduce NO₂ also needs to be targeted on the sources that make the biggest contribution to the problem: road vehicles contribute about 80% of NO₂ pollution at the roadside and growth in the number of diesel cars has exacerbated this problem."

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 (AQMAs) when compared to the rest of the county.²³ In total there are seven AQMAs located in the Borough; however, three are now set to be de-designated on the basis that NO₂ concentrations have not exceeded the annual mean objective value for the past four years.²⁴ 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

²² See <https://www.gov.uk/government/publications/air-quality-plan-for-nitrogen-dioxide-no2-in-uk-2017>

²³ 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)

²⁴ Defra: AQMA Maps [online] available at: http://aqma.defra.gov.uk/maps.php?map_name=kent&la_id=33 (accessed 12/2014)

improvements to local green spaces; and encourage cross collaboration between stakeholders to support networks of multi-functional green infrastructure.

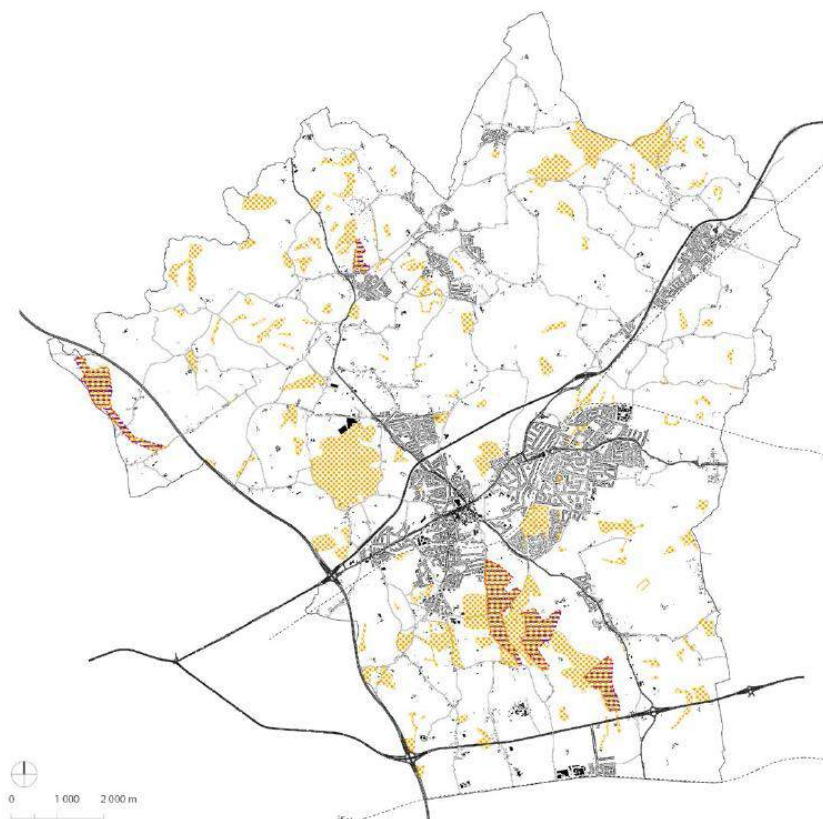
There are three Sites of Special Scientific Interest (SSSI) within the Borough. These are located at Coppice, Kelvedon Hatch; Curtis Mill Green; and Thorndon Park. All of these SSSIs are classified as being in 'unfavourable' condition, but remedial work is being undertaken. Of the sites, two are located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

Other sites of biodiversity interest in the Borough include:²⁵

- 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.
- 147 Local Wildlife Sites (LoWS) and areas of woodland. One of the most noticeable features of the current LoWS network is the relative lack of high quality grasslands.²⁶
- 11 parks in the Borough and four country parks. The country parks are regarded as being of biodiversity importance; for instance, Thorndon Country Park hosts an ancient deer park area which has been designated as a SSSI.

Brentwood's country parks are based in the west, east and south of the Borough. With the exception of Tipps Cross ward in the north of the Borough, all residential areas are within the recommended accessible drive time catchment²⁷ of one of the four country parks. Brentwood currently has no recognised formal green corridors. *The built-up area of Brentwood features a number of important 'green wedges', two of which extend into the centre of the town (Hartwood/Shenfield Common and Brentwood School/Merrymeade Park).*

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



²⁵ 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)

²⁶ EECOS (2012) Brentwood Borough Local Wildlife Site Review

²⁷ A drive-time accessibility standard of 10 minutes (4km) was deemed appropriate for country parks given their role as a destination venue

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 2005²⁸. 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.²⁹

Per capita emissions of CO₂ 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.³⁰

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.²⁸

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

²⁸ 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)

²⁹ Brentwood Borough Council (2012) Annual Monitoring Report 2010/11 [online] available at: <http://www.brentwood.gov.uk/pdf/18012012112208u.pdf> (accessed 12/2014)

³⁰ DECC (2014) Local Authority Carbon Dioxide Figures [online] available at: <https://www.gov.uk/government/statistics/local-authority-emissions-estimates> (accessed 12/2014)

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*”.

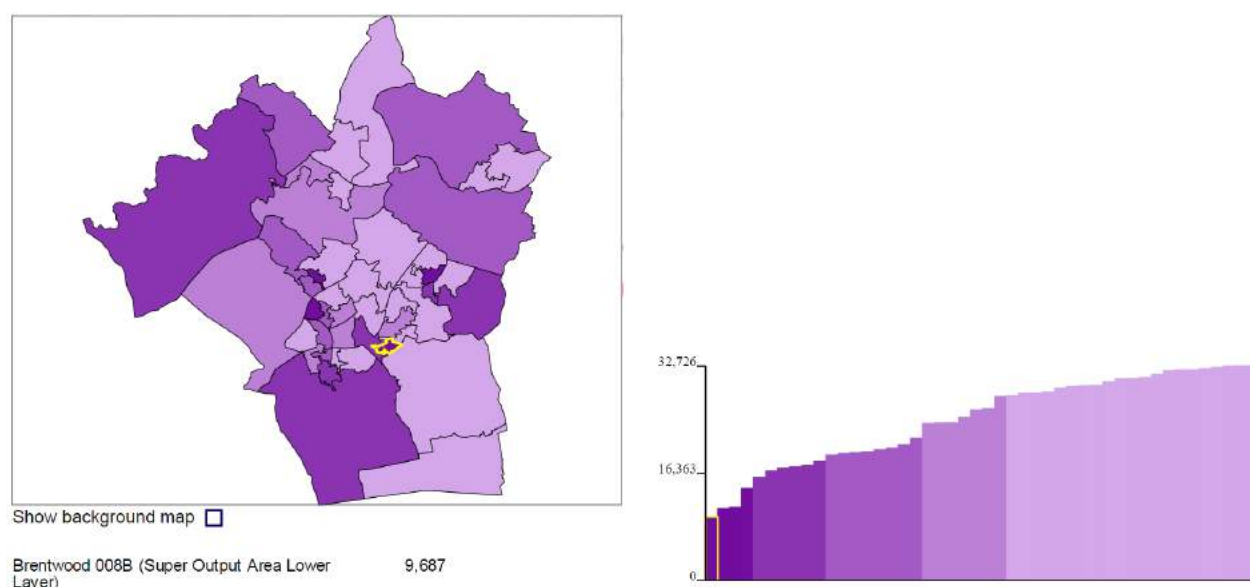
In the Borough, there is a higher proportion of the population classed as having ‘good’ health than in England as a whole. Life expectancy is higher than the national average. Over the period 2008-10 this stood at 81.1 for men and 84.3 for women in comparison to 78.2 and 82.3 respectively in England. 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.³¹

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.²⁸ 23% of the Borough’s population have no qualifications, compared to 29.1% in England.²⁹

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 32,726th (out of 32,844 nationally).

IMD 2015 (with most deprived SOA highlighted)



³¹ DoH (2012) Health Profile: Brentwood [online] available at www.apfo.org.uk/resource/view.aspx?RID=117177 (accessed 12/2014)

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*".

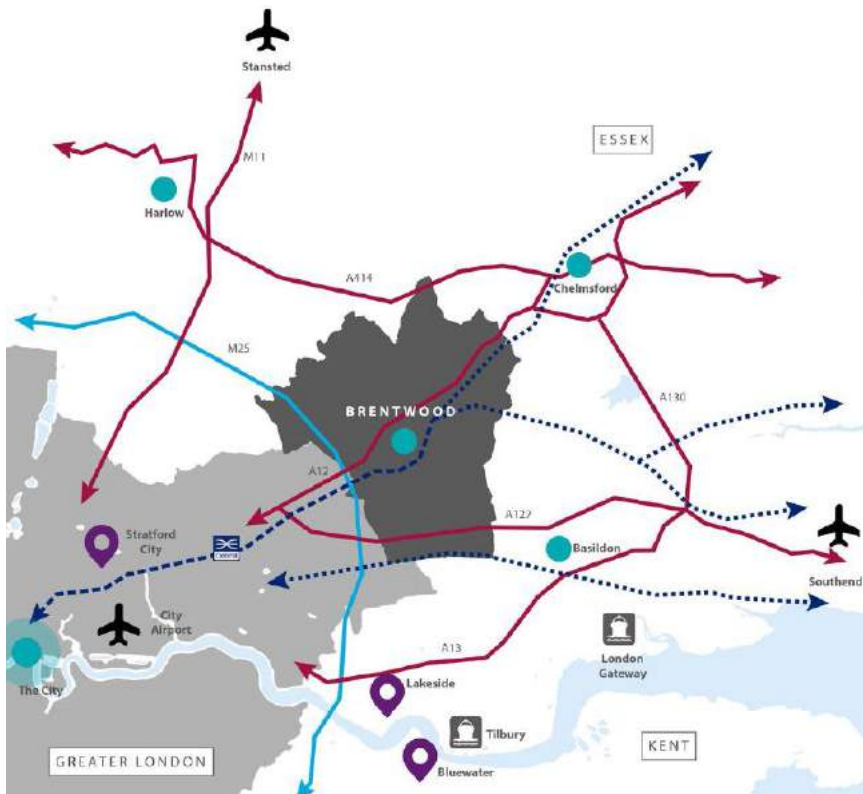
The Borough has low unemployment and has recorded strong levels of job growth over the last 17 years (30%; with the number of B-Class jobs having increased by 40%). However, there is currently an imbalance between skills and jobs because of the population working in London, which indicates a need to 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 2014.³²

³² 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:

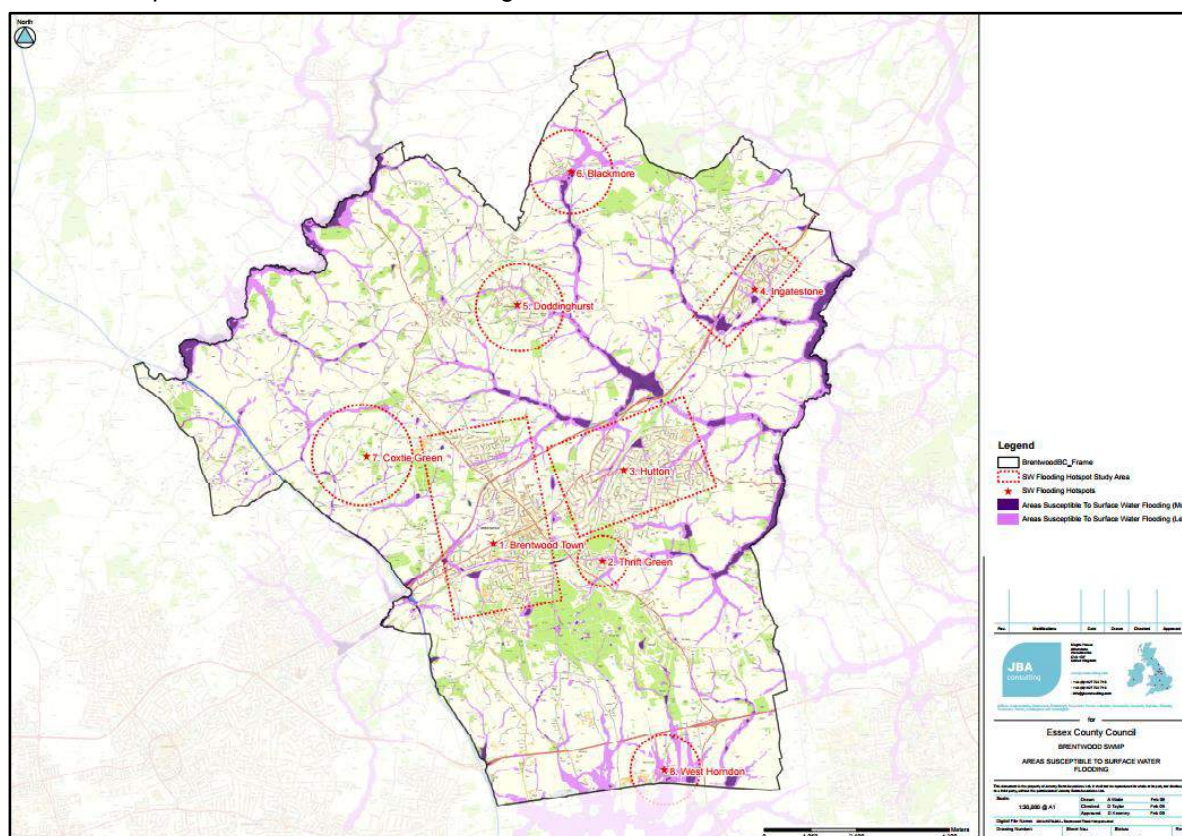
“for much of the urban area of Brentwood the infiltration potential of soils is high, meaning that infiltration SuDS are likely to be suitable. Infiltration options control runoff at source and are high up in the SuDS hierarchy. The feasibility of infiltration on site will need to be determined through 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.²⁸

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 Borough³³. Surface water flood risk is higher in urban areas.³³ 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.

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.

³³ Entec (2011) Brentwood Level 1 Strategic Flood Risk Assessment [online] available at: <http://www.brentwood.gov.uk/pdf/2103201162645u.pdf> (accessed 12/2014)

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.²⁸

There are two listed buildings in the Borough which are listed on English Heritage’s Heritage at Risk Register.³⁴ 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.³⁵

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.^{Error! Bookmark not defined.}

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.

³⁴ 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)

³⁵ 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]

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).²⁸

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)³⁶ averaging 99% over the 11 years to 2012.³⁷

There are currently no entries on the Council's Contaminated Land Register.³⁸

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. A very small proportion 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.

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.

³⁶ 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.

³⁷ Brentwood Borough Council -Annual Monitoring Reports (2004-2012) [online] available at

<http://www.brentwood.gov.uk/index.php?cid=880> (accessed 12/2014)

³⁸ Contaminated Land Study [online] available at: <http://www.brentwood.gov.uk/index.php?cid=718> (accessed 12/2014)

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 side³⁹.

In this regard, Brentwood Borough Council commissioned Entec UK Limited to produce a water cycle study (2011). This Water Cycle Study assesses the capacities of water bodies and water related infrastructure to accommodate future development and growth in Brentwood Borough and it forms part of the evidence base for the local development plan.

In line with environment agency guidelines the study sets the context of the study area and assesses environmental and infrastructure capacity to identify the most suitable locations for growth. Where constraints occur, the Outline phase recommends further work as part of a Detailed Phase Water Cycle Study.

Essex is in an area of serious water stress and so options to develop new resources are considered to be limited. However, based on water company plans,⁴⁰ water supply is not seen as being a constraint to potential growth in the Borough.

The Wastewater Treatment Works at Doddington and Ingatestone are currently at capacity and unable to receive any additional flow. This lack of capacity may affect growth in Tipps Cross, Ingatestone Fryerning and Mountnessing Wards, plus the eastern half of Brizes and Doddington Ward (including Kelvedon Hatch and Doddington). The Water Cycle Study recommended that growth in these areas be avoided; however subsequently Anglian Water has stated that they would take the necessary steps to accommodate further growth in these catchments should it come forward.

In terms of water quality, the water quality of rivers in the Borough is generally 'Moderate' status. The Rivers Ingrebourne, Mardyke and Wid each classed as having 'Poor' status. The chemical status of groundwater bodies in the Borough is classified as 'Poor'.⁴¹ Climate change projections for Essex⁴² also list the risk of decreased water (particularly in summer) as an issue reduced water as a sustainability issue, exacerbated by a potential increase in demand.

³⁹ 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)

⁴⁰ These plans involve demand management measures together with increased capacity at Abberton reservoir.

⁴¹ Entec (2011) Brentwood Scoping and Outline Water Cycle Study [online] available at: <http://www.brentwood.gov.uk/pdf/21032011165157u.pdf> (accessed 12/2014)

⁴² Thurrock Council (2008) Thurrock Climate Change Evidence Base [online] available at http://www.thurrock.gov.uk/planning/strategic/pdf/ldf_tech_climate_2008.pdf (accessed 12/2014)

APPENDIX III - SITE OPTIONS APPRAISAL

Introduction

As explained within Chapters 5 and 6, site options have been appraised using a criteria-based methodology. The aim of this appendix is to

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

Developing the site options appraisal methodology

It was not possible to simply apply the SA framework (i.e. the list of SA topics/objectives presented in Table 4.1, above) given the number of site options and limited data availability. As such, work was undertaken to develop a criteria-based methodology suited to site options appraisal.

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, recognising data limitations (and given that there is a need to appraise site options 'on a level playing field').

Table A explains that it has not been possible to draw on qualitative analysis, e.g. taking into account what will or will not be delivered on each site. Rather, there is a need to rely solely on quantitative analysis, i.e. location / distance analysis utilising Geographical Information Systems (GIS) software.

Table B then lists the criteria concisely alongside the rules that have been applied to categorise the performance of sites. Specifically, Table B explains how, for each of the criteria employed, the performance of sites is categorised on the following scale - ⁴³

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. the methodology is an evolution of that applied previously. Stakeholders are welcome to comment at the current time. Any suggestions will be taken into account when undertaking **further SA work** subsequent to the current consultation.

⁴³ 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"> Air Quality Management Area (AQMA) 	<p>Good data 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"> Site of Scientific Interest (SSSI) Locally designated wildlife sites Ancient Semi Natural Woodland Local Nature Reserves Other woodland 	<p>Good data is available to inform the appraisal. It is fair to assume that sites in close proximity are sensitive, including 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 or other areas contributing to 'green infrastructure').</p>
Climate change mitigation		<p>No data 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"> GP surgery Primary school Secondary school 	<p>Limited 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 community infrastructure.</p> <p>N.B. there is now the potential to calculate distance by road, rather than 'as the crow flies'. This is an important methodological improvement since the 2016 Draft Plan stage.</p>
Cultural heritage	<ul style="list-style-type: none"> Conservation area Registered park or garden Scheduled monument Listed building 	<p>Limited 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	No data 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"> Flood risk zone 	Good data exists to inform the appraisal in terms of flood risk, although the available data relates to fluvial (river) flood risk only. Data on surface water flood risk is now available, and will be drawn upon in the future.
Housing	No data 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"> Special Landscape Area (SLA) Landscape Improvement Area Green Belt 	Limited data is available to inform the appraisal. Work is ongoing to ensure that all site options are categorised in terms of potential for landscape impacts and also the potential to result in loss of functioning Green Belt (i.e. Green Belt that meets the established purposes). This work will be drawn upon in the future.
Soil and contamination	<ul style="list-style-type: none"> High quality agricultural land⁴⁴ 	Limited data 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	No data 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>No data is available to inform appraisal in terms of water quality; however, this is not a major issue for the appraisal.⁴⁵ 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>	

⁴⁴ 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.

⁴⁵ 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)	R = AQMA covering or adjacent to the site A = <1,000m	Impact thresholds are unknown, and so the RAG thresholds reflect the spread of the data. N.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. It is appropriate to 'flag' sites as potentially problematic, even where they are small and in practice not likely to result in negative effects.
2	Site of Scientific Interest (SSSI)	R = <800m of SSSI A = <2,000m	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 criterion of 800m has been included to reflect the number of sites within this Impact Risk Zone.
3	Local Nature Reserve	G = <2,000m R = Intersect	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.
4	Ancient Semi Natural Woodland	R = Intersect A = <400m	The thresholds reflect an understanding that County Wildlife Sites and ASNWs have relatively low sensitivity. 400m is a walkable distance.
5	Local Wildlife Site	R = Intersect A = <400m	
6	Woodland	A = Intersect	The threshold reflects an understanding that non-designated woodland tends to have lower sensitivity.
7	GP surgery	R = >1.5km A = 800m-1.5km G = <800m	Department for Transport guidance ⁴⁶ 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. N.B. The distance calculated is by road , rather than 'as the crow flies'
8	Primary school	R = >1.5km A = 800m-1.5km G = <800m	

⁴⁶ WebTag (January 2014) Unit A4.2 paragraph 6.4.5, Department for Transport

Criteria (Location in relation to...)		Performance categories	Notes
9	Secondary school	R = >3km A = <1.5 - 3km G = <1.5km	
10	Conservation Area	R = Intersect A = <400m	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	R = <100m	It is appropriate to 'flag' a red where a site intersects, is adjacent or within 200m of a Scheduled Monument.
12	Registered Park or Garden	R = <100m A = <400m	It is appropriate to 'flag' a red where a site intersects, is 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	R = <5m A = <50m	It is appropriate to 'flag' a red where a site intersects, is 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	R = > 10% of site intersects a flood risk zone A = 1 - 10% of site intersects a flood risk zone	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. The 10% threshold is fairly arbitrary.
15	Special Landscape Area	A = Intersect	The criteria reflect potential effects on landscape character in these areas.
16	Green Belt	A = Intersect	The Green Belt is not specifically a landscape designation. As such potential effects on the setting of the Green Belt has not been appraised.
17	Agricultural land	R = Grade 2 A = Grade 3	<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. As such, the GIS analysis has been supplemented by knowledge of whether sites are 'greenfield' or 'brownfield'. In instances where the GIS indicates loss of agricultural land, but the site is known to be brownfield, the site has not been flagged as constrained.</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 HELA are shown, except those that are now a commitment, i.e. have planning permission.
- Sites are categorised by 'type' as follows: Community or leisure use (C); Employment uses (E); Housing use (H); Mixed use (M).
- It is recognised that only limited understanding can be gained from Table C. The spreadsheet containing the underlying data is available upon request.

Table C: Site options appraisal findings

Ref	Name	Type	Area	1. AQMA	2. SSSI	3. Nature reserve	4. Ancient woodland	5. Local Wildlife Site	6. Woodland	7. GP	8. Primary school	9. Sec school	10. Conservation Area	11. Scheduled monm't	12. Reg. Park/Garden	13. Listed Building	14. Flood Zone 2	15. Special Landscape	16. Green Belt	17. Agricultural land
085A	Tipps Cross Community Hall, Blackmore Road, Tipps Cross	C	0.2																	
155	Brentwood School, Middleton Hall Lane, Brentwood	C	20.3																	
238	Land between Navestock and Green Lane, Navestock	C	4.8																	
045	Hutton Industrial Estate, Wash Road, Hutton	E	10.8																	
079C	Land adjacent to Ingatestone by-pass (part bounded by Roman Road)	E	2.1																	
101A(i)	Brentwood Enterprise Park (M25 Works Site at A127/M25 junction 29)	E	23.4																	
101A(ii)	Brentwood Enterprise Park (M25 Works Site at A127/M25 junction 29)	E	35.5																	
101B	Codham Hall Farm	E	6.6																	
101C	Codham Hall Farm	E	9.2																	
101D	Codham Hall Farm	E	15.7																	

Ref	Name	Type	Area	1. AQMA	2. SSSI	3. Nature reserve	4. Ancient woodland	5. Local Wildlife Site	6. Woodland	7. GP	8. Primary school	9. Sec school	10. Conservation Area	11. Scheduled monm't	12. Reg. Park/Garden	13. Listed Building	14. Flood Zone 2	15. Special Landscape	16. Green Belt	17. Agricultural land
109	East Horndon Hall Business Park, Tilbury Road	E	3.5																	
111	Upminster Trading Park	E	2.6																	
112A	Childerditch Industrial Estate	E	11.3																	
112B	Childerditch Industrial Estate	E	0.6																	
112C	Childerditch Industrial Estate	E	1.1																	
112D	Childerditch Industrial Estate	E	2.3																	
112E	Childerditch Industrial Estate	E	7.1																	
113A	Hallsford Bridge Industrial Estate	E	2.8																	
113B	Hallsford Bridge Industrial Estate	E	0.6																	
114B	Hubert Road Industrial Estate, Brentwood	E	3.8																	
115A	Brook Street Employment Area	E	0.6																	
115B	Brook Street Employment Area	E	0.7																	
116	Warley Hill Business Park	E	3.2																	
118	BT Centre	E	3.6																	
119	OCE offices, Chatham Way, Brentwood	E	0.5																	
120	47-57 Crown Street	E	0.1																	
122	1-7 & 16-26 St Thomas Road, Brentwood	E	0.1																	
122	1-7 & 16-26 St Thomas Road, Brentwood	E	0.2																	
123	7-9 Shenfield Road, Brentwood	E	0.1																	
124	Regency House, 38 Ingrave Road, Brentwood (adjacent Town Hall)	E	0.1																	
125	North House, Ongar Road, Brentwood	E	0.2																	

Ref	Name	Type	Area	1. AQMA	2. SSSI	3. Nature reserve	4. Ancient woodland	5. Local Wildlife Site	6. Woodland	7. GP	8. Primary school	9. Sec school	10. Conservation Area	11. Scheduled monm't	12. Reg. Park/Garden	13. Listed Building	14. Flood Zone 2	15. Special Landscape	16. Green Belt	17. Agricultural land
127	Land at M25 Junction 28, Brook Street, Brentwood	E	1.2																	
175A	Land at M25 J28, Brook Street, Brentwood (including existing buildings), and surrounding land	E	0.8																	
177	Land at Wash Road, south of Lower Road, Hutton	E	10.5																	
187	Land south of East Horndon Hall	E	8.7																	
200B	Dunton Garden Village Employment Land	E	7.3																	
228	Perri site, Warley Street, Warley	E	5.4																	
312	Land east of Nags Head Lane Sewage Treatment Works, Brentwood	E	3.4																	
001A	Land north of Highwood Close, Brentwood	H	0.5																	
001B	St Georges Court Highwood Close	H	0.8																	
002	Brentwood railway station car park	H	1.1																	
004	Land rear of The Bull Public House, Brook Street, Brentwood	H	0.3																	
006	Land adjacent Adult Education Centre, Rayleigh Road, Hutton	H	0.1																	
007	Land between Tendring Court and Tillingham Bold, Woodland Avenue, Hutton	H	0.1																	
008A	Woodlands School, Rayleigh Road, Hutton	H	1.3																	
008B	Woodlands School, Rayleigh Road, Hutton	H	11.2																	
008C	Land adjacent Woodlands School, Rayleigh Road, Hutton	H	3.7																	
009	Woodlands, School Road, Kelvedon Hatch	H	0.3																	
010	Sow & Grow Nursery, Ongar Road, Pilgrims Hatch	H	1.2																	
011	Land rear of 10-20 Orchard Lane, Pilgrims Hatch	H	0.2																	

Ref	Name	Type	Area	1. AQMA	2. SSSI	3. Nature reserve	4. Ancient woodland	5. Local Wildlife Site	6. Woodland	7. GP	8. Primary school	9. Sec school	10. Conservation Area	11. Scheduled monm't	12. Reg. Park/Garden	13. Listed Building	14. Flood Zone 2	15. Special Landscape	16. Green Belt	17. Agricultural land
011B	Land to the North of Ongar Road, Pilgrims Hatch	H	2.7																	
011C	Land to the North of Ongar Road, Pilgrims Hatch	H	0.6																	
012	Garage courts adjacent 49 Lavender Avenue, Pilgrims Hatch	H	0.1																	
014	The Gables, Essex Way, Warley	H	0.3																	
016A	Woodlands School, Warley Street, Great Warley	H	0.5																	
016B	Woodlands School, Warley Street, Great Warley	H	2.8																	
019	Land at the Rectory, Church Lane, Doddinghurst	H	0.7																	
022	Land at Honeypot Lane, Brentwood	H	10.9																	
023A	Land off Doddinghurst Road, either side of A12, Brentwood	H	6.0																	
023B	Land off Doddinghurst Road, either side of A12, Brentwood	H	2.2																	
024A	Sawyers Hall Farm, Sawyers Hall Lane/Doddinghurst Road, Brentwood	H	0.7																	
024B	Sawyers Hall Farm, Sawyers Hall Lane/Doddinghurst Road, Brentwood	H	19.6																	
025	Land at Ingrave Road (198, 198a, 198b & 176), Brentwood	H	2.2																	
026	Land at Hove Close, off Hanging Hill Lane, Hutton	H	0.6																	
027	Land adjacent to Carmel, Mascalls Lane, Warley	H	0.3																	
028A	Land east of Running Waters, Brentwood	H	26.6																	
028B	Land east of Running Waters, Brentwood	H	58.3																	
028C	Land east of Running Waters, Brentwood	H	350																	
029	Three Oaks Meadow, Hanging Hill Lane, Hutton	H	0.4																	
030A	Land at Bayleys Mead, off Hanging Hill Lane, Hutton	H	2.4																	

Ref	Name	Type	Area	1. AQMA	2. SSSI	3. Nature reserve	4. Ancient woodland	5. Local Wildlife Site	6. Woodland	7. GP	8. Primary school	9. Sec school	10. Conservation Area	11. Scheduled monm't	12. Reg. Park/Garden	13. Listed Building	14. Flood Zone 2	15. Special Landscape	16. Green Belt	17. Agricultural land
030B	Land at Bayleys Mead, off Hanging Hill Lane, Hutton	H	1.6																	
031	Home Meadow, land adjacent to 12 Tyburns, Hutton	H	1.8																	
032	Land east of Nags Head Lane, Brentwood	H	5.9																	
033	Land to the south of Lodge Close, east of Hutton	H	1.3																	
034	Officer's Meadow, land off Alexander Lane, Shenfield	H	20.8																	
035A	Land at Spital Lane, Brentwood	H	0.6																	
035B	Land at Spital Lane, Brentwood	H	0.3																	
036	Land opposite Button Common, Brentwood Road, Herongate	H	0.8																	
037	Land West of Thorndon Avenue, West Horndon	H	31.2																	
037A	Land West of Thorndon Avenue, West Horndon	H	8.4																	
037B	Land West of Thorndon Avenue, West Horndon	H	35.8																	
037C	Land West of Thorndon Avenue, West Horndon	H	38.9																	
038A	Land East of Thorndon Avenue, West Horndon	H	7.9																	
038B	Land East of Thorndon Avenue, West Horndon	H	68.6																	
038C	Land East of Thorndon Avenue, West Horndon	H	52.1																	
039	Westbury Road Car Park, Westbury Road, Brentwood	H	0.3																	
040	Chatham Way/Crown Street Car Park, Brentwood	H	0.3																	
041	Land at Hunter House, Western Road, Brentwood	H	0.2																	
044	Land at Priests Lane (west), Brentwood	H	4.5																	
047	Hutton Parish Hall, Rayleigh Road, Hutton	H	0.1																	
049	Land between 12-13 Magdalen Gardens, Hutton	H	0.1																	

Ref	Name	Type	Area	1. AQMA	2. SSSI	3. Nature reserve	4. Ancient woodland	5. Local Wildlife Site	6. Woodland	7. GP	8. Primary school	9. Sec school	10. Conservation Area	11. Scheduled monm't	12. Reg. Park/Garden	13. Listed Building	14. Flood Zone 2	15. Special Landscape	16. Green Belt	17. Agricultural land
050	Land between 31-45 Goodwood Avenue, Hutton	H	0.1																	
052	Land rear of Little Jericho, Church Street, Blackmore	H	0.1																	
053A	Land rear of 146-148 Hatch Road, Pilgrims Hatch	H	0.2																	
053B	Land rear of 146-148 Hatch Road, Pilgrims Hatch	H	3.2																	
054	Garages adjacent 25 Kings George's Road, Pilgrims Hatch	H	0.0																	
055	Rear of garage and adjacent to 126 Brentwood Road, Ingrave	H	0.1																	
056A	Land at Hayden and Ardslia, Wyatts Green Road, Wyatts Green	H	0.3																	
056B	Land at Hayden and Ardslia, Wyatts Green Road, Wyatts Green	H	2.5																	
057A	Meadowside, Swallows Cross Road, Mountnessing	H	0.4																	
057B	Meadowside, Swallows Cross Road, Mountnessing	H	1.5																	
058A	Hall Lane Farm, Little Warley	H	0.8																	
058B	Hall Lane Farm, Little Warley	H	1.9																	
059	Rear of 83-93 Park Road, Brentwood	H	0.1																	
060	Land adjacent and rear of 207-217 Crescent Road, Brentwood	H	0.1																	
061	18 Westbury Drive, Brentwood	H	0.0																	
062	Land adjacent to 110 Priests Lane, Shenfield	H	0.1																	
063	Land adjacent to Gayland, Thorndon Approach, Herongate	H	0.2																	
066	Greenways, School Road, Kelvedon Hatch	H	0.4																	
067A	Salmonds Farm, Salmonds Grove, Ingrave	H	0.9																	
067B	Salmonds Farm, Salmonds Grove, Ingrave	H	1.9																	
068	Land off Penny Pots Barn, Ongar Road, Stondon Massey	H	0.2																	

Ref	Name	Type	Area	1. AQMA	2. SSSI	3. Nature reserve	4. Ancient woodland	5. Local Wildlife Site	6. Woodland	7. GP	8. Primary school	9. Sec school	10. Conservation Area	11. Scheduled monm't	12. Reg. Park/Garden	13. Listed Building	14. Flood Zone 2	15. Special Landscape	16. Green Belt	17. Agricultural land
069	Land west of Nine Ashes Road, Stondon Massey	H	2.0																	
070	Land adjacent to St. Margaret's Church, Doddinghurst	H	1.0																	
071	Wyatts Field, Wyatts Green	H	2.5																	
072	Land adjacent to Whitelands, Wyatts Green	H	0.8																	
073	Land adjacent to Mountnessing Primary School	H	1.2																	
074	Land at Church Road, Kelvedon Hatch	H	1.5																	
075A	Swedish Field, Stocks Lane, Kelvedon Hatch	H	0.5																	
075B	Land off Stocks Lane, Kelvedon Hatch	H	2.2																	
076	Land south of Redrose Lane, north of Orchard Piece, Blackmore	H	1.7																	
077	Land south of Redrose Lane, north of Woollard Way, Blackmore	H	3.3																	
078	Land at Parklands, High Street, Ingatestone	H	1.8																	
079A	Land adjacent to Ingatestone by-pass (part bounded by Roman Road, south of flyover)	H	1.4																	
079B	Land adjacent to Ingatestone by-pass (part bounded by Roman Road)	H	1.2																	
080	Land adjoining 'The Surgery' Outings Lane, Doddinghurst	H	0.2																	
081	Council Depot, The Drive, Warley	H	3.0																	
082	Land fronting Warley Street, near Great Warley	H	0.4																	
083	Land west of Warley Hill, Pastoral Way, Warley	H	2.2																	
085B	Land adjacent to Tipps Cross Community Hall, Blackmore	H	0.3																	

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	Road, Tipps Cross																			
086	Land at Sandringham Road, Pilgrims Hatch	H	0.0																	
087	Land at Alexander Lane, Shenfield	H	1.7																	
088	Bishops Hall Community Centre and Land	H	4.8																	
090	Land rear of St. Thomas of Canterbury School, Sawyers Hall Lane, Brentwood	H	3.8																	
091	Land at end of Greenshaw, Brentwood	H	0.1																	
092	Land at Kelvedon Green, Kelvedon Hatch	H	0.1																	
093	Land at Fielding Way, Hutton (rear of Rayleigh Road shopping parade)	H	0.1																	
094	Land between 375 and 361 Roman Road, Mountnessing (south of No. 361)	H	0.2																	
095A	The Water Meadows, Mountnessing	H	0.7																	
095B	The Water Meadows, Mountnessing	H	2.8																	
096	Hutton Village Dental Practice, 217 Rayleigh Road, Hutton	H	0.0																	
097	Harewood Road bungalows, Pilgrims Hatch	H	0.3																	
098	Ingleton House, Stock Lane, Ingatestone	H	0.3																	
099	Victoria Court, Victoria Road, Brentwood	H	0.5																	
103A	The Old Barn, Woodside, North Drive, Hutton	H	0.0																	
103B	Land to east and west of North Drive, Hutton	H	0.4																	
103C	Land to east and west of North Drive, Hutton	H	0.0																	
103D	Land to east and west of North Drive, Hutton	H	0.3																	

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104	Land at Stondon Massey scrapyard, Clapgate, Chivers Road, Stondon Massey	H	3.6																	
105	Land between 339 and 361 Roman Road, Mountnessing (north of No. 361)	H	0.4																	
106	Site adjacent to Ingatestone Garden Centre (former A12 works site)	H	5.5																	
108	Old Pump Works, Great Warley Street	H	0.8																	
117A	Ford Warley - Southern Site	H	6.8																	
117B	Ford Warley - Northern Site	H	1.3																	
126	Land East of West Horndon, South of Station Road	H	19.5																	
128	Ingatestone Garden Centre, Roman Road, Ingatestone	H	3.5																	
129	Friars Avenue Car park Shenfield	H	0.2																	
130	Hunter Avenue Car Park, Shenfield	H	0.6																	
131	Land at Brookfield Close, Hutton	H	0.1																	
132A	Land at Albany Road, Pilgrims Hatch	H	0.1																	
132B	Land at Albany Road, Pilgrims Hatch	H	0.1																	
133	Maple Cross Garages, Hutton, Brentwood	H	0.3																	
134	Gloucester Road Garages, Pilgrims Hatch	H	0.1																	
135	Land at Hutton Drive, behind Tower House, Hutton, Brentwood	H	0.1																	
136	Land at Church Crescent, Mountnessing	H	0.1																	
137A	Land at Broomwood Gardens, Pilgrims Hatch, Brentwood	H	0.1																	

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137B	Land at Broomwood Gardens, Pilgrims Hatch, Brentwood	H	0.0																	
139	Land rear of The Spinney, School Road, Kelvedon Hatch	H	0.1																	
140	Land at Birley Grange, Hall Lane, Shenfield	H	0.7																	
141	Brentwood Leisure Park at Warley Gap	H	7.8																	
142	(Land North-East of Thoby Farm) St Annets Road, Mountnessing, Brentwood	H	2.0																	
143	Land East of Peartree Lane and North of Peartree Close	H	1.9																	
145	Land at Doddinghurst Road adjacent Brickhouse Wood, Pilgrims Hatch	H	0.8																	
146	Land adjacent Hillcrest Nursery, Herongate/Ingrave	H	0.7																	
147	Land at Joy Fook restaurant, adjacent Bentley Golf Club, Ongar Road	H	0.4																	
148	Land at Moat Farm, 48 Crow Green Road, Pilgrims Hatch	H	0.7																	
149	Land at Thriftwood Scout Campsite adjoining Beech Ave, Cherry Ave & Knights Way	H	0.6																	
151	Academy Place, Brook Street/Spital Lane, Brentwood	H	0.7																	
153	Land to South of Fryerning Lane, Ingatestone	H	2.0																	
154	Land off the Chase, Brentwood	H	0.2																	
156A	Greenacres Riding Stables & land opposite, Beads Hall Lane, Pilgrims Hatch	H	6.2																	
156B	Greenacres Riding Stables & land opposite, Beads Hall Lane, Pilgrims Hatch	H	1.5																	

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157	4 Nags Head Lane, Brentwood	H	0.4																	
159	Land off Crow Green Lane, Pilgrims Hatch	H	2.8																	
162	Little Warley Hall Farm, Little Warley Hall Lane, Little Warley	H	4.1																	
163	Old Mill Site, Hay Green Lane, Wyatts Green	H	0.2																	
164	North of Hay Green Lane, Wyatts Green	H	3.5																	
165	Keys Hall, Eagle Way, Brentwood	H	0.3																	
166	La Plata Grove, Brentwood	H	2.4																	
167	Land adjacent Hill Cottage, Warley Road, and Mill House, Mascalls Lane, Warley	H	1.5																	
168	Land at Searchlight Farm, School Road, Kelvedon Hatch	H	0.7																	
174	Land south of Hook End Road, Doddinghurst	H	4.6																	
176	Land at former Bentley Zoo, Hulleys Lane, Brentwood	H	0.2																	
178	Land at Priests Lane (east) adjacent Bishops Walk, Brentwood	H	0.6																	
179	Land adjacent Wybarns Farm and Mount Pleasant Cottage, Chelmsford Road, Shenfield	H	2.1																	
181	Green Keepers Cottage, Thorndon Gate, Ingrave	H	0.1																	
183	Former sewage pumping station at Ingrave Hall, Ingrave	H	5.1																	
184	Former Saxton 4x4 garage, Rayliegh Road	H	0.4																	
185	Land at Rectory Chase, Doddinghurst	H	0.9																	
186	Land at Crescent Drive, Brentwood	H	1.5																	
188	Land at Ashwells Lodge, Blackmore Road, Doddinghurst	H	1.9																	

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189	Former Catrina Nursery, Ongar Road, Pilgrims Hatch	H	3.0																	
190	Gardeners, Ongar Road, Kelvedon Hatch	H	3.3																	
191	Pettits, Frog Street, Kelvedon Hatch, Brentwood	H	0.4																	
192	Heron Hall, Herongate, Brentwood	H	236																	
193	Land on the north side of Church Lane, Warley Street	H	0.3																	
194	Brizes Corner Field, Blackmore Road, Kelvedon Hatch	H	0.9																	
195	Birchwood, School Road, Kelvedon Hatch	H	1.8																	
196	Land to North West of Lowes Farm, Wyatts Green Road, Wyatts Green	H	1.8																	
197	Land to rear of 31-40 Nags Head Lane, Brentwood	H	1.3																	
198	Land to South of Doddinghurst Road, Pilgrim Hatch	H	5.7																	
199	Land to the East Of Ingatestone Road. Blackmore	H	6.0																	
201	Land to West of Place Farm Lane, Kelvedon Hatch	H	9.4																	
202A	Land to the South of Blackmore, off Blackmore Road	H	4.5																	
202B	Land to the South of Blackmore, off Blackmore Road	H	2.7																	
203	Land to the West of Blackmore, off Blackmore Road	H	24.6																	
204	Land to North of Blackmore Road, Blackmore Road, Kelvedon Hatch	H	5.8																	
205	Land to East of Nine Ashes Road, Nine Ashes Road, Stondon Massey	H	0.4																	
206	Land to North of Reeves Close, Stondon Massey	H	1.7																	
207	Land to North of Blackmore Road, Stondon Massey	H	0.5																	

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208	Land at the West of Ongar Road, Stondon Massey, Brentwood	H	0.2																	
209	Land to South of Blackmore Road, Doddinghurst	H	0.9																	
210	11-12 Church Road, Kelvedon Hatch, Brentwood, Essex	H	1.2																	
211	Land and building on the West of Church Lane, Hutton	H	4.2																	
212	Coombe Woods, Beredens Lane, Warley	H	8.0																	
213	Land Adj.Crescent Cottage, Nines Ashes Road, Stondon Massey	H	0.3																	
214	Land North West Side of Blackmore Road, Stondon Massey	H	2.1																	
215	7 Church Road, Kelvedon, Hatch, Brentwood, Essex. CM14 5TJ	H	0.5																	
216	Applegrove, Swallow Cross Road, Mountnessing	H	0.6																	
217	Eagle Field, Kelvedon Hatch	H	1.4																	
218A	Land East of Hall Lane, Shenfield	H	12.4																	
218B	Land East and West of Hall Lane, Shenfield	H	4.1																	
219	Land to the East of Hutton Village, Hutton	H	2.8																	
220	Collins Farm, Goodwoods Ave, Hutton	H	10.2																	
221	Crown Corner Country Store, Ongar Road, Kelvedon Hatch	H	0.8																	
222	Jasmine Cottage, 141 Billericay Road, Herongate	H	0.1																	
223A	Land Adjacent to "Chitral", Wyatts Green Road, Swallows Cross, Brentwood	H	0.4																	
223B	Land Adjacent to iChitralm, Wyatts Green Road, Swallows Cross Mountnessing	H	1.1																	
224	Hermes, Brook Lane, Doddinghurst	H	0.9																	
225	The Nutshell, Stock Lane, Ingatestone	H	0.5																	

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226	Manor House, Haygreen Lane, Blackmore	H	0.3																	
227	144 Crow Green Road, Pilgrims Hatch	H	0.3																	
230	Bowmer (Waste Disposal), Magpie Lane, Little Warley	H	1.6																	
233	Rear of Meadow View, Green Lane, Pilgrims Hatch	H	0.0																	
234	Keys Hall Shopping Parade, Eagle Way	H	0.4																	
235	Land to the north of Alexander Lane, Shenfield	H	1.4																	
236	Land at Ashwells Cottages, Pilgrims Hatch	H	2.3																	
239	Land to the rear of 109 Roman Road, Mountnessing	H	0.5																	
240	Land north of White House, Ongar Road, Kelvedon Hatch	H	0.7																	
241	Land to the rear of Hillcrest Nursery, off Thorndon Approach, Ingrave	H	1.2																	
243	Parklands, High Street, Ingatestone	H	11.2																	
244	Land between Billericay Road and Heron Court, Herongate	H	1.0																	
245	Land at Hook End Farm, Hook End	H	9.3																	
246	Wrightsbridge Farm, Weald Road, South Weald	H	0.8																	
247	Land north of Rayleigh Road, Adjacent North Drive, Hutton	H	0.6																	
248	Wyevale Garden Centre, Ongar Road	H	3.8																	
249	Land adjoining Lodge Cottages, Ingatestone Road, Blackmore	H	0.2																	
250	Post Field, Redrose Lane, Blackmore	H	1.1																	
251	Land at Elm Farm, Spriggs Lane, Blackmore	H	1.6																	
252	Land adjacent to Meadvale, Chelmsford Road, Blackmore	H	0.2																	
253	Land north of Bakers Farm, Roman Road, Mountnessing	H	5.5																	

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254A	Land at Bennetts Farm, Weald Road, South Weald	H	6.2																	
254B	Land at Bennetts Farm, Weald Road, South Weald	H	6.9																	
254C	Land at Bennetts Farm, Weald Road, South Weald	H	6.4																	
254D	Land at Bennetts Farm, Weald Road, South Weald	H	14.1																	
255	Land at Broadfields, Tilbury Road, East Horndon	H	12.0																	
256	Land adjacent Chappington House, Magpie Lane, Little Warley	H	0.1																	
257	Warley Auto Salvage, Warley Street, Great Warley	H	1.4																	
260	Leverton Hall, Dark Lane, Brentwood	H	6.8																	
261	Chindits Lane, Warley	H	4.6																	
262	Land adjcant to the Hirst, Church Lane, Doddinghurst	H	1.9																	
263	Land east of Chelmsford Road, Shenfield	H	9.9																	
264	Land at Havering Grove Farm, Rayleigh Road, Hutton	H	17.8																	
265	Clementine Farm, Murthering Lane	H	6.4																	
266	Land adjacent Tye Lodge, Doddinghurst Road, Pilgrims Hatch	H	24.5																	
268A	Land to the east of Wash Road, Brentwood	H	27.7																	
268B	Land to the east of Wash Road, Brentwood	H	10.9																	
269	Hartwood Hospital, Eagle Way, Warley	H	1.1																	
270	Hartwood Road Allotments	H	3.3																	
271	River Road Allotments	H	2.2																	
272	Park Road Allotments	H	2.2																	
273	Chivers, Chivers Road, Kelvedon Hatch	H	4.9																	

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275	Land north of Coxtie Green Road	H	0.1																	
276	Oak Hurst, Chelmsford Road, Shenfield	H	0.6																	
277A	Land at Drury's Farm, Roman Road, Mountnessing	H	11.4																	
277B	Land south of Drury's Farm, Roman Road, Mountnessing	H	5.3																	
278	75 Peartree Lane, Doddinghurst	H	0.4																	
279	Land to the south east of Bird Lane, Great Warley	H	3.5																	
280	Straight Mile Nursery, Ongar Road	H	1.3																	
281A	Land north of Pilgrims Hatch	H	3.1																	
281B	Land north of Pilgrims Hatch	H	2.5																	
281C	Land north of Pilgrims Hatch	H	1.2																	
282	Land north east of Church Road, Watton's Green	H	9.4																	
283A	Land to the east of Warley Street	H	8.2																	
283B	Land to the east of Warley Street	H	1.7																	
284	Land adjacent 7 Hanging Hill Lane, Hutton	H	0.9																	
285	Land rear of Grange Close, Ingrave	H	1.2																	
286	Long Plantation, Brentwood Road, Herongate	H	3.4																	
287	Land to the east of Mascalls Lane	H	48.3																	
288A	Land to the north west of Roman Road, Ingatestone	H	1.2																	
288B	Land to the north west of Roman Road, Ingatestone	H	2.1																	
289	Land to the east of Goodwood Avenue, Hutton	H	9.5																	
290	Land to the east of Hall Lane, Shenfield	H	13.2																	

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291A	Land North West of Shenfield, access via Hall Lane	H	6.5																	
291B	Land North West of Shenfield, access via Hallwood Crescent	H	10.7																	
292A	Suffolk House Yard, Ashwells Road, Pilgrims Hatch	H	0.2																	
292B	Suffolk House Yard, Ashwells Road, Pilgrims Hatch	H	0.4																	
292C	Suffolk House Yard, Ashwells Road, Pilgrims Hatch	H	3.6																	
293	Pondfield Yard, Ashwells Road, Pilgrims Hatch	H	0.2																	
294	Chestnut Field, Backmore Road, Hook End	H	0.3																	
295	Pottagers Land, Hunters Chase Garden Centre, Rayleigh Road, Hutton, Brentwood	H	3.4																	
296	Land between A12 and Hall Lane, Shenfield	H	38.7																	
297	Land to the west of Hall Wood, Shenfield	H	4.5																	
299	Land at Weald Road and Honeypot Lane (land adjacent to former site of St Faiths Hospital)	H	15.6																	
300	Land to the South East of Hall Wood, Shenfield	H	0.8																	
301	Land to the east of Sawyers Hall Farm, Brentwood	H	3.3																	
302A	Land off Ongar Road, Pilgrims Hatch	H	13.2																	
302B	Land off Ongar Road, Pilgrims Hatch	H	4.9																	
302C	Land off Ongar Road, Pilgrims Hatch	H	53.0																	
303A	Land at Orchard Farm, Little Warley	H	19.0																	
303B	Land at Orchard Farm, Little Warley	H	9.7																	
304	681 Rayleigh Road, Hutton, Brentwood	H	3.8																	
305	Little Corston, Thoby Lane, Mountnessing	H	0.9																	

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306	Lingwood & land to east, Ashwell Road, Brentwood	H	2.9																	
307	Clanmere, North Drive, Hutton	H	0.8																	
308	Berendens Lane, Great Warley	H	1.9																	
309	Lorropark, Church Ln, Doddinghurst	H	1.8																	
310	Land at Dagwood Lane, Doddinghurst	H	3.8																	
311	The Eagle and Child Public House, Chelmsford Road, Shenfield	H	0.2																	
313	Land between 55 Middle Road and Brookside Farm, Ingrave	H	3.4																	
314	Land to the south of Rayleigh Road, Hutton	H	25.0																	
315	Land to the south of Sylvia Avenue, Hutton	H	7.4																	
316	Land to the South Side of Hook End Road, Doddinghurst	H	21.3																	
317	Land and buildings south west of Rayleigh Road, Hutton	H	10.8																	
318	Land east of Honeypot lane, Brentwood	H	2.7																	
319	The Hurst, Church Lane, Doddinghurst	H	1.1																	
320	41 Shenfield Road, Shenfield	H	0.8																	
003	Wates Way Industrial Estate, Ongar Road, Brentwood	M	1.0																	
017	Telephone Exchange, Ongar Road, Brentwood	M	0.5																	
020	West Horndon Industrial Estate, Childerditch Lane, West Horndon	M	6.5																	
021	Horndon Industrial Estate, Station Road, West Horndon	M	10.0																	
037D	Land West of Thorndon Avenue, West Horndon	M	64.7																	
037E	Land West of Thorndon Avenue, West Horndon	M	12.0																	
089	Brentwood Centre and land	M	20.0																	

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100	Baytree Centre, Brentwood	M	1.3																	
102	William Hunter Way car park, Brentwood	M	1.2																	
144	Area east of A128 towards tTimmermanjs Garden Centree and Dunton Hill Golf Course)	M	0.9																	
150	Land East of A128, south of A127	M	12.2																	
152	Land East of Horndon Industrial Estate	M	0.8																	
158	Land North of A1023 Chelmsford Road, Shenfield	M	4.5																	
173	BP Garage & McDonald's Restaurant, A1023 Chelmsford Road (A12 J12)	M	0.2																	
175B	Land at M25, J28, Brook Street, Brentwood (including existing buildings), and surrounding land	M	19.6																	
175C	Land at M25 J28, Brook Street, Brentwood (including existing buildings), and surrouding land	M	15.5																	
180	Land at Brook Street & Wigley Bush Lane, Brentwood (current Vauxhall garage)	M	1.1																	
200	Entire Land East of A128, south of A127	M	235																	
200	Entire Land East of A128, south of A127	M	7.5																	
200A	Dunton Hills Garden Village	M	224																	
231	Land to the north of the A127	M	64.6																	
232	Multi-storey car park, Coptfold Road, Brentwood	M	0.2																	
258	Hutton Service Station, Rayleigh Road, Hutton	M	0.1																	
259	91-105 Hutton Road, Shenfield	M	0.1																	