



Brentwood Borough Council  
Policy & Implementation  
Council Offices Ingrave Road  
Brentwood  
Essex  
CM15 8AY

**Our ref:** AE/2009/109691/CS-02/EW1-L01

**Your ref:** \*

**Date:** 01 March 2019

Dear Sir/Madam

**BRENTWOOD LOCAL PLAN 2016 – 2033 (PRE-SUBMISSION, REGULATION 19).**

Thank you for the opportunity to comment on the Brentwood Local Plan – Pre-submission Document. Overall we find the plan sound and are pleased to see that many of our previous comments have been incorporated into the plan. We have provided further advice on certain aspects of the plan where we feel Environmental issues could be enhanced further.

**Responding to Climate Change**

The plan rightly identifies the potential impact of climate change and contains a number of policies to address these. Whilst we would agree with these policies, we feel that the impact of flooding as a result of climate change should be more prominent. The NPPF states that proactive strategies should be taken to mitigate and adapt to climate change, taking full account of flood risk and coastal change (NPPF, Para. 149).

**Water Efficiency**

We are pleased to see that the issues of water resources has been addressed in the plan and support the measures to reduce water consumption in new development. Whilst you acknowledge the need to consider waste water and sewage infrastructure we feel this needs to be strengthened. As where sewerage capacity is identified as insufficient, development should only be permitted if it is demonstrated that improvements will be completed prior to occupation of the development. The Brentwood Water Cycle Study (2018) identifies areas where there may be limitations to the waste water infrastructure and therefore where applicants need to carry out

appropriate appraisals to assess whether the proposed development will lead to overloading of existing waste water infrastructure.

### **Policy BE08: Sustainable drainage**

We support this policy and are pleased to see our previous comments have been incorporated into the supporting text.

### **Policy BE18: Green and Blue Infrastructure**

We support this policy and are pleased to see the prominent position given to the water environment. In particular we welcome the desire to protect and enhance the area's rivers, ponds and watercourses. We would reiterate our previous comments in regards to the adequate capacity for waste water infrastructure.

We feel that the supporting text could be enhanced by acknowledging the role played by natural flood management. Reducing flooding by working with natural process, reconnecting watercourses with floodplains to enhance flood storage in times of need, and taking opportunities to restore watercourses to a naturalised state. This should be considered and incorporated into developments wherever opportunities arise. As well as contributing to reducing flood risk, such schemes can enhance the blue infrastructure and contribute to enhancing biodiversity.

We feel the wording in 5.152 could be modified, as it seems to relate to the effect of development on watercourses with either a poor or moderate status, the duty to prevent deterioration of water body status should apply to all water bodies irrespective of their current status.

### **Policy HP11: Proposals for Gypsies, Travellers and Travelling Showpeople on windfall sites**

We would advise that any new policy should contain the need for gypsy and traveller sites to be situated in areas that are low risk from flooding. Caravans, mobile homes and park homes intended for permanent residential use are classed as 'Highly Vulnerable' so are not permitted in Flood Zone 3, and require the exception Test in Flood Zone 2. It is also very difficult to make caravans, mobile homes and park homes safe through raising floor levels. For any caravan site used for short-let or holiday use there should be a reference to the need for any site proposal to provide confirmation that there are adequate warning and evacuation arrangements.

### **Policy NE06: Flood Risk**

We generally support this policy but believe the supporting text should stress that any proposed development should take into consideration the impacts of climate change for the development lifetime. In addition, it could be added that we would object to any new development in Functional floodplain as this would be against policy. Water compatible development can be allowed in Flood Zone 3b if: In accordance with the footnotes of [Table 3: Flood risk vulnerability and flood zone 'compatibility'](#) of the PPG, for water compatible development within Flood Zone 3b (functional floodplain), the applicant has designed their development to:

- remain operational and safe for users in times of flood;
- result in no net loss of floodplain storage;

- not impede water flows and not increase flood risk elsewhere.

We trust this information is useful.

Yours faithfully



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