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Our ref: AE/2006/000202/CS-
03/PO1-L01
Your ref: LDP/SGO/2
Date: 17 February 2015

Dear Mr Glenday

Brentwood Local Plan Strategic Growth Options Consultation

Thank you for inviting us to comment on the above consultation which we have reviewed and offer the following advisory comments.

Not all of the questions raised in the consultation document fall within our remit and it would therefore be inappropriate for us to provide comments on these questions. This response only considers those questions that touch our areas of environmental remit. We will in the first instance provide responses to the questions and then provide comments on a number of themes falling under the areas of water quality and water resources, sustainable construction and design, blue and green infrastructure, and flood risk.

Consultation Questions

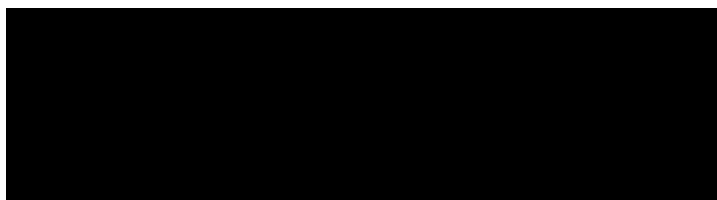
Q1: Do you agree with the three broad areas, for the purpose of considering approaches to growth?

We are broadly in agreement with the approach which in our view is consistent with taking a suitable spatial approach to the planning and managing of growth.

Q2: Do you agree with the issues raised for each of these three areas?

Although we agree with the limited issues raised, we consider that a very light touch, high level approach has been taken and consequently there is little in the way of specific details at this stage.

Q3: Do you have any comments on the appropriateness of particular sites?



Our main concern is that the sustainability of sites should be the main factor that drives the selection process.

Q4: Given the greater capacity for growth along the A127 Corridor which of the sites put forward do you think is the best location for growth?

We have no specific recommendations for the best location but would consider that the Dunton Garden Suburb Strategic Allocation offers possible sustainable benefits of extending an existing urban area on the east side of Basildon.

On this point we would mention that major planned developments such as new settlements and urban extensions provide an opportunity to design-in the greenest of technologies and infrastructure from scratch, in ways that are not possible in smaller infill schemes¹. With this mind, we consider that the proposed scale of development would lend itself well to the use of technologies and construction methods that underpin the principles of high quality sustainable development. Such development should aim to be, in our view, designed along the lines of Eco-town standards and Garden Suburb attributes envisaged by the Town and Country Planning Association (TCPA); the former in line with the Eco-towns Planning Policy Statement² and the latter in line with 'Creating Garden Cities and Suburbs Today'³. The creation of a high quality sustainable development reflecting the Eco-town and Garden Suburbs concepts would provide, in our view, an excellent opportunity to uphold the development as an exemplary to the planning world. Support for the principles of Garden Cities is given in paragraph 52 of the National Planning Policy Framework (NPPF).

Q5: Should the A12 Corridor accommodate growth by releasing sites on the edge of urban areas.

The same principles discussed under our response to Q4 apply to this question as well, though we would mention here that achieving critical mass is important in terms of infrastructure delivery and it is possibly the case that sites along the A12 Corridor may not be sufficient in size.

Q6: Government guidance appears to continue favouring, in the first instance, the re-development of brownfield sites.

Q12: Have we considered the main infrastructure issues? Are there other important issues to consider?

The planning of new development should look at infrastructure requirements such as new or upgrades to waste water treatment plants and water supply. These aspects are discussed below.

Water Quality and Waste Water Disposal

Please note that paragraph 177 of the NPPF states, among other things, that 'It is equally important to ensure that there is a reasonable prospect that planned infrastructure is deliverable in a timely fashion'. Related to this point, paragraph 109 of

¹ Best Practice in Urban Extensions and New Settlements: A Report on Emerging Practice. TCPA, 2007.

² Planning Policy Statement: Eco-towns A Supplement to Planning Policy Statement 1

³ Policies, practices, partnerships and model approaches – a report of the garden cities and suburbs expert group. TCPA, 2012.



the NPPF states that ‘The planning system should contribute to and enhance the natural and local environment by ‘...preventing both new and existing development from contributing to or being put at unacceptable risk from, or being adversely affected by unacceptable levels of soil, air, water or noise pollution or land instability’.

Para 110.of the NPPF goes on to say‘...minimise pollution and other adverse impacts on the local and natural environment.’

A high quality water environment supports wildlife but also provides quality of life benefits and can support local economies including boosting land and property values, agriculture, tourism and recreation. Where it is not properly planned for, new development can increase pressure on the water environment. Where development is properly planned it can provide opportunities to protect and enhance the water quality, amenity and biodiversity within a catchment.

Pressures on the water environment arise from point sources, such as waste water treatment works, and diffuse pollution sources such as urban water run-off. Waste water treatment and the quality of the water environment should be addressed in the Local Plan to ensure there is infrastructure to support sustainable growth and ensure there is no deterioration of water quality.

A water cycle study is a useful and indeed important source of evidence to inform planning. Water cycle study guidance has been produced to assist local authorities in commissioning WCS:

<http://webarchive.nationalarchives.gov.uk/20100512145403/http://publications.environment-agency.gov.uk/pdf/GEHO0109BPFF-e-e.pdf>

We understand that the Council has not carried out a Water Cycle Study. The absence of such study would mean, in our view, that a Local Plan was unsound under the NPPF tests of soundness. This situation appears to apply in this case. We would be happy to join in a discussion with the Council and the sewerage undertaker/ water supplier on the carrying out of a Water Cycle Study.

River Basin Management Plans (RBMPs) produced by the Environment Agency are the over-arching source of information on the water environment and the actions we and others are undertaking. The NPPF states in paragraph 165 that RBMPs should be used as evidence on which to base planning decisions. This promotes the use of “up-to-date information about the natural environment” which should be useful to inform the action needed to improve water quality in Local Plans. All public bodies, including local authorities are required to “have regard to the River Basin Management Plan and any supplementary plans in exercising their functions”. More information on the Water Framework Directive is available at:

<https://www.gov.uk/government/policies/improving-water-quality/supporting-pages/planning-for-better-water>.

Water Resources

Water resources are critical to sustainable economic growth and housing development as well as supporting the natural environment. Increasing population and a changing climate will have an impact on water resources in the future. As East Anglia is a water stressed area, we would refer the Council to paragraph 162 of the NPPF which states that local planning authorities should work with other authorities and providers to assess

the quality and capacity of infrastructure for...water supply...’

Sustainable Development

Climate change is one of the biggest threats to the economy, environment and society. New development should therefore be designed with a view to improving resilience and adapting to the effects of climate change, particularly with regards to already stretched environmental resources and infrastructure such as water supply and treatment, water quality and waste disposal facilities. We also need to limit the contribution of new development to climate change and minimise the consumption of natural resources.

Where a development proposal will result in the loss of a significant greenfield site, the developer should aim to minimise the use of resources and the production of waste and in doing so ensure the development incorporates principles of sustainable construction and design. This can include the use of passive systems using natural light, air movement and thermal mass, as well as using energy produced from renewable sources. In addition to this, there is the opportunity to install water efficient and water saving devices in the proposed development. Water butts, low flush toilets and efficient appliances would be obvious measures but there may be opportunities for more innovative technologies such as grey water recycling. With this in mind the developer should submit a Code for Sustainable Homes assessment (CSH), or any successor assessment procedure, together with a Sustainability Assessment, and build to a rating level beyond Code 3, which is regarded as minimum only. Reference should be made to the DCLG web site for the Code for sustainable homes case studies – see the link below.

<https://www.gov.uk/government/collections/code-for-sustainable-homes-case-studies>

Opportunities should therefore be taken in the planning system, no matter the scale of the development, to contribute to tackling these problems. In particular we recommend the following issues are considered at the determination stage and incorporated into suitable planning conditions:

- Overall sustainability: a pre-assessment under the appropriate Code/BREEAM standard should be submitted with the application. We recommend that design Stage and Post-Construction certificates (issued by the Building Research Establishment or equivalent authorising body) are sought through planning conditions.
- Resource efficiency: a reduction in the use of resources (including water, energy, waste and materials) should be encouraged to a level which is sustainable in the long term. As well as helping the environment, Defra have advised that making simple changes resulting in the more efficient use of resources could save UK businesses around £23bn per year.
- Net gains for nature: opportunities should be taken to ensure the development is conserving and enhancing habitats to improve the biodiversity value of the immediate and surrounding area.
- Sustainable energy use: the development should be designed to minimise energy demand and have decentralised and renewable energy technologies (as appropriate) incorporated, while ensuring that adverse impacts are satisfactorily addressed.

Ideas can be obtained from the various Communities and Local Government publications associated with the ‘Code for Sustainable Homes’. This initiative introduces

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minimum requirements for both water and energy efficiency for every different rating, as well as minimum requirements for materials, surface water run-off and waste. The Code is designed to assist in achieving Government's objectives for achieving zero carbon emission developments by 2016. For more information please see:

<http://www.communities.gov.uk/planningandbuilding/buildingregulations/legislation/code/sustainable/>

Increased water efficiency will directly reduce consumer water and energy bills and reduce carbon dioxide emissions. Measures such as spray taps, water efficient showers and appliances, low flush toilets and outdoor water butts can achieve the water efficiency levels specified above. Water meters should also be installed by water companies. In addition, all developments should aspire to incorporate community water harvesting and reuse systems; these are needed to achieve water use of less than 95l/head/day.

Green & Blue Infrastructure

A consideration of both green and blue infrastructure is an important component in the adaptation to climate change. Green infrastructure is regarded as comprising 'a network of multi-functional green space, both new and existing, both rural and urban, which supports the natural and ecological processes and is integral to the health and quality of life of sustainable communities'.

Blue infrastructure (e.g. rivers, streams, ponds, wetlands) concerns the management and development of water sources and resources. It forms an integral component of green infrastructure; its primary function is to convey water but it also has an important range of secondary functions including biodiversity and amenity.

Green infrastructure is capable of being incorporated within all scales of development including individual properties and neighbourhoods. Types of green infrastructure including green walls, green roofs, providing a bird box for every apartment / house, and incorporating a built-in growing plot on apartment balconies can be used at the level of individual buildings. Other wider approaches include maximising areas of water, providing a range of environmental conditions (including moist, dry, and semi natural habitats), and incorporating nectar rich vegetation to benefit butterflies.

There are many benefits associated with green and blue infrastructure and the adaptation to the impacts of climate change, including:

- Reducing the impact of urban run-off by reducing surface flow;
- Safeguarding areas for biodiversity and creating or retaining links between urban and rural areas;
- Improve water quality and attenuation; and
- Provide shading to buildings and outdoor spaces;

Establishing ecological corridors and networks helps to form more ecologically resilient landscapes. The ability to design a joined up strategic approach green and blue infrastructure network provide important connectivity to allow species to move around which will be important in the adaptation to climate change.

Designing and incorporating green and blue infrastructure into all scales of development, will form an important part in adapting to the impacts of climate change. We would encourage you to consider opportunities for incorporating green and blue

infrastructure within the development. Further guidance can be found on the Town and Country Planning Association website at:

<http://www.tcpa.org.uk/pages/climate-change-adaptation-by-design.html>

Flood risk

Paragraph 100 of the NPPF states that 'Local Plans should be supported by Strategic Flood Risk Assessment (SFRA) and develop policies to manage flood risk from all sources, taking account of advice from the Environment Agency and other relevant flood risk management bodies.' Due to the passage of time since the Council's SFRA was completed, it may need reviewing and possibly updating for any flood modelling carried out since the work on the SFRA was completed. We are happy to discuss this with the Council.

Other Comments

The Local Plan should include policies to manage the impact of climate change on water quality. This could include:

- increased sewage infrastructure capacity in some locations
- increased need for SuDS and green infrastructure in some locations.

On the theme of climate change we would also recommend policies aimed at:

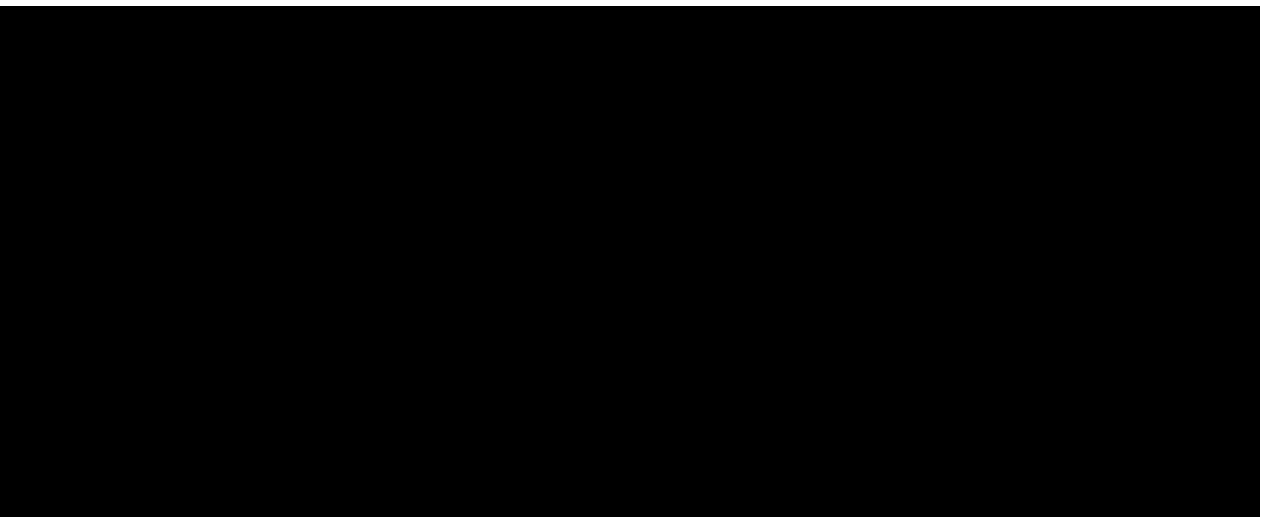
- energy and water efficiency
- sustainable design and construction.

Additionally we would recommend policies aimed at:

- reducing the risk of pollution from diffuse sources
- reducing the risk to developments from flooding, both onsite and offsite
- reducing the risk of disturbance to rivers.

If housing numbers are constrained by environmental capacity, we recommend that early reviews of core policies should be built into the plan to take into account 'feasibility' (or other) studies that water companies may submit to secure additional funding from OFWAT. This could help the Council accommodate additional housing numbers in later periods of the plan.

We recommend that water quality and RBMP objectives are included in the Sustainability Appraisal to inform the preparation of the Local Plan document.





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