

Date: 16 April 2018
Our ref: 240640
Your ref: Brentwood LP Site Allocations



brentwood@jdi-consult.net ; planning.policy@brentwood.gov.uk

BY EMAIL ONLY

Dear Sir/Madam

Planning consultation: Brentwood Draft Local Plan: Preferred Site Allocations

Thank you for your consultation on the above which was received by Natural England on 06 March 2018.

Natural England is a non-departmental public body. Our statutory purpose is to ensure that the natural environment is conserved, enhanced, and managed for the benefit of present and future generations, thereby contributing to sustainable development.

FURTHER INFORMATION REQUIRED

Brentwood Draft Local Plan: Preferred Site Allocations

As a general principle, allocations should be sited on land of least environmental and amenity value. In particular, they should avoid:

- designated sites/priority habitats
- Best and Most Versatile (BMV) agricultural land
- areas at risk of flooding
- brownfield sites of high environmental value.

There are 3 SSSIs within Brentwood District, namely Thorndon Park SSSI, The Coppice, Kelvedon Hatch SSSI and Curtismill Green SSSI. We have looked the allocations in relation to these SSSIs.

Part 2 Preferred Site Allocations

There are no allocations directly within or adjacent to SSSIs but the following allocations are within [Natural England Impact Risk Zones \(IRZs\)](#) for residential and/or rural residential development: 81, 117A, 117B, 112A, 112D, 112E, 194, 075B. This means that we would like to be consulted further to ensure that any impacts have been taken into account and mitigation provided if required. It does not mean that we have an outright objection to these allocations.

We have a more detailed comment to make on [Dunton Hills Garden Village](#) (site ref: 200) as follows:

We have no 'in principle' objection to this allocation but we advise that certain mitigation measures will be required to avoid significant adverse impacts to designated sites. Our SSSI risk zones have identified that water supply mechanisms and the method of foul drainage will need confirming before

impacts can be ruled out. Potential impacts from surface water runoff on water quality-sensitive designated sites will need consideration; good quality SuDS within the development would help to address this and could also provide biodiversity net gain along with other enhancement mechanisms, such as the provision of ecological linkages to existing habitats of importance and habitat management for S41 biodiversity priority habitats and species.

The location falls within a zone of influence for recreational disturbance to internationally designated sites, i.e. it will need to be considered in terms of the emerging Essex Coast Recreational disturbance Avoidance and Mitigation Strategy (RAMS), which Brentwood Borough Council are committed to delivering along with the other relevant Essex authorities. For large developments, such as this Garden Village, we consider that mitigation of increased recreational disturbance impacts usually requires more than one type of approach, typically involving a combination of 'on-site' informal open space provision and promotion (i.e. in and around the development site) and 'off-site' visitor access management measures (i.e. at the designated site(s) likely to be affected).

In terms of nationally designated sites, the development will also need to consider increased recreational pressure to the nearby Thorndon Park SSSI and Basildon Meadows SSSI (and any potential changes to the boundary of the SSSI; in Basildon District) and any mitigation measures that might be required.

Habitats Regulations Assessment of Brentwood District Council Draft Local Plan: Preferred Site Allocations

Section 4.5 Table 5: Screening Assessment of Employment Site Allocations: Brentwood Enterprise Park is listed as 1.9 km from Epping Forest, this should be 19km. The other distances for this site and for other allocations mentioned are also incorrect and need amending.

Epping Forest SAC

Note that recent studies have identified a new housing zone of influence around Epping Forest SAC to be a distance of 6.2km from the SAC; this may be subject to revision. However, we agree provisionally that impacts arising from increased recreational pressure from Brentwood's allocations can be ruled out given that none is within 6.2km from the SAC.

Para 5.10. We agree that 'At this early stage in the Plan development (i.e. Reg. 18) it is appropriate that both traffic modelling and air quality modelling are undertaken to confirm Brentwood's contribution to traffic flows (and thus atmospheric pollution contributions) within Epping Forest SAC to inform future iterations of the Plan.

The effects on designated nature conservation sites (including increased traffic, construction of new roads, and upgrading of existing roads), and the impacts on vulnerable sites from air quality effects on the wider road network in the area can be assessed using traffic projections and the 200m distance criterion followed by local Air Quality modelling where required. We consider that the designated sites at risk from local impacts are those within 200m of a road with increased traffic, which feature habitats that are vulnerable to nitrogen deposition/acidification.

Regarding effects on general air quality (regional or national), we advise that in addition to assessing local air quality effects, consideration should also be given to national air quality impacts resulting from diffuse pollution over a greater area. The UK Government has international commitments to reduce national emissions of pollutants and consideration should be given to impacts that occur on a regional, national and international scale and which also contribute to background concentrations.

Essex Coastal European Sites

Para 6.2: We agree that Essex Estuaries SAC and Thames Estuary and Marshes SPA/Ramsar are

scoped in for recreational disturbance impacts.

Para 6.4: We note that 4 allocations are located within 10km of Thames Estuary and Marshes SPA/Ramsar, including Dunton Hills Garden Village.

Para 6.6: We note that *All residential site allocations in Brentwood are located within 24km of the Essex Estuaries SAC.*

Para 6.8: We agree that Brentwood should adhere to the interim guidance that we have recommended in order to avoid adverse effects on these sites until the Essex RAMS is finalised with up-to-date evidence. Visitor survey have been undertaken for a number of European sites in the RAMS project and as such the zones of influence for recreational disturbance impacts are currently being considered by partners. The HRA may therefore need to reflect these zones of influence should they change from the current interim zones of influence.

Para 6.14: We agree that *the Council prepare their Plan in consultation with Thames Water and Anglian Water to ensure that development is delivered in locations that can accommodate increased sewage inputs.*

We agree with the findings of the *Conclusions* that further information and studies are required before the final assessment of impact on internationally designated sites can be made.

Interim Sustainability Appraisal (SA) of Brentwood Local Plan

Table 4.1: We support the objectives for biodiversity and suggest that an objective is included to ensure development delivers a net gain in biodiversity. Decisions about '*Areas that are home to declining species or habitats should be a particular target for protection and ecological restoration*' should be made on up-to-date information and evidence.

Chapter 7 Appraisal of reasonable alternatives: We have no further comments to make on the alternatives.

Chapter 8 Developing the preferred approach: We note that Option 3 which involves Dunton Hills Garden Village in addition to other sites which are a 'constant' is the preferred approach.

10.3. Biodiversity: We note the review of allocations which includes reference to Thorndon Park SSSI and The Coppice, Kelvedon Hatch SSSI. If it is likely that there will be impacts on SSSIs, we advise that the SA should undertake more detailed assessments and recommend any site specific mitigation that is required to inform the site allocation policies.

10.10 Landscape: We note the review of allocations which includes reference to highly valued rural landscapes.

10.11 Soil and contamination: We note that the current soil data does not allow an assessment of BMV land. We advise that further agricultural land classification surveys are required to inform decision-making.

Section 13 Monitoring: Whilst it is not Natural England's role to prescribe what indicators should be adopted, the following indicators may be appropriate.

Biodiversity:

- Number of planning approvals that generated any adverse impacts on sites of acknowledged biodiversity importance.
- Percentage of major developments generating overall biodiversity enhancement.
- Hectares of biodiversity habitat delivered through strategic site allocations.

Green infrastructure:

- Percentage of the city's population having access to a natural greenspace within 400 metres of their home.
- Length of greenways constructed.
- Hectares of accessible open space per 1000 population.

*APPENDIX III - SITE OPTIONS APPRAISAL Table B: Site appraisal criteria with performance categories: 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. (Note it should be Site of **Special** Scientific Interest). Natural England is unclear as to how the 800m criterion has been derived and we would like further clarification of this.*

We would be happy to comment further should the need arise but if in the meantime you have any queries please do not hesitate to contact us.

[REDACTED] letter only please contact Kate Ginn on [REDACTED]. For any new consultations, or to provide further [REDACTED] end your correspondences to [REDACTED]

Yours faithfully

Alison Collins
Sustainable Development Lead Adviser

[REDACTED]