



**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: | Kevin | Last Name: | Mate |
|--------|--------------------|-------------|-----------------------|------------|----------------------|

Address:

Post Code:

Telephone Number:

Email Address: kevin.mate@xerox.com

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):

Please see details with the comments.

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):

As a resident of West Horndon for over 20 years I feel strongly about preserving my home village's character and integrity.

Road and rail infrastructure in the A127 is already at (and often above) capacity. It is not clear why the A127 had greater potential for improvements than the A12.

The consultation implied that the A127 had greater development potential due to it having a "different landscape character". There may be a different landscape character, however the local residents' value of the open space and farmland should not be considered any lower than the appreciation residents elsewhere in the Borough have for their landscape. The open, fenland landscape is valued extremely highly by local residents, and contributes to a rural feel to this area and local settlements.

Flood risk had not been addressed for any of the sites. It is clearly a major problem for the A127 Corridor.

The industrial estates (sites 020 and 021) were already in the Brentwood 5 year land supply. However it was noted that development of these sites alone could increase the residential size of West Horndon dramatically, and as such sufficient planning and infrastructure would be needed to ensure that the impact to existing residents is managed appropriately. There is also the loss of jobs and effect to the local economy to consider.

037A, B and C, 038A and B, and 126 are all Green Belt sites surrounding West Horndon village. Development of these sites would change the existing West Horndon village beyond recognition, and put a very significant strain on local residents and infrastructure. I believe that the very significant development this would represent within the Green Belt would be an inappropriate development and represent significant harm to the local environment, harm which would not be outweighed by the need for housing within the Borough.

Any development of site 200 (Dunton Garden Suburb) would require a significant level of infrastructure, and appropriate phasing and planning to safeguard the existing West Horndon community and create a self-sufficient community within the Garden Suburb. It would also be necessary to ensure a sufficient buffer of land is maintained going forwards between the Garden Suburb and the land surrounding West Horndon village. I suggested that this could be achieved through creating a woodland area reaching from the west of the Garden Suburb, up to Thorndon Country Park.

With regards to infrastructure, it was noted that the consultation ignored the A128 which is the key link between the A127 Corridor and Brentwood. Additionally, concentrated development within the A127 Corridor would simply exacerbate expected further strain on the Shoeburyness to Fenchurch Street rail line, with authorities all the way up this line expected to build extensively around it.

With regards to the Dunton Garden Suburb consultation, I's representations can be summarised as below:

I stated that it supports the principles set out in the National Planning Policy Framework ("NPPF") for the protection of Green Belt to prevent urban creep. It strongly opposes inappropriate development in the green belt except in exceptional circumstances where the benefits clearly outweigh the harm. Housing need alone does not, to I, constitute exceptional benefit. I felt that there was very little evidence that the garden suburb proposals are viable or realistic.

There was no comfort in what was described as only “possible” benefits. It suggested that a lot more work was needed, perhaps involving a significant reduction in the number of houses proposed. If some 6,000 houses are proposed I needs to be consulted on a scheme that can be proved to be both sustainable and self-sufficient.

Such a major development of up to 6,000 houses (c. 10 times the size of West Horndon) must pay for improvements to transport infrastructure. If such development cannot be largely self-sufficient it would have significant implications for a small adjoining village such as West Horndon.

The Dunton Garden Suburb consultation lacked significant background evidence and supporting information.

There would need to be a robust buffer zone so that the communities of West Horndon and any development on the west side of Basildon could not at some future stage be expanded further to meet more housing need. I suggested that the land between the A128 and the stream is turned in to woodland. This would help reduce flood risk and provide an attractive green space that could link up to Thorndon Country Park.

Concern over impact on highways and transportation, in particular on the strategic highway network including the A127, A128 and A13. Any development would need to be constructed to ensure that no material increase in parking at West Horndon station is required (car park already at/above capacity).

Infrastructure would need to be appropriately sized and phased to avoid an undue burden being placed on West Horndon village before, during and after construction of Dunton Garden Suburb.

Any development needs to create a sustainable community, which would not be the case if the suburb becomes another large urban extension with the majority of people relying on car transportation.

Key conclusions of the sustainability appraisal:

- Looking at the two ends of a growth spectrum, it is clear that Scenario 1 (no growth) would be beneficial in terms of protecting Green Belt and preventing coalescence. It would also maintain the existing village character and its setting. However it would not provide for any real development of community spirit and investment in infrastructure and facilities.

Scenario 5 looks at expansive growth, defined as being greater than that anticipated by the first four scenarios. Such a level of growth has been put forwards by BBC in the latest draft of its LDP. It would involve a much larger development on open Green Belt land such that the Parish would increase from around 700 dwellings to around 3,700. The village itself would increase from around 700 dwellings to around 1,300. Given the location of West Horndon at a distance from larger centres, and the current strain on services and facilities, such a scenario scores poorly in respect of social, environmental and economic dimensions. Out of the 11 elements of the sustainability framework it scores 5 reds, 6 ambers and no greens. It would be disproportionate and unsustainable.

Scenario 2 is described as “controlled growth”. It suggests an additional 400 houses for the village and scores well against most sustainability objectives. It is important to note however that some of the positive scores, say in respect of residential amenity, or in the provision for education and healthcare, are dependent on a commensurate level of new infrastructure. Without the infrastructure in place, such growth cannot be described as “controlled” or in accordance to The Vision. It would not therefore be sustainable.

Implications for Current Consultation Response

Any development needs to be undertaken in a sustainable manner, at all levels. Extensive development whereby close to 50% of the Borough’s housing needs are met by a very small area of the Borough (“A127 Corridor, aka West Horndon) is not considered sustainable either conceptually, or when actually formally tested against a specific methodology.

Even a scaled down level of development within West Horndon Parish, such development on sites 020 and 021 in the order of magnitude of around 400 houses, would require significant infrastructure investment within West Horndon village to create a sustainable development.

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Whilst Dunton Hills Garden Village looks only at the Brentwood side of the originally proposed Dunton Garden Suburb, there was clear rejection of material development both 1) at this site and 2) within West Horndon village as stated throughout the Draft Local Plan, in response to the 2013 consultation round. As such, consultations to date clearly reject material development at either potential location within the A127 Corridor. Yet the current Draft Local Plan is supporting this approach.

As a general representation, I note that the proposed development within the Draft Local Plan is highly concentrated within the A127 Corridor. This scale and concentration will irrevocably harm Green Belt within this area (at a disproportionate level than the wider Borough), create problems and risks with regards to deliverability, contribute to urban sprawl rather than prevent it, and create material infrastructure requirements that are simply not considered in sufficient detail within the Draft Local Plan. These issues are either ignored, or glossed over, in the Draft Local Plan document. I believe that these issues lead to the potential for the Draft Local Plan to be considered unsound, unsustainable, and lacking in the level of detail that is required for a proposal of this nature. Much of the discussion below picks up on, and expands on the issues around material development within the A127 Corridor.

On this basis, and considering the independent Sustainability Appraisal undertaken by I, I represent that a sustainable level of development within the A127 Corridor would be limited to a maximum of 250 houses across sites 020 and 021 (the West Horndon Industrial Estates). As noted in 3.7 above however, even this level of development would require a significant amount of infrastructure expenditure to ensure it is sustainable.

Throughout the development of the Draft Local Plan, BBC have consistently ignored potentially viable alternative sites, focusing primarily on the A127 Corridor despite the concerns noted in 5.3 above. I believe that BBC's initial rejection of further growth in the A12 Corridor, or any material development in the North of the Borough, is not founded on sound analysis and hard evidence. Given the scale of development proposed, the original "problems" identified by BBC including the need for new infrastructure, are relevant wherever the development is sited. Greater diversification of the identified housing need will assist in improving deliverability, feasibility, and the impact on local transport networks. In particular it is noted that the A12 is in the process of being upgraded to 3 lanes (funded allocated), with the A12 Corridor also benefiting from Crossrail. Neither of these upgrades are proposed or indeed, currently feasible, within the A127 Corridor with the A127, and the C2C rail line.

Spatial Strategy

5.9 of the Draft Local Plan states that, in the Council's Preferred options consultation (2013) "Proportionately more growth at West Horndon was proposed because of the comparative capacity for growth in that location, and less growth in Ingatestone because of capacity and land constraints. The strategy also considered lack of capacity in the Brentwood urban area and north of the Borough in terms of infrastructure such as roads (due to congestion), primary schools, GP facilities and a higher landscape value". Whilst this is a historic comment, I note that any development at or around West Horndon faces the same problems, and this is a point that remains relevant to this current consultation. New primary schools, GP facilities and local roads would need to be constructed, and major upgrades to the A127 and potentially A128 would also be required. We also continue to challenge the lower landscape value.

7.8 of the Draft Local Plan states that "The A127 Corridor provides an opportunity for growth in the Borough that brings along new services, facilities and infrastructure. These same opportunities are not possible in the A12 Corridor considering the higher impact on existing services and lack of contained land to provide for similar development numbers". I strongly challenge this statement. The A127 Corridor is not, as noted within these representations, readily bound, with cross border authorities a material threat to urban sprawl. The scale of development proposed within the A127 Corridor is not supported by existing infrastructure, and the ability to upgrade it to support the proposed level of development is questionable. In particular, the A127 is bounded by housing along its duration, and is significantly closer to the Dartford Crossing and A13 which create regular traffic problems for the local area. I also note that expansion of the A127/M25 in the context of the proposed development is not supported by Essex County Council or Highways England.

7.10 of the Draft Local Plan states that "Land around West Horndon village remains a reasonable alternative because it can provide for similar development numbers forwards local needs". I strongly challenge this statement. As set out above, it was recognised in prior consultations that the flood risk around West Horndon village creates significant issues when considering larger scale development around the village. The flood issues are also clearly stated in the Draft Local Plan (10.68). Previous consultations also rightly highlighted increased deliverability challenges should development be focused on West Horndon village. The village is already assumed to support 500 houses. If all development is concentrated on the village these houses' deliverability becomes more challenging, and viability clearly reduces.

5.7 Duty to Cooperate

The proposed Dunton Hills Garden Village would be located on the Brentwood/Basildon border. Whilst Brentwood and Basildon Borough Councils jointly consulted on Dunton Garden Suburb in January 2015, Brentwood have decided to take their portion of the potential development forwards separately. This is despite the emerging Basildon Borough Council Local Development Plan incorporating the "Dunton Extension" which would see at least 5.5ha of land west of

Basildon allocated for mixed use development.

Whilst separating the two developments may in theory improve deliverability, it raises serious concerns around sustainability when the total area is considered together. Brentwood Borough Council must work with Basildon Borough Council to ensure that any development within and around the border is developed holistically, with sufficient infrastructure provided.

The scale of development proposed for the A127 Corridor creates material infrastructure improvements necessary, in particular, upgrading of the A127, A128 and other local roads. I would question whether BBC have actively brought Essex County Council and Highways England in to pre-plan discussions, as previous consultation responses would imply some contradictory views, in particular around road upgrade plans.

5.8 Creation of a Sustainable Community

As stated above, I strongly believe that any development within the Borough or indeed, Parish, needs to be undertaken on a sustainable basis.

SO3 states that BBC will “plan for housing that meets the needs of the Borough’s population and contributes to creating inclusive, balanced, sustainable communities”. I note that given the scale of development proposed within West Horndon village, this is essential for our community. Any development needs to provide a range and balance of different housing types, that complement the existing village and help create a dynamic and stable community. Simply providing houses/flats for commuters would not achieve this – whilst this type of housing might help balance out Brentwood Borough as a whole, it would create an unsustainable and unbalanced community within West Horndon. A good mix of housing types will be required.

SO12 states that BBC will “improve public transport, cycling and walking facilities and encourage sustainable transport choices”. This will be absolutely essential for West Horndon village should sites 020 and 021 be developed, however no details regarding delivery are included in the Draft Local Plan. It is unclear how this goal would be enforced on to any development within the village.

Policy 6.5 of the Draft Local Plan states that “Locations around rail stations should contribute to these aims through the delivery of higher density development to meet local needs in central sustainable locations.” As noted above, the proposal for 500 houses near to West Horndon Station on sites 020 and 021 would close to double the size of the village. Any development needs to include a range of property types to create a sustainable and balanced community. It is also noted that at present, West Horndon village has a specific character which will need to be protected. Densities and styles will need to reflect and complement the existing village, to create a seamless transition between the “new” development and the “old” village.

5.9 Prevention of Urban Sprawl

SO11 states that BBC will “protect and nurture existing leisure, cultural and recreational assets such as the Borough’s Country Parks for residents and visitors to the Borough and promote and enhance social inclusion, health and wellbeing”.

Thorndon Country Park is mentioned extensively throughout the Draft Local Plan as both a leisure and environmental area that it wishes to protect and enhance. I share this view. Should development east of the A128 take place, be it in the form of the proposed Dunton Hills Garden Village, or an alternative development, I recommend that an environmental buffer is created between the A128, any new development, reaching up to Thorndon Country Park. This would have the dual benefit of i) preventing urban sprawl which would be inevitable should no buffer be created given proximity of West Horndon to the A128, and ii) improving an existing leisure and environmental resource.

This would be supported by 7.7 of the Draft Local Plan which states that “Ultimately, once the new community is in place, it will be critical that recognisable and defensible Green Belt boundaries are created that are in keeping with local landscape character.” I note significant concern however that these boundaries are not currently defined. The Draft Plan is considered too vague, and given the importance within BBC’s proposed Spatial Strategy, greater detail of boundaries of any development east of the A128 is required for any final Local Plan.

The south of the Borough is bounded by neighbouring authorities Thurrock, Havering and Basildon. Whilst I agree that it is bounded by the A127 and railway line, in reality it would be easy for all neighbouring authorities to develop up to their borders, creating massive urban sprawl from London to Basildon. Indeed, the Basildon Dunton Extension plans in their emerging LDP already point to this. As such, I reject the notion stated throughout the Draft Local Plan that current “defensible boundaries” would prevent this.

5.32 of the Draft Local Plan states that “it will be important to retain the settlement (*West Horndon*) as a village and not over-develop in order to be consistent with the proposed spatial strategy. This is a statement I fully agree with, with the representations under 5.8 above reflecting this.

5.10 Infrastructure Delivery

As a general representation, I state that even if sites 020 and 021 are developed in line with the Draft Local Plan (500 houses), material infrastructure would be required to ensure that this development is considered sustainable. With the village close to doubling in size, further health and education facilities would be required, and a re-think of current transport would be essential. The existing C2C trains are well above capacity at peak times, and roads around the village (A127, A128) are characterised by standstills and queues in both the morning and evening peaks. An additional 500 cars (assuming just 1 per property) would have a very material impact on already severely congested roads. This comment does not consider the proposed development at Dunton Hills Garden Village which would clearly have an even greater impact on the local infrastructure network.

5.20 of the Draft Local Plan states that “Significant improvements to infrastructure and services will be required to support growth within the A127 Corridor”.

SO13 states that BBC will “secure the delivery of essential infrastructure, including transportation schemes and community facilities in order to support new development growth throughout its delivery”. However I note that there is no detail as to what this would entail, how it would be paid for and how it would be delivered. Given the high concentration of proposed development, this is an area which requires far greater evidence than that provided.

Policy 6.3c states that “Proposals for development will be expected to meet all of the following criteria – ensure the transport network can satisfactorily accommodate the travel demand generated and traffic generation would not give rise to adverse highway conditions or highway safety concerns or unacceptable loss of amenity by reason of number of size of vehicles”. The size and scale of development proposed for the A127 corridor at present, would not be supported by existing infrastructure in particular, transport infrastructure. The A127 is already severely congested, as is the A128 at rush hour. Additionally, any development east of the A128 would not be readily served by a train station and indeed, the C2C trains at West Horndon are already above capacity. All in local transport south of the Borough is severely strained, and whilst investment may help alleviate some of this problem it is hard to see how i) the train capacity could be upgraded sufficiently noting wider development along this line, and ii) the A128 could be expanded to support intra-Borough car journeys. We also re-iterate that Highways England and Essex County Council have not supported an A127 widening scheme in relation to development alone.

Policy 10.1 of the Draft Local Plan states that a Green Travel Route will be created to link the strategic allocations in the A127 Corridor with Brentwood Town Centre. This statement is too vague and more detail is required to assess whether this supports sustainability or not.

It is unclear what the proposed phasing or delivery timing is for Dunton Hills Garden Village. It is not included in Appendix 3. I state concern regarding any development within this site given its scale, and the knock-on impact to West Horndon should infrastructure not be delivered in an appropriate, timely, and properly phased manner.

5.20 of the Draft Local Plan states that a new village centre will be created for West Horndon, with supporting services and facilities close to the village rail station. No evidence is provided as to how this would be funded and provided, and indeed hence if this is a realistic assumption based on the other changes needed at sites 020 and 021 in order to make them suitable for large scale residential redevelopment.

5.11 Protection of Greenbelt

SO9 states that BBC will “safeguard the Green Belt from inappropriate development and enhance its beneficial use”. I questions whether the BBC stated need to meet objectively assessed housing needs justifies using green belt land for housing development. This is a question I has raised at each round of consultation on the LDP and underpinning evidence. To date, no satisfactory answer has been provided.

87 of the National Planning Policy Framework (“NPPF”) states that “inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in special circumstances.” I state that housing need alone does not necessarily represent special circumstances.

5.22 in the Draft Local Plan notes that loss of just 1% of Green Belt “means development needs can be sustainably met in the Borough whilst Green Belt would still make up 88% of the total area”. I challenge that a small loss of Green Belt implies that development needs can be met sustainably – as discussed above there are far greater elements of sustainability than simply considering what proportion of Green Belt is lost. I also note that whilst the Borough as a whole would lose only 1% of its Green Belt, the local impact on West Horndon Parish and indeed the south of the Borough is far more material.

The area of land making up the A127 Corridor is a small strip of land sandwiched between Upminster (London) and Laindon (Basildon). The proposed extensive development of the A127 Corridor would essentially create a ribbon development linking London and Basildon.

Policy 9.8b and c of the Draft Local Plan states that “The Metropolitan Green Belt boundaries within Brentwood Borough will be maintained in order to continue to serve its key function, and be protected from inappropriate development, and to b) Check the growth of London and prevent ribbon development and urban sprawl, and c) Prevent

the coalescence of settlements". The level of proposed development along the A127 Corridor, particularly on Green Belt is contradictory to this policy. It is well observed that all authorities along the A127 are allocating adjoining land for development, with the Basildon Dunton Extension a perfect example. The policies proposed within the Draft Local Plan will actually contribute to urban sprawl and ribbon development within the area.

I question whether BBC have considered all available and suitable brownfield sites. Whilst this is noted throughout the Draft Local Plan, I note that for example, the Childerditch Industrial Estate within the A127 Corridor has not been considered despite it being brownfield land in what is BBC's stated preferred transport corridor for development.

5.12 Preservation of Valuable Landscapes

SO10 states that BBC will "protect and enhance valuable landscapes and the natural and historic environment".

I represent that the scale and concentration of the proposed development within the A127 Corridor will irrevocably harm the landscape and environment within this area.

5.13 Brentwood Enterprise Park

Whilst it is noted that the creation of Brentwood Enterprise Park could create important replacement employment land to help offset the proposed loss of nearly 19 hectares of employment land, I note that the redevelopment of the local industrial estates (sites 020 and 021) would result in a material loss of employment within West Horndon village. Appropriate travel needs to be put in place to ensure that local residents are able to travel to alternative local employment in a sustainable manner (Enterprise Park and wider employment area is not accessible by train, bus or foot from West Horndon at present). Whilst this is mentioned in the Local Draft Plan, no specifics are detailed and it is not clear whether any proposed transport would cover West Horndon.

5.14 Redevelopment of Sites 020 and 021

6.18 of the Draft Local Plan states that "In order for a scheme to be acceptable development will be required to make satisfactory arrangements for vehicular, cycle and pedestrian access into the site and for parking and servicing within the site". At present, the sites are served by a small entrance placed in a hazardous location below a blind hill created by the railway bridge, opposite the station, and on a busy road. Traffic is already considered dangerous in this location. Any redevelopment of the sites will need to be able to show an improvement in road layout safety, together with appropriate access consideration (one entrance/exit will be insufficient for size of proposed development).

□ This point is repeated in Policy 6.4a of the Draft Local Plan: "Development proposals will be favourably considered where the planning and design of buildings and spaces – arrange access points, routes within the site, public and private spaces, building forms and ancillary functions in an efficient, safe, workable, spatially coherent and attractive manner".

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**