



21<sup>st</sup> March 2016

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

Dear Sirs,

**DRAFT LOCAL PLAN: PUBLIC CONSULTATION**

My response to the current consultation on the Council's draft Local Plan is as follows. Further detail and supporting evidence can be found in Dunton Community Association's response, to which I have contributed.

1. **Comments relating to Dunton Hills Garden Village and Brentwood Enterprise Park**
- 1.1 The proposed Dunton Hills Garden Village would overwhelm the adjacent village of Dunton Wayletts; if Policy H10 proposed by Basildon Council were implemented as well, the combined development would obliterate the village.
- 1.2 Dunton is an unsuitable location for large-scale development because:
  - (i) the development would further reduce the narrowest and most critical section of the Metropolitan Green Belt.
  - (ii) the Green Belt is fulfilling all five of its classic functions at Dunton Wayletts.
  - (iii) a significant development at that point would promote the coalescence of the Southend/Basildon and London conurbations.
  - (iv) developing alongside the A127 would constitute ribbon development.
  - (v) moving the edges of the Green Belt as proposed would replace strong Green Belt boundaries with a weak (and in effect non-existent) boundary.
  - (v) the Dunton area lacks the landscape capacity for large-scale development.

- (vi) the area does not exhibit any of the four recognised characteristics (constituting infill, being well contained within the landscape, not harming settlement identity and maintaining a strong town/country boundary) that indicate potential suitability for Green Belt boundary adjustment.
- (vii) the development would be adjacent to the Bacton to Horndon-on-the-Hill gas transmission line, a Major Accident Hazard Pipeline.
- (viii) the development would be in an area identified by the Department for Environment, Food and Rural Affairs as having exceptionally poor air quality.
- (ix) the development would cause Dunton Waylets to merge with the surrounding built-up area and lose its identity as a rural settlement.
- (x) the development would harm the character and setting of the historic village of Dunton Waylets.
- (xi) the development would ruin the setting of a Grade 1 listed building, All Saints' Church, East Horndon.
- (xii) the development would severely harm the setting of the many other listed buildings in the vicinity on either side of the borough boundary.
- (xiii) the local rural road network could not absorb the increase in population and vehicle movements.
- (xiv) the development would reduce much-needed public access to open space by urbanising a tranquil corridor of countryside accessible through a network of public footpaths.
- (xv) the development would reduce opportunities for open-air pursuits such as cycling, angling and horse-riding, which the Dunton area currently affords;
- (xvi) the development would bisect an important wildlife connectivity corridor that allows wildlife to pass between habitats in Thorndon Country Park and Langdon Nature Reserve.
- (xvii) the development would intrude into the Mardyke Valley, a valued landscape.
- (xviii) the development would frustrate the objectives of the Thames Chase Community Forest by bisecting the limb that connects Thorndon Country Park with its Thameside areas.
- (ixx) the development would be unacceptably close to the Site of Special Scientific Interest at Thorndon Country Park.
- (xx) the development would threaten the ancient woodlands at Eastland Springs.
- (xxi) the development would lie in a high-risk flood zone.
- (xxii) the land is in good productive agricultural use.

(xxiii) the Dunton area is required to be left undeveloped for aviation purposes because it lies underneath a point of high collision risk and is needed for the emergency dumping of fuel.

- 1.3 Dunton Hills Garden Village, adjoining Policy H10/E7 proposed by Basildon Council, would effectively bridge the gap between Basildon and West Horndon. Brentwood Enterprise Park would effectively bridge the gap between West Horndon and the M25. The circle of open land would thus be broken. But a local authority's power in regard to removing land from the Green Belt is limited to altering its boundaries. Removing so much land from a Green Belt that it ceases to exist as a continuous circle would be unlawful.
  - 1.4 The Council has failed to carry out landscape assessments and so its decision to remove the Dunton area from the Green Belt has no validity.
  - 1.5 The Council has misconstrued government policy concerning the balance between meeting housing need and preserving critical portions of Green Belt. A planning authority so short of options for meeting its Objectively Assessed Need that it faces sacrificing a critical section of Green Belt land such as the open space at Dunton is expected to preserve the Green Belt land and fall short of meeting its OAN. This was placed beyond doubt by the amended National Planning Practice Guidance issued in October 2014 and announced in a press release entitled *Councils Must Protect Our Precious Green Belt Land*.
  - 1.6 The Council's claims in s7.6 of the draft Plan that Dunton Hills Garden Village would restrict urban sprawl and prevent settlement coalescence are absurd. The Council must surely be aware that Basildon Council is planning a development that would abut Dunton Hills Garden Village. Basildon's proposed development (Policy H10/E7) is an extension of Basildon town. Far from restricting urban sprawl Dunton Hills Garden Village would contribute to a 2½ km. westward sprawl of Basildon. And the development, combined with Policy H10/E7, would cause merging with the nearby settlement of Dunton Wayletts.
  - 1.7. In spite of the fact that the most westerly houses in Dunton Wayletts lie only 200 metres beyond the borough boundary the Council has failed to take any account of the impact of its proposals on the village. The Council appears to be cynically planning to destroy a village in a neighbouring borough in order to preserve the villages in its own borough. Such tactics represent a dereliction of the Duty to Cooperate.
  - 1.8. The Council claims that the A127 corridor provides growth opportunities that are not possible in the A12 corridor. On the contrary there is no such capacity on the A127 corridor: see below.
- 2. Comments relating to the draft plan as a whole**
- 2.1 The Plan is unbalanced in that it concentrates growth excessively at one particular point in the Borough. The Plan allocates 35% of the Council's OAN to the Dunton area. Such a proposal is clumsy in the extreme and does not represent proper and thoughtful planning.
  - 2.2 The Plan is unbalanced in that it fails to distribute loss of Green Belt land evenly throughout the Borough. The Plan proposes the siting of 3,792 homes in the Borough's Green Belt. Of this total the Council proposes to locate 63% in the Green Belt at Dunton. This extreme outcome, combined with the absence of Green Belt assessments, suggests that the Council has failed to

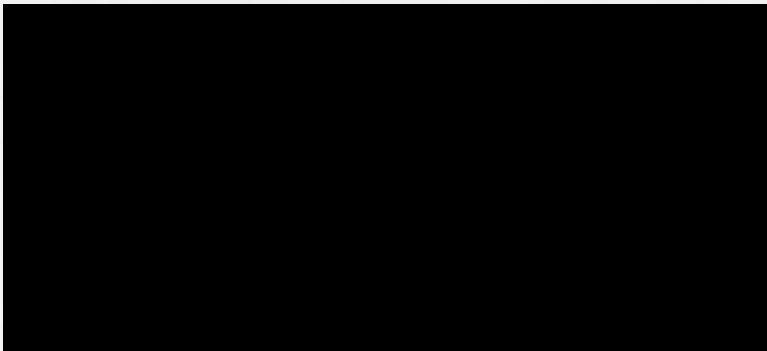
consider the matter in the careful manner expected of a planning authority and has simply dumped the housing allocation at an arbitrary point in the Green Belt.

- 2.3** The Council has cynically offloaded its housing and other needs to an edge of the Borough where a neighbouring borough will shoulder the infrastructure burden. The Plan sites a high proportion of the Borough's housing and economic growth to a point as far away as possible from Brentwood town and other settlements in the Borough and as close as possible to a neighbouring borough, Basildon. In this way the infrastructure burden has been transferred to another borough in a fashion incompatible with the Duty to Co-operate.
- 2.4** Basildon Council, which the Council sees fit to exploit, already faces insurmountable infrastructure problems. Even without Dunton Hills Garden Village and Brentwood Enterprise Park the area of Essex south of the A127 faces an overwhelming level of development over the next 20 years. For example the aggregate number of homes planned by local authorities in the region for that period has been calculated to be approximately 70,000. The London Gateway Port and its associated complex have yet to add most of the 27,000 daily vehicle movements that will in due course burden the A128 and the A127. Southend Airport is currently handling 620,000 passengers per year but this figure is set to rise to 2 million passengers per year. The additional 1,380,000 passengers will, apart from a very small number living with walking distance of the airport, be added to the Southend-Basildon-London road and rail links in the area.

The degree of improvement in Basildon Borough's infrastructure needed to absorb the scale of aggregate development is not realistically achievable, a fact recognised in *A Planning and Transport Strategy for Thames Gateway South Essex*, October 2013. The Council must heed that warning and refrain from exacerbating the problem by siting housing and economic development south of the A127.

- 2.5** The landscape assessment of the fenland area south of the A127, cited in s 9.9 of the Council's draft Plan, is misguided. The assessment of the Fenland displays both a lack of historical insight and a lack of familiarity with the area. Its conclusion that the Fenland is only moderately sensitive to change is not supportable and is at odds with Basildon Council's assessment of the same landscape; Basildon Council, in its Green Belt Study, assessed it as "highly sensitive to change". If the Council had conducted its own landscape and Green Belt assessments it would have properly understood the area and not proposed it as an area for large-scale development.

Yours faithfully,



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Yours faithfully,

  
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