

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

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www.havering.gov.uk

Dear Planning Policy Team

London Borough of Havering response to Brentwood Draft Local Plan consultation

The London Borough of Havering welcomes the opportunity to comment on the above document. Our comments are set out below. These build on our previous responses to the Strategic Growth Options and Dunton Garden Suburb consultations in early 2015.

Proposed development sites – A12 Corridor

The Strategic Growth Options document contained potential development sites in the A12 Corridor including one which was adjacent to the Havering borough boundary.

Havering welcome the decision not to progress this in the Draft Local Plan following the concerns expressed in our previous response. However, Havering remain concerned about the cumulative transport implications of further development in the A12 Corridor, with a potential adverse impact on Havering's section of the A12, the A127 and the rest of Havering's road network. This is underlined by Brentwood's Sustainability Appraisal Report which expresses traffic congestion and air pollution concerns in both the A12 and A127 Corridors. Havering is especially concerned about the likelihood that the proposed development sites will add to the existing congestion and road safety problems at the Gallows Corner intersection of the A12, the A127 and Main Road (A118).

Havering's previous response recommends that Brentwood Council liaise and consult with Transport for London as they are responsible for the A127 and other main routes and key junctions inside Havering.

Proposed development sites – A127 Corridor

The Draft Local Plan proposes Brentwood Enterprise Park as a new 30 ha employment site for B1, B2 and B8 uses, adjacent to the Havering borough boundary within the green belt. This is in line with the 2013 Preferred Options report and the 2015 Strategic Growth Options document. Havering objects to the Brentwood Enterprise Park because of the p

potentially significant transport implications and adverse impact on Havering's section of the A127, which is already at or close to capacity in the peak periods in both directions.

Havering is also concerned about the adverse impact on the green belt. Whilst it is noted that the site has been previously developed, the proposal will significantly increase the quantum of development on the site and therefore impact on the function of the green belt and its openness.

Following joint consultation in 2015 by Brentwood and Basildon Councils on the Dunton Garden Suburb consultation document, it is noted that the extent of the proposed development has been reduced and that each authority are now progressing their own proposals (Dunton Hills Garden Village).

Havering would like to re-emphasise that it strongly opposes the Dunton Garden Suburb concept and our concerns that were expressed previously relating to transport and congestion implications and harm to the character and openness of the Green Belt still apply despite the reduction in scale.

It is recognised that the option to join these separate allocations in each borough to form a cross-boundary urban extension is still being explored, but this does not form part of the current plans as they cannot be fully justified by evidence at this point in time. Havering welcomes this decision but strongly opposes any consideration being given to this option now or in the future.

The proposed development in the A127 corridor at Dunton Hills Garden Village will result in a significant development within the green belt. Whilst the Draft Local Plan states that the site can contribute to the Green Belt purposes, it is not demonstrated how. Havering therefore find it more likely that development will have a negative effect on the Green Belt purposes.

The A12 and the A127 are the responsibility of Transport for London (TfL) within Havering. Both roads are essential elements of the highway infrastructure of Havering and are fundamental to traffic being able to get into and out of the borough and move around within it safely and conveniently.

Havering's residents and businesses as well as those further afield are highly dependent on these key routes for day to day living and business prosperity. Both highways are already heavily trafficked and there is considerable concern that additional traffic using these routes linked to development in Brentwood will adversely affect traffic flows and have a detrimental environmental impact through additional noise, pollution and vibration. There are already very heavy traffic conditions at Gallows Corner intersection and on the A127 road coming into the London Borough of Havering and heading eastwards to Southend-on-Sea. Havering's road network does not have particularly high levels of 'resilience' and when there are traffic problems on it, or on the strategic network (such as the M25). There are often difficulties with congestion resulting in noise, disturbance and pollution.

Gypsy and traveller sites

Havering welcomes Brentwood's plans to meet its own need for Gypsy and Traveller sites within the borough boundary as set out in Policy 7.10. However, the plan identifies a need for 89 pitches and makes provision for 22 pitches with an additional 20 proposed at Dunton Hills Garden Village. It is unclear how or where the remaining 47 pitches will be provided. It is noted that a revised Gypsy and Traveller Accommodation Assessment is being prepared in light of new National Planning Policy for Traveller Sites. Havering would welcome continued dialogue and engagement as this assessment progresses.

Please contact Lauren Miller, Development Planning Team Leader at lauren.miller@haverling.gov.uk if you have any regarding this response. Havering, would like to be kept informed as the Local Plan progresses.

Yours faithfully,



Councillor Roger Ramsey
Leader of the Council

