



**BRENTWOOD  
BOROUGH COUNCIL**

## Draft Local Plan

**2013 - 2033**

February 2016

## COMMENT FORM

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

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

All responses should be received by Wednesday 23 March 2016

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

### Data Protection

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

By submitting this form you are agreeing to these conditions.

### PERSONAL DETAILS

Title: **Mr**

First Name: **Brian**

Last Name: **Worth**

Address:



Post Code:



Telephone Number:



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):

Please see additional sheets

**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):

Please see the sheets following this one

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

## General Development Concerns

I am rejecting both the proposals for 500 houses on sites 020, 021, and 152, and the Dunton Hills Garden Village Proposal for 2000 houses for the reasons below:

### Infrastructure

The plan has no infrastructure change details. Just a general statement to the effect that necessary infrastructure changes can be made.

The existing infrastructure serving West Horndon is insufficient at this present time to cope with the existing village needs. It is difficult to see how the extra development can be supported when the major infrastructure changes that are required have not been established first. Specifics of the changes to be made, and the how, when, and where, and individual organisations responsible for providing those changes need to be presented.

Unless there is a legal obligation to provide the infrastructure before or during the build then all that will happen is 50 houses per year will be built and nothing will be done until something breaks – if then. This has been my experience in this and other areas.

It is unclear as to why the West Horndon Parish is considered to be the target for such large development with its known infrastructure problems such as flooding, drainage, sewerage, road/rail capacity etc., yet areas in the north of the borough with those same issues are not. The statement that necessary infrastructure changes can be made could equally apply to those areas north of the borough as well as West Horndon.

Although various places in the Local Development Plan makes grandiose statements such as “will secure the delivery of essential infrastructure, including transportation schemes and community facilities in order to support new development growth throughout its delivery” and “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”, in reality it seems difficult to see how this can be achieved.

### Rail Services

The existing Fenchurch Street train service greatly exceeds capacity at peak travel times. Clearly, a massive upgrade would be required to accommodate not just the extra people housed in the 500 homes proposed for sites 020, 021, and 152 and the 2000 homes proposed for the Dunton Hill Garden Village, but also to accommodate additional people from developments planned by councils east of these locations. It should be noted that it is the rail operator that is in control of service provision and not the Borough council. Any expansion could only be fulfilled by the operator if they decide to do so which would assume they can secure enough resources along the route to facilitate this.

It can be seen from the above, that the justification that West Horndon village has a rail link so is suitable for development is a false one and that criteria should be therefore be discounted thus making West Horndon less favourable for development in relation to other land areas.

### Roads

The roads around the village have been given as another reason for favouring West Horndon due to “good transport links” according to a council representative. These roads are the A127 and A128. At peak times the traffic barely moves and there are large queues. These conditions are when there are no accidents, which is not always the case. These roads are also busy out of peak

times, particularly the A127 which has both lanes clogged with traffic. An additional 1000 vehicles (assuming just 2 per property from the sites 020, 021, and 152), and assuming the same ratio for the vehicles from the Dunton Hills Garden Village would yield another 4000 vehicles giving a further potential 5000 vehicles joining the road network.

It is readily evident that these roads cannot cope with even the existing volume of traffic let alone the additional projected volumes. Highways England and Essex County Council would be the authorities to decide on any upgrades, so statements made in the Local Development Plan about necessary infrastructure will be provided as required have no foundation.

Once Crossrail arrives at Brentwood and Shenfield stations, it will act as a magnet to people, so they will be looking for housing in the A12 corridor. In addition, the A12 is being expanded to 3 lanes. It makes sense that these areas are where the development should be.

There is no rail link from West Horndon to these stations and no suitable regular bus link. So a large development in the West Horndon area would mean a greatly increased amount of traffic heading onto the A127 and A128, the latter of which is not fit for purpose with existing traffic levels, looking to park near to Brentwood or Shenfield station. Plus there would be an extra increase in traffic on the A127 for those attempting to drive London bound.

Each proposed location has its drawbacks due to infrastructure capacity problems, and all will require significant infrastructure investment.

It makes sense to direct this investment to into new development that will benefit the most people. Given that most people will be looking to live near Brentwood and Shenfield for the above reasons, this is where the new development and infrastructure spending should take place. As a result, those who like living in busy urban areas would still be in an urban area. Those living in a small rural area such as West Horndon who chose such a location because of their dislike of urban areas would not have their rural area was turned into an urban area against their wishes.

Crossrail is already being built, which eliminates a large slice of infrastructure cost associated with the new development.

### **Other Services**

Extra bus services, the doctor's surgery, etc. will almost certainly be left to private operators to provide if they can determine such services will be profitable. This is highly likely to mean if any extra services do materialise they will do so towards the end of the plan period (2033) when house building is near completion. In the meantime, the people living in those residences will avail themselves on the few services present in West Horndon village. Such services are barely adequate for the population of the village as it presently stands.

### **Scale of the Proposed Expansion**

Nearly 50% of the Borough's housing needs are planned to be met by using land in the West Horndon Parish.

West Horndon is currently a small rural village of low density development surrounded by open spaces. In the core of the village there are around 500 houses, with more in outlying areas, making it a well sought after location.

Adding another 500 houses on sites 020, 021, and 152 would double the size of the village and change its classification from a Settlement Category 3 to a Settlement Category 2 (a larger settlement category). There is a mention of "Mixed use developments" for this site which would

include industrial units on this site as well. In fact I can see that less industrial units than envisaged will probably relocate elsewhere resulting in less space to locate 500 houses than planned. This could mean a higher density development which would conflict with the density throughout the rest of the village.

The rest of the allocation, 2000 houses, is on Green Belt land adjacent to the A128, despite various statements in the Local Plan about preservation of the Green Belt. Although only 1% of the amount of Green Belt land of the 89% in the Borough will be lost, nearly all of this will be lost from West Horndon Parish. This represents a huge amount from the total Green Belt land in the West Horndon Parish.

### **Green Belt - Dunton Hills Garden Village**

Green Belt land should not be released unless it would be a huge benefit for the local community and hugely sought after by those residents. Neither case is true as far as West Horndon residents are concerned. Once gone it can never be restored.

This is Metropolitan Green Belt land. National planning policy indicates that such land should be permanently open, and housing development is considered an inappropriate use for such land except in exceptional circumstances. Housing demand alone does not warrant the exceptional circumstances to justify such loss.

The Local Plan for Dunton Hill Garden Village shows no detail, other than it all being earmarked for potential development. This could result in just one field each side of Station Road being the boundary between Dunton Hill Garden Village and West Horndon village.

This conflicts with various statements in the Local Plan which talk about “recognisable and defensible Green Belt boundaries are created that are in keeping with local landscape character”, “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”, “protect and enhance valuable landscapes” to name but three.

Developers will have a powerful case to build more homes on adjacent Green Belt land once the precedent is set.

The Brentwood Borough Local Plan not only seems to conflict with National Planning Policy on Green Belt retention but actively seems to encourage more than just this “one-off” release of Green Belt with the Parish.

The Draft Local Plan goes so far as to hint that more Green Belt land around West Horndon village could be a prime candidate at a later point in time - 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” despite the fact that West Horndon flood issues have been identified in the Draft Local Plan in paragraph 10.68.

Should this happen, the boundaries of West Horndon will be forgotten and its periphery will become a sprawl of housing out of all proportion to the village centre.

Should surrounding areas bordering the West Horndon Parish that are controlled by other authorities be developed in this way, there could be urban sprawl all the way from London to Basildon or even beyond, something which the Metropolitan Green Belt was designed to protect against.

For example, in the past, attempts have been made to develop on land south of West Horndon, such as the “Tillingham Hall – New Country Town project”, land which is not controlled by Brentwood Council. Such a plan could easily be resurrected by Thurrock Council.

I also understand that Basildon Council are also considering developing up to the Brentwood Council border at Dunton.

### **Policy 7.10 - Gypsy and Traveller Provision**

The initial estimated 20 traveller pitches at Dunton Hills Garden Village is out of proportion to the much smaller allocations elsewhere. West Horndon Parish would be taking a disproportionate amount of the total pitch requirements of 67.

No indication has been given as to where the 20 pitches are to be located. National Planning Policy states that the use of Green Belt for traveller/gipsy sites is classed as inappropriate development

Such a site would harm the character and appearance of the Parish and result in an unacceptable visual impact. House prices in the area would plummet. The events of Dale Farm have proved how a supposed limit of a legal number of pitches can mushroom out of control.

It is no coincidence that many existing traveller sites are situated in locations away from developed areas because the travellers have chosen these secluded locations for compatibility with their lifestyle. Their wishes should be respected by allocating similar sites unbounded by other development.