



**BRENTWOOD  
BOROUGH COUNCIL**

## Draft Local Plan

**2013 - 2033**

February 2016

## COMMENT FORM

From 10 February to 23 March 2016 we are consulting on the Draft Local Plan for Brentwood Borough. You can view and comment on the Draft Local Plan online at [www.brentwood.gov.uk/localplan](http://www.brentwood.gov.uk/localplan)

Alternatively, please use this form to share your views on the contents of the Draft Plan.

All responses should be received by Wednesday 23 March 2016

Please return forms to Planning Policy Team, Brentwood Borough Council, Town Hall, Brentwood, Essex CM15 8AY, or alternatively attach completed forms and email them to [planning.policy@brentwood.gov.uk](mailto:planning.policy@brentwood.gov.uk)

### Data Protection

All personal information that you provide will be used solely for the purpose of the Local Plan consultation. Please note whilst all addresses will be treated as confidential, comments will not be confidential. Each comment and the name of the person who made the comment will be featured on the Council's website.

By submitting this form you are agreeing to these conditions.

### PERSONAL DETAILS

Title:

MR

First Name:

JONATHAN

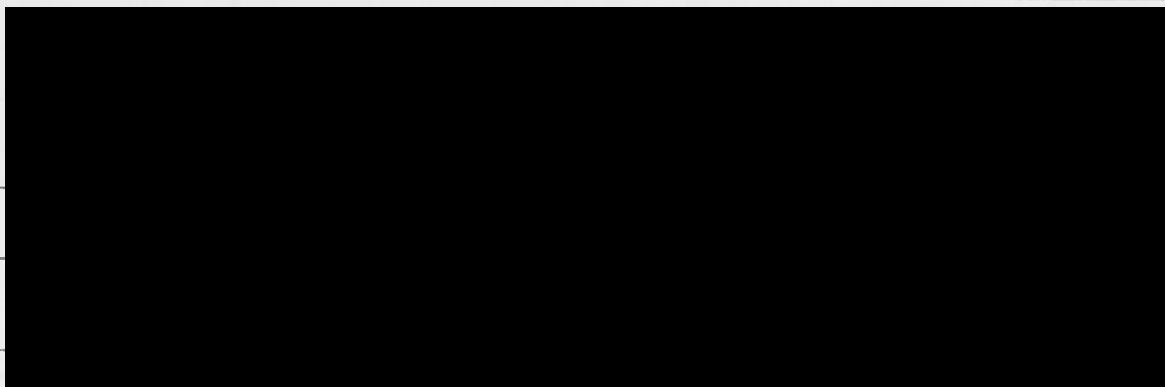
Last Name:

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Address:

Post Code:

Email Address:



**YOUR COMMENTS**

**Please indicate which section(s) of the Draft Local Plan you are commenting on (where applicable please clearly state the Policy reference or paragraph number):**

*See attached*

**Please specify if you Support, Object or are providing a General Comment:**  
(tick as appropriate)

Support

Object

General Comment

**Comments (please use additional sheet if required):**

*See attached*

Thank you for taking the time to respond. Please return forms to Planning Policy Team, Brentwood Borough Council, Town Hall, Brentwood, Essex CM15 8AY, or alternatively attach completed forms and email to [planning.policy@brentwood.gov.uk](mailto:planning.policy@brentwood.gov.uk)

# **Brentwood Borough Council – Draft Local Plan 2013-2033**

## **Public consultation – response**

### **1. Introduction and Context**

**The introduction looks at what has been done to date regarding the Development Plan and the stages that the Council has gone through including the various consultations.**

**The Council in the draft Local Plan January 2016 recognise that the number of Brownfield sites are finite and that of those available not all are suitable for redevelopment. Within the draft Plan the Council concedes that there is pressure to release Green Belt land to meet development needs in full and yet throughout the draft Plan they seek to restrict development in the Green Belt. There is no balance shown between the need for new development and the protection of the Green Belt.**

**Brentwood Borough consists of 89% Metropolitan Green Belt which is basically all the remaining land that is not already developed. There is a need to increase development within the Borough, with housing numbers increasing from 175 new homes a year to 360 new homes a year.**

### **2. Vision**

**In the Vision Statement the Council state;**

**“Brentwood Borough will continue to be a thriving, attractive and unique destination for people to live, work and visit by protecting and nurturing its existing high quality environment, growing its prosperous local economy and fostering development which is responsive to local needs.**

**Outstanding leisure opportunities and high quality greenspaces such as Thorndon and Weald Country Parks will continue to be a significant attraction. Brentwood Town Centre will expand its focus for niche shopping, quality employment, exciting cultural opportunities and super connectivity into London via Crossrail. This combined with surrounding attractive countryside and villages will continue to make the Borough a destination of choice.**

**Brentwood will grow sustainably with new development directed to locations best served by local services and facilities to help further improve existing and new residents’ quality of life. This will be**

achieved by realising opportunities to enhance the quality and character of places and provision of facilities, and minimising the negative impacts of development on people, the environment and resources.”

The Vision Statement included in the draft Plan should be applauded, so why do the Council ignore it by deciding to develop a site at Dunton that is not sustainable, will not benefit the Borough's residents, will not benefit Brentwood Town Centre, is not responsive to local needs and does not take advantage of Crossrail. The logistics actually suggest that Basildon will benefit most from any development at Dunton. Nearly any site can be made sustainable if enough money is spent on it, with extra buses, improved roads, improved services etc. To meet the demands of the Vision statement the draft Plan should be looking throughout the Borough and recognising that developing small areas of the Green Belt adjoin or in close proximity of existing settlements will have less of an impact on the Green Belt, this has been recognised but ignored in a previous Council report. The Council do not answer why building over 5000 homes in total, it is likely to be more, at Dunton will continue to make the Borough a destination of choice – is it because they will be far enough away from the heart of the Borough to affect it ?

### 3. Spatial Strategies

Within the Spatial Strategies section of the draft Plan, it looks at the sequential approach and lists what to consider. In bold it states; “Development needs cannot be fully met by the above so reluctantly the Council needs to consider appropriate sustainable locations within the Green Belt”. This statement typifies the approach taken by the Council not just in this draft Plan but throughout the process. There has been a general reluctance to embrace the need for new development throughout the Borough and to look at ways that any development can benefit the Borough as a whole. Over developing West Horndon was met with fierce local opposition so instead of looking again at the Borough as a whole the Council moved slightly further down the A127 to Dunton where any opposition would be limited as it is sparsely populated. The same arguments apply as they did to West Horndon.

Within Policy 5.1 it states that; “ Development sites 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” How does the Council consider the building of over 5000 homes at Dunton meets this criteria. The impact of building so many homes, creatively called a Garden Village, is significant and will adversely affect not only the Green Belt but existing services. The proposed building of 500 new homes and industrial buildings at West Horndon will also have a significant impact on the Green Belt and existing services. The A127 is already a pinch point for traffic and is regularly brought to a standstill, adding more industrial traffic and vehicles from over 5500 new homes will exacerbate the problem. If as expected significant work will be required to improve services including the road network then how is the proposed development sustainable – a key theme throughout the draft Plan.

Policy 5.2 lists Housing Growth during the Plan period and recognises that 7,240 new dwellings need to be built which equates to 362 dwellings a year. The Policy shows how the Council will meet its required housing numbers. Of the 7,240 new dwellings some 2500 will be built at Dunton with a

further 500 at West Horndon and over 900 seen as Windfall sites. This equates to over 40% of new dwellings being situated along the A127 and a further 14% not yet accounted for. The 14% figure is high especially as the Council has accepted Brownfield sites are finite and has recognised those most likely to be developed in the Plan period, with the Council's stringent policy on building in the Green Belt it is difficult to see where the Windfall sites will come from.

It is interesting to note that in the appendices the Windfall allowance is heavily weighted to the latter years of the draft Plan. No Windfall allowance is shown from 2015 through 2021, the numbers suddenly start picking up in 2022. A cynic would suggest that this will tie in with the proposed development at Dunton and suddenly there will be Windfall sites appearing at Dunton. How can a draft Plan not allow for Windfall sites for 7 years, is it because the Council will ensure there are none by using restrictive planning policies and hiding behind the Green Belt designation of any suitable available land.

Throughout the Plan period, which has been excessively long, the Council have fought against increasing housing numbers to meet demand. The draft Plan now recognises that over 7000 new dwellings are needed to meet expected requirements, at the moment over 55% of these are either Windfall sites or along the A127. If Dunton doesn't happen, as it shouldn't, what is the Council's fall-back position. The Council cannot wait and allow house building in the Borough to stagnate or to remain at the previous average of 175 a year (this average only held up thanks to some large Brownfield sites that became available ie Warley Hospital). Too much reliance is being put on one site to meet the Borough's housing numbers.

When West Horndon was originally muted as an area for significant development, the local people objected. One of the main objections was based around the existing rail line and the overcrowding on the trains. The Council within the draft Plan are still proposing to site 500 new homes at West Horndon, with one of the main reasons being to improve the village centre near the railway station. It is difficult to imagine how an arbitrary figure of 500 homes will improve the village centre, on what basis has this figure been arrived at. The 2 main line stations in the Borough are situated at Brentwood and Shenfield, Shenfield in particular is an important hub. In planning terms more development should be situated within the surrounding areas of Shenfield and Brentwood as they have excellent sustainable transport links and yet 500 new homes are proposed in the draft Plan at West Horndon where the transport links are either over crowded or poor.

#### **4. Managing Growth**

The Council within the draft Plan concedes the importance of the car to everyday life and whilst in an ideal world people would use alternative means of transport, the fact is people rely heavily on getting to and from places using their cars. With this in mind and with the problems associated with parking at Brentwood Town Centre especially at the weekends, it is difficult to comprehend the proposal to build on one of the carparks adjacent to the shops. The draft Plan is keen to highlight Brentwood Town Centre and how important it is and yet by making it more difficult to park they will cause shoppers to go to alternative sites such as Romford, Lakeside etc. There are other sites that could handle development whilst retaining the car park.

In section 6.4 it states that; "The growth strategy directs new housing and employment development to larger settlements and sustainable transport corridors, well served by public transport with rail stations at Brentwood and Shenfield. Managing growth in this way will help the Borough safer and more liveable, more sustainable, better connected, more prosperous and very distinctive." This is exactly what the draft Plan fails to deliver by proposing to build over 40% of new homes away from the Shenfield and Brentwood areas, if the Windfall sites are included it would mean over 55% of residential new development being built in areas not readily accessible to Brentwood or Shenfield, more accessible to Basildon. This is a problem with the draft Plan, it is ignoring key areas of the Borough whilst concentrating housing on Dunton and West Horndon.

With the development of Crossrail, Shenfield will become an even more important hub and will connect the whole area with West End of London as well as the City. The importance of Crossrail to the Borough cannot be underestimated, hence why there should be significant investment and development in the surrounding areas of Shenfield and Hutton. To concentrate so much effort along the A127 is missing the benefits of Crossrail. Chelmsford Council, before becoming a City, recognised the importance of its rail station and constructed 2 park and ride sites to allow for commuters from both sides of the city. The Council should look at this and concentrate on Shenfield and Brentwood rather than focussing their attention on outlying areas like Dunton.

## 5. Sustainable Communities

For the Council to propose to build so many new homes away from strategic hubs and larger villages is not sustainable and does not benefit the Borough as a whole. Policy 7.1 specifically relates to Dunton Hills Garden Village. Within the policy it states it will apply garden village principles and provide 2500 new homes. What it does not say are that the proposals are for a far larger scheme that include Basildon District Council and that the overall size of the joint scheme will be anywhere between 4000 to 6000 new homes. The wording of this Policy is misleading and should be changed to show exactly what is being proposed at Dunton.

The area of Dunton does not lie in a sustainable location capable of major development, the area is capable of limited development but not to the level proposed in the draft Plan. The Council decided a number of years ago that it wanted to place the majority of its residential development as far removed from the main centre of the Borough as possible hence initially West Horndon and now Dunton.

The scale of development proposed in and around Dunton cannot be described as sustainable, in fact it is not sustainable, without significant alterations to the existing landscape and existing infrastructure.

The site at Dunton does not meet any of the requirements within the draft Plan regarding sustainability, managing growth and when considering the Vision Statement. It is difficult to ascertain the logic that went into choosing Dunton as a site for a development of the size and scale proposed.

The Strategic Housing Market Assessment (SHMA) that was produced in 2013 looked at the housing needs of the Borough. It recognised, as does the draft Plan, that the population is getting elderly and

that more than ever they desire to live in their existing homes as long as possible or more suitable homes within their existing communities. There is also the need for family members to move to be nearer their elderly relatives. How does the Council propose to meet this need by building over 40% of new homes along the A127 and at the same time maintain stringent planning policies?

The government recognised that the housing supply must be necessary to meet demand. By providing new homes throughout the Borough, including sites on the edge of villages or within easy walking distance, the criteria as set down by the government and the SHMA would be met.

Building on the edge of villages will not just meet local need it will also meet the need of existing residents who wish to remain within their community as they age. The SHMA recognised that for concealed householders the two main reasons for moving was, to be near family and they had always lived there. An integrated housing approach throughout the Borough would meet these needs, the current approach will alienate families.

## 6. Economic Prosperity.

Economic prosperity of the Borough is important, the Borough is fortunate in that it has the M25 and the A12 supporting it and to a lesser extent the A127. Constructing new employment sites within easy access, especially of the M25 and A12 is sensible and will allow for growth within the Plan period. The Council need to be prepared for further growth than that identified within the draft Plan, there needs to be a degree of flexibility to enable the Borough to take advantage of a healthy economic climate.

There must be consideration to allow local businesses to expand and to encourage new businesses within residential areas provided they are compatible. By providing an integrated approach it will encourage new sites to be developed and for businesses to grow within villages thereby providing local employment.

With development throughout the Borough, increased public transport and a greater reliance on working from home as recognised in section 8.14, the Council could cut car usage. There has been no mention in the draft Plan of new developments focused on working from home, these could be created to encourage people to work from home on a regular basis. With increased technology there is a trend for people to go to their workplace less and instead work from home. When live/work units were originally introduced they were for craftsmen to have workshops adjacent to their homes, this has progressed to having fully functioning offices above their garage or within their house.

To ensure the Town Centre remains economically sustainable it is important for the draft Plan to relook at the proposed housing developments. Public transport needs to improve to enable access to the Town Centre and parking provisions need to be appropriate for those wishing to drive. A coordinated approach that considers the motorist is essential to enable the town to survive and thrive in the long term. The residents should be encouraged to see the Town Centre as their main destination whilst using local shops where possible.

## **7. Environmental Protection and Enhancement**

Due to its proximity to London, Brentwood Borough is made up of Green Belt and existing settlements. The draft Plan recognises that there is a need to release land from the Green Belt in order to achieve its housing target of over 7000 new homes in the Plan period. Throughout the draft Plan there is a reluctance to accept that for the Borough to grow and continue to develop there needs to be a more flexible approach to taking land out of the Green Belt and hence develop it.

The draft Plan is the perfect opportunity to look at the Borough as a whole and to identify areas capable of taking development whilst minimising the overall effect on the Green Belt, the draft Plan misses this opportunity and reflects the long held view of the Council that the Green Belt within the Borough is sacrosanct.

The Council within a previous report recognised that the best way to maintain the Green Belt was to do smaller developments in and around villages, thereby minimising damage to the existing Landscape – so what does the draft Plan recommend, it recommends building 2500 new homes at Dunton on Green Belt land and 500 new homes at West Horndon on Green Belt land and over 900 new homes to be built on unspecified Windfall sites but none to be built for 7 years, thereby creating the impression these Windfall sites will be found in and around Dunton and West Horndon.

The draft Plan's approach does not allow for growth throughout the Borough and does not recognise the need to move away from the blanket designation of Green Belt over the whole Borough.

## **8. Conclusion**

The Brentwood Draft Local Plan January 2016 has been a long time coming and is described as the Local Development Plan For Brentwood Borough. In reality it should read Local Development Plan For Brentwood Borough (A127), the draft Plan is led throughout by trying to justify a development at Dunton that meets none of the key criteria of the actual draft. The existing site is not sustainable, has poor infrastructure, has poor public transport, will increase the use of cars, is poorly situated to the two main rail stations within the Borough and will bring no benefit to Brentwood Town Centre. What it does do is allow the Council to dispose of at least 2500 of their 7000 new homes to be built in the Plan period.

The draft Plan does not accurately reflect the needs of the Borough however it does reflect the Council's desire to see no development to the North of the Borough and to stop development in and around existing villages. The draft Plan is seen as an opportunity missed to create a Borough that is all encompassing and set up for the next 20 years. It needs to be recognised within the final Plan that sympathetic development can take place throughout the Borough whilst meeting the needs of those currently living within the Borough and those wishing to live within the Borough.