



**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

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

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: **Richard**

Last Name: **Hatter**

THURROCK BOROUGH COUNCIL

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):

General comments on legal compliance and soundness

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

Support	<input type="checkbox"/>
Object	<input checked="" type="checkbox"/>
General Comment	<input type="checkbox"/>

Comments (please use additional sheet if required):

BRENTWOOD DRAFT LOCAL PLAN – CONSULTATION

Thurrock Borough Council has considered the consultation on the Brentwood Council Draft Local Plan and sets out below its formal response.

Thurrock Council welcomes the opportunity to discuss the comments submitted and requests to be consulted and engaged at further stages of the Brentwood Local Plan under Duty to Co-operate arrangements.

Introduction and Background

Brentwood Borough Council has previously consulted on Local Plan Preferred Options in 2013 which sought to protect the Green Belt and local character and focus new development during the period 2015-30 on land accessible within existing settlements. Other than a strategic Green Belt development site identified at West Horndon there were no other significant Green Belt boundary changes. The plan sought to provide 3,500 dwellings for the period of the plan with a higher provision of 5,600 dwellings rejected.

Thurrock Council strongly objected to the Brentwood Borough Council Preferred Option Local Plan and in particular provision in Policy S2 to accommodate only some of the identified objectively assessed need for housing within Brentwood. Thurrock Council also objected to the Brentwood Local Plan requiring neighbouring authorities to accommodate the remainder of the need. Thurrock Council has stated its concern that there was a lack of assessment of the potential benefits of Crossrail in promoting development in and around the settlements of Brentwood and Shenfield. Thurrock Council also questioned why a formal Green Belt review had not been undertaken and the lack of publication of some of the evidence base to justify the assumptions, strategy and policies in the preferred options plan.

Brentwood Council then undertook consultations in early 2015 on Strategic Growth Options as part of the Local Plan and a separate proposal for the Dunton Garden Suburb in collaboration with Basildon Borough Council.

It is noted the Brentwood Borough Local Plan Strategic Growth Option consultation set out a proposed Vision, and Spatial Strategy options that proposed a higher level of development than the previous draft Preferred Options Local Plan consultation. The proposed approach in the Strategic Growth options sought to accommodate approximately 5500 additional dwellings and 49ha of employment land in Brentwood during the plan period. In addition the strategic release of Green Belt land for development east of West Horndon and west of Basildon was suggested as concept to be investigated as a joint approach by Basildon and Brentwood Councils.

Thurrock Council supported in principle the approach taken by Brentwood Council to accommodate the objectively assessed need within Brentwood's boundary, whilst recognising this is an ambitious growth agenda. However Thurrock Council recommended that Brentwood Council should further review the strategic development locations issues (see previous response to growth options and in response to Dunton Garden Suburb) due to concerns about deliverability and the impact on the openness of the Green Belt. Furthermore it was considered that the evidence base needed updating including a revised Objectively Assessed Need.

The draft Local Plan 2016 consultation

Brentwood Council has made the proposed revisions to the Draft Local Plan to take account of the requirements of the National Planning Policy Framework and National Planning Policy Guidance and as a response to representations received including review of sites suggested for development.

Thurrock Borough Council recognises that the proposed changes included in the draft Local Plan consultation seeks to accommodate the higher growth levels derived from the objectively assessed need within the Brentwood Council boundary compared to the Preferred Options Local Plan of 2013. The revised strategy continues to advocate development focused on brownfield sites and town centres regeneration (1296 dwellings) but also proposes 3795 dwellings and 28ha of the 36 ha of land for employment identified as potential Green Belt releases including a number of Strategic Sites and urban extensions.

However Thurrock Council still considers the Brentwood Draft Local Plan and supporting evidence base will require further revision and consultation with an ongoing duty to cooperate with adjoining local authorities. Thurrock Council objects to the spatial strategy as currently proposed with emphasis on the A127 corridor, the impact on the strategic role of the Green Belt and in particular the identification of a free standing Green Belt settlement of Dunton Hills Garden Village.

Duty To Cooperate

Thurrock Council is concerned that there has been limited Duty to Cooperate with Brentwood Council on its emerging draft Local Plan. It is acknowledged that previously Brentwood Council hosted a Duty to Cooperate workshop including Thurrock Council at the Preferred Options consultation stage and has since had meetings on the Dunton Garden Suburb and recently the SHMA second stage.

However there was no engagement between the authorities at the Growth Options consultation stage and Thurrock has not been invited to any discussions on the Brentwood Local Plan for example on strategic matters such as Green Belt or transport. Thurrock Council would welcome the opportunity to progress a more formal approach to Duty to Cooperate and to discuss a range of planning matters of strategic and cross boundary importance. Thurrock Council has itself begun the preparation of new local plan and supporting evidence base. Thurrock Council has only recently started consultation on a Issues and Options stage 1 on the new local plan and will continue to engage and consult with adjoining authorities on the plan, technical evidence and strategic matters under Duty to Cooperate.

Lack of up to date evidence base

Brentwood Council needs to ensure that the local plan including the spatial strategy and policies are evidenced on sound economic and housing technical studies based on robust methodologies for identifying objectively assessed need. In addition relevant infrastructure requirements associated with each of the proposed broad growth areas and strategic sites should be identified and any environmental constraints and impacts of development taken into consideration.

Thurrock Council remains very concerned that considerable elements of the evidence base have not been made available or updated during the consultation process even though some of these studies were identified as forthcoming at the Preferred Options stage in 2013 and despite comments made by respondents regarding this issue at the previous stage of consultation.

The previous Growth Options consultation document of 2015, identifies on page 6 the following evidence base documents as forthcoming:

- Green Infrastructure Plan;
- Landscape Capacity Assessment;
- Objectively Assessed Housing Need (OAN) for Brentwood Borough;
- Housing Viability Study;
- Crossrail Economic Impacts;
- Highways Modelling
- Open Space Study

It is considered the draft Brentwood Local Plan remains part based on assumptions that are not clearly evidenced or available for respondents to make full and informed comments to this current consultation. The previous OAN report was only published very late in the consultation period and the SHMA stage two report has not been published too date. Furthermore assumptions and assertions are made in the SA report without the full baseline of supporting evidence available (see other comments). This is a major error in approach and in the consultation and Duty to Cooperate process. The draft local plan and evidence when available should be subject to further consultation prior to the submission stage of the plan.

Technical Evidence requiring an update.

It is also suggested that some of the existing technical evidence base will require to be updated prior to the submission draft of the Local Plan. Brentwood Council has published a revised Strategic Housing Market Assessment (SHMA) in July 2014 and an updated Economic Futures Report in December 2014. Both reports relate to demographic forecasts and household projections based on EPOA Phase 6 study scenarios or earlier demographic information. The information in these reports relates to scenarios based upon the 2010 sub-national population projections and the 2011 Interim population and household projections. It is noted the Economic Futures Report also refers to an Objectively Assessed Need figure and earlier demographic scenarios.

Green Belt Review

Although Thurrock Council strongly supports the purpose and function of the Green Belt there is a strong objection made to Brentwood Council for the failure up to this stage to undertake a formal Green Belt review including as part of the current local plan stage and the earlier Local Plan Strategic Growth options of 2015 and the previous Preferred Options consultation of 2013.

The National Planning Policy Framework makes provision for the review of Green Belt boundaries in order to meet other objectives of the framework and it is considered Brentwood should undertake such a review to accommodate its housing need. No compelling evidence has been presented at this stage as to why the Council should not undertake such a Green Belt review. Strong support for the Green Belt by the community in itself is not a strong enough argument for not undertaking a Green Belt review.

The current draft Brentwood Local Plan consultation and previous stages of the local plan demonstrate that Brentwood can only accommodate some of the objectively assessed housing requirement on brownfield land in the urban area and it is considered this represents the exceptional circumstance appropriate for Brentwood to undertake a Green Belt review.

The draft Local Plan contains proposals for strategic Green Belt releases without a formal and consistent review of the Green Belt having been undertaken. Within the Preferred Option Brentwood Council Local Plan there was a proposed strategic Green Belt release at West Horndon of up to 1500 dwellings. The Strategic Growth Options document puts forward three broad area options to consider for development and suggested sites including Green Belt releases identified from the SHLAA call for sites and representations submitted on the Preferred Options. The Dunton Garden Suburb was identified as the only strategic Green Belt release.

The current Local Plan consultation document fails to consider a more strategic and consistent approach to assessing options for Green Belt release and boundary changes for the broad locations in the Brentwood borough. The current working draft report on Assessment of Potential Sites in the Green Belt has not completed at consultation stage and it is considered that Brentwood Council should undertake a comprehensive Green Belt review as part of the spatial options testing which is subject to further public consultation before the Council progresses the local plan to submission stage.

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**

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):

Chapter 5 (Paragraphs) and Policy 5.1 - Spatial Strategy,

Policy 6.2 Managing Growth

and Policy 7.4 – Housing Land Allocations

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

Support	<input type="checkbox"/>
Object	<input checked="" type="checkbox"/>
General Comment	<input type="checkbox"/>

Comments (please use additional sheet if required):

The preferred option stage of the Brentwood Local Plan had a spatial strategy that was based on a variation of the transport corridor option but with a strategic Green Belt release at West Horndon on the basis this location had the capacity to accommodate growth compared to other areas. The current Strategic Spatial Strategy divides the borough in four broad areas for the purpose of considering the locations for growth and is a variation on the previous Growth Options consultation. The draft Local Plan proposes a strategic free-standing settlement identified as Dunton Hills Garden Village. It is noted this is similar in location and scale to the Brentwood part of Dunton Garden Suburb option.

Thurrock Council has no objection to the four broad areas used for the purposes of the consultation but recognises that the spatial strategy represents a further variation from the previous spatial strategy. It is challengeable therefore as to whether the previous spatial options represent the best or only options to accommodate the levels of development proposed.

Thurrock Council objects to the spatial strategy and the various elements as proposed. It is unclear why a sequential approach (figure 5.14) and the spatial strategy advocate a free-standing greenfield settlement in the Green Belt and that this should be the preferred location for development compared to existing settlement expansion or green field urban extensions which are likely to be more sustainable and closer to existing transport and other existing infrastructure and services. This sequential approach also appears to be supported in Policies 6.2 (Development of Management) and 7.2 (Site allocations).

Thurrock Council considers that the most appropriate spatial strategy would be a variation of the previous preferred options strategy (Option 2) with growth including Green Belt release concentrated in the A12 Brentwood/Shenfield corridor but with some limited potential for Green Belt release at West Horndon.

Thurrock Council sets out further comments below. The Thurrock Council response should also be read in conjunction with comments submitted at the previous stage Growth Options consultation and the separate Dunton Garden Suburb Consultation.

A12 Corridor.

Thurrock Council considers there is further significant potential to provide housing and other development in the A12 Corridor Broad Area including the potential for urban edge expansion of settlements. Thurrock Council does not wish to focus on site specific proposals but suggests some broad locations and key issues.

It is recognised that the western end of the A12 Broad Location is subject to a number of environmental constraints in addition to being within the Green Belt and is likely to have limited potential for development. However areas to the north, east and south east of Shenfield and Pilgrims Hatch and south of Hutton should be subject to further consideration for edge of settlement expansion as part of a Green Belt Review. These latter locations have less environmental constraints and sites are likely to have a lower sensitivity to impact on the landscape due to their proximity adjoining or close to the urban edge. A number of these locations also have boundaries that can provide a suitable new edge to the Green Belt for example the A12. It is considered due to the size and extent of the Green Belt in these locations that a limited number of urban expansions are less likely to have a significant harm to the openness of the Green Belt than locations in other broad areas.

The suggested A12 corridor locations have good existing transport services and community infrastructure and open space. The locations are also within reasonable distance of the railway stations.

Thurrock Council considers the role and potential economic and housing benefits of Crossrail in particular with regard to development at Shenfield have not been fully assessed and incorporated into the emerging Brentwood Local Plan, either as part of the current stage or previous consultations.

The NPPF states that in preparing their plans local authorities should support opportunities for growth. The housing and economic impact of Crossrail within Brentwood needs to be considered and assessed in detail. The improvements to the existing rail lines and increased frequency of services are likely to make Brentwood and Shenfield in particular a favourable location to live and work and stimulate economic growth.

The Draft Local Plan makes reference to a “Park and Walk” scheme but contains no specific strategy or policies to direct and support growth at Shenfield.

It is considered the role and development of Brentwood and in particular Shenfield as a terminus of Crossrail should be thoroughly investigated and its potential role to accommodate further growth over the period of the local plan and beyond. The implications of the potential to accommodate more growth and associated infrastructure requirements need to be considered with some weight as a way of meeting the undersupply of housing requirement currently identified in the Brentwood Local Plan options and supporting evidence.

There is also an objection to the lack of a published detailed evidence base assessing the transport impacts of the various spatial strategy options and a detailed housing, economic and transport assessment of the impacts of Crossrail and with particular reference to Shenfield. It is understood that the technical assessment is being undertaken.

The recently published Road Investment Strategy and Autumn Statement of 2014 identify the Government committed to start the widening of the A12 (north of Chelmsford) and M25/A12 junction improvements. The widening of the A12 from the M25 to Chelmsford will follow in the next Road Period. These schemes represent an increase in road capacity and the opportunity to improve road junctions and accessibility to Brentwood and the A12 Broad Location Area generally during later period of the plan.

The A12 widening and delivery of Crossrail will bring about significant increased capacity and accessibility improvements to transport infrastructure for Brentwood in the A12 Broad Corridor during the later-part of the plan period. This will make the A12 Corridor broad area more suitable for development opportunities.

A127 Corridor

Thurrock Council is fundamentally opposed to any large scale Strategic Green Belt releases either at Dunton Hill Garden Village as put forward in the Brentwood Local Plan consultation or the previous option for the Dunton Garden Suburb. The assumption that the A127 has greater potential for growth is questioned. Thurrock Council highlights the key concerns in relation to the A127 Corridor strategic corridor below and in response to Policy 6.6 Strategic Sites.

Dunton Hill Garden Village/Dunton Garden Suburb

Representations on the Dunton Garden Suburb proposal were made separately by Thurrock Council. However reference is also made below to the key concerns regarding the free standing Dunton Hill Garden Village or Dunton Garden Suburb proposals including:

- Significant impact and harm to the openness of the Green Belt;
- Coalescence of settlements;
- Detrimental impact on the Landscape;
- The lack of certainty regarding the deliverability of the development;
- Lack of detail on location and phasing of such a development;
- Lack of detail on the viability of such a proposal;
- Impact of the scale of development on adjoining housing markets and ability of Thurrock to deliver its housing;
- Infrastructure delivery and funding;
- Impact on strategic highway network - A127, A128, A13;
- Impact on the local highway network including within Thurrock;
- Lack of transport modelling and mitigation measure;
- Impact of possible LTX crossing route on land and infrastructure capacity;
- Assumption and scoring in the SA/SEA.

Green Belt Issues on the A127 Corridor

The draft local plan document 2016 identifies there are several sites for development of brownfield land and Green Belt release along the A127. It is considered that brownfield redevelopment and a limited Green Belt release north of West Horndon as indicated by sites (referenced site 37) represented a suitable scale of housing development in this location. It is noted that Brentwood Council had previously identified Green Belt release at West Horndon for up to 1000 dwellings (and 500 on PDL land in industrial estates).

Thurrock Council remains concerned about the lack of detail on location, delivery and phasing of such a development. It is considered that if these issues are not properly addressed then the development may not be delivered and exacerbate the lack of housing provision within the Brentwood Local Plan. Thurrock Council requests that more detail is provided as to how such a release is to be achieved and incorporated into a more formal Green Belt review process and Local Plan consultation.

It is considered any larger strategic Green Belt development such as Dunton Hill Garden Village or the Dunton Garden Suburb or at West Horndon or in combination will have significant harm to the openness and function of the Metropolitan Green Belt. The Green Belt west and east of West Horndon meets the purposes of the Green Belt including preventing urban sprawl and coalescence

between Basildon and West Horndon in the east and from West Horndon westwards to Cranham and Upminster in London.

The Dunton Hill Garden Village would result in a significant Green Belt release leaving a limited gap between Basildon and West Horndon. Other proposals such as the significant Basildon Local Plan West Basildon Urban extension (Policy H10) (up to 2,300 dwellings) together with the Dunton Hill Garden Village would also result in potential coalescence and urbanisation of the A127 corridor resulting in significant loss to the openness and strategic function of the Green Belt.

Further Green Belt releases including the previous proposal for land north of West Horndon and employment land (Brentwood Enterprise Park) at Junction 29 of the M25 with A127 taken together with a strategic release for housing at Dunton Hills Garden Village will also contribute to an even greater cumulative impact on the openness of the Green Belt in this broad corridor.

Road Capacity and Impact

The A127 is at capacity and does not represent a better road transport alternative to the A12. Any larger development is going to require additional road infrastructure investment to improve access. There is limited public information currently available in order to consider highway capacity impacts at this stage.

The Government is currently giving further consideration to Options A and C for the future Lower Thames Crossing. This includes assessing three alternative routes for Option C. Any assessment of development proposals at Dunton Hill Garden Village or West Horndon will need to take account of the any decision on the Lower Thames crossing. The most northern and easterly route path for a route for option C depending on the location may have implications for development proposals in terms of land - take south of the A127 and west of the A128.

Landscape Impact

Thurrock Council suggests that the potential impact of large scale developments on the A127 Corridor is more significant than stated by Brentwood Council.

The impact of development on the landscape depends on the size and scale of the development and the sensitivity of the landscape. It also depends on the level that any landscape character assessment is undertaken.

The A127 corridor sits within an important large fenland landscape character area, which extends across part of Brentwood, Havering and Thurrock authorities. The character assessments undertaken for Mid Essex including the Brentwood section do not reflect the importance of this open landscape. This fenland has been recognised by the Thames Chase Heritage Lottery Fund as a 'distinctive landscape character worth conservation' and has been identified by the CPRE as a nationally significant area of tranquillity in the metropolitan greenbelt.

The urban edges of Brentwood and Basildon are set back from the steeper slopes and screened with woodlands from views across the fenland. The settlements of Upminster and South Ockendon are identifiable in distant views to the east and south-east.

There are built features within the open fenland character which do not significantly impact the value of the area but may lower the quality or condition of smaller local character area and field by field character assessments. It is highly likely from the outcomes of landscape capacity studies that any development greater than discreet infill plots would significantly harm the landscape character.

The Brentwood section of the Mid Essex Landscape Character Assessment does not assess different scales of development. Furthermore the Mid Essex Landscape Character Assessment Sep 2006: Chris Blandford Associates Section 4 Character of Brentwood Borough description of open

views to the south of Horndon Fenland, suggest the negative influence of "proximity of the area to a landscape which is more influenced by human activity around Thurrock and the Thames Gateway". This description does not properly reflect the character of the extensive fenland which is described in Thurrock Landscape Capacity: March 2005 Chris Blandford Associates as in having a "Rural character" and "Sense of tranquillity due to absence of major roads and built developed".

West Horndon Village retains a rural settlement character in the open landscape despite the relatively modern style of residential buildings and rural-urban fringe clutter that is disproportionate to the scale of the settlement. The east of the village, particularly the north-east, has a more intact and important rural landscape character. The larger fenland landscape character area would be affected by any further development. It is considered that development of the scale of the Dunton Hill Garden Village or Garden Suburb or an extension east of West Horndon will significantly harm the open rural character of the broad fenland and the setting of rolling farmland and wooded hills of Thurrock.

Employment Provision - Brentwood Enterprise Park

The Brentwood Plan and supporting evidence identifies the requirement for additional employment land. However it is unclear why the employment sites (Policy 8.2) are proposed in the draft local plan. It is not always the case that employment land should be located at busy junctions or along the A127 corridor where it would add to traffic flows on a road at current capacity. The sites are not located close to existing centres and are without easy access for workers other than by car. Alternative locations and options should be investigated including the A12 corridor possibly as part of edge of settlement expansion and in mixed use schemes.

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

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):

Policy 5.2 - Housing Growth,

Policy 7.2 – Housing Mix and tenure

and Policy 7.5 - Affordable Housing

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

Support	<input type="checkbox"/>
Object	<input checked="" type="checkbox"/>
General Comment	<input type="checkbox"/>

Comments (please use additional sheet if required):

Thurrock Council supports the approach taken by Brentwood Council to provide for the Objectively Assessed Need (OAN) within Brentwood boundary. However it is considered that the current SHMA and evidence base for the OAN needs updating. It is also recognised that further work on the second stage of the SHMA is currently being undertaken to assess affordable housing and specialist housing needs requirements. Updates to both parts of the evidence base may alter the OAN and the overall housing requirement for the plan period and the level of affordable housing.

The National Planning Policy Framework (NPPF) and National Planning Policy Guidance place great weight on using the most up to date population and household data. The Government has produced the 2012 set of household projections following on from the publication of the 2012 population forecasts and these are referred to in Government guidance as the starting point for assessing need. Both these sets of data are the first robust set of post census data and projections. Brentwood Council should consider the need to take these projections into account in any objectively need assessed scenarios for employment or housing upon which to base the strategy for development for Brentwood Borough. Furthermore the Government should be publishing the 2014 set of sub national population projections (SNPP) in May 2016.

An Objectively Assessed Need (OAN) figure of 362 dwellings a year (resulting in a total of approximately 5,500 dwellings for the plan period) is quoted in the current draft Local Plan. This may be an underestimate of dwellings required when compared to scenarios based on the current 2012 Population household projections. It is considered the household numbers produced by the EPOA Phase 6 population and demographic report and the current analysis in the Brentwood SHMA of 2014 do not constitute the objectively assessed need. It is noted that the OAN report by consultants recognised that further assessment will be required to take into account the pending 2012 household projections.

The revised SHMA was published by Brentwood Council in July 2014. The SHMA relies on the EPOA phase 6 work including 2010 SNPP and 2011 interim population and household based projections which are less robust than the 2012 based data. The SHMA also defines the housing market area for Brentwood as the borough based on evidence of a high level of self-containment.

Government guidance states that SHMA areas are unlikely to reflect borough boundaries unless a high level of containment is demonstrated. Whilst Thurrock is not part of the same SHMA area it is considered the evidence provided for self-containment of the Brentwood SHMA is questionable as it relies on data from a limited period of house moves in the sub-region which may distort the level of self-containment. Also population migration and household data demonstrate significant flows into Brentwood over short and longer periods from London. It is considered the SHMA market area should be reviewed to assess its robustness and spatial geography. The SHMA is also based on the now out of date 2007 SHMA guidance.

It is acknowledged that the dwelling requirement will need to include any shortfall from previous years. In revising the OAN figure any shortfall should be taken into account and is usually adjusted to align with to the baseline of key demographic data. The Local Plan should also provide sufficient dwelling provision (15 years) from the anticipated date of adoption. For the above reasons both the Objectively Assessed Need and dwelling requirement for the plan period are likely to be higher than the 5,500 dwellings stated in the draft Local Plan.

It is unclear how Brentwood is going to take account of the new dwellings provision requirement to be met for households identified by DCLG/ONS projections for Brentwood into the OAN. At this stage therefore Brentwood Council does not demonstrate how it is accommodating this housing need for Brentwood. Brentwood Council will need to ensure that the objectively assessed need meets the requirements as set out in the NPPF, NPG and recent good practice guidance produced by the Planning Advisory Service. The new OAN figure should form the basis upon which to take forward the draft local plan strategy, the policies and site allocations (and should be subject to further consultation).

Both the recently published Brentwood SHMA and Economic Future reports will need updating to reflect the new objectively assessed need based on 2012 (and 2014) published demographic data. This will especially be the case if the OAN is significantly different from the current assumptions about the level of dwellings required for Brentwood Borough over the plan period.

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

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):

Policy 6.6 – Strategic Sites,

Policy 7.1 – Dunton Hills Garden Village,

Policy 7.4 - Housing Land Allocation

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

Support	<input type="checkbox"/>
Object	<input checked="" type="checkbox"/>
General Comment	<input type="checkbox"/>

Comments (please use additional sheet if required):

Brentwood Council has now embarked on a consultation on new strategic site at Dunton Hills Garden Village as part of the draft local plan consultation. The Brentwood draft Local Plan identifies the need to plan for a level of dwelling provision based on an OAN that suggests a dwelling requirement over 5,500 dwellings taking into account backlog need. One option would be for the Dunton Hills Garden village Concept to be a strategic site location along the A127 corridor to accommodate a significant element of the Brentwood housing requirement. The site for Dunton Hills Garden Village is located in the Metropolitan Green Belt east of the A128 and up to the borough boundary with Basildon Borough.

The Dunton Hills Garden Village is regarded as a new borough village in the Brentwood Local Plan with 2,500 new homes and supporting schools, shops, healthcare, employment and infrastructure. The Dunton Hills Garden Village concept is expected to make a significant contribution to Brentwood's housing and will have significant implications for the Brentwood Local Plans in terms of the overall spatial strategy, the Green Belt and policies including for the delivery of housing and infrastructure.

Previously Brentwood Council had consulted on the Dunton Garden Suburb which was a joint approach between Basildon and Brentwood Borough Councils to consider taking forward the concept of a strategic development proposal for land south of the A127, west of Basildon and east of West Horndon. The proposed development straddled the boundary between the two boroughs and is within the Metropolitan Green Belt. Basildon and Brentwood Councils had jointly signed up to a memorandum of understanding at the end of 2014 which sets out how the two Councils in partnership would work together to consider concept of the Dunton Garden Suburb and the potential arrangements for taking the project forward.

Thurrock Council strongly objected to the Dunton Garden Suburb for a number of reasons highlighted above in this representation and in more detail in representation submitted previously.

Brentwood Borough Council has previously consulted on Local Plan Preferred Options in 2013 which sought to protect the Green Belt and local character and focus new development during the period 2015-30 on land accessible within existing settlements. Other than a strategic Green Belt

development site identified at West Horndon there were no other significant Green Belt boundary changes. The plan sought to provide 3,500 dwellings for the period of the plan with a higher provision of 5,600 dwellings rejected. Thurrock made representations objecting to the strategy and under provision of the dwelling requirement set out in the plan.

Basildon Council had also previously consulted on a Preferred Options strategy in January 2014. Thurrock Council had formally objected to the Basildon PAD5 – 'West Basildon Extension' on grounds of impact on the Green Belt, impact on the Thurrock main and local highway network, the unlikely delivery of a Dunton Station and the lack of detail on other infrastructure delivery and mitigation impacts.

It is recognised that Basildon Council are also currently undertaking consultation on a draft Basildon Local Plan at Regulation 18 issues and options draft plan prior to moving to a draft local plan for submission. Basildon draft local plan includes a proposed West Basildon Urban Extension of up to 2,300 dwellings.

Thurrock Council acknowledges that both Basildon and Brentwood Councils are undertaking consultations on draft local plans with strategies that seek to accommodate the Objectively Assessed Need for each authority within their own borough boundaries. Thurrock Council welcomes this approach in principle.

However Thurrock Council is very concerned about the proposed Dunton Hills Garden Village concept and has fundamental objections on grounds of:

1. Lack of Technical Evidence

It is recognised that the Dunton Hills Garden Village is only at a concept stage. However Thurrock Council remains very concerned that considerable elements of the evidence base to justify such a concept have not been prepared and at this stage must call into question the robustness of the concept and the approach being undertaken. There is limited information available to comment on the detail of such a scheme and the existing technical evidence base does not include assessments for development of this scale. It is considered that various preliminary studies should have been to be commissioned in order justify such a concept including the following:

- Strategic Green Belt Review;
- Landscape Impact Assessment;
- Viability assessment;
- Market deliverability assessment;
- Infrastructure costing and deliverability assessment;
- Transport modelling and highway impact assessments;
- Green Grid assessment;
- Urban design and layout masterplan and standards;
- EIA assessment;
- Biodiversity and habitat assessments.

The Dunton Hills Garden Village concept in part appears based on assumptions that are not clearly evidenced or available for respondents to make an informed decision.

2. The concept of the Garden Village

It is not considered that Brentwood Council have provided a convincing case as to why a free standing settlement of 2,500 homes in the Green Belt is the most suitable option to accommodate a large element of the borough's housing need. In addition to the other comments set out below the location does not have any public transport, other infrastructure or services compared to existing settlements. It is noted that the local plan identifies that West Horndon itself has capacity and infrastructure as a reasonably alternative.

3. Masterplan Approach

There is significant concern that so much of the detail for a strategic site would be left to master plan stage as set out in Policy 7.1. Thurrock Council considers that more evidence should be provided on the suitability of the project as part of the local plan process.

4. Green Belt Issues

Thurrock Council is fundamentally opposed to any larger scale strategic Green Belt release in this location including the Dunton Hills Garden Village or the Garden Suburb concepts. It is considered any large strategic Green Belt release such as the Dunton Hill Garden Village or releases at West Horndon or in combination will have significant harm to the openness and function of the Metropolitan Green Belt. The Green Belt surrounding West Horndon and along the A127 corridor meets the purposes of the Green Belt including preventing urban sprawl and coalescence between Basildon and West Horndon in the east and from West Horndon westwards to Cranham and Upminster in London.

The Government attaches great importance to the Green Belt as stated in the National Planning Framework (NPPF) and the recent ministerial statement of October 2014 in respect of the National Planning Policy Guidance. Paragraph 79 of the NPPF confirms the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristic of the Green Belt is its openness and permanence.

The Dunton Hills Garden Village in itself would result in a major Green Belt release leaving a limited gap between Basildon and West Horndon and Upminster settlements and therefore causing significant harm to the function of the Green Belt and the openness of Green Belt. It is considered such a development would reduce significantly the openness of this part of the Green Belt and result in urban sprawl along the A127 by spreading the extent of built development further into the Green Belt. It is considered the form and scale of the Dunton Garden Village would also cause significant harm to the other purposes of the Green Belt and would result in major encroachment into the countryside whilst also causing harm to the purpose of preventing the merging of neighbouring towns

Other proposals such as the significant West Basildon Urban Extension (Policy H10) (up to 2,300 dwellings) would also undermine the function of the Green Belt in this location as stated above and was subject to formal objections by Thurrock Council at the previous Core strategy preferred options stage and as part of the current Basildon local plan consultation. Any Green belt release west of Basildon together with any Green Belt release east of the existing West Horndon urban boundary would also result in potential coalescence and urbanisation of the A127 corridor resulting in significant loss to the openness and strategic function of the Green Belt

Other Green Belt releases including proposed land north of West Horndon and employment land (Brentwood Enterprise Park) at Junction 29 of the M25 with A127 taken together with a strategic release for housing at Basildon will have an even greater cumulative impact on the openness of the Green Belt in this broad corridor.

5. Landscape Impact

Thurrock Council suggests that the potential of larger scale developments such as the Dunton Garden Suburb would have a much greater negative impact on the landscape than stated by Brentwood Council.

The assessment of both landscape character areas and capacity for development can be undertaken for a range of scale and type. The Dunton Hills Garden Village concept would be considered a large scale urban development likely to have significant impact to neighbouring local character areas.

The character assessments undertaken for Brentwood in the Mid Essex Character Assessment Area G3 South Essex Towns do not reflect the importance of the adjacent large landscape

character area of fenland. This has been recognised by the Thames Chase Heritage Lottery Fund as a distinctive landscape character worth conservation and has been identified by Campaign for the Protection of Rural England as nationally significant area of tranquillity in the Metropolitan Green Belt.

Dundon Hill Farm site is on a highly distinctive rise on a raised plateau between Laindon Hills and the Brentwoods Hills and separates the catchments of the Mardyke River to west and the River Crouch to the east. Basildon descends north-east from Langdon Hills to the River Crouch. The urban edges of Brentwood and Basildon are set back from the steeper slopes and screened with woodlands from views across the fenland. The settlements of Upminster and South Ockendon are identifiable in distant views to the east and south-east.

There are built features within the open rural landscape which do not significantly impact the value of the area but may lower the quality or condition of the landscape in field by field character assessments. The impact to the wider fenland character is likely to be greater than the settlements of South Ockendon in the south west. It is highly likely from the finding of landscape capacity studies that any development greater than discreet infill plots would significantly harm the landscape character.

6. Deliverability and Phasing

At present no evidence has been provided by Brentwood Council to demonstrate the deliverability of this proposal or its acceptability in planning and infrastructure terms. Thurrock Council requests that more detail is provided as to how such a large scale development would be achieved and that all alternative options have been properly considered through the local plan process.

It is considered Brentwood Council have not produced convincing or robust evidence to back up the assertion that this is the best way in which to meet a significant element of its own dwelling requirement. Furthermore it is strongly recommended that Brentwood Council should undertake a strategic and comprehensive Green Belt review and adopt a consistent approach to the assessment of the Green Belt boundary and the suitability of locations for Green Belt release.

The size and scale of the Dunton Hills Garden Village would require key partnership arrangements between the local authorities and presumably with key house builders. It has not been demonstrated at this stage as to how that could be achieved. In addition there are no details of the potential involvement and role of other public agencies and key stakeholders.

It is noted at this stage that only indicative figures are given for housing and jobs at the Dunton Hills Garden Village and no detailed information on infrastructure. Without proper assessment of the potential of the site it remains questionable as to whether the concept is deliverable. There are currently no available studies associated with this development and it largely sits outside of the technical evidence of the existing Local Plan.

No evidence is provided for the overall cost associated with a project of this scale and there is no indication given as to the level and the cost of infrastructure required or how this cost is apportioned between stakeholders. Infrastructure requirements and delivery are a key issue for a large scale development. For a large scale development on a greenfield site there is likely to be additional infrastructure requirements and costs. There is no information provided on the infrastructure requirements or its delivery and implementation.

No estimate has been given for the delivery and timetable of housing and jobs arising from this development. Due to the size and scale of this development it will require significant upfront infrastructure investment and lead in times for house building are likely to be long term. This will have a significant impact on the ability of a development of this scale to contribute to the local plan dwelling plan requirements in the short to medium term.

It is questionable therefore whether such a development of this large scale and in this location can be relied upon to significantly meet the dwelling requirements of Brentwood Council during a significant part of the plan period. In particular this would undermine the case for Brentwood to rely heavily on such a development as part of its housing requirement.

Thurrock Council remains concerned about the lack of detail on location, delivery and phasing of such a development. It is considered that if these issues were not properly addressed and alternative options properly considered through the local plan process then development may not be delivered. This would result in a lack of sufficient housing provision within the council area unless alternative options are brought forward. Failure to deliver any strategic Green Belt release could also put further pressure on adjoining Councils to potentially accommodate such a requirement

7. Viability

No evidence is provided on the viability of such a large scale development and how it would be brought forward. It is requested that viability testing would be a priority in assessing the suitability of such a scheme. There must be serious questions about the market ability to absorb such a large scheme in the short term.

8. Impact on Thurrock Housing Market

It is considered the Dunton Hill Village concept would potentially have an adverse impact on Thurrock's ability to deliver its own housing requirement during the plan period and beyond due to the market becoming swamped by competing development including also the Basildon West Extension and in particular due to its scale and location close to potential broad locations in Thurrock (e.g. South Ockendon/North East Grays/East Tilbury).

It would undermine Thurrock's ability to deliver its existing and future housing requirement in and adjoining existing urban areas and the need to meet both the current and future economic, housing, social and community objectives. Such a project would also reduce economic benefits accruing from the co-location of new housing development within Thurrock's own centres and regeneration hubs as resident expenditure would potentially be diverted towards Dunton Hills/ West Basildon.

Discussions with developers have already revealed that the market already has concerns about the ability of Thurrock's own housing market area to sustain and support competing large scale housing developments given the fragile nature of Thurrock's housing market and persistent problems of under delivery. The justification for also seeking to meet a large proportion of Brentwood's development needs in this location are difficult to justify given it's a location physically, functionally and perceptually separate from Brentwood's main urban area which is also in a separate and distinct Strategic Housing Market Assessment Area.

9. Infrastructure and Public Expenditure Funding

Given the need for significant investment in new infrastructure to support the development of a new village at Dunton Hills would potentially divert already limited public resources away from existing priority areas. It would undermine the scope for new housing development to cross subsidise new community infrastructure and address existing deficits in provision.

10. Road Traffic Impact and Transport Evidence.

Thurrock Council considers the transport modelling and impact on adjoining authorities has not been fully assessed by Brentwood Council or published as part of the evidence base.

However no assessment appears to have been undertaken on the impact of such a scale of development on the main highway network of the A127, A128 and A13. Thurrock Council also notes the proposals for significant developments adjacent to Lower Dunton Road and to the west of Basildon as part of the West Basildon Extension. These, potentially, could have the great impact on Thurrock's local road and highway network and the impacts do not appear to have been taken into account.

It is also not clearly identified how the Dunton Hills Garden Village would be served by public transport. It is noted that there is a proposed Green Travel Route but with no detail provided.

Thurrock Council is also concerned at this stage that the proposals for development of the Dunton Hills Garden Village do not appear to have sufficient assessment of the mitigation and delivery measures regarding the transport and highway implications to ensure this development can be brought forward in a sustainable manner in the plan. Thurrock Council requests that further technical evidence on the matters identified be provided to justify the ability to include proposed development in these locations or to provide alternative locations.

11. Design and Layout Issues.

The consultation documents only include an indicative plan for the layout and design of the development and therefore no detailed comments are made.

12. Sustainability Appraisal of the site

It is noted the Dunton Hills Garden Village site scores poorly across a range of SA criteria in appendix 2 of the Interim SA and when compared with other sites.

It is considered that the appraisal of the SA should have a reduced score to reflect the distance that housing in such a development as Dunton Hills village would have from the main centres, services and residents in Brentwood.

The impacts should be scored more negatively to reflect the isolated nature of the development from Brentwood and public transport. The lack of public transport at this development is a fundamental issue which calls into question the access and sustainability of the development. There would be considerable additional road movements and congestion.

Furthermore:

- It is considered the housing appraisal skews the findings towards meeting the OAN but undermines the location of the housing.
- It is not considered that Housing along the A127 corridor would meet housing needs (p34) in Brentwood/Shenfield as well as housing located along A12.
- It is not considered that a new strategic settlement at Dunton Hills would be a self-sustaining community.

13. Assessment of Potential sites in the Green Belt – Working Draft

The document is only a working draft with the detailed site assessments in appendices not available during the consultation. However it was noted that Site 200 which forms the basis of this development scored High in relation to meeting purposes of the Green Belt. It is recognised that the appraisal was site specific and not a Green Belt review.

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

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):

Policy 7.10 - Gypsy and Travellers

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

Support	<input type="checkbox"/>
Object	<input checked="" type="checkbox"/>
General Comment	<input type="checkbox"/>

Comments (please use additional sheet if required):

The draft Local Plan recognises the recent changes made to legislation relating to Travellers and states that further work is being carried out to establish the number of Gypsy and Traveller pitches required within the Brentwood area. Thurrock Council is concerned however, that whilst Brentwood's local plan identifies the issues there may be un-met needs arising from neighbouring authorities for the provision to accommodate Gypsies and Travellers, and there is no acknowledgement of this within the Local Plan documents or implications for Duty to Cooperate.

It is considered that local authorities in Essex should acknowledge and have assessed the needs and requirements of Travelling Showpeople in the preparation of their local plans. It is recognised that Travelling Showpeople have become concentrated in a number of local authorities including Thurrock. Thurrock Council would wish to engage under the Duty to Cooperate with other authorities in Essex including Brentwood to ensure that there is appropriate provision for future needs and requirements of Travelling showpeople.

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

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):

Interim SA Report on the draft Local Plan

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

Support	<input type="checkbox"/>
Object	<input checked="" type="checkbox"/>
General Comment	<input type="checkbox"/>

Comments (please use additional sheet if required):

Thurrock Council considers the approach set out in the Interim Sustainability Appraisal (SA) is flawed and that a number of assumptions on the way that options have been scored is not supported by the available evidence.

The Interim SA does not adequately include or reflect in paragraph 6.2.9, Thurrock Council's concerns about development focused on the A127 corridor and impact on Green Belt and Landscape. Paragraphs 6.2.11 to 6.2.12 also do not include a reference to Thurrock Council's fundamental concerns about the deliverability, viability and impact on Green Belt and Landscape of the Dunton Garden Suburb.

The SA appraises and scores six options for the location of development with the assumption that most development would be located in one of the locations and with a strategic scale of development. Whilst this may be useful as an initial approach it is considered that actual development may result in a hybrid of such options with development in several key locations but not necessarily the dispersed option or one strategic location. A hybrid option may well moderate the scoring and impact of development in these locations therefore giving more positive scores rather than a large scale concentration of development.

It is noted that further assessment needs to be undertaken of urban extensions around Brentwood. A new option should be considered including development north and east south east of Brentwood/Shenfield. Again this may result in different scores for a Brentwood Town based option. Such an option is likely to give different scores than presented in the report.

It is suggested that some of the scoring for the options in the SA has been based on assumptions that may not be correct or realistic and should be reconsidered.

- It is unclear that the options and sites have been comprehensively appraised in terms of access and sustainable transport.
- It is uncertain whether the benefits of improved accessibility brought about by Crossrail and longer term the A12 widening are taken into account.
- It is consider the housing appraisal skews the findings towards meeting the OAN but undermines the location of the housing.

- It is not considered that Housing along the A127 corridor would meet housing needs (p34) in Brentwood/Shenfield as well as housing located along A12.
- It is not considered that a new strategic settlement at Dunton Hills would be a self – sustaining community.

The scoring of the development options in relation to community and well-being tends to overstate the benefits for new strategic developments in the south without evidence being provided. Conversely the SA under-states the ability of existing locations to gain improved and additional capacity in infrastructure.

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**

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):

Summary of Thurrock Comments

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

Support	<input type="checkbox"/>
Object	<input checked="" type="checkbox"/>
General Comment	<input type="checkbox"/>

Comments (please use additional sheet if required):

It is considered that Brentwood Council has not thoroughly tested all the available options to accommodate the housing requirement within Brentwood. The National Planning Policy Guidance and earlier advice from the Planning Advisory Service recommend that local authorities should be required to thoroughly test all reasonable options before requiring other authorities to accommodate some of their need.

Thurrock Council at this stage does not consider that all reasonable options to accommodate Brentwood's dwelling requirement within Brentwood have been fully examined by the Council and tested in accordance with government policy and guidance. Therefore the approach to preparation of the local plan is unsound.

Thurrock Council requests that more detail is provided as to how such Green Belt release is to be undertaken and how alternative locations have been considered before a further draft Local Plan consultation. It is considered the role and development of the A12 corridor and in particular Brentwood/Shenfield Broad Area should be thoroughly investigated and its potential role to accommodate further growth over the period of the local plan and beyond. The implications of the potential to accommodate more growth and associated infrastructure requirements need to be considered with some weight as a way of meeting the housing requirement currently identified in the Brentwood Local Plan Growth Options and supporting evidence.

Thurrock Council has a fundamental objection to a strategic Green Belt release at Dunton Hill Garden Village or at West Horndon due to the impact on the Green Belt. In addition limited new or updated evidence has been made available to demonstrate the deliverability and viability of such schemes.

Thurrock Council has also highlighted various aspects of concern with the evidence base in connection with the preparation of the draft local Plan.

Thurrock Council wished to clarify that its objections to the earlier consultations to the Brentwood Local Plan and Dunton Garden Suburb stage still stand. Due to the issues highlighted in this response and to the earlier documents there are several fundamental concerns to the strategy approach and detail development proposals it is considered that Brentwood Council needs to carefully consider how it proceeds with the preparation of the Local Plan and the timetable for its production.

Thurrock Council request to be kept informed of the preparation and publication of the Brentwood Local Plan and technical evidence base as part of the Duty to cooperate process.

