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**Date:** 01 April 2016

Dear Sir/Madam

**CONSULTATION ON BRENTWOOD DRAFT LOCAL PLAN AND INTERIM SUSTAINABILITY APPRAISAL**

Thank you for your consultation on Brentwood's draft Local Plan, received on 11 February 2016. We are generally very supportive of the plan, but have some suggestions on how it can be improved and some of the policies can be strengthened. Our comments are given below and follow the layout of the draft plan for ease.

**3.Vision**

We are supportive of the plan's vision to grow the Borough sustainably, protecting its environment and realising opportunities to enhance the quality and provision of facilities and minimising the negative impacts of development. It is important to recognise that planning can not only protect existing natural assets, but can also provide opportunities to achieve environmental gains.

The vision could be strengthened by changing 'minimising negative impacts' to 'preventing negative impacts'.

**5. Spatial Strategies**

**Policy 5.1: Spatial Strategy**

We are pleased that this policy ensures development sites will be identified having regard to environmental quality, including wildlife, flood risk, and air and water pollution.

**7. Sustainable Communities**

**Policy 7.1: Dunton Hills Garden Village**

We have no comments to make on this policy. We have already provided our advice on this strategic site through the Joint Consultation with Basildon Council last year.

## **8. Economic Prosperity**

It is a shame that these objectives do not explicitly link the role of natural assets in a prospering economy.

### **Policy 8.5: Supporting the Rural Economy**

We support this policy, in particular point f, which ensures that rural development will only be supported where it has no unacceptable effect on water quality, flooding, watercourses, biodiversity or important wildlife habitats. However, it is not clear from the policy wording or supportive text what is meant by 'unacceptable effects'. Ideally, this should be made clearer to ensure the policy is properly enforced.

## **9. Environmental Protection and Enhancement**

### **Environment, Landscape, Wildlife and Conservation**

We are pleased that this text highlights the environment as an attraction for visitors. This in turn can bring great economic benefits to the area.

### **Policy 9.1: Historic and Natural Environment Landscape Character**

We are very supportive of this policy, which gives regard to conserving and enhancing biodiversity and habitats, including the creation of new habitats.

### **Policy 9.2: Wildlife and Nature Conservation**

We are also very supportive of this policy, which provides a lot of detail on the requirements for development proposals affecting wildlife and nature conservation sites. We are pleased that this policy references Local Wildlife Sites and Local Nature Reserves, as these are not explicitly afforded protection through the National Planning Policy Framework.

We are also pleased to note that river corridors and wetlands are listed as features which could be used as mitigation or compensatory measures.

### **Policy 9.3: Landscape Protection and Woodland Management**

We support this policy and welcome the third paragraph in particular, which promotes the importance of smaller scale contributions to landscape and biodiversity, such as wildlife gardens, ponds, and green roofs and walls, as well as wider habitat creation.

## **10. Quality of Life and Community Infrastructure**

It is recognised in principle that sustainable development is being promoted in this chapter of the Plan. It is good that the Local Plan will tie in and adhere to the recommendations of the Brentwood Level 1 Strategic Flood Risk Assessment (SFRA) and the South Essex Surface Water Management Plan (SWMP) which is currently being reviewed.

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In the near future, there could be additional recommendations highlighted in our emerging Flood Risk Management Plans (FRMPs).

Areas within key urban growth areas of Brentwood, Warley, West Horndon, Ingatestone, Pilgrims Hatch, Dunton and Shenfield, including their communities, are dependent upon effective fluvial Flood Risk Management infrastructure (flood embankments, flood and surface water storage areas) to maintain their sustainability and viability both now and into the future. To ensure the successful and most efficient delivery of the programme we want to work with partners to maximise 3rd party investment and optimise our investment, in line with DEFRA's flood and coastal resilience partnership funding policy statement. We can't afford to maintain the assets alone and need 3rd party investment to sustain current levels. We also want to deliver integrated flood risk management solutions, including potential habitat creation schemes, that reflect partners' and other parties' aspirations for the riverside. This will require close partnership working between Thurrock, Brentwood, Basildon Councils, the London Borough of Havering as well as ourselves and other key stakeholders as we appraise the options. There are many challenges such as future rise in river levels (climate change), highlighted in the consultation, and structural deterioration of existing flood defence assets that the Council should fully appreciate along with the funding challenges to deliver these important infrastructure assets to support viability of these communities.

The new Brentwood District Flood Risk Assessment (SFRA), which is currently proposed for review is a useful supporting document to understand the potential impacts that the flood risk management infrastructure that all Flood Risk Management Authorities including Brentwood District Council and ourselves will need to managed into the future.

The DEFRA document "Flood and Coastal Resilience Partnership Funding DEFRA policy statement on an outcome-focused, partnership approach to funding flood and coastal erosion risk management" is another useful document to support evidence base with regard to funding deliverability of new and replacement flood defence infrastructure. This is enclosed for you.

Any new proposals relating to flood defence schemes should draw on the guidelines highlighted in the attached documents.

We would encourage you to also liaise with Essex County Council as Lead Local Flood Authority (LLFA) to identify potential opportunities to reduce and manage surface water flooding.

### **Policy 10.3 Sustainable Construction and Energy**

We support this policy, which requires all proposals to maximise energy efficiency, incorporate water conservation measures, and include details of measures to improve resilience to climate change.

We are pleased that paragraph 10.27 of the supporting text references the Brentwood Scoping and Outline Water Cycle Study 2011 and recognises that the

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Borough lies within an area of Serious Water Stress. It also recognises the generally poor water quality of the Borough's watercourses and that, in some areas, sewage infrastructure is already operating at capacity.

### **Policy 10.10 Green Infrastructure**

It is encouraging to see the emphasis on protecting green belt land and the promotion of green infrastructure. It is extremely positive that the proposed development allocations will only reduce the Borough's proportion of green belt from 89% to 88%. We would like to see further information on the development of the proposed enhanced green wedges.

We fully support this policy, which promotes an integrated approach to providing green infrastructure, including using it for open space, recreation, flood risk management, habitat creation, climate change mitigation and water quality improvements. This should be expanded to make reference to realising opportunities to meet the objectives of the Thames and Anglian River Basin Management Plan (RBMPs), for example through protecting and enhancing river corridors or networks of wildlife habitats. It is disappointing that no reference is made to either of the RBMPs as part of the evidence base.

In reference to paragraph 10.46 of the plan, even where a site is constrained due to its urban nature or for other reasons, environmental gains can still be achieved through de-culverting, creation and management of ecological buffer strips, or new wetland areas. Even these smaller gains can help to reduce pollution and help to reconnect people to nature.

We would recommend that more detail is included in the Local Plan with regards to the rivers within the borough, their ecological status and potential opportunities for improving these through drivers such as the Water Framework Directive (WFD) and Eel Regulations. Several of the water bodies are all currently at less than good ecological status (e.g. Wid) and need to be a good status or potential status by 2027 in order to meet the requirements of the WFD. Any development proposals need to be compliant with the WFD in ensuring no deterioration and where possible seek enhancements.

The plan is very land centric and only mentions water bodies or waterways in passing. We would like to see further detail regarding the rivers within the Borough and specifically the headwaters of the Rivers Wid and Mardyke for our area. Given the improvements suggested above, we consider that this could be addressed through a completely separate policy, which should address water quality, the requirements of the WFD and RBMP objectives. We would like to see a new policy on the protection, enhancement and buffering of watercourses to help in the achievement of WFD objectives. This should include the provision of ecological buffer strips and corridors, native tree planting and the new wetland areas to help manage flood risk and reduce diffuse pollution whilst connecting people to nature. This could also include de-culverting, removal of redundant structures, alien species removal where appropriate. The need for this is supported in paragraph 21.1.4 of the Interim Sustainability Appraisal.

### **Policy 10.13 Flood Risk**

We support this policy but consider would benefit from a reference to applying a sequential approach within sites, as well as them passing the requirements of the Sequential Test. This will ensure that more vulnerable development is directed to lower risk areas of a site, especially on mixed use development sites. It also can direct open space to higher risk areas, allowing an integrated approach to open space, recreation and flood risk management. More emphasis should be placed on enhancing existing flood management systems rather than focussing purely on managing flood risk to and from new development. We would encourage you to liaise with Essex County Council as Lead Local Flood Authority to identify potential opportunities to reduce and manage surface water flooding.

This policy could be improved by having some supporting text that further explains what is meant by resistant and resilient design means.

It could also benefit from mentioning (if not within a new policy) the need to ensure that development does not prevent flood risk management now or in the future. This is particularly important to us, as we often access to watercourses for example to exercise our permissive powers. In addition, space should be safeguarded for future defence raising.

### **Sustainability Appraisal**

Within the Climate Change Mitigation topic, an objective could be included on ensuring that people and wildlife can adapt better to climate change. For example, using blue and green infrastructure to protect green corridors and help to reduce the urban heat island effect.

### **Site Allocations**

#### **Proposed Housing Sites**

Most of the allocations lie in Flood Zone 1, apart from site 200 Dunton Hills Graden Village and we have already provided comments on flood risk to this site through a separate consultation. However, sites 042, 034, 087 and 235 are adjacent to a tributary of the River Wid, which is designated a Main River.

We do not currently hold modelled data for this watercourse and these sites therefore appear to be in Flood Zone 1 on our Flood Map. However, there is likely to be some fluvial flood risk associated with this watercourse. Any development proposed here will need to be supported by a flood risk assessment that is informed by fluvial modelling of this watercourse. Any works in, over under or within 8m of the River Wid will need an Environmental Permit from us under the Environmental Permitting Regulations (2010).

Allocation 022 Land at Honeygot Lane is bisected by a large ordinary/non main river watercourse. Full consultation should occur with Essex County Council as LLFA.

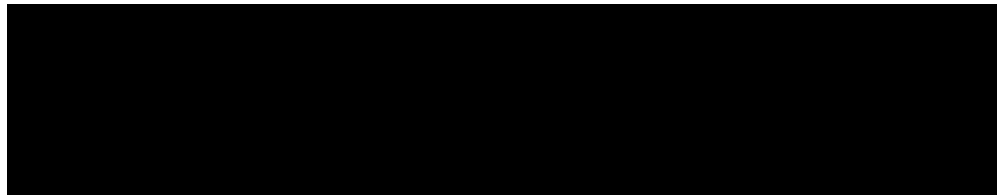
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We trust this advice is useful.

Yours faithfully



**Miss Lizzie Griffiths**  
**Sustainable Places - Planning Advisor**



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