



Planning Policy Team (fao Phil Drane)
Brentwood Borough Council
Town Hall
Ingrave Road
Brentwood
Essex
CM15 8AY

20 February 2015

Dear Mr. Drane,

Sustainability Appraisal (SA) of the Brentwood Borough Local Plan Interim SA Report January 2015

We write further to the above consultation on behalf of our client, Hermes Property Unit Trust (“Hermes”), the owners of the Horndon Industrial Park, Station Road, West Horndon (your site ref 021). We also refer you to our letters to you dated 17 February 2015 (regarding the Strategic Growth Options draft) and 30th September 2013, regarding the preferred options draft local plan and (particularly how it related to) the Interim SA of that time.

We have reviewed the current Interim SA and also compared it to the Interim SA issued in 2013, for the preferred options draft local plan.

Both documents appear largely identical in terms of the context, baseline and how the SA’s were set up as part of the plan making process. This is probably unsurprisingly since both assessments were undertaken by the same company (in fact, the same people within the company), and given that they would be assessing in largely the same way, there was little need to make significant changes to the 2013 version – rather use it as a framework to assess the latest round of options .

This does raise questions about the status of the preferred options – can you clarify the Council’s position on its preferred draft, particularly in respect of West Horndon?

The introductory parts of both versions have no appreciable differences: the most noticeable change is the combination of section 3 and 4 in the 2013 version to form section 3 in the 2015 version. However, the “Local Plan Objectives” set out at paragraph 5.1.5 have been altered: originally they read,

“Direct development growth to the existing urban areas of Brentwood, Shenfield and West Horndon in locations well served by existing and proposed local services and facilities “

This was altered for 2015 version to:

“Direct development growth to the existing urban areas in locations well served by existing and proposed local services and facilities.”

This alteration might reflect the different aims of the two version of the Local Plan. However, members of the public are left speculating about the significance of the way the objective has been expressed. We would grateful to receive Officers' clarification on this change.

"PART 1 WHAT IS THE SUSTAINABILITY 'CONTEXT'?" - lists the areas/ factors that will form the basis of the appraisal. Not surprisingly, this list is identical in both versions of the SA - the only appreciable difference we could discern was the 2015 version presents a shorter, summarised version of the way the same information was presented in the 2013 version.

"WHAT'S THE SUSTAINABILITY 'BASELINE'?" – again, both versions are similar, except 2015 version does not include a section entitled *"The likely situation in the future (assuming no intervention through the plan)"* for each heading – we are speculating that this may be largely stylistic reasons (ie no slavish adherence to a particular format) but we would be grateful to receive confirmation as to the reasons.

Moving on to the differences between the versions in the way each heading has been dealt with (in each case we seek to understand why the changes have been made):

Air quality - similar except reference *"Brentwood Borough features a high proportion of Air Quality Management Areas (AQMAs) when compared to the rest of the County"* has been removed. Has this now changed in some way?

Biodiversity – identical in both versions

Climate change mitigation – identical in both versions, but paragraph stating, *"In terms of sustainable transport infrastructure: Fast train services stop at Shenfield and Ingatestone; metro services stop at Brentwood and Shenfield. In future Crossrail will replace the existing metro service, stopping at Brentwood and terminating at Shenfield. Crossrail will provide the Borough with an improved train service, increased capacity, station improvements and a direct link to London Heathrow airport"*, has been deleted. We are not aware the position of Crossrail has changed, but would ask for clarification.

Community and well-being, the following paragraph was removed, *"According to the Department for Health, health priorities identified for Brentwood Borough include reducing road injuries and deaths, and increasing physical activity in adults and children"* – has this now changed?

Cultural heritage – identical

Economy and employment– identical

Flooding - identical but added *"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"*

Housing – same in both versions, expect for one paragraph, which now reads, *"In terms of the type of housing that is required, the Brentwood Borough Strategic Housing Market Assessment (SHMA) 2013 found that of a total demand of 2,743 market housing is needed within the borough in the next five years. The SHMA recommends that 35% of new homes are affordable housing (approximately 960 houses)"*.

In the 2013 version this read, *"In terms of the type of housing that is required, the 2008 London Commuter Belt (East)/M11 Sub-Region Strategic Housing Market Assessment (SHMA) found that of a total housing requirement of 3,200, intermediate affordable housing should make up the greatest*

proportion, numbering 2,100 (65.5%); social rented housing should form the next largest segment of the tenure mix, at 1,000 (29.6%); and additional market housing should number just 200 (4.9%)”.

The significance of the alteration is not clear – could you clarify if the early one is now obsolete?

Landscape – identical but the following removed *“Around 80% of the Borough is designated Green Belt, which is protected for the ‘openness’ of its landscape (and to prevent settlement coalescence).”* Again, the reason we seek clarification as to whether the point made is now changed.

Soil and Contamination – identical

Waste – identical, but the figure for waste the borough reuses, recycles, or composts is now 51% - it was 56% in the 2013 version – presumably this reflects a slightly worsening record?.

Water quality and water resources – identical

“WHAT ARE THE KEY ISSUES THAT SHOULD BE A FOCUS OF THE SA?” - this section is identical in both versions, except for landscape point where the following was removed *“Around 80% of the Borough is designated Green Belt, which is protected for the ‘openness’ of its landscape (and to prevent settlement coalescence).”* See the landscape above

“PART 2: WHAT HAS PLAN-MAKING / SA INVOLVED UP TO THIS POINT?” – largely similar in both versions, except the addition of the following:

“This part of the report comprises two chapters:

- *Chapter 10 provides an overview of plan-making / SA between 2009 and 2013.*
- *Chapter 11 explains how (in late 2014) alternatives were established in relation to two key plan policy areas / issues -*
 - 1) *The location for a strategic scale development scheme*
 - 2) *The approach that should be taken to locating (a relatively small amount of development in the rural area”*

And,

“The Preferred Options consultation document received extensive representations, and it subsequently became apparent that the policy approach to addressing a number of key issues needed to be reconsidered, including:

- *Objectively assessed housing need (which has increased by 2,000 to 5,500 new homes in the borough over the next 15 years);*
- *Employment land and job provision;*
- *Supporting the growth of Basildon;*
- *Opportunities associated with Crossrail;*
- *Renewable energy / sustainability policy; and*
- *Gypsy and Travellers’ accommodation.*

10.1.7 Throughout 2014 the Council worked to revisit issues / policies in-light of consultation responses and other sources of evidence. At the current time, the Council is in a position to present further options for consultation”

Following on from then, the versions of the SA’s are different, to reflect their different focuses; the subsection on Spatial Strategy (based on growth targets and set out in specific sites) is replaced by introducing the 5 options (based on broad locations) that are to be assessed.

“PART 3: WHAT ARE THE SA FINDINGS AT THIS STAGE?” – this section in both versions sets out the assessment for options presented in the preferred options and growth options draft local plans. Even so, it is still possible to look at the way both versions have assessed West Horndon.

The latest interim SA sets out to compare each option, resulting in a relative score. There appears to be some evidence that the assessments seek to compare West Horndon with Dunton Garden Suburb, or both those options against the rest – rather than looking at each option more objectively, based on an individual assessment against the listed criteria.

Air quality – the assessment states, *“Option 1 (Dunton) offers the greatest potential for development to occur while limiting the need for additional vehicular travel. While West Horndon (Option 2) already has a railway station it does not provide easy access to services and employment.”*

It goes on to conclude, *“It is not possible to conclude significant positive effects on the basis that growth could still result in an increase in car travel locally (and possibly traffic congestion to some extent). Essentially, the conclusion of this appraisal is that Option 1 has the greatest potential to offset the increase in car travel locally by supporting more ‘sustainable’ patterns of travel”*

Option 1 scored 1 (best one under this heading, with option 2 scored 2).

It is worth looking at what the 2013 version of the SA concluded about air quality issues for West Horndon – it simply stated “no constraints”.

It is unclear why the assessor came to mark West Horndon below Dunton, especially (as they point out) there is already an existing railway station and public transport resource – if anything, it is more likely West Horndon should be placed above Dunton: however, further clarification is sought.

Biodiversity – the assessment is *“Options 1 and 2 have the potential to adversely affect the Thorndon Park SSSI.”* It goes on to conclude *“At this stage significant negative effects are considered unlikely, but impacts to biodiversity could warrant further investigation if development near the previously mentioned sites of biodiversity value is pursued”* – Both score both 3.

The 2013 SA simply states *“Nearest SSSI (Thorndon Park) is 225m away”* – to point out it was sufficiently far away not to be a problem for West Horndon.

We are unable to give a firm view on the potential for detrimental impact from Dunton- it may be greater. However, to conclude there was no problem associated with West Horndon in 2013, but there is in 2015 is inconsistent – further clarification is sought.

Climate Change Mitigation – the assessment states *“It is not possible to conclude significant effects (given that climate change mitigation is a global issue and the influence of the growth strategy promoted through the Local Plan will be minor).”* Despite that, Dunton scored 1 and West Horndon scored 2. It may be these are (again) the wrong way around; certainly so when factoring in the use of existing infrastructure and services, and the reuse of previously developed land rather than exclusively farmland in green belt. Further clarification is sought.

Community and Well Being – Option 1 scores 1 because of health impacts of more sustainable forms of travel. Option 2 scores 4 because developer contributions are required. This is an odd comparison because it is almost certain both options will require developer contributions (although they are likely to be greater in Dunton). It is also odd because West Horndon has existing sustainable transport links and

Dunton has none. Finally (and similarly to the Climate change heading above), the Council and officers know the removal and reuse of the industrial estates in West Horndon is very popular with local people, resulting in a significant plus in terms of well being – the same cannot be said of Dunton. Further clarification is sought.

Cultural Heritage – Options 1 (scored 5) and 2 (scored 4) score poorly because of impact on Thorndon Park – Dunton because impact on setting of listed buildings.

2013 version of the SA in relation to West Hordon simply says “no constraints”.

We are unable to give a firm view on the potential for detrimental impact from Dunton- it may be greater. However, to conclude there was no problem associated with West Horndon in 2013, but there is in 2015 is inconsistent – further clarification is sought.

Economy and Employment – both options score highest (1), but there is no clear reason offered.

Flooding - both options score poorly because of areas of flood, but the 2013 version of the SA simply points out West Horndon area was not affected by flood. Clearly the 2015 version considers a larger area of land some of which is in flood zone 3, but the result of the assessment done in this way suggests the whole of West Horndon is affected by flood in, and equally poor compared with Dunton.

We are unable to give a firm view on the potential for impact of flood on Dunton - it may be greater. However, to conclude there was no problem associated with West Horndon in 2013, but there is in 2015 is inconsistent – further clarification is sought

Housing – options score equally highest, but no clear reason is offered.

Landscape - West Horndon scores better than Dunton, without explanation.

Soil and Contamination – West Horndon scores best but no explanation

Water quality and water resources – not applicable, but waste water solutions will from part of all developments.

The 2013 version of SA mentioned capacity in Wets Horndon for 200 more dwellings (in addition to the existing capacity also exists on industrial estates). Further clarification is sought.

“Commentary” - the 2015 SA states, *Options 1, 2 and 3 perform better in comparison, most notably in terms of economy and employment objectives. Significant negative effects (at least under Options 1 and 3) would however be likely in terms of ‘landscape’ and ‘soil’ objectives.*

Options 1 and 3 also perform well in terms of community and well-being considerations given relatively good accessibility to community infrastructure for residents of new communities and the potential for large scale growth to help with addressing ‘relative deprivation’ issues where they exist.”

Given the analysis we set out above, and the evidence of inconsistency in scoring, the commentary will need to be redrafted.

“PART 4: WHAT ARE THE NEXT STEPS (INCLUDING MONITORING)?” - Identical in both reports

Although the two versions of the interim SA assess quite different options, the comparison above demonstrates that they are clearly closely related - not surprising given they were prepared by the same consultant team, so closely together in time.

That is not problematic per se, but there appears to be inconsistencies between the conclusions in the 2013 version of the SA (prepared by the same consultants' team in relation to the Council's preferred options) and those set out in the latest one. We seek clarification as to whether the Council have now abandoned the 2013 version.

More worryingly, our examination of the scoring highlights a number of oddities, which really do call for further clarification.

It appears that, despite the lack of any details of whatsoever (except the identification of the land affected), Dunton Garden Suburb (a proposal which it is understood was thought up by officers late last year and is being tested for the first time at present as part of this local plan round) is favoured by the assessor wherever possible, and where that is not possible, then West Horndon scores similarly badly. If this is the case, then it throws doubt on the credibility of the entire interim SA document.

We look forward to your response.

Kind regards

Chris

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Director

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