



**BRENTWOOD
BOROUGH COUNCIL**

Local Plan 2015-2030 Preferred Options July 2013 COMMENT FORM

(For official use only)

Comment
No.

Ack. date

You can comment on the Local Plan 2015-2030 Preferred Options online at www.brentwood.gov.uk/localplan. Alternatively, please use this form to share your views on the contents of the Local Plan.

PERSONAL DETAILS

Title:	Mr	First Name:	Christopher	Last Name:	Hart
Organisation (if applicable):					
Job title (if applicable):					
Address:					
Post Code:		Telephone Number:			
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YOUR COMMENTS

Please indicate which section(s) of the Local Plan you are commenting on

CP4, S1, S2, CP10, DM11, DM23, DM28, DM35, DM36, CP13, CP17, DM22, DM24, DM25, DM26, DM27

Please specify if you Support or Object (tick as appropriate):

Support ☐

Object ☒

Below is a summary of my objection to the Local Plan, with the comments focussed on West Horndon unless noted otherwise.

The Preferred Option falls short on at least two of the four metrics that the Inspectorate will use to assess its soundness, as summarised below.

Is it Justified – the Preferred Option should be the most appropriate strategy when considered against other reasonable alternatives, based on proportionate evidence. However, the following points are made in regard the Local Plan and Preferred Option :

- **No cost-benefit analysis** between Preferred Option, Alternative Options or any other potential options
- **No development cost analysis whatsoever** despite elements that are likely to increase costs of the Preferred Option – flood risk mitigation, no existing infrastructure, rail capacity expansion. This would also put into question whether developers could achieve competitive returns.
- **No demand analysis** for 100 homes per year for 15 years in a single village, West Horndon.
- **No analysis of existing brownfield sites or the 780 disused properties** in Brentwood
- Rather the Brentwood Borough Council Planning Committee recommend **1,000 houses on Metropolitan Green Belt land, a dangerous precedent**
- **No assessment of sites currently protected for employment** use that have not been used for employment and have no reasonable prospect of being used for this purpose
- **No Transport Statement, Transport Assessment or Travel Plan**
- **No target for brownfield land development**
- **No analysis into wealth destruction** from impact on existing house prices of adding a huge supply (c. 100 houses per year for 15 years) to existing 750 houses in West Horndon, or the resulting loss in Stamp Tax Duty as existing residents are unlikely then to move on.
- **Some of the essential infrastructure unlikely to be available;** will BT justify rolling fibre optic broadband out to a village of 2,250 ? Can the Borough Council demand capacity increases on a rail line at full capacity ? Do technologies exist to mitigate the susceptibility to flood risk on the development site ?
- **No justification for West Horndon housing at least 14, and potential more, Traveller pitches,** especially given the flood risk (i.e. mobile homes, caravans).

Is it Consistent with National Policies :

- **Does not take account of local character or distinctiveness** – materially increasing densities, trebling village size
- **Contradicts existing Landscape Character Assessment** notably for Thorndon Country Park and the area to the North of the A127
- **No reference of flood risk yet the Strategic Flood Risk Assessment noted susceptibility to flooding in development area.** The development area is within 200m of High Probability Flood Zone 3 areas whilst North West Brentwood has high/intermediate suitability for Sustainable Drainage
- **No reference to design policies;** massing, height, landscape, layout, materials
- No mention of the evidence of **archaeologically important heritage assets** within 500m of village, dating as far back as the Bronze Age, with archaeologists noting that there may be further heritage assets within the vicinity.
- **Inconsistent with guidance and comments provided by the Secretary of State for Communities and Local Government**

What follows is a more detailed review of the Local Plan in context of the key Policy Documents and Acts that the Local Plan needs to abide by. This analysis has led me to conclude the points summarised above. Additionally, at the end of this response document, I have included numerous recommendations for a Revised Plan.

Abbreviations used : PCPA, Planning and Compulsory Purchase Act 2004; TCPR, Town and Country Planning (Local Planning) (England) Regulations 2012; NPPF, National Planning Policy Framework; PPTS, Planning Policy for Traveller Sites; BBC, Brentwood Borough Council

1. Environmental Concerns

The Preferred Option will cause irreversible damage to the environment, and has not considered the material flood risk.

NPPF 17: These 12 [core planning] principles are that planning should ... **take full account of flood risk**

Appendix A to the 'Brentwood Level 1 Strategic Flood Risk Assessment Jan 2011' highlights West Horndon shows the following :

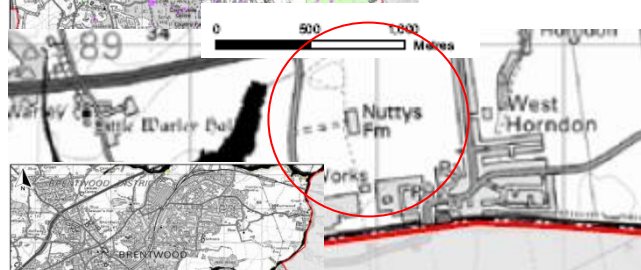
a. Across the development areas are **susceptibility to surface water flooding** (purple = susceptibility)



...s Brentwood where there is no susceptibility



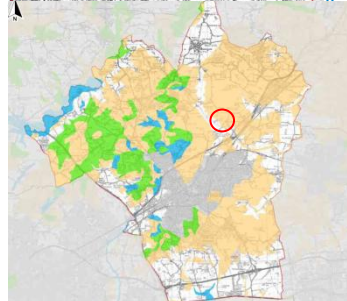
...ent are, in some instances, **within 200m from High Probability Flood Zone 3 Areas**



...near any Flood Zone 3 areas



...North West Brentwood has high or intermediate suitability for Sustainable Drainage (green intermediate suitability)



...should ... [be] preventing both new and existing development from contributing to or being put ... being adversely affected by unacceptable levels of ... water

...references to the susceptibility of the proposed development area to flooding, a former consultant has made the following points "It is clear that any development on the land identified as ... has a significant potential to increase flood risk. The magnitude of this increase has not been properly assessed and thus its significance is unknown. Development on this land must be rejected until it can be demonstrated that any increase in flood risk is insignificant both in the area of the development but also for the surrounding locations.". Were the BBC to recommend any flood defence mechanisms, these are likely to be expensive, further worsening the current preferred option when considered against other potential options [both those considered in the Local Plan, and those not considered] when compared through a cost-benefit analysis.

NPPF 17: These 12 [core planning] principles are that planning should ... take account of the different roles and character of different areas ... protecting the Green Belts around them, recognising the intrinsic character and beauty of the countryside.

The **character of the existing village would change materially** given the Preferred Option is to treble the Village's size, the Preferred Option density for West Horndon (45 dwellings per hectare when 5 hectares of non-housing are considered) is materially above the existing density of the village (average 17, range 15 to 18), and therefore by default, the type of housing would be altered (predominantly bungalows with large gardens or 3-4 bedroom family houses with moderate gardens).

Further on character, the BBC released a Landscape Character of Brentwood Borough assessment, in which the following 'Suggested Landscape Planning Guidelines' were determined :

a. In regard Thorndon Country Park, where the assessment sought "to protect and enhance positive features that are essential in contributing to local distinctiveness" - **"conserve existing views across the area" and "seek to screen visual distractions"**. The Preferred Option contradicts the BBC's own Planning Guideline, as the development would be observed from Thorndon Country Park itself.

b. In regard the area just north of the A127 - **"seek ways to ensure that potential new development at the fringes of Brentwood or other small settlement [i.e. West Horndon] is not visually intrusive within surrounding landscape"**. From this area, the development would also be seen.

NPPF 17: These 12 [core planning] principles are that planning should ... contribute to conserving and enhancing the natural environment

The destruction of Green Belt land is inconsistent with this policy when there are other areas more suitable, and of likely less cost. Further, given this is Metropolitan Green Belt land, it is felt that this sets a very dangerous precedent. As the BBC note in their Preferred Option "The importance of protecting Green Belt land is supported by Borough residents who in consultations identify the protection of the Green Belt as their top priority".

NPPF 49: Housing applications should be considered in the context of the presumption in favour of sustainable development AND NPPF 79: the essential characteristics of Green Belts are their ... permanence.

Again, building on existing Green Belt land when there are known Brownfield sites and >700 disused properties within Brentwood is inconsistent with favouring sustainable development.

NPPF 88: 'Very special circumstances' [for Green Belt development] will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

Until all non-Green Belt land has been developed, any development proposed on Green Belt land must therefore be considered inappropriate, otherwise the harm, when considered against development of non-Green Belt land, can surely not be outweighed by the benefits.

2. Justification and Reasoning for the Preferred Option

The Preferred and Alternative Options, in their current form, are ill thought through containing insufficient information and analysis to allow a reasoned and justifiable decision to be made. One could argue that it is not currently possible for the public to make a fair assessment of the Local Plan until this information and analysis has been completed.

TCPR 8 (2): A local plan ... must contain a reasoned justification of the policies contained in it AND NPPF 173: Pursuing sustainable development requires careful attention to ... costs.

*There is **no cost-benefit analysis** completed on the Preferred or Alternative options – the cost of building 1,500 new houses in an area with nil existing infrastructure and evidenced to be susceptible to groundwater flooding and on a flood plain (see later), is likely to be materially higher than developing the 780 disused properties within the Borough (figure derived from 2012 council tax returns where properties within Brentwood Borough were classified as empty), and reusing Brownfield sites that already contain infrastructure.*

Where is the demand analysis showing that there is sufficient demand for an additional 100 houses per year for 15 years in a single village (West Horndon) without any existing infrastructure to support it.

NPPF 17: These 12 [core planning] principles are that planning should ... encourage the effective use of land by reusing land that has been previously developed (brownfield land).

*The Local Plan **does not represent or consider (i) the total area of Brownfield sites, (ii) the number of Brownfield properties available or (iii) make reference to the 780 disused properties within Brentwood.** This is in direct contradiction to this policy.*

NPPF 51: Local planning authorities should identify and bring back into residential use empty housing and buildings in line with local housing and empty homes strategies and, where appropriate, acquire properties under compulsory purchase powers

No analysis of empty housing and buildings within Local Plan, however, as noted above, there exists 780 such properties within Brentwood Borough.

NPPF 177: it is important that local planning authorities understand district-wide development costs at the time Local Plans are drawn up. For this reason, infrastructure and development policies should be planned at the same time, in the Local Plan.

No detailed analysis of infrastructure, or any analysis of infrastructure costs included in Local Plan.

NPPF 162: Local planning authorities should ... assess the quality and capacity of infrastructure for transport, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management, and its ability to meet forecast demands

There is no evidence of this having been considered, or even assessed, within the Local Plan. It is unlikely West Horndon post Preferred Option development will have access to high speed telecommunications (see later) and evidence that the areas currently considered for development in West Horndon are susceptible to flooding. Further, and as mentioned earlier, the North West of Brentwood Borough has high or intermediate suitability for Sustainable Drainage Systems. None of these points are represented anywhere within the Local Plan.

NPPF 22: Planning policies should avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being used for that purpose.

*Local Plan contains **no assessment of sites currently protected for employment use that have not been used for employment and have no reasonable prospect of being used for this purpose.***

NPPF 32: All developments that generate significant amounts of movement should be supported by a Transport Statement or Transport Assessment

*Infrastructure for the 1,500 houses recommended in the Local Plan for development in West Horndon and the associated impact on a train network that is already over capacity, should be considered a 'significant amount of movement'. There is **no Transport Statement or Transport Assessment**, indeed C2C, the train operator, have advised West Horndon Parish Council that there are no plans to expand capacity or frequency of trains, and the BBC are unlikely to have any ability to demand these improvements.*

NPPF 36: All developments which generate significant amounts of movement should be required to provide a Travel Plan.

*There is **no Travel Plan** in the Local Plan.*

NPPF 80: Green Belt serves five purposes ... to assist in urban regeneration, by encouraging the recycling of derelict and other urban land

***No analysis of derelict or other urban land** within Local Plan*

NPPF 111: Local planning authorities may continue to consider the case for setting a locally appropriate target for the use of brownfield land.

No target has been referenced in the Local Plan, with the BBC favouring West Horndon Green Belt development for c. 29% of its total housing requirement.

3. Economic Concerns

The Local Plan in its current form would cause irreversible damage to the local economy and local residents, exacerbated by the lack of infrastructure necessary to drive further growth.

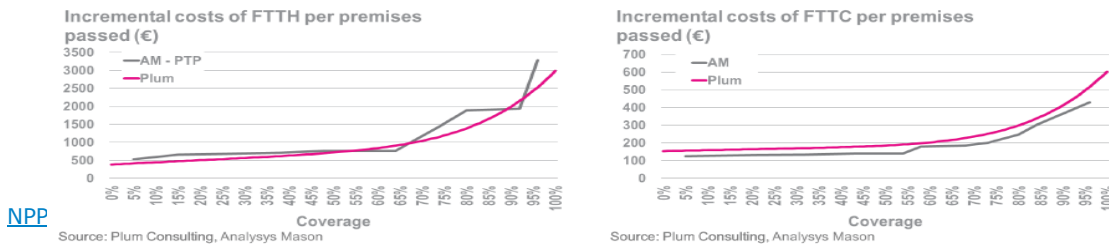
NPPF 7: There are three dimensions to sustainable development: economic, social and environmental ... the need for the planning system to perform ... an economic role ... by ensuring that sufficient land of the right type is ... available in the right places and at the right time to support growth AND NPPF 17: These 12 [core planning] principles are that planning should ... proactively drive ... thriving local places ... taking account of the needs of the residential ... communities.

*West Horndon village currently has c. 750 houses. The Preferred Option is looking to add c. 100 houses per year for 15 years, totalling 1,500, to the supply of housing. **Simple supply and demand economics shows that when such large supply is added to a free markets, prices decline – this is wealth destruction, and is unnecessary.** Were the houses built in an area where the existing supply is materially larger than the amount being added, there would be de-minimise impact on house prices. Further, because of the house price decline, local residents will spend less as they save to cover the lost wealth over years, and a majority will not move house again given the loss they would then have to absorb, **reducing the receipt of Stamp Tax Duty.** This wealth destruction is contrary to the economic role the Local Plan should be enabling.*

NPPF 43: In preparing Local Plans, local planning authorities should support the expansion of electronic communications networks, including telecommunications and high speed broadband AND NPPF 42: Advanced, high quality communications infrastructure is essential for sustainable economic growth. The development of high speed broadband technology and other communications networks also plays a vital role in enhancing the provision of local community facilities and services

*It is **considered unlikely that BT, or any other telecoms services provider, could justify rolling out expensive fibre optic broadband to a village of 2,250** (750 existing + 1,500 proposed). The below shows how the cost to roll out Fibre to the Home and Fibre to the Cabinet increase materially as it is rolled out to villages – it is simply too expensive and therefore*

uneconomical :



NPP

The Preferred Option would **destroy two existing industrial sites, currently employing hundreds of people**. There is concern that the companies currently leasing slots on the existing sites **may be priced out of slots on the new proposed industrial site**, outside of the village, meaning a number of these jobs would be lost permanently.

4. Inconsistent with guidance and comments provided by Secretary of State for Communities and Local Government

The Local Plan does not appear to follow the guidance provided by the Secretary of State for Communities and Local Government

PCPA 19(2) a: a Local Development Plan must have regard to national policies and advice contained in guidance issued by the Secretary of State AND PCPA 19(2) j: a Local Development Plan must have regard to such other matters as the Secretary of State prescribes

- Secretary of State for Communities and Local Government, Meeting with residents in West Horndon 15/08/13: "The rules have changed, there is no longer a fixed requirement for a certain % of affordable housing ... we should be protecting the nature of West Horndon village, and this means **preserving the current mix of the type of housing and the density – that should be for you to decide**"
- Secretary of State for Communities and Local Government, Brentwood Weekly News 21/08/13: "**Localism means local people make the decision.**"
- Secretary of State for Communities and Local Government, Brentwood Gazette 08/08/13: "**We want to ensure that West Horndon retains its character**". "I think there's a strong case in terms of them coming up with their own plan, so they can have an impact on what happens in their village over those 15 years.". "It's not just green belt its metropolitan green belt ... It's the first green belt in the world. It's the reason why we're not a suburb of London."
- BBC News 30/07/13 "**Eric Pickles calls in Field Farm green belt housing plan for inquiry ... A decision to build 450 homes on green belt land in Nottinghamshire is to be investigated in a public inquiry.**"
- Inside Housing 01/07/13 "**Pickles blocks Essex green belt development [for 165 houses]...** In light of all material considerations in this case the secretary of state is concerned that a decision to allow this appeal for housing in the green belt **risks setting an undesirable precedent for similar developments which would seriously undermine national green belt policy**"

The above comments need to be taken in context with Preferred Option: 1,000 houses, which is **29% of Brentwood Borough's total housing requirement, to be built on Metropolitan Green Belt land in a village making up c. 2% of Brentwood Borough's population and housing density increasing from average 17 dwellings per hectare currently to 45 in West Horndon under the Preferred Option, completely altering the character of the village.**

This is completely inconsistent with the guidance provided from the Secretary of State.

5. Inconsistent with other policies and requirements

TCPR 9 (1) (c): [The Local Plan] must ... illustrate geographically the application of the policies

There is no **map showing where Policy DM28 of the Local Plan would be located** – this is in reference to the 14 pitches currently earmarked for West Horndon. At various meetings with the BBC Planning Committee, they have refused to reveal the location of the Traveller Pitches – how can one therefore either support or object this particular part of the Local Plan.

NPPF 9: Pursuing sustainable development involves ... improving the conditions in which people ... travel

Every week, thousands of journeys are made to work at the two West Horndon industrial sites via the C2C train line to West Horndon Station. The new site will require the employees to now drive to work given the proposed industrial site will be several miles from the train station, creating travelling conditions that are more expensive and environmentally more polluting.

Additionally, **it has been evidenced that there is already insufficient capacity on the train route to London every weekday morning**, with on average >50% of people getting onto the train after West Horndon station on the way to London Fenchurch Street having to stand. C2C have confirmed they have no plans to increase capacity, and it is understood that Brentwood Borough Council have no ability to demand capacity increases, meaning any new residents would further increase the capacity problem beyond its existing extent, worsening the conditions in which people travel to London to work. Increasing the frequency of the trains would not work either, because the same, often higher, percentage of people have to stand on the trains that do not currently stop at West Horndon on the way to London Fenchurch Street. Therefore, **to prevent worsening travelling conditions, let alone improving them, whole new carriages would need to be purchased to existing trains,**

or new trains would need to be put on – the cost of this is likely to be very high when compared to building the properties near to a train station with available capacity- Shenfield will have a station on Cross Rail, for instance.

NPPF 10: Plans and decisions need to take local circumstances into account AND NPPF 58: Local and neighbourhood plans should develop robust and comprehensive policies that set out the quality of development that will be expected for the area ... to ensure that developments ... respond to local character and history... AND NPPF 47: Local Planning Authorities should ... set out their own approach to housing density to reflect local circumstances AND NPPF 60: it is ... proper to seek to promote or reinforce local distinctiveness.

*As noted earlier, and in contradiction to the guidance from the Secretary of State, the material increase in density of the new development versus current density (17 to 45 dph), and the nature of the housing (bungalows and 3-4 bedroom houses for flats and 1-2 bedroom houses with no gardens 30% of which will be affordable housing), **would completely alter the character of West Horndon.***

NPPF 34: Plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised AND NPPF 37: Planning policies should aim ... so that people can be encouraged to minimise journey lengths for employment.

With the destruction of the two West Horndon Industrial Estates in the Preferred Option, there would be de-minimise employment in West Horndon, with the BBC not having the ability to demand employment be created in West Horndon, irrespective of best intentions. Of West Horndon's working population, the average distance travelled to work is likely to be well over 10 miles, indeed predominantly into London. As such, it is felt the Preferred Option is contrary to this Policy when development could occur within walking distance of existing large employment centres, such as Brentwood and Shenfield.

NPPF 52: The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns that follow the principles of Garden Cities

*Some of the Garden City principles include 'community ownership of land' and 'long-term stewardship of assets' and includes the development of 'homes with gardens'. Given the scale of development presented in the Preferred Option within West Horndon, it is surprising that Garden City principles are not referenced. **It would make sense if the parameters (density, development areas, timescales) were agreed and then West Horndon Parish Council are responsible for the delivery, allowing local ownership and stewardship of the development and allowing local residents to decide on specific planning proposals given the subjective nature of "character".***

NPPF 59: Design policies ... should concentrate on guiding the overall scale, density, massing, height, landscape, layout, materials and access of new development in relation to neighbouring buildings and the local area more generally

The Local Plan makes no reference of height and landscape. In a Parish Council meeting with developers earmarked to develop the site, and in the presence of Brentwood Borough Council Planning Committee, designs were shown of the potential buildings. It is felt the Local Plan needs to go further than this, defining specific height and landscape parameters, allowing future planning decisions to be made more promptly and with less potential controversy.

NPPF 111: Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land).

There are many brownfield sites that have not been considered within the Local Plan, and thus the Local Plan is not only failing to abide by this policy, but by recommending development of Green Belt land over those brownfield sites, is actually in contradictions with the policy.

NPPF 152: Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three. Significant adverse impacts on any of these dimensions should be avoided and, wherever possible, alternative options which reduce or eliminate such impacts should be pursued.

As shown earlier within this response, there are arguably net losses across at least two of these three dimensions under the BBC's preferred option, and a number of alternative options have not been considered which would eliminate such impacts :

*Environmental dimension – loss of green belt for 29% of total BBC housing requirement without considering the majority of brownfield sites, disused buildings, derelict land, other urban land and without considering the flood risk on the West Horndon development sites on both the new development and existing residents. **NET LOSS.***

*Economic dimension – immediate decline of house prices resulting in material wealth destruction for West Horndon residents and loss of Stamp Tax Duty for the state. Further, there is no cost-benefit or demand analysis to show, respectively, that the Preferred option is the one that maximises economic growth for every £ invested, or that there is sufficient demand to justify 1,500 houses in a single village. It is also unlikely that essential infrastructure, such as high speed fibre optic telecommunications networks or increased train capacity would be available. **NET LOSS.***

NPPF 169: Local planning authorities should have up-to-date evidence about the historic environment in their area and use it to assess the significance of heritage assets and the contribution they make to their environment. They should also use it to predict the likelihood that currently unidentified heritage assets, particularly sites of historic and archaeological interest, will be discovered in the future.

*In January 2012, Albion Archaeology carried out a limited archaeological dig (10m wide by 0.38m deep and 0.6m wide by 1.45m deep) within an area c. 500m from the proposed West Horndon development site. It concluded that "The groundworks revealed one ditch dating to the late Bronze Age, as well as four modern (post 1750) ditches ... similarly dated shreds from the overlying layer suggest **there may be further activity of this date in the vicinity**. Whether the ditch is related to a settlement or a wider field system is unclear due to the limited amount revealed during the groundworks. However, **further evidence for either of these activities is of interest in the light of regional research themes relating to the development and relationships of settlements and field systems of the period**". Below is an inventory of some of the pottery found within this small dig :*

Common name and date	Sherd No.	Context / Sherd No.
<i>Late Bronze Age</i>		
Flint gritted	3	(101):3
Flint and sand	5	(101):4, (110):1
<i>Roman</i>		
Samian ware	1	(101):1
<i>Late medieval/post-medieval transitional</i>		
Oxidised sandy ware	1	(108):1
Smooth oxidised sandy ware	3	(101):3
<i>Post-medieval</i>		
Glazed fine red earthenware	2	(101):2
Black-glazed earthenware	1	(101):1
Tin-glazed earthenware	1	(101):1
<i>Modern</i>		
English porcelain	1	(101):1
White salt-glazed stoneware	3	(106):3
White earthenware	2	(114):2
White-slipped earthenware	1	(114):1

*Further to these items of pottery, a number of other artefacts were discovered including roof tiles, land drainage ceramics, Victorian coins, all of which have been gifted to Thurrock Museum. **It would be contrary to this policy, given the proximity to the development site, and the comments from Albion Archaeology that there may be further such heritage assets that would be of interest to regional research, for the West Horndon development to be approved.***

NPPF 173: the sites and the scale of development identified in the plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened

*As can be seen throughout this response, the Local Plan does not abide by, and in some instances is directly contrary to, the NPPF. **This has the potential to threaten the delivery of the Preferred Option.***

NPPF 173: the costs of any requirements likely to be applied to development, such as ... infrastructure contributions or other requirements should, when taking account of the normal cost of development and mitigation, provide competitive returns to a willing land owner and willing developer to enable the development to be deliverable.

*As noted earlier, there has been **no cost-benefit analysis** of the Preferred Option versus other options, **no analysis of demand** for 100 houses per year for the next 15 years in West Horndon, and **no reference to the cost of mitigating the material susceptibility to flooding**. Further, **there is little choice for developers if 43% of Brentwood Borough's required housing development is to occur in 1 village**. All of these factors reduce the potential for developers to make competitive returns. It would be **much more attractive for a developer to build in numerous smaller areas with existing infrastructure, no flood risk and clear demand for that level of housing**.*

NPPF 176: Where safeguards are necessary to make a particular development acceptable ... the development should not be approved if the measures required cannot be secured through appropriate conditions or agreements

*To meet policies NPPF 42 and 43 on the necessity for high speed broadband, NPPF 32 and 36 in regard an assessment of transportation, notably by train in this instance and NPPF 17 in regard flood risk, **it is considered likely that a number of safeguards would need to be sought, including the following, which the BBC are unlikely to get agreement on :***

- BT / a rival telecoms operator, agreeing to roll out fibre optic broadband to West Horndon post development, given the small size of the village and the significant increases in cost to roll out fibre to small pockets of populations.*
- Department for Transport agreeing that there must be material capacity increases at West Horndon station given the services are already at capacity. Further, the station only has one line in each direction, limiting ability for increased capacity. This would not be required if development were focussed on Shenfield, where the Cross Rail station will bring a significant increase in capacity.*
- An Environmental contractor agreeing to deliver flood risk mitigation mechanisms at a cost considered acceptable to BBC, noting that the BBC has not even considered the West Horndon development areas susceptibility for flooding in this Local Plan.*

PPTS 11: Local planning authorities should, therefore, ensure that their policies do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans.

*As noted earlier, the development sites are vulnerable to flooding. West, North West and Central Brentwood Borough is not, however. **It would be contrary to this policy were Traveller Pitches to be placed in / around West Horndon given the susceptibility to flood risk and close proximity to High Probability Flood Zone 3 Areas in context of typical Traveller accommodation which are especially vulnerable to flooding (caravans, mobile homes).***

In context of the points raised in this response to the Local Plan, I have put together several principles that, if followed, would mitigate or remove the bulk of the concerns raised above, and therefore should be included in a new Revised Plan following the consultation period :

1. The density of new development should be the same as the existing density of West Horndon (17 dwellings / hectare), to ensure the character of the village is not changed and to abide by the numerous comments from the Secretary of State for Communities and Local Government.
2. The proportion of affordable, and social, housing of any new development should be the same as the current proportions in West Horndon, for the same reasons as pointed out in 1 above.
3. There should be no development on Green Belt land in West Horndon given (i) the flooding susceptibility across the Green Belt development site and (ii) it is very likely there are sufficient sources of non-Green Belt land elsewhere in the Borough (existing brownfield sites, the 780 empty properties referenced earlier, disused and derelict land and land allocated for employment use with no prospect of it being used for employment).
4. Traveller sites are not built in West Horndon given the susceptibility to flooding and the specific vulnerabilities of Traveller accommodation (caravans and mobile homes).
5. West Horndon Parish Council, ideally through a self appointed Housing Committee consisting of local residents, should be responsible for delivering any development in West Horndon, as per the Garden City principles. Agreement should be reached on density, area, height, people per house, materials, timescales etc before hand, and then the Parish Council can deliver it. This will give resident a say in the aesthetic impact of any proposed development, given "character" is subjective.
6. Further, alignment with Garden City principles should be considered by transferring ownership of the development land from the Borough Council to the Housing Committee, putting ownership and long-term stewardship into the hands of the local residents, allowing the residents to profit from any of the land sales to developers.
7. Community Infrastructure Levy and New Homes Bonus money should be given directly to the West Horndon Parish Council, pro-rata as a percentage of West Horndon's totalling housing development of the total built across the Borough. The Parish Council should be allowed the freedom to use this money as they see fit.
8. Controls should be included to ensure development doesn't continue if homes are not being sold i.e. perhaps construction of the next 25 houses can only begin once 90% of the previous 25 houses have been sold.
9. Removal of all references of potential further development in West Horndon, as it is unacceptable and unnecessary to use a single area to fill any potential shortfalls i.e. CP4 "West Horndon could give rise to further capacity depending on its ability to accommodate a self sustaining community and provision of infrastructure can be met over the plan period", and PM28 "West Horndon is identified as a broad location for further provision to be planned as an integrated way as part of a mixed use development. The level of provision is subject to the findings of the forthcoming GTAA but in the first instance estimated to be 14 pitches".
10. Understand whether it would be feasible for fibre optic broadband to be rolled out to West Horndon post development, given its necessity for driving economic growth.
11. Produce a cost-benefit analysis of all the options to ensure the tax payer is getting value for money, and a demand analysis to ensure there is demand for the level of housing in the areas you are recommending development.
12. Consider alternative sites :
 - Shenfield will have a material increase in train capacity and open up new areas to travel for employment when Cross Rail is delivered. This is in contrast to West Horndon, where the train use is already above capacity.
 - There are residential properties currently for sale with several hectares of available land that could be developed, reusing existing developed land i.e. the Garden Centre in West Horndon on the A127, which contains 13.5 acres of land
 - The 780 empty buildings referenced earlier, based on council tax returns.