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8th March 2016

Planning Policy Team
Brentwood Borough Council
Town Hall
Brentwood
Essex CM15 8AY

Dear Sirs

Re : BRENTWOOD BOROUGH COUNCIL: DRAFT LOCAL PLAN

I write in respect of your DRAFT LOCAL PLAN. The evidence to support the Plan on highways grounds is very much lacking with the PBA Highway Modelling Report only dealing with the effects of the various growth options on junction capacity.

- Clearly any growth will have an effect on an already busy road network and the work should analyse impacts that the various options will bring on flows, speeds, queuing, accidents and pollution. This is particularly true as all of the options have a degree of concentrated growth but particularly option 1. Concentrated growth will bring very significant local effects and these need to be presented to inform whether large strategic options are the right way forward and if so where these should be located. Studying traffic more generally will also help to inform other policies, the CIL scheme and masterplans.
- The effects of traffic generation will have an effect well beyond the boundaries of Brentwood borough. This is particularly true for Option 1 which is located in the south east corner of the Borough. Clearly there will be effects on roads in Thurrock and Basildon from this.
- Option 1 would also be contiguous with a major allocation in Basildon and therefore the impacts of this overall area of development would be exacerbated. A joint traffic study should be carried out with Basildon.
- Remarkably, considering the emphasis in the Plan for considerable development at West Horndon in all options (but particularly Options 1 and 2), the junction of Station Road with the A128 has not been modeled. On this basis alone the PBA report is not fit for the purpose of identifying impacts of traffic at junctions throughout the Borough.

Even more remarkable is the fact that Station Road, A128 and this junction are very heavily trafficked with queues commonly building up in Station Road and consequent dangerous driver behavior.

Figure 5.4 General

- Whilst I appreciate the aim of keeping Figure 5.4 simple, since this is the root of supporting text and policies in Section 5 and further on in the Plan, the need for clarity is very important and this figure needs to be expanded and refined to draw out a few more items and concepts that are combined in the figure as currently drawn up.
- I think the table is trying to do three things: a) combine all types of development b) explain the totality of sources of development and c) create a hierarchy for decision making. I think the table would greatly benefit by separating these strands. I believe that it could much better reflect the different drivers for development if say 'Housing' and 'Job Growth and Employment' strands were separated.

Housing

Figure 5.4 'Urban Areas' box

- Within the 'Urban Areas' box the concept of increasing the density of development needs to be raised and subsequently developed in the Plan through policies. It is readily apparent that this concept can help fulfil most of the Borough's vision by growing existing local economies and improving existing communities whilst maintaining the context of existing green spaces. It is this that will contribute most to protecting and nurturing its existing high quality environment.

- This concept finds expression to various degrees in contributing to all Strategic Objectives other than perhaps SO7.
- To avoid misunderstanding of the word urban and to maximise growth in this way this should apply to all areas of existing development eg town, suburb village.

Figure 5.4 'Strategic Sites' box

- I disagree with this placing of 'Strategic Sites' in the hierarchy and even more so with the explanation 'Larger scale development.....'
- Firstly strategic means much more than large scale and in its broader sense (if this were better defined) it could be a subset of each of the spatial categories 'Urban areas', 'Brownfield sites in Green Belt' and 'Greenfield sites in Green belt' and not as a self standing category in the hierarchy. The hierarchy could be improved so that it is clear what is meant by strategic and how this would play out within the three main boxes. In a sense this process has already been started for the latter box (see my comments on 5.4 below).
- The reference is in fact to the Dunton Hills Garden Village and Brentwood Enterprise Park. I would not include the former at all for reasons given against Policies 5.1 and 5.2 below and the latter should be considerably scaled down for reasons given against Policy 5.3 below.

Figure 5.4 'Greenfield sites in Green Belt' box

- These comments relate to housing only. As mentioned above I do not believe the Dunton Hills Garden Village development should be part of the Plan at all and that instead attention should be turned to increasing the use of Urban areas and Brownfield Sites in Green Belt. Nevertheless it may well be the case that some Greenfield sites in Green Belt will have to be developed. I consider that a more sophisticated way of looking at these should be developed. I agree with the idea of development being in reach of services and this seems sensible for many sustainability reasons.
- However the idea that development growth be directed to transport corridors is repeatedly cited and is probably the main plank of the Plan eg Policy SO1 and 5.1 so to constrain development by that same piece of infrastructure seems remarkably contradictory. The reason given does seem very simplistic and rather undermining of the role of the Local Plan if it is felt that development that goes beyond such a piece of infrastructure is less controllable.

Putting these ideas together the Greenfield sites in Green Belt box could look something like

Greenfield sites in Green Belt	<ul style="list-style-type: none"> • Intensified density of development • Infill development • Urban extensions within reach of services and • Urban extensions not in reach of services and infrastructure
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Figure 5.4 'Windfall' box

Similarly windfall development doesn't work very well in the hierarchy. By definition the location and circumstances surrounding these sites are unknown therefore these can't be assigned a place in a hierarchy, they may vary from top to bottom of the hierarchy depending on their merits in meeting the borough's strategic objectives.

Job Growth and Employment

As mentioned above I believe that a separate hierarchy should be developed for this as some of the concepts, such as intensified and infill development, are not particularly appropriate.

Policy 5.1

I disagree with the idea of the strategic (meaning large scale), allocations in the A127 corridor, or indeed anywhere else in the Borough for the reasons given below. First I would like to comment on two seriously flawed ideas that find

expression in several places through the Plan (perhaps finding their worst expression in 7.6) but are mentioned here because I believe the Spatial Strategy to be dependent on these ideas and is therefore flawed itself.

A The idea that eroding the Green Belt by virtue of an urban development protects it. If this were the general perception residents of the Borough would be clamouring to have such a development close to them. Of course a well planned designed and executed development is better than one that is not but it is contradictory in the extreme to say that it can contribute to the Green Belt purpose of restricting urban sprawl. It is reasoning such as this that led to the growth of London in the first place and the need for the Green Belt.

B The second piece of nonsense is that infrastructure routes such as the A12, A127, A128 and railway lines limit the potential for future unrestricted urban sprawl and deny any merging with nearby settlements. The Plan talks about these being defensible boundaries. This makes it sound as though development in Brentwood Borough is a barely controllable cancer and needs the help of a road or railway line. One of the main purposes of the Plan is to decide where development will or will not be permitted to occur, therefore it is entirely in Brentwood Borough's gift as to how much land on the currently undeveloped side of a road or railway should be released. It is abundantly clear that roads, railway lines etc are not inherent defences.

Preservation of the Green Belt

- The first reason is that I believe that effective preservation of the principle and character of the Green Belt should be foremost in thinking. This is supported in 5.21 where it is stated that growth in the rural north and south will be limited to retain their rural character. I believe that a very large allocation would have a far greater effect on the Green Belt than more dispersed developments and particularly if those many smaller releases of the Green Belt were contiguous with existing development.
- Secondly though, I believe that the siting of this proposed large allocation would be especially detrimental to the Green Belt. The A127 corridor where both the large allocations are being proposed (the A127 / M25 junction together with the Dunton Hills Garden Village plus contiguous development in Basildon) would come close to being a developed / semi development wedge through London's Green Belt. The Plan talks about retaining infrastructure to create 'defensible boundaries' to development but in fact the greatest defensible boundary there is to sprawl is a continuous and substantial Green Belt - the very designation that would be eroded by the Plan.
- I consider would be far more detrimental to the aims of the Green Belt than the idea of a more dispersed loss.

Competition to Brentwood town centre

Dunton Hills Garden Village would create a new urban centre which would divert use of facilities and reduce footfall in Brentwood and hence be detrimental to the economic sustainability of Brentwood town centre.

Transport

The ability of existing transport corridors (road and rail) to accommodate growth needs careful and transparent examination rather than just being stated. Whether they can absorb focussed growth any better than local roads could accommodate a more dispersed growth in traffic or need for other infrastructure is unsupported.

My own experience is that both the A127 is extremely busy throughout the day and for considerable periods is over capacity. The A128 busy for a good deal of the day and flows cause traffic delays at its junction with Station Road, West Horndon. I should not think that the additional traffic on these roads generated by a large development could be accommodated without road widening on the A127 and A128 and junction improvements. Whatever the situation this remains unsupported in the evidence base to the Plan.

Bearing in mind the location of the Dunton Hills Garden Village adjacent to the boundary with Thurrock and very dependent on the A128 for connections to the south, there is surprisingly no evidence of cooperation with Thurrock.

Equity of approach

The most obvious location for growth is in Ingatestone to the south east of the railway line because the village has a railway station, good road connections, is already a small centre in its own right with retail and would benefit from further investment. Not only that there is land to the south east of the railway line that is ideally positioned from a

sustainable communities perspective. Quite remarkably despite the Plan presumably being able to provide adequate controls over the sprawl of a new 2500 at Dunton Hills Garden Village, it feels vulnerable to controlling development here. There is a serious lack of logic in this.

Another opportunity is for increased growth in the north Brentwood area the investment from which could help provide an additional junction at the A12 / A128. Such a junction would also have considerable benefit in relieving traffic problems in central Brentwood, Shenfield and Brook Street.

In conclusion I believe the Dunton Hills Garden Village allocation would make the Plan inwardly inconsistent for the following reasons

- It would not achieve the right balance in conserving the Borough's character (5.17).
- It would not meet National Planning Policy on the Green Belt (inferred in policy 6.1)
- It provides an inequitable Plan for the people and area of Brentwood Borough.
- It would not meet the objectives of the policy on managing growth (policy 6.2)
- It would not meet the objectives of the policy on general criteria (policy 6.3)
- It would likely overload the local road system

Also I believe the many of the statements in 5.17 and 5.18 are unsubstantiated.

An alternative approach

A more dispersed growth model can be used to efficiently use existing infrastructure capacity possibly with little intervention whereas large developments will inevitably require greater use of investment in needing to solve problems created by the development. With a revised hierarchy of development (Figure 5.4) as suggested above together with a strategic aim to provide growth in transport corridors, this would favour a Strategic policy based on:

- a Increased and intensified development in existing developed areas
- b Development of brownfield sites in Green Belt adjoining existing urban areas and within reach of services
- c Extensions of existing development into Green Field sites based on their appropriateness to services facilities transport and other infrastructure.
- d Medium scale allocations at the places with railway stations: Ingatestone, Shenfield and West Horndon. Development in these locations will contribute towards meeting Policy

Policy 5.2 Housing Growth

It follows from the above that I believe the 2500 dwellings at Dunton Hills Garden Village should be redistributed. A policy of intensified development could perhaps yield a further 1500 on development within existing developed areas and perhaps a further 1000 could be obtained from new developments.

Policy 5.3 Job Growth and Employment Land

5.54 states that 'Selection of sites for new employment land has been considered through the same sequential approach of land types as has been the case with housing development' This is clearly not the case. If it were then the aim would be to preserve and maximize use of existing sites and prioritise new sites in the order of:

- Brownfield sites in Urban areas
- all appropriate land within existing urban areas
- Previously developed sites adjoining existing urban areas

The intention represented in this policy and allocations is clearly not internally consistent with this hierarchy otherwise there would not be the significant loss of existing employment land at the council depot Warley, West Horndon Industrial Park and 're-use displaced older employment premises suitable for housing-led redevelopment in central areas.' (5.55) to preferred housing allocations.

I suggest that this hierarchy for Job Growth and Employment is opposite to the housing strategy and looks something like:

- Strategic sites
- Greenfield sites in Green Belt
- Brownfield sites in Greenbelt

- Urban areas

I do not agree with this approach. Whilst for certain employment uses eg distribution centres there is a strong link between the proximity of infrastructure, for many employment types this is not particularly strong. On the contrary I feel that many employment uses can be advantageous within or on the edge of existing developed areas for sustainability reasons and in creating a positive mixture of land uses and communities. I do not believe in a model that seeks to relocate this away from Urban areas (urban in this context including the West Horndon Industrial Park).

I believe that much more attention should be paid to the many facets of employment generation and location of land for that purpose.

Future employment need should be met by considering the full range of planning matters including impacts on the landscape and the green environment.

Policy 6.2 Managing Growth

It is not clear how the 'settlement hierarchy and role of key settlements' would operate. Whilst this is generally true, it becomes particularly important in the case of the delivery of the Dunton Hills Garden Village. This large concentrated development requires a great deal of planning and construction of infrastructure in order to be sustainable and the role of the settlement hierarchy is particularly uncertain.

This point is brought out in para 6.13 'Therefore in this regard, an important role of this Plan is to indicate where and when sites are expected to come forward' however this phasing does not form part of the Plan.

One advantage from a dispersed growth model is that the phasing of growth is adaptable and can be reviewed in the light of changing circumstances in contrast to a major development proposal. With regard to The Plan this is therefore contradictory with regard to Policy 6.2 f and undefined with regard to Policies 6.2 b, d,

Policy 6.3 General Development Criteria

The Dunton Hills Garden Village development would not meet the criteria of Policy 6.3 on nearly all accounts compared with alternative growth models. Concentration of development would give rise to the following effects:

- It would have a much larger effect on the character and appearance of the surrounding area
- It would likely give rise to adverse highway implications. This is evident by considering the additional traffic that would use the A127, A128 and Station Road / St Mary's Lane.
- It would be more likely to give rise to adverse health effects
- It would have a greater impact on designated heritage assets ie Thorndon Park

Policy 6.3 Strategic Sites

Without substantiation the wording of 6.29 is circular. A site should not be viewed as strategic just because it can become so with enough investment but because it has certain characteristics in its own right. Many locations can be made to become strategic particularly with regard to a Housing led site. The evidence supporting a Strategic (large) housing allocation is not presented and furthermore there is no evidence to suggest that an investigation has been carried out to test whether the Dunton Hills Garden Village or any other location would be the best place to develop a strategic housing site.

Policy 7.1 Dunton Hills Garden Village

7.5 talks about a development of the size proposed being necessary to provide critical mass for local services and infrastructure that otherwise could not come forward with several smaller sites. The supporting text to the policy does not explain what it means by this but simply makes broad statements unsupported with evidence. In a similar vein 7.6 talks about the sustainability of this approach.

With the major hubs of Brentwood, Shenfield and Warley plus a number of smaller areas Brentwood Borough has a wide range of settlement sizes so it is not easy to see the need to develop a town the size of the Dunton Hills Garden Village to fulfil any particular aim for critical mass.

On the contrary I would view the matter in the opposite way. There are already a number of settlements in the Borough that are overwhelmingly residential in nature and with limited retail and commercial premises. In places there is a decline in even those that do exist. I believe that by directing housing growth to these settlements such investment will help to improve the balance and sustainability of those existing communities. Furthermore the varied size and location of existing settlements allows flexibility in approach.

7.8 Again makes unsupported and somewhat obscure statements such as the same opportunities not being possible in the 'A12 Corridor considering the higher impact on existing services and lack of contained land to provide for similar development numbers'.

Policy 7.3 Residential Density

I welcome the fact that there is a policy on density however feel that this needs to be elaborated upon more specific and generally revised upwards if it is to achieve the aim of making efficient use of land.

Clearly the policy needs to set out factors that would except a development from the stated figures but the use of 'special character of the surrounding area' and 'other site constraints' and the way the densities are specified in the policy are very broad.

The policy would be more robust if it went some way in defining general expectations and in refining designations where an exception may apply. Such exceptions could be based generally on site location relative to conservation areas, defined edges of the community, green spaces, surrounding densities etc.

The greater of one and half times surrounding densities and

- Villages generally 35 dwellings per hectare net
- Suburban areas generally 40 dwellings per hectare net
- Urban areas generally 50 dwellings per hectare net

With centres of these subdivisions being one and half times these densities

General rules could be developed for edges of the community and green spaces and perhaps specifically for conservation areas.

As an example a recent small development of flats in Station Road at West Horndon yields a density in the order of 80 dwellings per hectare net. Whilst such small sites can yield disproportionately high densities it does demonstrate how density within even rural settings can be accommodated.

Figure 7.2 - I do not agree with the Hierarchy of Figure 5.4, in particular, in relation to the placing of the strategic allocation before Greenfield Green Belt sites.

Policy 8.2 Brentwood Enterprise Park

Release of land at both these locations should be limited to those activities for which these strategic locations are essential. In my view this should not include business and office use that could not only be reasonably located elsewhere but which may contribute directly to a pre-existing community. For sustainability reasons these should be located in areas that have good public transport and access to local facilities.

These proposed sites are in strategic Green Belt and 'green environment' locations in both east – west and north – south axes. In the east – west direction the Green Belt is already precariously thin any erosion of this should be limited to the absolute minimum. Both axes are dominated by the trunk roads of the A127 and M25 with their attendant environmental impacts of noise, atmospheric and light pollution and separation of north, south, east, west quadrants for people and wildlife. This area has already been severely degraded by development. Conditioning further development in this critical location to simply ameliorating further impacts is a far dated approach and is simply not good enough. Some thought has gone into a masterplan for the commercial viability (8.21) and travel (8.24) but it is overwhelmingly obvious that as a Strategic development this allocation be accompanied by a far more wide ranging masterplan looking into all aspects of the environment. Such a masterplan should not just look at on-site minimisation of impacts as a 'bolt on' proposal, but at how development can contribute to a restoration of the environment.

For this reason the allocation should not go ahead until the need for the scale of the development has been better understood together with a study covering all environmental aspects in the vicinity of the strategic allocation. I suggest

this takes in all land west of the B186, south of Warley Road, east of Tomkyns Lane and built up Cranham and north of the B187. In order to be fully effective this would also include cooperation and joint working with LB Havering. It is essential that this allocation is shaped by such a study as corridors would need to be provided for wildlife and human access through to the bridge over the A127 or any new crossing.

Any resulting allocation here should then add a policy point e requiring the development and implementation of a masterplan covering the A127 / M25 interchange strategic allocation west of the B186, south of Warley Road, east of Tomkyns Lane and built up Cranham and north of the B187.

Policy 8.3 Employment Development Criteria

I disagree with the part of point e regarding proximity to the A127, A12 and M25. This wording could mitigate against employment proposals some way removed from those roads. It is far more sustainable both in terms of transport and in developing communities for employment to be embedded within or close to existing development than simply being close to these major roads. The clause is also superfluous considering point f requires the proposal to be covered by a Transport Assessment and Travel Plan. This is the place for assessing travel impacts not a prejudged blanket assumption.

Finally it is somewhat ironic that the A128 is not included in this list considering the massive increase in traffic this would receive were the Dunton Hills Garden Village development to proceed.

Policy 9.12 Site Allocations in Green Belt

I disagree that the extent of development at Dunton Hills Garden Village should be set by a separate Masterplan for the garden village. This development is proposed to be a key part of the Borough Plan and should be dealt with at this stage as opposed to being deferred to a later stage in the planning process.

Policy 10.1 Sustainable Transport

The green Travel route is welcomed however the policy should go much further in explaining how this is to be delivered. It should not result in 'bolt on' proposals but should be so planned with land acquisition as necessary to create a safe and pleasant route for walkers, cyclists and horse riders. The A127 represents a severe block to north-south recreational routes. There is no crossing from Great Warley Road to the East Horndon junction. This is a very regrettable matter as it limits the value of Thorndon Park to residents of West Horndon resulting in people having to drive to their local Country Park. It also creates a block to recreational users wishing to traverse north-south. To rectify this matter the policy should also aim to construct at least two crossings of the A127, the most obvious locations being at Footpath 41 West Horndon to Thorndon Park and Footpath 60 by Friern Manor Wood although in total there are five footpaths in Brentwood Borough that are severed by the A127. One of these is on the boundary with Basildon Council.

Appendix 2-1

Housing densities at West Horndon should be greater than the 29 dwellings / hectare in order to retain a greater proportion of land for business use thus reducing proposed release of Greenfield sites for business elsewhere. The sites at West Horndon are ideally placed for such higher densities having a rail link and being close to the centre of the village.

Appendix 2-1

Should the Plan conclude that the Dunton Hills Garden Village development be allocated Housing densities should be greater than the 30 – 40 dwellings / hectare proposed. In fact the name and density proposed is further indication that the solution is not the right one to justify sacrificing Green Belt. If the Plan is serious in its aim to minimise loss of green Belt it should be setting a far more aspirational vision than simply replicating a development type that has led to urban sprawl in the first place.

Yours faithfully


J M Gillingham