

Brentwood Borough Council Draft Local Plan – submission by Danny Lovey

DUNTON GARDEN VILLAGE PROPOSALS

I wish to clearly state that I object to the above proposal, both in principle and substance.

The following highlights my objections:

- The loss of land which is designated as Green Belt
- Ribbon development and further Urban Sprawl along the A127 towards London
- Inadequate infrastructure locally in South Essex

Opening Remarks

There is undoubtedly a large degree of political expedience contained in Brentwood's Local Plan for 2,500 homes in Dunton Hills. These proposals by Brentwood Council - not motivated by the needs of its residents, but by opportunism for Brentwood to wish to build as many homes required (approximately half of those in their Local Plan) as far away from the centre of Brentwood and the A12

Brentwood's Dunton Garden Village (or the DGS proposal), would effectively be an extension of Basildon outside of its current boundaries, a development under the guise of homes in Brentwood, but in reality a back door de-facto Dunton Garden Suburb in a different form.

It also would also seem that Brentwood Council has not undertaken a Green Belt review to properly consider where its growth could best be located.

Logically, it is most surprising that keeping in mind the plans to upgrade the A12 and the closeness of the M25 and M11 and looking at where Brentwood is proposing new homes, only a very small number of sites are proposed north of the A12. There are clearly many hundreds of acres of land to the north of Brentwood

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Town that logistically are attractive for development. No comprehensive surveys on the Green Belt appear to have been made in these areas as to their suitability for development.

I have no knowledge of any Green Belt Study undertaken by Brentwood Council, but feel certain that the similarities between Area 66 and Area 67 (Dunton Wayletts) in Basildon would feature in any Consultants conclusions; that much attention would be drawn to the natural boundaries between Basildon and Brentwood and that these should be preserved and that it currently provided recreational facilities that were an amenity to the people of Brentwood and surrounding areas. Further, that attention would be drawn to the major contribution made by the area between Dunton and the A128 to the Metropolitan Green Belt.

Clearly, the motive behind Brentwood Council's enthusiasm (for which it has done no assessment of suitability) for DGV is to solely link to this development on Basildon's doorstep to link it to developments in Basildon and to lessen the number of homes planned for West Horndon where there has been significant local objection to the previous proposal of a development of 1,500 homes. Now of course the Brentwood Local Plan - has in light of the Dunton Garden Village proposals, been downgraded to 500 homes, albeit most of this on existing brown field sites on the old industrial estate of West Horndon.

I do note with some irritation that in the Brentwood Local plan the Dunton Garden Village proposal from has been excluded from the green belt and is listed as a strategic site, thus doing some political gerrymandering on the fact that they are using green belt land!.

Dunton Garden Village should not be used as a means by Brentwood Council of deflecting its own obligations upon a neighbour, along the already heavily congested A127 corridor, when Brentwood Council has far more Green Belt than Basildon north of their Borough that has not been properly explored for development, as no Green Belt Review has been presented, and prima facie the scope for development of its own Green Belt is immense with the opportunity to develop its own sustainable Garden Suburb north of Brentwood Town should it wish to propose this.

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The National Planning Policy Framework

The NPPF outlines within the document under section 80 that the Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

Section 87 says:

As with previous Green Belt policy, inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances.

Section 88:

When considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm, is clearly outweighed by other considerations.

To clear up some apparent 'confusion' with recent planning decisions on 1st July 2013 Local Government Minister Brandon Lewis issued a written statement to Parliament.

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The statement said: *'Having considered recent planning decisions by councils and the Planning Inspectorate, it has become apparent that, in some cases, the green belt is not always being given the sufficient protection that was the explicit policy intent of ministers. The Secretary of State wishes to make clear that, in considering planning applications, although each case will depend on its facts, he considers that the single issue of unmet demand, whether for traveller sites or for conventional housing, is unlikely to outweigh harm to the green belt and other harm to constitute the "very special circumstances" justifying inappropriate development in the green belt.'*

Following this, in a speech to the Royal Town Planning Institute on 11th July 2013, Secretary of State Mr Eric Pickles stated:

'You can plan for growth but not at any price. So we have been very clear that we must have secure safeguards to protect the green belt. That vital green lung which prevents urban sprawl. Sometimes I feel politicians in particular forget that it is there, not simply for the beautiful landscapes, but to keep conurbations from running into each other. To protect the nature of what we call home.'

Mr Pickles reinforced the Government's guidance on the Green Belt on 4th October 2014 when he said:

'This government has been very clear that when planning for new buildings, protecting our precious green belt must be paramount. Local people don't want to lose their countryside to urban sprawl, or see the vital green lungs around their towns and cities to unnecessary development.'

To conclude

It is clear that any large scale release of Green Belt in the area of Dunton either by Basildon, or Brentwood Council would have a significant and harmful effect upon the Metropolitan Green Belt. It would be particularly inappropriate as this would indeed be a blot on the rural landscape and be an unwelcome view from neighbouring areas.

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As previously stated earlier, an aim of the Green Belt was to prevent Urban Sprawl as included in section 80 of the NPPF.

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;

As Mr Pickles said '*Local people don't want to lose their countryside to urban sprawl, or see the vital green lungs around their towns and cities to unnecessary development.*'

It is very clear that local people in the Basildon and Brentwood area do not want to lose their countryside to urban sprawl, as eloquently said by Mr Pickles. In the Joint consultation with Basildon & Brentwood over the proposal for Dunton Garden Suburb - a cross border exercise, it was very clear that 84 percent of those who responded to the consultation were against the proposed Dunton Garden Suburb proposal.

Inadequate infrastructure locally in South Essex

There are two main roads running along South Essex east to west, the A127 and the A13. Whilst there is, and will be, some more upgrading of the A13 from the Stanford-Le-Hope interchange to the London Thames Gateway Container Port westwards, the A127 remains heavily overcrowded with traffic for most of the day and exceedingly overcrowded on not only the A127 itself, but also on the feeder roads into it. With traffic from the Southend area in the east and down to M25 junction and beyond in the morning, traffic becomes log-jammed which extends all the way into the London area.

Already, the South Essex Council's Local Plans will make the A127 problems even worse, and there are no big improvement plans with regard to the number of lanes. Of course, this problem is well known by the Essex County Council and Highway Authorities.

The Potential Ramifications

Any development of Dunton Garden Village would have many ramifications:

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It would be a major loss of Green Belt between Basildon and West Horndon.

It would be a Ribbon Development against the objectives of the NPPF:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;

The Infrastructure problems as already outlined would be very challenging. Not only would these be affecting Basildon and Brentwood, Thurrock would face substantial challenges as well, particularly as a result of the likely major investment that would be required on the A128 from the A127 the A127 itself and the A13 would also likely face higher volumes of traffic as a result.

The Huge Medium & Long Term Risks

If a marker is not now put down to protect the Metropolitan Green Belt, then what is to stop it creeping further westwards towards West Horndon? On past experience there will be little to stop it!

If DGV or indeed DGS is built, Developers will not be satisfied, they will want to build on what will remain of the land left between DGV/DGS and the A128 as all the main infrastructure of roads etc. will have had to be provided already. New developers will argue it is just infill to what would then seem a natural boundary at the A128. The fact that DGV/DGS from the proposals published appears to stop short of Eastlands Spring and the associated water course running north to south of the site is unlikely to deter them as there will be room for a thousand or so homes. With potential developers then in a position to argue that the road infrastructure is ideal for access to the A128, the A127 and the M25 and A13, plus West Horndon Station being only a mile or so away from the proposed DGV. If planning permission was refused a win on an appeal could well be successful!

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Then that will only leave a few fields before the whole development is structurally joined to West Horndon. Is this a likelihood that residents in West Horndon will relish? I doubt it!

The Urban Sprawl from Basildon will then stretch to West Horndon and the Metropolitan Green Belt will be irreversibly destroyed.

Conclusion

I would state that it is impossible in my opinion to separate the ramifications of Basildon Council and Brentwood Council's proposals in their respective Local Plans. Many of my comments therefore are just as relevant to both.

- The loss of land which is designated as Green Belt
- Section 88 of the NPPF says clearly that - inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Brentwood Council has failed to give any reasons why there are very special circumstances for the development proposals.
- That the protection of the Green Belt in the Dunton area is necessary to form a natural barrier between Basildon and Brentwood
- Ribbon development and further Urban Sprawl along the A127 towards London
- Inadequate infrastructure locally in South Essex

I believe that I have more than provided enough material to substantiate my objections, I would therefore request that this proposal for Dunton Garden Village in any shape or form is **not** progressed any further.

Ends.....

Comment [DL1]:

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Yours sincerely

