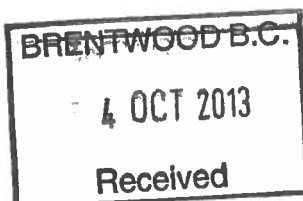


BRENTWOOD B.C.  
PLANNING SERVICES

By post and email to:  
[planning.policy@brentwood.gov.uk](mailto:planning.policy@brentwood.gov.uk)

2<sup>nd</sup> October 2013



Dear Sirs,

**Reference: Brentwood Borough Council Draft Local Plan 2015 - 2030**

I write with regards to the Brentwood Borough Council Draft Local Plan 2015-2030.

Whilst I appreciate that development does, and will, take place within communities that we live in, it must be undertaken sympathetically towards existing communities, rather than just building for the sake of satisfying government housing statistics.

As a resident of West Horndon, I have taken great interest in the council's plans for our village and whilst I loosely support the draft plan in part, I have grave concerns over the majority of the council's extensive proposals for our village.

Firstly, I would raise the concern of lack of timely and thorough community consultation.

Clearly, development on any scale will be of concern to those who are affected by it. Residents affected by such plans should therefore be informed of proposals, such as Brentwood's draft local plan, at the earliest stage possible and be provided with comprehensive information that is clear and concise, in order that they may form an informed opinion on the proposals that will undoubtedly affect their lives both during and beyond the plan period.

It was incredibly frustrating therefore to learn of the draft plan through the West Horndon Facebook community forum, rather than via the council issued letters which failed to reach me and a vast number of my neighbours.

I raised this frustration within my telephone call to the planning department on 23<sup>rd</sup> August 2013 where the member of the planning team with whom I spoke confirmed that issues had been experienced with the delivery of these letters, but copies could be obtained online.

This is unacceptable. Further letters should have been posted to all residents when it became apparent to the council there was an issue, to ensure that each and every member of the community was aware of the draft plan and the timescales concerned.

I understand that the consultation period for this plan was extended to 10 weeks by Brentwood council. Whilst this may be an acceptable period of time under less controversial circumstances, due to the complexity of the plans for our village and how incredibly sensitive the matter is, I feel that this consultation period should have been far longer in order for residents to have sufficient time to review the proposals, make an informed decision and respond to the council in a timely manner.

This task of forming an informed opinion about the plans has been made even more difficult as the information provided by Brentwood Council is vague (such as the definition of exactly what the 'Green Transport Route' is), incomplete (such as the definitive delineation of the 1,000 homes to be built on green belt land) or non-existent (such as designated site/s for the gypsy and traveller pitches).

I question how a community can be expected to form an opinion on a document that is woefully ill-prepared.

I refer back to my telephone conversation of 23<sup>rd</sup> August 2013, whereby I requested evidence from the planning team to support the level of housing proposed within the plan - how was the figure of 3,500 homes justified?

I requested as part of this conversation a copy of the up to date Strategic Housing Market Assessment and Strategic Housing Land Availability Assessment documents, as they play a critical role in determining the level of housing required and what available housing and / or land there is to satisfy this need.

I was informed during this telephone call that the SHMA was not yet available for public review as it was still in draft format and was unlikely to be available before the expiry of the consultation period. This not only leaves members of the public unable to form an informed view, it clearly begs the question how Brentwood Council can put forward the proposed numbers, with the evidence base being incomplete.

I was then informed during this telephone call that whilst the proposed level of housing during this 2015-2030 period is 3,500 homes, the Council's original target was circa 5,000 homes for the plan period. I was informed that Brentwood Council felt this amount unachievable within the borough and therefore 'met roughly in the middle' between this and the previous target (of 2,500 homes set by the former Regional Spatial Strategy) and ended up with 3,500 - with no real scientific calculation behind this figure.

Whilst I agree with the Council's approach to reduce the target, the proposed level of housing within the plan is unachievable without taking the drastic measure of building on Green Belt land and this lack of strong evidence base only further undermines the proposals put forward.

A response to my telephone call on 23<sup>rd</sup> August 2013, was answered by the planning team via email on 23<sup>rd</sup> September 2013 - a period of a month to respond is an unacceptable delay and further demonstrates that the consultation period is totally insufficient for residents to form an opinion on something that will undoubtedly affect their lives both in the next 15 years and beyond.

Due to the extent of the plans for our village, I find it deplorable that the head of planning has remained distant throughout the consultation process and did not attend the consultation meeting with residents, when clearly this is of great concern to us.

Secondly, I would like to raise my concerns about the extent of the proposed plans.

The draft plan proposes a total of 1,500 new homes within the historic village of West Horndon which currently comprises (I understand) of circa 700-800 homes. The proposed extent of development would dwarf the village in its current form and effectively create a town. This is not the wish of the majority of residents, who have either moved to, or remained living here for a number of years, because it is a village.

The scale of the possible development is completely out of character with the existing village settlement and there is no substantive justification why West Horndon should shoulder almost half of the Borough's housing target for the period.

Whilst I agree in part that brownfield sites, such as the two industrial estates to the West of the village, are the most appropriate locations for development, development of both industrial estates to accommodate 500 homes would almost double the existing size of the village alone.

The rudimentary outline plans provided by the Landlord of Horndon Industrial Park Hansteen at the second meeting, demonstrate a real lack of imagination, innovative design and few community facilities. A far more joined up approach needs to be had with residents to ensure that any development on this brownfield land is carried out with the existing residents' needs in mind.

Thirdly, I have considerable concerns relating to the proposed allocation of Metropolitan Green Belt land for the development of 1,000 homes on the fields West of Thorndon Avenue.

Planning Policy as a whole promotes sustainable development and strongly discourages development on Green Belt land. Residents also place a high value on protecting the Green Belt and view this as their top priority so I cannot understand why the development of 1,000 homes has been proposed on Green Belt land.

Brentwood Council's draft plan echoes the protection of the Green Belt in Strategic Objection 7, which states that the plan will look to *"...safeguard the Green Belt and protect and enhance valuable landscapes and the natural historic environment."*

Chapter 2 goes on to state that *"...the Council's preferred spatial strategy for the Borough aims to protect the Green Belt and local character and foster sustainable communities by focusing the majority of new development between 2015 and 2030 on land within accessible settlements."*

This strategy also states that the Council will consider whether a developed site to be included within the building envelope:

- a. is accessible to public transport, services and facilities
- b. will have no significant impact on the Green Belt, visual amenity, heritage, transport and environmental quality including landscape, wildlife, flood-risk air and water pollution

The current draft proposals to allocate 1,000 homes on the Metropolitan Green Belt land to the West of Thorndon Avenue are completely contradictory to planning policy and the strategic objectives of the draft plan.

The alternative option 3 (semi-dispersed growth for larger villages) was rejected by Brentwood Council because there would be a greater reliance on Greenfield sites which would lead to *"...loss of Green Belt and detract from the quality and rural character of the Borough..."* but that West Horndon *"...is considered less affected by these constraints and a strategic allocation is proposed here."*

I find it difficult to understand this statement as Green Belt land is Green Belt land, regardless of where it lies within the Borough. West Horndon would, if the Green Belt land were to be built upon, be affected in exactly the same manner that other Green Belt areas would, by detracting from the quality and rural character of the village.

Green Belt land is in existence to prevent the urban sprawl and maintain settlement boundaries. A loss of this land to development would be devastating regardless of geographic location within the Borough.

The justification for the Green Belt strategic allocation within West Horndon cites good road and rail access, local shops, employment and community facilities.

Firstly, I would state that if development is to be sustainable, then good road access should not be a consideration for development - a heavier reliance should instead be made on public transport facilities.

I would also disagree with the statement that the village benefits from good road access as the three access points into the village have a number of disadvantages:

1. **Entrance onto Station Road from A128** – this junction is becoming busier every day, particularly during rush hour. There have been a number of accidents and near misses in recent years due to the speed at which traffic travels along this road. Increasing the number of homes within West Horndon village (and thereby the number of vehicles on the road) would only exacerbate this problem.
2. **Entrance onto Thorndon Avenue from A127** – this is a very dangerous junction and should be closed. The entrance to Thorndon Avenue from the A127 is concealed from view and close to the entrance of the Farm. Due to the sharp turn into Thorndon Avenue, vehicles must decelerate quickly from the national speed limit to less than 10 miles per hour in order to turn. This causes confusion for vehicles behind who are not familiar with this turning and often results in vehicles driving too close to the cars in front or moving out to the outside lane at the last minute in order to avoid a collision.

Similarly, vehicles leaving Thorndon Avenue to join the A127 at this junction are dangerous as they are not visible to oncoming traffic until almost at the junction. To join a road with national speed limit from stationary is unsafe.

I understand that the draft plan proposes a 'Green Transport Route' using this junction – I have serious concerns about this proposal and would strongly recommend that this does not proceed. Instead, I would stress that the junction is closed off to all traffic (with the exception of emergency vehicles) without delay.

3. **Entrance onto Station Road from St Marys Lane** – this is a narrow, winding country lane capable of accommodating mainly smaller vehicles. An increase in the number of vehicles travelling into and out of the village would require substantial improvements to this road both to repair the potholes, road markings and improve visibility.

In respect of public transport, I agree that the C2C train service is a relatively good train service. The station is however operating at full capacity and could not cope with the potential increase in passengers as a result of 1,500 new homes.

Substantial development would need to be made to the station to increase the capacity of the station, which clearly would not be undertaken by C2C until there is an evidenced demand, causing crowding issues for existing users in the interim period and further disruptive and noisy works for residents in the future.

The service from West Horndon also takes you straight out of the Borough into Upminster or Laindon, thus those using the service for employment or shopping are directed straight out of the Borough.

Whilst the frequency of the bus service is diabolical, it does have the advantage of linking the village with Brentwood, unlike the train service. I would however question who would use this service other than school children and those who do not have a private car to shop or travel to employment in Brentwood town centre.

For these reasons, clearly a development of this size should be focussed around either Brentwood or Shenfield stations, both of which have a much greater capacity and will be served by the High Speed rail link which will complete at the beginning of the plan period - surely it makes sense to focus development (if it *must* be allocated on Green Belt land) in this area, opposed to West Horndon?

The argument that the area supplies employment facilities is true at present; however this is by no means on the same scale as areas in and around Brentwood, Shenfield and Hutton.

Should the proposed development of the two industrial estates into 500 homes proceed, this would remove this source of employment - I cannot therefore understand why Brentwood would cite good employment facilities as a reason for development as clearly this will not be the case, should the plan proceed.

One of the Council's arguments for redeveloping the industrial estates is to remove conflict between the industrial and residential areas as a result of HGV's travelling through the village. There is however an alternative solution that would resolve this issue and maintain the employment facilities within the village.

A solution to this problem would be to carry out improvement works to Childerditch Lane and create a purpose built estate road linking Horndon Industrial Park to Childerditch Lane, thus redirecting the traffic West, away from the village. Whilst there would need to be a number of discussions had with surrounding landowners to facilitate this, this solution would resolve the conflict issue and would maintain the employment facilities for local businesses.

The facilities serving this small community are sufficient for the number of residents at present, however should the proposals go ahead, these facilities would be completely inadequate.

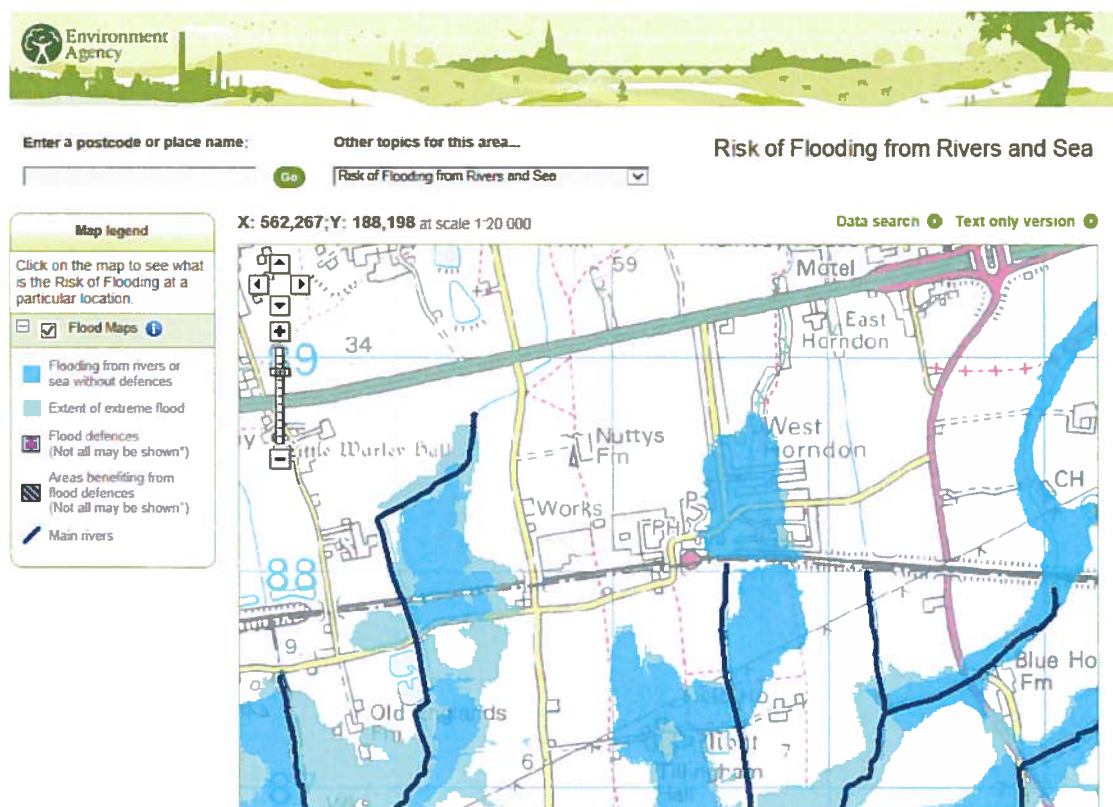
Substantial infrastructure works would need to be undertaken to increase the capacity of the primary school, the doctor's surgery and community facilities along with 'unseen' infrastructure works such as drainage and flood prevention, green/sustainable power supply and waste disposal.

So far there has been no explanation by Brentwood Council as to what infrastructure improvements would be undertaken along with development. I appreciate that much of this will stem out of the CIL/S106 payments by developers at the point of planning permission being granted, however it must be made absolutely clear that infrastructure works must be carried out before the commencement of any building programme. Further substantial consultation will also need to be had with residents to ensure that the right infrastructure and community facilities are provided.

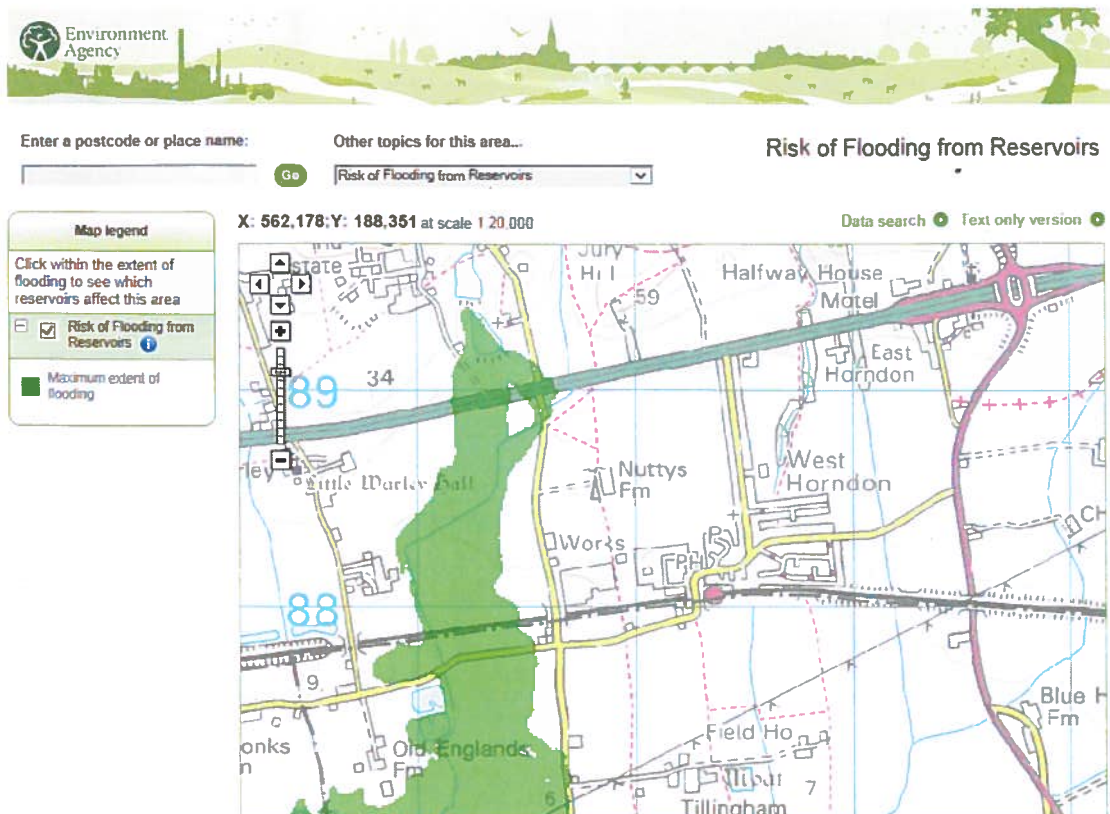
There appears to have been no consideration given by the Council to the impact on the countryside, open setting and rural character of the village, which would be completely destroyed along with established wildlife habitats, by the development of these 1,500 homes.

There also appears to have been little (if any) consideration given to the flood risk of such a large scale development.

A large proportion of the existing village settlement sits both within the Environment Agency's area for risk of flooding from rivers and the sea and close to the area of flooding from reservoirs:







Whilst the proposed development land does not sit squarely within these risk areas, development within the proposed areas, particularly on the Green Belt open fields which currently act as a natural source of drainage, could exacerbate the flooding issue for surrounding areas. This could also affect the possibility of obtaining house insurance for existing residents, which cannot be justified.

From a logistics perspective, the proposed development on the Green Belt land would be completely cut off from the settlements on Thorndon Avenue due to the existing housing layout. This would therefore result in a complete lack of social interaction between the existing settlement and the new.

This is therefore contradictory to core policy CP9, which states that new development should foster a sense of place and local identity... enhancing the character of the area. This would not be possible as the new development would be completely separated from the existing community.

I would at this stage refer back to my telephone conversation of 23<sup>rd</sup> August, concerning the reduction of housing target.

As the Council have demonstrated that it is in a position to 'push back' on unattainable targets by reducing the target of circa 5,000 homes to 3,500, I would ask why the target housing allocation was not reduced further to 2,500. This would therefore remove the 1,000 homes allocated to Green Belt land from the plan, which are not achievable without developing in contradiction to planning policy.

I also have serious concerns regarding the proposal to allocate Gypsy and Traveller sites within the village.

Policy DM28 states that 14 pitches (as an estimate at the moment, with a possibility of increasing this number) will be allocated within West Horndon. As with the SHMA document, I understand that the assessment base to establish the gypsy and traveller need is not yet complete. This again begs the question how these numbers can be established without the evidence base.

Of all of the proposals put forward by the draft plan, the allocation of land within our community for the gypsy and traveller pitches and the development on Green Belt land are the proposals that concern me the most. With the case of Dale Farm very much in residents' minds, I would question why we should make provision for this group within our established community.

In summary therefore, my response to the draft plan is as follows:

1. The consultation process has been inadequate
2. The documentation provided is incomplete
3. The scale of development is not in-keeping with the existing settlement
4. Under no circumstances should Green Belt land be developed
5. Development on brownfield land should be scaled back, to complement the existing settlement
6. Infrastructure provisions will be vast and should be established with community involvement and implemented prior to development work completing
7. There should be no allocation of land to gypsy and traveller sites

I would at this stage like to make a point of congratulating and thanking the West Horndon Parish Council for their excellent work to inform the residents of the Council's proposals and what they meant in practical terms.

They have led the charge in respect of community liaison and without their involvement I fear there would be a greater number of residents unaware of the proposals put forth by the Council.

I hope that sufficient opposition to these plans is put forward by my fellow residents in order that these plans are substantially revised.