

Date: 16 February 2015
Our ref: 8880/141567
Your ref:



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Dear Mr Glenday,

Planning consultation: Brentwood Local Plan – Strategic Growth Options and Dunton Garden Suburb

Thank you for your consultation on the above dated 06 January 2015 which was received by Natural England on 06 January 2015.

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.

Chapter 1: Introduction

Paragraph 1.2 refers to sites being assessed in light of transport infrastructure, local services and *the environment* this is to be welcomed and encouraged. Compliance with the National Planning Policy Framework as required and should assist the Council in delivering sustainable communities and development (see also comments below).

Strategic Objectives

The document lists eleven objectives of which the Sustainable Communities objective includes “safeguard the Green Belt and protect and enhance valuable landscape and the natural and historic environment”

This objective is broadly supported; however, the document does not appear to mention designated sites within the borough – other than Green Belt. Contained within the borough’s area are the Curtismill Green, Thordon Park and The Coppice, Kelvedon West Hatch Site of Special Scientific Interest (SSSI’s). These sites will need to be considered in regards to potential for recreational disturbance or pressure in respect of new build developments.

Paragraph 117 of the NPPF states that planning policies should:

- Plan for biodiversity at a landscape-scale across local authority boundaries...
- promote the preservation, restoration and re-creation of priority habitats, ecological networks and the protection and recovery of priority species populations, linked to national and local targets, and identify suitable indicators for monitoring biodiversity in the plan.

Environmental Protect and Enhancement

This section refers to leisure, cultural and recreational assets which would include the SSSI’s mentioned above. The Council needs to reference these sites and consider the potential for impact on them of increased development.



Chapter 2: Managing Growth

Increased development and could also lead to increased transport and road usage, especially with regards to the M25. This in turn could impact on Epping Forest Special Area of Conservation (SAC)

Traffic is a major issue affecting the Forest and whilst vehicles are becoming less polluting, the volume of traffic is increasing. Natural England acknowledges that overall pollution levels are decreasing (i.e. plume from London) but not at a very significant rate, and the level of pollutants still exceeds desired levels. NOx is exceeded across most of the Forest, while ozone levels are borderline.

Mapping showing the condition of the Forest is available online at www.apis.ac.uk

The Council are advised to consider air pollution in respect of Epping Forest SAC and liaise with neighbouring authorities as necessary.

Chapter 3: Sustainable Communities

Reference to the Curtismill Green, Thordon Park and The Coppice, Kelvedon West Hatch Site of Special Scientific Interest (SSSI's) sites is advised here also as is the reference to NPPF.

Chapter 5: Environmental Protection and Enhancement

The Council has reference the SSSI's designations in this section and could link this to other sections/chapters as per our comments above, strengthen the document.

Paragraph 5.4 under the other environmental considerations refers to water, biodiversity and open space which are welcomed. However, our comments in respect of stronger reference to the SSSI's still stands.

Chapter 6: Quality of Life and Community Infrastructure

Community facilities as mentioned under paragraph 6.8 refer to recreation and leisure and this includes green/open spaces.

Green Infrastructure as mentioned under paragraphs 6.9 to 6.11 in respect of linking multifunctional green spaces between, across and through new developments by provision of additional, new and enhanced green infrastructure are to be welcomed and broadly supported. See our comments above in regards to SSSI's and increased recreational pressure

Sustainability Appraisal

The issue and topics identified are those that Natural England would wish to see considered by such a document and we acknowledge the reference to the SSSI's in paragraph 7.3.2.

The Council needs to consider in more detail the impact upon Brentwood's Local Wildlife Site network; and Priority Habitats and Species; particularly in the context of the Brentwood Borough Local Wildlife Site Review 2012. (<http://www.brentwood.gov.uk/pdf/17072013120644u.pdf>)

The SA also needs to consider in more detail the recreational impacts upon the local SSSI network. AS mentioned above, there is only limited reference to the SSSI's within the borough.

Hopefully subsequent iterations of the plan will set out a more ambitious approach to ensure recreational impacts upon existing publically accessible natural spaces are robustly addressed and planned for.

Dunton Garden Suburb

The joint approach between Brentwood and Braintree is acknowledged and encouraged.

The large scale development described for the 'Dunton Garden Suburb' scheme has the potential to have significant negative effects on habitats and species within and close to it, for example due to direct loss of woodland within the area or increased recreational pressure on sensitive habitats from the residents of the 4,000-6,000 additional homes. This effect is judged to be uncertain as it may be possible to avoid or reduce the potential effects by sensitive layout and design of development and appropriate design of the "generous green space" to be provided.

It is advised that consideration is given to additional mitigation measures, potential through a strategic approach. These should include planning for the provision of 'off-site' compensatory habitats to address likely residual impacts upon Priority Habitats and Species*, and long-term financial support to land managers of nearby Green Infrastructure that may be subject to significant additional recreational pressure.

Given the scale and proximity of possible development to the Thorndon Park SSSI (circa 750m to the northwest) and Basildon Meadows SSSI (circa 3km to the southeast), further assessment of the recreational impacts upon these statutory protected sites is necessary. Both are located within Country Parks with existing high-levels of public recreation. Disturbance, trampling of sensitive vegetation and nutrient enrichment from dog-fouling represent some of the issues that already pose a challenge to conserving 'notified special interest features'.

Essex County Council own considerable areas of Thorndon Park and Basildon Meadows SSSI; and its Country Parks service are responsible for the day-to-day management of Thorndon Country Park. Therefore, appropriate representation from the Parks Service should be sought to inform the design of future assessment/mitigation studies for ecology and green infrastructure.

relating to the specific advice in this letter only please contact David Hammond on [REDACTED] For any new consultations, or to provide further information on this consultation please send your correspondences to consultations@naturalengland.org.uk.

We really value your feedback to help us improve the service we offer. We have attached a feedback form to this letter and welcome any comments you might have about our service.

Yours sincerely

David Hammond
Lead Advisor
Sustainable Development and Regulation
for and on behalf of the Beds, Essex, Northants, Cambs Herts Team