



**BRENTWOOD  
BOROUGH COUNCIL**

# Brentwood Draft Local Plan Preferred Site Allocations

January 2018

## COMMENT FORM

From 29 January to 12 March 2018 we are consulting on the next stage of the Brentwood Local Plan: Preferred Site Allocations. You can view and comment on the consultation document 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 document.

All responses should be received by Monday 12 March 2018

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:

First Name:

Last Name:

Address:

Post Code:

Telephone Number:

Email Address:

## YOUR COMMENTS

**Please indicate which section(s) of the Preferred Site Allocations document that you are commenting on** (where applicable please clearly state the section/heading or paragraph number):

Section 12 – Dunton Hills Garden Village (DHGV) “evidence base is increasing including masterplan work” and Section 64 e – “Developing a comprehensive masterplan for the new garden village at Dunton Hills, to engrain the core garden village design principles”

- how can an objective view be made on site selection before this masterplan detail is presented and made available to the public?

Section 26 – “Committed to growth . . . but in a way that maintains and enhances unique local character”

- whereas DHGV will completely destroy the unique local character of Dunton Village which is right on its border.

Section 28 – Strategic Objectives – S04 “A new well connected community at Dunton Hills”

- Please see fuller comments below – but how can it be well connected when it isolated from the rest of Brentwood, isolated from the railway and bound by already heavily congested roads

Figure 9 – page 26/27 – Proposed Housing Led Allocations

- DHGV is not included in the Green Belt total, effectively masking the extent of Green Belt land being developed
- Out of 381.25 Hectares of land allocated, 342.65 (257 + 85.65) is green belt. That’s a staggering 89.8% Green belt land, which does not deliver a sustainable, ecological allocation plan.

Section 67 – Total dwellings

- Figure 9 shows a total allocated dwelling number of 6,154 houses. DHGV makes up 40% of this total. However, section 67 states this figure could increase to 9080 with accelerated growth within DHGV to deliver 3500 dwellings.
- This will add a huge burden to the surrounding infrastructure. With an estimated 9000 residents (section 105), a large level of investment will need to be made regarding roads, health, schools, shopping and work provisions. A sticking plaster approach will just not work given that many of these areas are already stretched to within breaking point.
- It just seems that not enough effort has been put into dispersing these houses across the borough. It is just lazy of the council to allocate it 1) on green belt land and 2) land from a single land owner – just to make the allocation process easier

Figure 13 – page 33 – Provision of traveller sites

- If traveller provisions do need to be created, surely it is better for all concerned to allocate them away from large communities and therefore the 30 allocations at DHGV would seem wholly inappropriate in that regard

Figure 22 – page 57 – New Employment Site Allocations

- The largest proportion of new employment areas are extensions onto green belt land – again along the A127 corridor, further burdening the already gridlocked roadways. The A127 is already experiencing pollution levels above EU allowable levels.
- The erosion of Greenbelt along the A127 means that there is almost no division from the urban sprawl of London and Brentwood / Basildon meaning that there will no longer be any green belt

**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):

I would like clearly **state my opposition** to the proposed plans for development of 2500 houses in the proposed Dunton Hills Garden Village.

The issues associated with such a development are numerous and complex, requiring **significant infrastructure and investment** and I have outlined these in detail below.

I would also like to confirm that I attended the West Horndon Consultation workshop on the 5<sup>th</sup> March and have also stated my objections in person to the many planning officers in attendance.

Counting both Dunton Garden Suburb and Dunton Hills Garden Village, I have now attended five events and responded to four consultations. At each stage - whether it be Brentwood Council, or Basildon and Brentwood - there has been significant opposition from the general public to the idea of having a large single concentration of houses on Green Belt Land adjacent to infrastructure that just can't cope (84% objected to Dunton Garden Suburb). And yet no-one is listening, the next consultation comes round and the plan has barely changed, in fact the proposal for DHGV is to be accelerated in the plan period to 3500 dwellings, far worse than a year ago.

It is clear that this consultation has been promoted to the residents of Brentwood Borough with a letter to every resident and yet has made no consideration at all to the residents of Basildon Borough (especially Dunton) who are adjacent to the proposed area and who will be directly affected by such a large scale development.

### **Brentwood Local Plan Specific Proposal Points**

- Dunton Hills Garden Village (DHGV) is situated away from the majority of Brentwood infrastructure with poor access to Brentwood hospitals, shops restaurants & supermarkets, police, fire and sports & leisure facilities. Residents are naturally more likely to use Basildon amenities placing further burden on the Basildon area, and place the funding burden on Basildon Council Tax payers. The Local Plan vision is that the community will be self-sustaining but is by its nature isolated from Brentwood facilities.
- The Brentwood Local Plan fails to provide any detail leaving little confidence that it has a robust plan. In order to access Brentwood centre and amenities, DHGV will be forced to use the A128 which is already gridlocked most days with two severe pinch points at Herongate, Hanging Hill Lane and Wilson's Corner.
- Further there are very few footpaths, cycleways and bridges spanning the A127 and A128 which would be needed to allow DHGV residents to access Brentwood district in the North and West.
- To build 2500-3500 houses on the proposed area would lead to significant density of housing which is completely at odds with the vision of a wide avenue, open space Garden Village
- Policy S015 states that Brentwood would look to safeguard greenbelt from inappropriate development and enhance its beneficial use, yet DHGV and the enterprise parks along the A127 would significantly reduce Green Belt at one of its narrowest point around London. The proposal may only reduce the Green Belt of Brentwood district by 1%, but it is doing so in an area where it will have huge implications for urban sprawl.
- There is opportunity to build in the land in the North of the A12 and create a new village away from existing villages to minimise impact on existing residents. Many of the reasons given for not building in this area – inadequate roads, lack of schools, GP facilities, landscape value, local character etc. also apply to the proposed area. In fact, with Crossrail and the A12 widening scheme, all of the infrastructure investment supports the north of Brentwood.

## 1) Green Belt

The proposed site is Green Belt land. According to the National Planning Policy Framework (March 2012), there are five stated purposes of including land within the green belt:

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

The remaining green belt along the A127 corridor is one of the narrowest bands around London already. The proposed enterprise development and the proposed housing developments would effectively remove the green belt, merging the sprawl from London through Brentwood and into Basildon.

Paragraph 89 of the National Planning Policy Framework states that a **Local Planning Authority shall regard the construction of new buildings as inappropriate in the Green Belt. Exceptions to this are (amongst others) buildings for agriculture and forestry.**"

**Dunton Hills Garden Village proposal is clearly on Green Belt Land, is clearly not for agricultural or forestry use and therefore must be deemed as inappropriate construction as clearly stated in the ruling above.**

## 2) Dunton Village Character

Dunton village has a longstanding history dating back to the doomsday book. It has significant history including the Colony, St. Mary's Church, Plotlands as detailed in these links:

- [http://en.wikipedia.org/wiki/Dunton\\_Wayletts](http://en.wikipedia.org/wiki/Dunton_Wayletts)
- [http://www.laindonhistory.org.uk/category\\_id\\_\\_20.aspx](http://www.laindonhistory.org.uk/category_id__20.aspx)

Dunton has a village feel with **many character properties** including businesses located within the village that rely on a rural setting.

- The Old Rectory – relies on scenic nature and rural location for entertainment licence and for marriage ceremonies
- Friern Manor – another character property relying on the rural aspects of Dunton
- Dunton Park – mobile home park with mainly senior residents who value the peaceful setting and secure environment
- Dunton Hills Family Golf Centre
- A number of farms including Dukes Farm and Sheddings Farm

Development would ruin the character of the village and the ability of these businesses to operate.

Development would also ruin the views that can be seen looking West and North West from Langdon Hills Country Park across Dunton to London and to Thorndon Park.

**Dunton is already absorbing nearly 1000 homes in the Radford Park /Dunton Fields development.** The intensity of the new development will place a significant burden on the resources and infrastructure of the area, and will lead to significant issues of integration with the existing community.

### 3) Significant Barriers to Proposed Development

#### a) Road and Pavement Infrastructure

It is clear from the draft plan that insufficient thought has been given to improving transportation support around the A127 / A128 and linking to Brentwood town centre. When I pressed your planning officers on this, they really had no tangible ideas of what could be done. They cited Essex County Council as being responsible, but they don't have the levels of funding needed. Your planning officers also offered that any new development would help to pay for improved infrastructure but admitted it was likely to come after the development itself. Given the near gridlock state we already find ourselves in, this seems an infeasible plan.

- **The A127 cannot cope** with traffic today. It is near gridlocked at morning and evening peak times every day. Widening is an absolute must and removal of bottlenecks at both the M25 junction westbound and the Fortune of War roundabout eastbound is required to aid traffic flow in the immediate area
- **The A127 has recorded excess pollution levels** which has already led for calls for congestion charging. Talking with your planning officers, the average is 3 cars per household, so DHGV could add 7,500-10,000 additional cars in the area which will make the problem significantly worse and have an impact on the health and wellbeing of residents in the area
- The **A128 cannot cope** with traffic between the A127 and Brentwood. Dunton Hills would significantly add to this traffic which would also impact the villages of Herongate and Ingrave. A new link would be needed to avoid isolation of residents in the new Garden Village development.
- **Dunton Roundabout** also cannot cope with today's traffic. The business of the A127 causes traffic to queue back onto the roundabout. In periods of heavy rain both the westbound exit and entrance ramps become flooded which exacerbates the problem. In addition there is additional traffic from the Ford works in the morning and evening. The Ford morning traffic now queues onto the roundabout due to the new road layout to incorporate the Dunton Fields link road. The Link Road is not yet open but once completed will add significant further traffic to the roundabout.
- **Dunton Roundabout** issue is not limited to weekdays; when Dunton Boot sale is operating from Spring to Autumn traffic not only blocks the roundabout it also queues back onto the A127.
- **Footpaths and Cycleways** – there are no footpaths or cycle ways linking Brentwood to the proposed development area. The current A128 and Dunton roundabouts are so busy they are completely unsafe for pedestrians and cyclists.
- **Road crossings** – there are no bridges to allow safe crossing of the A127 and the A128 in order to access Brentwood district to the North and the West.

#### b) Drainage

- The proposed **site is prone to surface flooding and waterlogging** as it is Essex clay with no run-off. The only way for the water to dissipate is to eventually be absorbed back into the ground
- Building houses and **reducing the amount of soak-away land will cause severe drainage problems** in the area and with the wet winters we are having will cause extreme problems for new residents.
- **Investment will be needed to develop a suitable drainage structure** that can cope with the significant water levels experience on the site. There is no evidence in the local plan that the Environment agency has surveyed the area and deemed the area viable.

### c) Wildlife

There is **significant Biodiversity in the area.**

- There are many **mature Oak trees** on the site in both coppices and marking boundaries for the fields. These should have preservation orders attached and in themselves provide a bio-system for Wildlife.
- Additionally, In accordance with the UK BAP (Bio-Diversity Action Report) I have seen the following priority species whilst living in the area:-
  - Great Crested Newt (photos taken)
  - Bats
  - Sky Lark
  - Herring Gull
  - Yellow Wagtail
  - House Sparrow
  - Hedge Accentor (Dunnock)
  - Spotted Woodpecker
  - Wood Warbler
  - Common Starling
  - Song Thrush
  - Common Toad
  - Adder
  - Significant fungus and toadstools – I'm no expert, but I counted twenty types in one area of woodland on the site alone
  - Hoverfly
  - Large Garden Bumblebee
  - Crimson Underwing Moth
  - Field Cricket
  - Brown Diving Beetle
  - Cinnabar Moth
  - Hedgehog

There is no evidence in the local plan document that the following Natural England planning advice has been adhered to (i.e. that significant study has taken place to ensure the correct consideration has been given to wildlife in the area)

- <https://www.gov.uk/protected-species-and-sites-how-to-review-planning-proposals>

In addition, Essex Wildlife Trust have had strong opposition to building on the proposed area because it provides a green corridor for wildlife between Thorndon and Langdon Hills country parks.

### d) Recreation

There is significant recreational activity that takes place in and around the proposed development area.

- Particularly road cycling, which has attracted more interest since the 2012 Olympics / 2013 Tour De France. Lower Dunton Lane, Doesgate lane and the surrounding area provide scenic, rural, relatively **low intensity traffic corridors for cyclists** to use as a link between, Brentwood, Billericay, Bulphan, Orsett and the Horndons. The proposed development would add significant traffic to the area and make the roads less safe to cycle on.

Additional recreation in the area includes (but is not limited to):-

- Mountain Biking
- Shooting
- Walking / Rambling
- Horse Riding
- Fishing
- Birdwatching
- Photography

## e) Other Infrastructure

The resources in the area are not sufficient to sustain the significant increase in houses and people that development would bring.

- Secondary School – there is already a shortage of quality school places in the immediate area as Langdon Hills and Laindon West has no secondary school. Children from the area would have to migrate North to Brentwood County High or St. Martin's adding to the burden of school places and increasing traffic at peak times.
- Primary School – Further primary school places would be needed with West Horndon, Langdon Hills and Ingrave being the closest schools
- Nursery Care – given that the proposed development is designed to help with the Government housing framework to help cater for the shortage of homes in London, I would imagine that there will be many working mums who will need good Nursery care provision.
- Police – a suburb of the size and scale with significant affordable housing and traveller provision will need visible policing to maintain security. As the suburb is being placed on the edge of Basildon and far from the centre of Brentwood, it is by definition **further from police resource than many other estates in the area**. Consideration should be given to adding police presence to the area and response times to emergency situations
- Ambulance and Fire. - Many of the above arguments in regard to **response times for Ambulances and Fire Engines**. Being removed from the main Basildon and Brentwood hubs will significantly increase risk to the proposed Dunton Hills site
  - Basildon and Brentwood NHS are already failing most months to meet the 75% of responses within 8 min red calls in 2014 <http://www.eastamb.nhs.uk/Performance/performance.htm>
- Healthcare – In addition to additional doctor provision, **new A&E capacity will need to be added to cope with the large increase in population**. With Basildon Hospital to the South of the town and Brentwood Community Hospital to the North-East the residents of Dunton Garden Village will not easily be able to access emergency Healthcare.
- Internet – there is **no high speed broadband** in the area – which will need additional investment to install
- Electricity – is mainly by overhead lines with voltage fluctuations and occasional black-outs. Significant **investment is needed to install a new electric grid** in the area.
  - The existing pylons that run across the site would be both an eyesore and a health risk for residents, and again are not in keeping with the image of a Garden village
- Water and Sewage – 2500-3500 homes will require significant additional capacity for water and sewage infrastructure and again significant investment is required.

## f) Proposed Traveller Pitches

Whilst it is understood that the subject of developing new Traveller sites must be raised with any sizeable new development,

- The proposal of Traveller sites is not consistent with promoting a garden village atmosphere with an integrated community
- Better to site the pitches separately to reduce tensions – e.g. closer to the proposed enterprise areas

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)