

Sustainability Appraisal (SA) of the Brentwood Local Plan

Interim SA Report
Non-technical Summary

January 2018

DOCUMENT DETAILS					
Rev	Date	Details	Prepared by	Reviewed by	Approved by
1	January 2018	Non-technical summary (NTS) of the Interim SA Report published alongside the 'Preferred Allocations' consultation document	Mark Fessey Principal Consultant	Steve Smith Technical Director	Steve Smith Technical Director

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AECOM Infrastructure & Environment UK Limited
 2 Leman Street, London E1 8FA
 Telephone: +44 (0)20 7798 5000

Introduction

AECOM is commissioned to lead on Sustainability Appraisal (SA) in support of the emerging Brentwood Local Plan. Once adopted, the plan will allocate land for development and set policies to guide decisions on development and changes in how land is used.

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

At the current time, a 'Preferred Allocations' consultation document is published by the Council, and an 'Interim SA Report' is published alongside, with a view to informing the consultation. This is a Non-technical Summary (NTS) of the SA Report.

Structure of the Interim SA Report / this NTS

SA reporting essentially involves answering the following questions in turn:

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

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

What's the scope of the SA?

The scope of the SA is essentially reflected in a list of sustainability topics and objectives. Taken together, this list indicates the parameters of SA, and provides a methodological 'framework' for appraisal.

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 to reduce per capita emissions. • An opportunity exists to obtain a greater proportion of energy from renewable sources, and development should be constructed and situated in order to minimise resource use. • Businesses in the Borough should to contribute to the creation of a low-carbon economy, including reduced levels of energy use in buildings and from transport.

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.

PLAN-MAKING / SA UP TO THIS POINT

An important element of the required SA process involves appraising ‘reasonable alternatives’ in time to inform development of the draft plan, and then publishing information on reasonable alternatives for consultation alongside the draft plan.

As such, Part 1 of the SA Report explains how work was undertaken to develop and appraise a ‘reasonable’ range of alternative approaches to site allocation, or ‘spatial strategy alternatives’, in time to inform development of the Preferred Allocations consultation document.

Specifically, Part 1 of the report -

- 1) explains the process of **establishing** the reasonable spatial strategy alternatives;
- 2) presents the outcomes of **appraising** the reasonable spatial strategy alternatives; and
- 3) explains reasons for **establishing** the preferred spatial strategy option, in light of the appraisal.

Who led on this work?

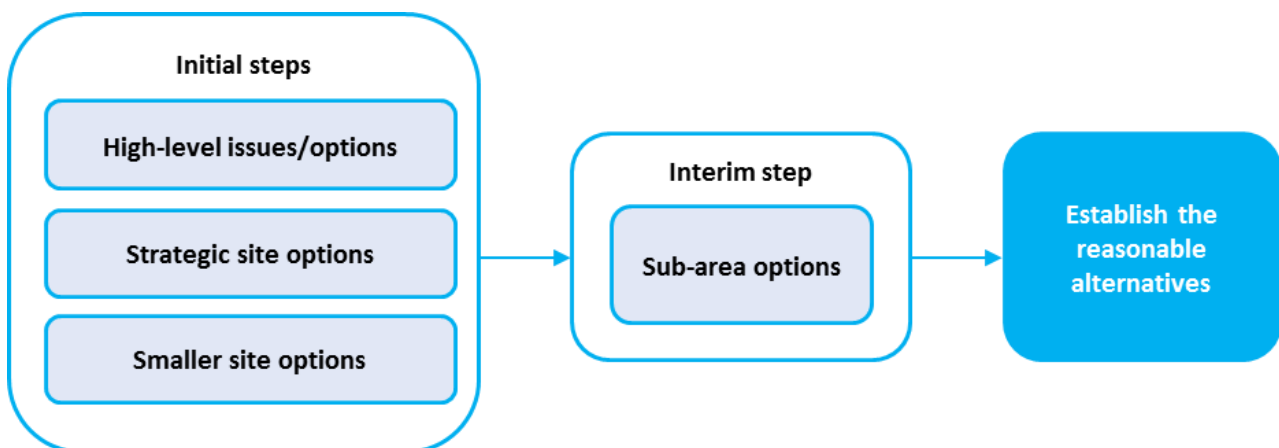
It is important to be clear regarding the division of responsibilities -

- 1) Establishing the reasonable alternatives is ultimately the responsibility of the Council; however; in practice AECOM has worked closely with the Council, as an advisor.
- 2) Appraising the reasonable alternatives is the responsibility of AECOM.
- 3) Establishing the preferred spatial strategy option is the responsibility of the Council.

Establishing reasonable alternatives

The main report explains how reasonable alternatives were established subsequent to a lengthy process of gathering evidence and examining/refining options. The process can be summarised in a diagram.

Establishing the reasonable alternatives



The process of establishing the reasonable alternatives is discussed within Chapter 6 of the Report, which is quite lengthy. As such, it is helpful to present a brief overview of each section within Chapter 6 -

Section 6.1	Introduces the process, and presents the flow diagram.
Section 6.2	Presents a brief discussion of high-level issues/options , in particular focusing on the matters of: objectively assessed housing needs (OAHN); other strategic considerations with a bearing on the quantum of homes to be provided for through the plan; and high-level considerations in respect of the broad distribution of housing.
Section 6.3	Introduces the strategic site options that are available, and hence might potentially feature within reasonable spatial strategy alternatives.
Section 6.4	Introduces the smaller site options that are available, and hence might potentially feature within reasonable spatial strategy alternatives.
Section 6.5	Draws together information from the three steps discussed above, in order to arrive at a discussion of sub-area options , e.g. options for the A12 corridor and the A127 corridor.
Section 6.6	Draws together information from the steps discussed above, in order to establish a single set of reasonable spatial strategy alternatives for appraisal.

The reasonable spatial strategy alternatives ultimately arrived at (within Section 6.6 of the SA Report) are presented below - see Table 1. The key point to note is that there are a number of '**constants**' across the alternatives (including allocation of a package of preferred smaller allocations) and a number of '**variables**'.

There are four variables, each associated with either two or three **options**:

- 1) North of Brentwood - should it be allocated, or not?
- 2) West of West Horndon - should it be allocated, and if so for how many homes?
- 3) East of West Horndon - should it be allocated, and if so for how many homes?
- 4) Dunton Hills Garden Village - should it be allocated, or not?

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 Objectively Assessed Housing Need (OAHN), which means 380 dwellings per annum (dpa). As part of this there is a need to provide a contingency, or 'buffer', to account for the risk of unforeseen delayed delivery at one or more sites.
- West Horndon East - the assumption is that this site -
 - 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
 - could not be allocated in addition to Dunton Hills Garden Village.
- Too many homes - it is 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 (or 494 if the 'cap' is removed).

The reasonable 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	
		Main urban area (greenfield)	95	95	95	95	95	95	95	95	95	
		Main urban area Green Belt	1437	1437	1437	1437	1437	1437	1437	1437	1437	
		West Horndon urban	580	580	580	580	580	580	580	580	580	
		Ingatstone Green Belt	218	218	218	218	218	218	218	218	218	
		Northern villages Green Belt	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%	

Appraising reasonable alternatives

Introduction

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.

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.

Air quality

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.

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.

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.

Biodiversity

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.

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).

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).

Climate change mitigation

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.

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.

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)

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.

Communities and wellbeing

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.

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.

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.

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."

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.

Economy and employment

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.

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.

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.

Flooding

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.

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

Heritage

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).

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).

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.

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.

Housing

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).

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.

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).

Landscape

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'.

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.

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.

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.

Soil

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.

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.

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.

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.

Water

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.

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).

Appraisal conclusion

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').

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.

Establishing the preferred option

The following text is the **response of Officers** to the alternatives appraisal, i.e. reasons for supporting the preferred option in-light of the alternatives appraisal.

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.

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 cab 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.

APPRAISAL FINDINGS AT THIS STAGE

Part 2 of the Interim SA Report answers the question – *What are appraisal findings at this stage?* – by presenting an appraisal of the Preferred Allocations. Appraisal findings are presented as a series of narratives under the ‘SA framework’ headings, followed by an overall conclusion.

The overall conclusion is as follows -

The appraisal 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.

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.

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’.

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.

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).

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.

Next steps

Part 3 of the SA Report answers– *What happens next?* – by discussing plan finalisation and monitoring.

Plan finalisation

Preparation of the Proposed Submission Plan

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).

The SA Report will be published alongside the Proposed Submission Plan. It will provide all of the information required by the SEA Regulations 2004.

Submission and examination

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.

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).

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

Monitoring

The SA Report must present ‘measures envisaged concerning monitoring’. 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.

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.