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Brentwood Draft Local Plan – Preferred Site  
Allocations, Sustainability Appraisal and  
evidence base

Representations

on behalf of

Countryside Properties (UK) Limited

in respect of land to the east of West Horndon

by

Andrew Martin – Planning Limited

March 2018 | AM-P Ref: 13035



## EXECUTIVE SUMMARY

- A proposal for 2,500 homes to be built in a new garden village at Dunton Hills (DHGV) forms a pivotal role in the emerging Draft Plan for Brentwood Borough. Initially a failed cross border proposal with Basildon District, DHGV has progressed as a result of the political will of the Council and its joint promotion with CEG. It was selected as one of 14 garden villages to receive financial backing from the government in 2017.
- Nowhere in the bid to the government in 2016/2017, the Draft Plan, its Sustainability Appraisal or evidence base is there a detailed site assessment to demonstrate that the proposed garden village at Dunton Hills is sustainable or viable, nor that it represents the best spatial strategy for large-scale growth in the borough.
- DHGV would result in nearly half the housing supply in the local plan period being provided in one location. Such a large development would have a considerable lead in time and be unable to meet the urgent need for housing in the first five years of the plan period.
- The current draft plan describes the proposed housing allocations including DHGV as the Council's 'preferred sites', whilst alluding to the fact that these remain 'draft' in the context of the current consultation.
- It is clear however that Brentwood Borough Council sees DHGV as the answer to its housing need problems and important in helping to avert the impending threat of government intervention in the local plan process. In addressing recent DCLG advice on OAHN and a target for housing growth in the borough the Council proposes that extra growth be added to the proposals for DHGV taking the number of houses up from 2,500 to 3,500 in the plan period, and to 4,000 beyond. This proposed increase to the scale of development at DHGV is once again made in the absence of any detailed site assessment and the knowledge of whether the site can deliver this level of growth. BBC appears to be on a firm course in its attempt to bring forward this site.
- The adjoining boroughs of Basildon and Thurrock are opposed to DHGV. Basildon Council "*maintains the view that there is a lack of credible and robust evidence to justify that a new village in this Green Belt location is the best option for meeting Brentwood borough's housing needs and continues to have doubts that it can be demonstrated as a legitimate proposal through the planning system.*"

Basildon Council also stresses:

***"This initial investment by the Government is designed for a local planning authority to boost its staff resources or pay for key studies or assessments regarding their Garden Village proposals, and is therefore made at risk that the planning and legal processes may not conclude that the proposal should proceed any further."***

- Since 2009 Andrew Martin-Planning has submitted representations to the emerging Local Plan for Brentwood, on behalf of Countryside Properties. These representations have consistently promoted land to the east of West Horndon as a more sustainable location for strategic growth. For many years the proposed development at West Horndon was consistent with the Council's vision for growth in the borough. Only in late 2016 did the Council change course and back DHGV in place of West Horndon, leading to strong objection by a number of members who claimed not to have known about the change in strategy until leaked to the press.



- Our submissions to the emerging Local Plan for BBC over the last five years and more, have consistently argued that a robust and credible evidence base to inform the emerging plan is absent or lacking and without this the plan cannot be found sound. These latest representations advance the same response.
- The selection of DHGV in 2017 by the government as a potential new garden village, came with funding for 2017/18 and support provided by the Homes and Communities Agency (HCA) and their Advisory Team for Large Applications (ATLAS). It still remains that the proposal for a new village at this location will need to meet the planning and legal processes consistent with the Local Plan being found sound.
- Land at West Horndon remains a “*reasonable spatial strategy alternative*” in the context of the latest Draft Plan and associated Sustainability Appraisal. We submit that it is very difficult for the Council and its technical advisors to dismiss this location for growth. It represents a more sustainable location for growth than DHGV, as some of the emerging evidence base documents and latest SAR reveal. Unlike DHGV it can deliver houses in the first five years of the plan period and in conjunction with land to the west of the settlement or strategic growth north of Brentwood, is capable of *exceeding* OAHN going forward.
- The Council cannot progress with its preferred site allocation for Dunton Hills to meet half the Local Plan needs, unless a complete and robust evidence base reaches the conclusion that this is the most sustainable option for growth. This work has yet to be concluded. The following key studies remain to be completed or are in draft form and have not influenced the site selection process to date:
  - *Green Belt Study*. This is in draft form and has not influenced the site selection process;
  - *Strategic Housing and Employment Land Availability Assessment (SHELAA)*. This is not yet available;
  - Site Assessment Methodology and Summary of outcomes*. This is in draft form and has not influenced the site selection process;
  - Highway Modelling*. Undertaken in February 2016 and still in draft form; and
  - Infrastructure Delivery Plan*. Not yet available.
- This latest round of consultation is the appropriate time to conclude the evidence base and finalise detailed site assessments. We submit that this will demonstrate, as it has done historically, that strategic growth at West Horndon as part of the wider spatial strategy for growth in the borough, represents the most sustainable option.



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### APPENDICES

1. Representations to the emerging Draft Local Plan for Brentwood, January 2016 and SA February 2016 by Andrew Martin-Planning for Countryside Properties (UK) Ltd, including site location plan and illustrative masterplan at appendix 4.



## 1.0 INTRODUCTION

- 1.1 Land to the east of West Horndon (see documents and appendices at Appendix 1) has been promoted for development via the local Development Framework for Brentwood, by AM-P on behalf of Countryside Properties (UK) Limited, (hereafter referred to as Countryside Properties) since 2009. It was first put forward in response to a “Call for Sites” by Brentwood Borough Council (BBC), upon commencement of its Strategic Housing Land Availability Assessment (SHLAA). It was subsequently the subject of representations to an Issues and Options Plan in 2013 and Strategic Growth Options in January 2015. Throughout this time the emerging plan for Brentwood has consistently advanced a transport led strategy for growth that centres upon Brentwood, Shenfield and West Horndon, together with developed sites in the Green Belt and brownfield development in other villages.
- 1.2 As the Local Plan has progressed, the settlement of West Horndon – situated in the A127 corridor – has been identified by the Council as a location for strategic growth. In addition to good road and rail access, it is served by existing shops, employment and community facilities. It is also relatively unconstrained from a landscape perspective. The land has been the subject of years of intensive farming and represents one of the least attractive and lower quality parts of the landscape that could be released to meet growth needs. Consequently, in the preparation of its SHLAA in 2013, the Council acknowledged that there is the potential to develop land to the east and west of the existing settlement of West Horndon. Countryside Properties has argued that land to the east of the existing settlement has ‘moderate’ sensitivity to change due to its open, flat nature and its containment by strong defensible boundaries including the A128, A127 and the railway line. A well-established network of hedgerows and trees limit views of the land. Development of this land would extend the settlement of West Horndon to a limit that is logical and contained. As such it would not appear as encroachment on the countryside, nor would it cause the merging of nearby towns.
- 1.3 Appendix 1 comprises previous representations to the emerging Local Plan for Brentwood by AM-P on behalf of Countryside Properties. These were submitted to the Council in March 2016 and remain highly relevant to the current round of consultation. Full justification for the development of land to the east of West Horndon is set out in section 5.0 below. This draws on previous representations submitted to the emerging Local plan in recent years.
- 1.4 By 2016, when a further draft plan was issued, land at west Horndon was rejected in favour of an allocation at Dunton. At this time the Draft Plan confirmed that “*Land around West Horndon Village remains a reasonable alternative because it can provide for similar development numbers towards local needs*”. The only reason given for rejecting this highly sustainable location for growth was that “*it has not been selected as a preferred site in this Draft Plan owing to impacts on the existing village, which would not be consistent with emerging spatial strategy*”. The rejection of land at West Horndon was not supported by the Sustainability Appraisal. Indeed the SA gave more support to West Horndon as a strategic site for growth than Dunton, based on landscape impact. AM-P submitted further representations on behalf of Countryside Properties, stating that an extension to an existing village served by a railway station and community services and facilities must be more sustainable than a randomly located site on open green fields that is not contained by defensible boundaries. This same conclusion was made in the SA, February 2016, that stated specifically in respect of Dunton: “at the current time it remains appropriate to ‘flag’ the potential for **significant negative effects** given the uncertainty that remains regarding Dunton Hills Garden Village” (DHGV).
- 1.5 AM-P also argued that aside from the fact that DHGV was not supported by the SA, the emerging Plan was over reliant upon the allocation of DHGV to meet nearly 50% of the new housing proposed



in the borough over the plan period. The allocation had emerged at the last minute and was not justified or supported by an up-to-date evidence base.

- 1.6 The Council was subsequently advised to delay the emerging plan to allow time to commission more evidence base reports and undertake further regulation 18 consultation. This stage of Local Plan preparation has now been reached. However, we submit that *there is still an incomplete evidence base* and without it a lack of robust assessment of sites to support the proposed strategic growth at DHGV. The supporting SA to the latest regulation 18 consultation plan, continues to find West Horndon (both east and west of the existing settlement) to be a viable option for growth. Land to the east of West Horndon being promoted by Countryside Properties, features in 4 out of 10 'reasonable spatial strategy alternatives' tested in the latest SA. In all cases land to the east of West Horndon is considered in place of DHGV, either with land to the west of the settlement or land at North Brentwood. The Green Belt Review after years of preparation remains in draft. It continues to conclude that developing land at West Horndon would be less harmful to the Green Belt than DHGV.
- 1.7 Proposals for DHGV have progressed at a pace, purely based on the political will of the Council for this development. Together with the promotion company CEG, the Council submitted an expression of interest in response to the government's Locally-Led Garden Villages, Towns and City opportunity. DHGV was one of 14 garden village schemes selected to receive financial backing from the government in January 2017. We submit that all this has taken place without any proper justification or detailed site assessment. There is a strong argument for an alternative spatial strategy for growth that distributes new homes more widely throughout the Borough and has less impact on the Green Belt and open green landscape. Now is the right time to undertake detailed site assessments to ensure that the most sustainable sites are taken forward in the plan to be submitted for examination in due course.



## 2.0 BRENTWOOD DRAFT LOCAL PLAN – PREFERRED SITE ALLOCATIONS, JANUARY 2018

- 2.1 The Draft Local Plan has been presented to members and the public as representing the Council’s *preferred land allocations*, albeit these remain as *draft*. Reference is made to an accompanying Sustainability Appraisal and to an evidence base “undertaken so far” and which remains to be completed. The Draft Plan does not provide any information on detailed planning policies, which are in the process of being reviewed and updated in the light of consultation representations made to the emerging Local Plan to date. This raises the question of how preferred land allocations have been identified when the guiding detailed planning policies have not yet been finalised.
- 2.2 Despite the draft nature of the proposed land allocations, the largest strategic site – Dunton Hills Garden Village – has been progressed as a new garden village, designated by the Government in January 2017. The Draft Plan claims to have arrived at a list of preferred allocations using a site assessment Matrix and supporting technical evidence. However we submit that consultation on the emerging plan to date has resulted in overwhelming objection to DHGV by key stakeholders including the public. In addition the technical evidence that should be available to support this key strategic allocation is absent. The SA finds greater favour in land at West Horndon as a strategic location for growth, than DHGV.
- 2.3 The Green Belt Study remains to be completed. Although referred to on the Council’s website as having been undertaken in January 2018, this ‘working draft’ was undertaken predominantly in 2017 and considerably earlier. An “Overview and Technical Note”, dated February 2018 refers to work undertaken back in 2013, which as we highlighted in previous representations to the emerging plan, found that DHGV location scored higher in terms of its contribution to the Green Belt than land at West Horndon. Work to date has yet to include detailed site assessments. The report confirms specifically: *“the scope of the study did not extend to the identification of Parcels that should be prioritised for allocation for housing, employment, or mixed use....”*
- 2.4 The evidence base document “Site Assessment Methodology and Summary of Outcomes” (January 2018) is also a working draft and to date contains no individual detailed site assessment. This document can have made no contribution to the selection of preferred development sites. Strategic sites are identified as DHGV, Brentwood North and West Horndon. Reference is made to Appendix 7, which simply comprises a table of sites and accompanying site location plans. No assessment is made of the individual sites. This document defers instead to the SA. The purpose of the technical document (Site Assessment Methodology and Summary of Outcomes) is unknown.
- 2.5 The draft plan states that in arriving at a list of preferred site allocations, the Council has developed a site assessment process that is *“robust, balanced and wide-ranging in terms of technical evidence material for each allocated and discounted site.”* There is no reference to the individual evidence base documents referred to. As stated above many of these are still in draft form, were prepared historically and/or claim that they have not influenced the selection of sites. The ‘robust framework’ for site selection is shown graphically on page 23 of the draft plan. Most of the critical stages of assessment remain to be undertaken. Important evidence base documents have not been updated/prepared in time to influence the Local Plan. This same argument has been at the heart of representations made by AM-P to the emerging Local Plan, on behalf of Countryside Properties, since 2013.
- 2.6 The previous Draft Local Plan of 2016 proposed an Objectively Assessed Housing Need (OAHN) of 362 dwellings per annum (DPA), i.e. a total of 7,240 homes over the plan period 2013 – 2033. More





recent household projections show lower figures. However Peter Brett Associates in considering key issues such as affordability and migration from London are proposing a revised figure of 380 DPA or 7,600 new homes over the plan period. Recent DCLG advice that was published on the assessment of OAN, showed a target figure of 454 DPA for Brentwood (9,080 over the plan period). For the time being the Council proposes to stick with the figure of 380 on the basis that the DCLG figures are the subject of consultation. However, the draft plan states that *“should the Council need to accommodate this significant increase in housing need, consideration is being given as to whether the delivery of DHGV could be accelerated to increase its dwelling yield within the plan period.”* Its current capacity is considered to be 2,500 with a possible total dwelling yield of 4,000 (3,500 to be built in the plan period). We submit that this assertion is made in the complete absence of a detailed site assessment. In any event this would result in a single development providing 46% of the housing required over the plan period. We have always questioned the ability of DHGV to provide even the lower figure of 2,500 homes, due to overriding constraints including:

- its ‘high contribution’ to the Green Belt (as identified by the Council’s consultants – Crestwood Environmental Limited, in 2016). This expansive agricultural site if wholly developed would significantly reduce the gap between West Horndon and Basildon. If it were to be progressed, a large area of open space would need to be provided in the east to prevent coalescence with West Horndon, and a potential deleterious effect on functional ;
- further land in the east and north would be required for structural planting;
- the site is at risk of flooding (zone 3); and
- lack of infrastructure provision. The proposals are a failed attempt at a cross boundary development with the district of Basildon. Previous links to the railway station and access via the existing built up area of Basildon, including public transport links, are now uncertain. The draft proposals to date (Government Bid document, 2017) show access to the proposed development site via the A128 to the east of the site and the intention to use the railway station at West Horndon. The construction of up to 4,000 new homes and all supporting infrastructure cannot be accommodated on the land available and would in any event create unacceptable impact on the existing settlement of West Horndon.
- The Councils of Basildon and Thurrock are opposed to DHGV. Back in January 2017 when Basildon Council became aware of the government’s decision to award funding for DHGV – at that time for 2,300 homes – it stated

*“Basildon Council objected to the proposal to create a standalone new village just over the administrative boundary in Brentwood borough in February 2016.”*

*“The council maintains the view that there is a lack of credible and robust evidence to justify that a new village in this Green Belt location is the best option for meeting Brentwood borough’s housing needs and continues to have doubts that it can be demonstrated as a legitimate proposal through the planning system.*

*“This initial investment by the Government is designed for a local planning authority to boost its staff resources or pay for key studies or assessments regarding their Garden Village proposals, and is therefore made at risk that the planning and legal processes may not conclude that the proposal should proceed any further.”*

Thurrock Council has similarly opposed the proposals for DHGV, stating that Brentwood Council has not thoroughly tested all the available options to accommodate the housing requirement within Brentwood.





2.7 With regard to its 5 year housing land supply the Council has recently confirmed that it is "unlikely to be able to demonstrate a five year housing land supply on plan adoption due to a significant rolling deficit". It claims: "one of the critical factors in this calculation will be the number and type of allocations that are deliverable in the first five years of the plan. A mixed portfolio of sites, including smaller greenfield/ Green Belt sites may form part of this approach, rather than over reliance on large scale strategic sites with longer delivery lead in periods and complex brownfield sites" (report to the Extraordinary Council Meeting, BBC on 15 November 2017). The current proposal to meet potentially up to 46% of its housing need on one site, is contrary to the requirement of the Council to demonstrate a five year supply of land for housing. A large proposal such as DHGV will have considerable lead in time and not be able to contribute to housing need in the early years of the plan. The Council has explored alternatives to meet growth needs. An option to meet all strategic growth needs at West Horndon (1,200 to the west and 1,000 to the east) would with other brownfield and greenfield development spread throughout the borough, provide a total of 7,960 new homes or 398 dpa. When considered against OAHN this would represent an over provision by 5%.

2.8 In allocating DHGV as a new garden village the Council has accepted in principle the need to build in the Green Belt if it is to meet OAHN in the plan period. We submit that the higher target figure of 454 dwellings per annum or 9,080 over the plan period, proposed by DCLG in September 2017, should be taken as the appropriate target for growth going forward. The adjoining District of Basildon is at a similar stage in the plan making process and is another local authority under immediate threat of government intervention in its plan making process. It is proposing to adopt a level of growth in housing consistent with the government's advise on a standardised 'methodology' for calculating housing need, and household projections issued in September 2017. Like Brentwood, Basildon is a predominantly Green Belt authority. Officers of the Council have advised the Infrastructure, Growth and Development Committee (7/12/2017) on a review undertaken of adopted Local Plans across England with an emphasis on the relationship between Green Belt policy and housing supply. Officers found:

*"While there are a number of local authorities who have been unable to meet their full objectively assessed need for housing, there are no instances where Green Belt alone has been the constraining factor, and indeed several Green Belt authorities who have sought to use Green Belt as a constraint have had their Examinations in Public paused, to allow for additional housing sites to be identified. Reigate and Banstead, and Lichfield are examples of Council's which have experienced this issue. Whilst each plan is judged on its individual circumstances, there are no known instances of where an authority has had a plan found sound, by failing to secure a substantial element of its housing need as a result of applying the Green Belt constraint. The need for housing land does therefore emerge through numerous Local Plan Examinations in Public, as an 'exceptional circumstance' for releasing land from the Green Belt."*

2.9 Officers at Basildon refer to the 2015 High Court case of Calverton Parish Council v Nottingham City Council and others, which provided a judgement which has been widely used to determine whether exceptional circumstances exist in relation to development needs. Some types of development and locations will give rise to exceptional circumstances and others will not. The five tests are identified as follows:

- (i) *The acuteness/intensity of the objectively assessed need (matters of degree may be important);*
- (ii) *The inherent constraints on supply/availability of land prima facie suitable for sustainable development;*



- (iii) *(on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt;*
- (iv) *The nature and extent of the harm to the Green Belt (or those parts of it which would be lost if the boundaries were reviewed): and*
- (v) *The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.”*

2.10 These are then explored in BDC’s Green Belt Topic Paper. In terms of acuteness of need the Council looks to meet full OAHN in accordance with the government’s latest recommendations for growth. In terms of ‘supply’ a full assessment of each individual site - put forward to the Council in a call for sites - has been undertaken in its HELAA to ensure that development locations are suitable, available and achievable. Sufficient sites outside the Green Belt cannot be found to meet the need identified in test 1. Reference is made to all adjoining Boroughs, which also sit within the Green Belt *“and will have to consider land within the current extent of their respective areas of Green Belt for housing purposes”*. These are therefore unable to assist under a duty to cooperate. Brentwood Borough is specifically referred to as having urban areas entirely surrounded by Green Belt and *“therefore having to consider applying these tests itself”*. Basildon officer stress the importance of the Green Belt review in assessing individual sites and identifying sustainable opportunities for growth. Members resolved to:

*“Understand that exceptional circumstances may exist to justify the consideration of sites in the green belt for the provision of housing development but expect that no building on green belt land would take place until the specific site has been assessed on a site by site basis and agreed by the appropriate Council Committee”*.

- 2.11 At the same meeting of the Infrastructure Growth and Development Committee, proposals for some 2,300 homes on the western edge of Basildon (H10) were considered and members accepted a recommendation for inclusion in the emerging Local Plan. These proposals do not extend as far as the local authority boundary separating Brentwood and Basildon. DHGV is however proposed to extend up to this boundary leaving an unacceptably small gap and therefore resulting in a very harmful effect on the purposes of the Green Belt, particularly that of coalescence. Overall it is submitted that BBC falls behind Basildon in properly assessing the Green Belt. Furthermore BBC has yet to fully assess individual sites and the contribution these make to key purposes of the Green Belt.
- 2.12 Officers from the adjoining borough of Thurrock have similarly advised members of the importance of meeting the full OAHN and the need to develop in the Green Belt to meet some 26,000 homes. (Report to Planning, Transport, Regeneration Overview and Scrutiny Committee, 12 September 2017). Members have been warned of the negative consequences to the borough of not providing sufficient housing and the importance of a Green Belt review to identify sites that minimise environmental impact. As another predominantly Green Belt authority, Thurrock is proposing to meet future housing need by building on greenfield land in the form of large urban extensions.
- 2.13 On 5 March 2018 the government released the National Planning Policy Framework – Consultation Proposals. This continues its objective to create reform that will allow more homes to be built. Draft text sets out a clear expectation for objectively assessed needs to be accommodated unless there are strong reasons not to. The importance of Green Belts continues to be stressed, together with their alteration only in exceptional circumstances. *“When drawing up or reviewing Green Belt boundaries, the need to promote sustainable patterns of development should be taken into account.”* *“Where it has been concluded that it is necessary to release Green Belt land for development, **plans should give first consideration to land which has been previously developed and/or is well***



**served by public transport**” (paragraph 137) (our emphasis). They should also set out ways in which the impact of removing land from the Green Belt can be offset through compensatory improvements to the environmental quality and accessibility of remaining land.



### 3.0 SUSTAINABILITY APPRAISAL

- 3.1 An interim SA report (SAR) on the Brentwood Local Plan- Preferred Site Allocations, was published by AECOM in January 2018. Our comment on this report is confined to the comparative assessment of strategic sites for development to meet housing needs. We continue to support the broad distribution for growth that seeks a spatial strategy focused on the A12 and the A127 transport corridors. We do however object to the matter of balance between the corridors and the identification of preferred strategic site options within them.
- 3.2 The SA confirms that a number of strategic site options have been examined over the years and genuine contenders are:
- **Dunton Hills Garden Village**, described as coming forward in the Local Plan since 2016;
  - **West Horndon**, where a strategic extension has been considered as a central element of the plan dating back to 2013. This is described as having been rejected in favour of DHGV. However despite the potential benefits of expansion at this location, highlighted in the 2015 and 2016 SARs, a scheme at this location is said to be notable for the level of opposition from local residents. Additional comments include Duty to Cooperate considerations given the southern boundary of West Horndon with Thurrock; the stated feasibility of a scheme in the north-west or north-east of the village or both; and potential cumulative impact with the redevelopment of West Horndon industrial estate, DHGV and Thurrock;
  - **North of Brentwood**. This featured in the 2015 and 2016 SARs. Proposals are not advanced however and landownership is fragmented. Major road infrastructure upgrades would be required and there is the potential for cumulative impact with other extensions to Brentwood /Shenfield.
- 3.3 The only real support for DHGV to justify its elevation to a 'preferred allocation' is that the scheme is 'supported by the Council'. The only reason given for rejection of West Horndon is opposition from local residents. In fact consultation on DHGV led to past wide-scale objection from the public and key stakeholders, which the Council has chosen to ignore.
- 3.4 In the context of a lack of overwhelming support for DHGV and failure to give substantive reasons to reject West Horndon, the SA identifies 10 'reasonable spatial strategy alternatives' for growth. The SA maintains that land to the east of West Horndon would only be suitable in conjunction with land to the west. It could not be allocated in addition to DHGV. It is also described as a 'more constrained site' but no reasons are given. Table 6.2 on page 26 includes land to the east of West Horndon in 4 out of 10 options (it is included in option 1, 6, 9 and 10). Between 500 to 1000 homes are proposed in the various options. All options are capable of exceeding OAHN in Brentwood Borough. Appraisal of these alternatives is set out in section 7 of the SAR. This is full of inaccuracies and misleading comments. Examples are set out below:
- Air Quality. We support the view that West Horndon is preferable from the perspective of minimising traffic and hence the knock on positive implications for air quality. We do not accept that significant opportunities exist at DHGV around the need to minimise travel. This is an isolated green field site that has problems relating to access from the surrounding road network. It is disconnected from existing public transport links and distant from a railway station.
  - Communities and wellbeing. The fact that development at Brentwood and West Horndon would not benefit from national funding as a garden village, lies at the heart of comments in



this category. Public objection to DHGV and impact on the settlement of West Horndon is ignored.

- Flooding. An area of fluvial flood risk that intersects the west of DHGV is acknowledged. Comment that this can be avoided given the extent of the site is doubtful. The number of homes being proposed at this location has gone up from 2,500 to 3,500 in the plan period with another 500 beyond.
- Deliverability. It is stated that little or no work has been undertaken in terms of delivering a North Brentwood scheme and that major transport upgrades would be required. We submit that the same criticism can be levelled at DHGV. Even the bid document to the government is lacking in detail on access. The document reads as a series of objectives and aspirations with no justification on viability or achievability. Options 7 to 10 are judged to perform best as they provide the most housing and would provide for in excess of 454dpa, which is the figure suggested by the government's draft standardised methodology for OAHN. Land to the east of West Horndon is included in two (options 9 and 10). DHGV features in only one (option 8).
- Landscape. The SA confirms that "work has been completed to ascertain how landscape impacts associated with DHGV could be mitigated and minimised." There is no reference to where this work can be found. Later in the SAR at paragraph 10.10.1 it is confirmed that "there will be good potential to avoid/mitigate effects; **however there is some uncertainty and a need for further work to examine options**". "It is noted that, whilst there is the potential to make use of some clearly defined physical features (A127, A128, railway line) it may be a challenge to ensure a defensible long term boundary separating the Garden Village from west Basildon (where there is a planned urban extension). West Horndon is described as a flat landscape that should lend itself to relatively effective screening. Option 1 performs best in landscape terms. This relates to development at West Horndon, east and west alone. It proposes the lowest level of growth but would still deliver 5% growth above OAHN. At the current time the SA 'flags' **significant negative effects** (highlighted in the SAR in bold and red, paragraph 10.10.6). Appendix III (page 75) confirms that on the matter of landscape only **limited data is available to inform the appraisal**. Appendix III clarifies that "Work is ongoing to ensure that all site options are categorised in terms of potential for landscape impacts and also the potential to result in loss of functional Green Belt (i.e. Green Belt that meets the established purposes). This work will be drawn upon in the future". Without this we submit that there is nothing to set DHGV apart from West Horndon in terms of its 'preferred' status.
- Conclusions. All options have pros and cons. Option 1 (Land to the east and west of West Horndon) performs best from a landscape perspective. This is important given the Green Belt status of all options and it would still be capable of exceeding OAHN. Option 3 (DHGV only) is said to have drawbacks in respect of biodiversity, landscape and housing.

3.5 Despite the above conclusions Option 3 DHGV only, is selected as the 'preferred approach'. The conclusion that this performs well in sustainability objectives is incorrect and ignores key issues such as landscape, in a borough juggling with the need to minimise impact on the Green Belt. It is an isolated site with no transport connections and cannot compare to the sustainability score given to West Horndon, served by a train station and other existing public transport links. The NPPF consultation document just released by the government is clear in advising that where it is necessary for plans to release Green Belt land for development, this should start with brownfield sites and those well served by public transport. The preference for Dunton Hills as a location for large-scale growth, instead of West Horndon, is contrary to this latest advice.

3.6 The table on pages 78 of the SAR presents a summary appraisal of all site options. If a numerical score were to be applied to the colour coding system used then land at West Horndon would score

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Land to the east of West Horndon

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considerably lower than DHGV thus demonstrating that it represents a significantly better option for sustainable, strategic growth. This is the same conclusion that previous versions of the SA have reached over several years. It is only the political will of the Council that has resulted in the preference for Dunton Hills.



#### 4.0 LANDSCAPE AND GREEN BELT MATTERS

- 4.1 Since 2013 BBC has been commissioning consultants to assess potential housing and employment sites in the Green Belt. This work was eventually published in February 2016. A report by Crestwood Environmental Limited was clear in stating that it is not a review of detailed Green Belt boundaries nor does it seek to identify sites to be prioritised for development. Its findings contravened the Draft Local Plan (2016) strategy for growth and identification of Dunton as the sole allocation for strategic growth. The study by Crestwood back in early 2016 concluded that Dunton is one of 7 sites out of 203 assessed, which makes a ‘high’ contribution to the Green Belt. The analysis found that “This expansive agricultural site if wholly developed would significantly reduce the gap between West Horndon and Basildon, as well as presenting large scale development along the A127 leading east from the M25.” The site was found to be “not contained”, to have “significant separation reduction” and a harmful effect on functional countryside. Land at West Horndon is found to make only a ‘moderate’ contribution to the Green Belt. Development on land to the east of the settlement would decrease the gap to Basildon but still retain a functional open space with very limited or no visual linkages. There would be some loss of countryside if developed. Land to the north-east would lead to larger encroachment of the countryside but not to the coalescence with other towns.
- 4.2 The Council’s website now shows ‘updated’ work on the Green Belt by Crestwood Environmental Limited, November 2017 and January/February 2018, which reaches different conclusions on the contribution to the Green Belt made by land at Dunton Hills. The findings relating to West Horndon are unchanged. The draft working study continues to confirm that it is not intended to provide evidence of exceptional circumstances to revise the Green Belt nor can it be used to justify the allocation of land for development. Furthermore, Part 3 – Detailed Site Assessment leading to Part 4 the Site Assessment Process still **remains to be undertaken**.
- 4.3 Crucially this latest study has downgraded the importance of the parcel of land at Dunton Hills in terms of its contribution to Green Belt purposes. It has gone from a ‘high’ status to a ‘moderate to high’. Land at West Horndon remains classified as ‘moderate’. There is no explanation of this change in the latest published report. Examination of individual site assessment tables in the 2016 study and that undertaken in late 2017, indicate that the results in terms of overall contribution to the Green Belt, are contrived. They have been prepared retrospectively to justify the Council’s wish to promote DHGV.





## 5.0 LAND TO THE EAST OF WEST HORNDON – A JUSTIFICATION FOR STRATEGIC GROWTH

- 5.1 West Horndon is a settlement capable of absorbing significant growth. This has been strongly supported in the emerging Local Plan for Brentwood, going as far back as the SHLAA in 2009. A significant amount of growth can be focused on the settlement because it is relatively unconstrained by landscape and visual effects, and offers opportunities to mitigate the impacts of development by integrating them into the existing landscape. Green Belt releases are inevitable in the Borough in order to meet OAHN. In a Borough where 89% lies within the Green Belt, this privately owned land at West Horndon, that has been the subject of years of intensive farming, represents one of the least attractive and lowest amenity parts of the Green Belt that could be released to meet housing and employment needs.
- 5.2 The evidence base to the emerging Local Plan although always limited in extent, has consistently supported growth in the A127 corridor, where land at West Horndon has proven to be the most sustainable option for new development. A landscape-led approach to development at this location, proposed by Countryside Properties, shows that it is possible to create an urban extension rooted in its context, which also offers opportunities for biodiversity enhancement and restructuring of green infrastructure (see appendix 4 to Appendix 1 to these representations).
- 5.3 Proposals for strategic growth on land to the east of West Horndon by Countryside Properties, include a number of improvements to the existing settlement:
- Contributions towards improving the ‘heart’ of the village
  - New gateway feature
  - Extension to existing school/medical centre, or new facility
  - Affordable housing
  - Improved access and connectivity
  - Greater provision of accessible public open space
  - Improved station parking
  - Disabled access to station platform
  - Pedestrian crossing
  - Improved bus provision and frequency.
- 5.4 In considering ways to improve the existing settlement, Countryside Properties has in the past referred to the West Horndon Parish Council – Annual Statement. This highlights where contributions are needed towards new and existing facilities. For example, the need to improve pedestrian safety and disabled access to the railway station platform. Improved station car parking is required as well as improved bus provision including frequency and speed of service and a contribution towards improving the ‘heart’ of the village.
- 5.5 The settlement lies in the A127 transport corridor, found in a transport assessment by Essex County Council and Southend-on-Sea Borough Council to have the greatest capacity for growth in the Borough. It is viewed as a vital artery to economic competitiveness. Strategic growth in this location will assist in the funding and delivery of a number of transport related benefits that have historically been sought. The above mentioned report remains the only piece of background evidence relating to transport that has been prepared in the context of the emerging Local Plan for Brentwood. A Highway Modelling report undertaken in 2016 is still in draft form.
- 5.6 Transport consultants Odyssey Markides (OM), have been engaged by Countryside Properties to assess land at West Horndon from a transport and access perspective. OM confirm in a report,



appended to Appendix 2, that land to the east of West Horndon is within walking distance of numerous services and facilities within the existing settlement, including a railway station, and that it is suitably located to connect to the good quality existing pedestrian network in the village. The site represents a sustainable location for new housing in terms of its accessibility via non-car modes and is therefore in accordance with the NPPF (paragraph 34). Furthermore the development could help to realise the Parish Council's wish for pedestrian related improvements in the centre of the village. Although there is little in the way of cycle facilities throughout the settlement, proposed development could fund additional cycle parking at the railway station and in the centre of the village. Further cycle routes could be facilitated.

- 5.7 The centre of the site is within a c. 1.4km walk of West Horndon railway station and there is a good existing footway network between the site and the station. Due to the frequency of trains to and from London and Southend there is no option to increase the number of trains. However there is an option to increase the number of train carriages from eight up to twelve. It is understood that the Parish Council would like to see improvements to the footway linking the railway station with that adjacent to station road. It would be possible to provide disabled access that is currently lacking, and additional car/cycle parking at the railway station to cater for increased demand in the future.
- 5.8 West Horndon benefits from a good bus network that future growth could significantly improve via increased revenue from future residents and from developer funding. The key strategic road in the vicinity of the site is the A127 Southern Arterial Road, which connects the M25 (junction 29) to Southend. The A127 is a dual carriageway subject to the national speed limit. There are a number of left-in left-out junctions connecting to the A127 in the vicinity of the site that are substandard, such as Thorndon Avenue and Childerditch Lane. The A127/A128 Halfway House junction is an all movements grade separated junction to the north east of the site. The "A127 – Corridor for Growth: An Economic plan" is a joint strategy between Essex County Council and Southend-on-Sea Borough Council to assess the current issues and potential future improvements to the A127 corridor. The study confirms the corridor's economic importance and suggests improvement works to provide greater journey time reliability to facilitate future growth in the region. The introduction of variable speed limits and realignment of junction entries would assist in improving visibility, reducing collisions and increasing reliability. This may however increase journey times.
- 5.9 It is understood that there is local concern regarding the movement of heavy goods vehicles through the village. There is the potential for a traffic calming scheme to be implemented on Station Road to slow HGV movements.
- 5.10 Suitable access to the site can be achieved for all modes of transport. The site has frontage in excess of 500m onto both sides of Station Road between West Horndon and the A128 Tilbury Road. The highway alignment along the site frontage to Station Road is relatively straight and therefore providing a site access junction with suitable visibility splays onto Station Road is comfortably achievable. There is an existing gap in the hedge/tree line along Station Road that currently provides access to the field. It is this gap in the hedge that could be used to enable a site access to be achieved with Station Road.
- 5.11 There is the potential to develop land to the east and west of the settlement of West Horndon and provide a balanced urban extension that builds upon and strengthens the existing centre, by adding to its services and facilities. Appendix 2 includes a detailed landscape and Green Belt analysis together with a transportation assessment. These assessments are submitted in the absence of such analysis having been undertaken by the Council. Furthermore they demonstrate that West Horndon features most favourably in the comparative assessment of sites for strategic growth, including land at Dunton.



- 5.12 As the attached analysis demonstrates, land being promoted by Countryside Properties has no overriding environmental, technical or land ownership constraints to prevent development. Its merits are reflected in various versions of the SA.
- 5.13 Another important advantage of the proposed development on land to the east of West Horndon is that it is capable of being delivered in the short term, and can make an early contribution towards the Council's Five year housing land supply. This is in stark contrast to land at Dunton which is not envisaged to come forward until later in the plan period. Although there is no housing trajectory available, the officers' report to committee 15/11/2017 confirmed that the Council is *"unlikely to be able to demonstrate a five year housing land supply on plan adoption due to a significant rolling deficit"*. It claims: *"one of the critical factors in this calculation will be the number and type of allocations that are deliverable in the first five years of the plan. A mixed portfolio of sites, including smaller greenfield/ Green Belt sites may form part of this approach, rather than over reliance on large scale strategic sites with longer delivery lead in periods and complex brownfield sites"* A large proposal such as DHGV will have considerable lead in time and not be able to contribute to housing need in the early years of the plan.
- 5.14 To conclude this section of the representations that justify growth on land to the east of West Hordon we summarise key benefits that would arise from development:
- Countryside Properties track record of delivering high quality strategic schemes with genuine a sense of place and integration with existing villages
  - Fully deliverable and fully sustainable- within a 5 minute walk of the existing railway station and
  - local facilities and services.
  - Delivery of much needed high quality housing in the Borough.
  - Development early on in the plan period with minimal infrastructure required to access and deliver proposals.
  - Delivery of new open space, recreational facilities, primary school, new connections to wider countryside.
  - Improvements to the existing village.
  - No significant impact on the Green Belt, landscape character and visual amenity.
  - Development proposals can fully mitigate its impact.
  - Comprehensive illustrative masterplan.



## 6.0 SUMMARY AND CONCLUSIONS

- 6.1 BBC continues to progress its Local Plan without the benefit of a complete, robust and up-to-date evidence base. This has been the position since at least 2013.
- 6.2 The pivotal site in the latest consultation plan is DHGV. The Council sees this as the answer to its housing problems and an impending threat from the government to intervene in its local plan process.
- 6.3 The selection of DHGV by the government in 2017 as a potential garden village should not be taken by BBC as license to make a local plan allocation or justify the grant planning permission for development. It remains the case that planning and legal processes will need to find the spatial strategy for growth, which centres on DHGV, to be sound.
- 6.4 The SA continues to find favour in land at West Horndon for strategic growth. A draft Green Belt study has been amended in the last year to ensure more favourable results for land at Dunton Hills. Without any proper explanation for this change it can only be surmised that this change has been made to justify the Councils preferred allocation for strategic growth in the Borough.
- 6.5 A number of spatial strategies for growth have been considered by the Council in conjunction with allocations on brownfield and greenfield land spread throughout the borough. As an alternative to DHGV the Council has considered land to the east of West Horndon to be developed in conjunction with land to the west of the settlement. This would exceed OAHN by 5%. Alternatively land to the east of West Horndon could be considered in conjunction with growth at North Brentwood and still considerably exceed growth needs in the plan period.
- 6.6 There is an opportunity now to take stock and reconsider the most sustainable strategy for growth. The evidence base documents prepared to date, show greater support for land at West Horndon. It remains the preferred location to accommodate strategic housing development.