



**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

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## 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):

**General comments and Duty to Co-operate matters on the Brentwood Draft Local Plan Preferred Sites Allocation.**

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):

Thurrock Borough Council has considered the consultation on the Brentwood Council Draft Local Plan Preferred Site Allocations Consultation and sets out below its formal response.

Thurrock Council welcomes the opportunity to discuss the comments submitted and requests to be consulted and engaged at further stages of the Brentwood Local Plan under Duty to Co-operate arrangements.

### Summary of Thurrock Council Response

Thurrock Council supports in principle the approach taken by Brentwood Council to accommodate its objectively assessed need within Brentwood's boundary, whilst recognising this is an ambitious growth agenda.

However Thurrock Council is concerned with regard to the spatial strategy and the levels of growth proposed in the A12 and A127 corridors and considers that Brentwood Council has not thoroughly tested all reasonable options. Thurrock Council also remains concerned about the identification and impact on the Green Belt of the proposed free standing Green Belt settlement of Dunton Hills Garden Village. In addition limited new or updated evidence has been made available to demonstrate the deliverability or viability of such a scheme.

It is considered the Brentwood Draft Local Plan and supporting evidence base will require further revision and consultation with ongoing duty to cooperate with adjoining local authorities. In particular the preparation of the draft Brentwood Local Plan should be reviewed to take account of the outcome of testing of other spatial options being considered by the South Essex authorities as part of the preparation of a Joint Strategic Plan.

Thurrock Council wishes to clarify that its representations to the earlier consultations of the Brentwood Local Plan with regard to the spatial strategy and Dunton Hills Garden Village (and earlier proposed Garden Suburb) still stand. Due to the issues highlighted in this response and to the earlier documents it is considered that Brentwood Council needs to carefully consider how it proceeds with the preparation of the Local Plan and the timetable for its production.

### Local Plan approach and Duty to cooperate

The overall approach of the Brentwood Local Plan remains the same as the previous consultation of 2016 with Brentwood Council proposing to accommodate all of the identified objectively assessed need for housing and employment within the Borough Boundary during the plan period of 2013-2033. The Local Plan includes a revised housing requirement of 7600 dwellings (up from 7,240 dwellings in the 2016 Local Plan consultation) and a provision of approximately 47.4ha of net employment land.

Thurrock Council supports in principle the approach of Brentwood Council to accommodate all of its needs within the Borough whilst recognising this is an ambitious growth agenda.

Brentwood Council intend to plan for housing numbers and land supply slightly above the currently identified Objectively Assessed Housing Need of 380 dwellings per year to allow some degree of flexibility and to make a contingency for future housing requirements. Furthermore it is noted that the Council considers that there is potential to accommodate the housing numbers proposed by the Government proposed standardised methodology with further capacity at Dunton Hills Garden Village.

Thurrock Council seeks further clarification as to whether level of growth proposed for Brentwood could be accommodated in the plan in light of the concerns to current proposed strategic location at Dunton Hills Garden Village to accommodate this growth and would wish to further engage with Brentwood Council to discuss that other alternative options in the borough have been properly considered.

There has been ongoing engagement with Brentwood Council under the Duty to Cooperate since the 2016 draft consultation Local Plan. It is recognised that Brentwood has undertaken consultation and engagement on its various technical studies such as the SHMA, employment study and Green Belt review through workshops, meetings and correspondence. There has been a specific workshop on the A127. An officer working group set up to consider strategic transport matters and duty to cooperate has resulted in a Statement of Common Ground signed by South Essex authorities, the LB Havering and Highways England. More recently Brentwood Council has engaged in the South Essex Members and Officer groups.

In addition a number of meetings have taken place between officers of Thurrock and Brentwood Council. At all of these DTC meetings Thurrock Officers have reiterated the objection to Dunton Garden village and suggested that alternative options are investigated including potential development at West Horndon and A12 Corridor.

### Key issues under the DTC

Thurrock Council considers that there are key strategic issues and cross-boundary matters of importance in relation to the preparation of the Brentwood Local Plan that should be addressed through further engagement and collaboration between Brentwood Council and Thurrock Council and with the other South Essex authorities under the Duty to cooperate. The key matters include:

- Confirmation of the Brentwood Objectively Assessed need and whether the borough can accommodate its need;
- The spatial strategy and alternative options within the A12 and A127 corridors to accommodate the growth;

- The Thurrock Council concerns regarding the justification of Dunton Garden Village and the need to consider of alternative options at West Horndon;
- Transport and other infrastructure Issues;
- Further development of the Brentwood Local Plan evidence base;
- The development of the South Essex Joint Strategic Plan and evidence.

In particular in recognition of the Thurrock concern about Dunton Hills Garden Village and due to its location close to and adjoining the boundaries between the two authorities Thurrock Council requests further engagement on this development and considerations of alternative options along the A127 Corridor and elsewhere.

To ensure more effective collaboration and joint working it is suggested that Brentwood Council should progress key strategic matters through the South Essex Joint Strategic Plan process as well as with individual local authorities on cross- boundary matters.

Since the summer of 2017 the leaders and chief executives of the South Essex Councils with the inclusion of Brentwood Borough Council and Essex County Council have also come together to develop a shared long term place vision for South Essex and develop the scope for greater strategic collaboration. By late 2017 work on the vision has resulted in the South Essex 2050 Ambition which includes agreement on the key policy themes to be supported, identifies six growth areas to be promoted and the establishment of new joint working arrangements including strategic planning.

In early 2018 the leaders and chief executives have committed to continuing with the vision and formalising the collaboration by forming an Association as agreed in a MOU and known as the Association of South Essex Local Authorities (ASELA). The aims of ASELA include providing place leadership, and the opening up of space for housing, business and leisure development by developing a joint spatial strategy.

More recently the ASELA Councils have begun considering more detailed arrangements for joint strategic planning including an expression of interest in becoming a pilot for the Government's proposed Statement of Common Ground, the commissioning of further technical studies and the consideration of the exact nature and status of the joint spatial strategy including the possibility of producing a Joint Strategic Plan (JSP).

A key issue for Brentwood Council will be the need to consider how the emerging New Local Plan will align with the preparation of the joint strategic planning both in terms of the content and nature of the local plan that the Council intends to prepare but also in its timing and production especially if the South Essex Councils agree to move forward with the option of a statutory joint strategic plan.

The South Essex authorities are considering spatial options to assess the capacity of South Essex to deliver its growth ambitions and are commissioning a spatial options study as part of the evidence to inform the Joint Strategic Plan preparation. In consideration of locations and strategic sites for growth a range of options including alternatives to Dunton Hill Garden village should form part of the options testing as part of this study. Therefore it is considered premature for the Brentwood Plan to progress until the outcome of this options testing is known and the locations and nature of growth has been advanced with a degree of certainty.

It is acknowledged that additional or updated elements of evidence base has been produced by Brentwood Council since the last local plan consultation of 2016 including a strategic Housing Market assessment update 2018, draft Green Belt review and economic assessment. However other elements of the evidence base do not appear to have been produced or published to support the site proposals in the draft plan such as the HELAA, transport and other infrastructure assessments.

Brentwood Council will need to consider how much additional evidence base for housing need and capacity can be prepared in partnership with adjoining authorities and the other South Essex authorities. The South Essex Authorities are considering the commissioning of additional elements of evidence base to support the preparation of the joint strategic planning including a review of the South Essex SHMA, a spatial options study including a high level housing land and capacity assessment and further infrastructure studies.

The outcome of these studies and the preparation of the joint strategic planning will have implications for the nature and scale of housing provision across South Essex including Brentwood and the approach to be taken in the Local Plan.

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)**

## 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):

### Housing Need

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):

It is noted that the revised assessment of Objectively Assessed Housing Need 2018 provides a figure of 380 dwellings per annum and 7600 dwellings over the plan period 2013-2033. The OAHN figure is based upon a demographic derived need of 280 dpa uplifted by 30% to take account of market signals and 6% contingency figures to allow for possibility of increase due to new official population and housing projections. There is no employment uplift to these figures.

The Government published in September 2017 draft potential options for a standardised methodology for assessing OAN. The draft paper recommends a target for Brentwood Council of 454 dwellings a year. It is accepted that the Government methodology is only draft and there are uncertainties as to when the final methodology will be published and whether the OAN figure for authorities will have altered significantly. Revised population and household projections are also due to be published by the Government and will need to be considered as part of the assessment of any revised OAN figures. Therefore at this stage there remains uncertainty on the future figure of OAN for Brentwood. The Council will need to take into account the expected changes to the methodology, population and household projections along with other evidence for housing need as it moves to the next stages of plan preparation.

The South Essex Authorities are considering the commissioning of additional elements of evidence base to support the preparation of the joint strategic planning including a further review of the South Essex SHMA that would incorporate the outcome of changes to projections and methodology referred to above. It is considered that as a partner in the joint working that Brentwood Council should include any review of its OAHN in the South Essex review SHMA.

It is stated in the consultation document that Brentwood Council are to plan housing numbers slightly above the currently identified Objectively Assessed Housing Need of 380 dwellings per year to allow some degree of flexibility and to make a contingency. Furthermore it is noted that the Council considers that there is potential to accommodate the housing numbers proposed by the Government proposed standardised methodology with further capacity at Dunton Hills Garden Village.

Thurrock Council therefore seeks further clarification as to the actual level of housing requirement and provision that will be included in the local plan and that this can be accommodated within the Brentwood Borough boundary.

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## YOUR COMMENTS

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**Housing Supply**

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):

The Consultation document clearly sets out the current position with regard to proposed housing supply with a total provision identified of 8,263 dwellings of which 6,154 dwellings are the proposed allocated sites and with Dunton Hills Garden Village allocation representing 30% of the Brentwood housing supply.

However in relation to the evidence base for housing land supply it appears that Brentwood has still not completed a Strategic Housing land Availability Assessment since 2011 and is updating the Housing and Economic Land Availability Assessment. It is suggested that this evidence is provided in order to justify the sites that are being proposed for allocation. These assessments should review and identify whether sites are suitable, available and achievable in planning and viability terms.

A Site Assessment Study has been produced in 2018 that sets out how sites have been selected for inclusion as allocations. However it is also not fully clear how the sites for proposed allocations have been included and others discounted. Further evidence is required to understand why the proposed allocated sites are considered suitable in updates to the land supply and further information provided from Green Belt review, landscape and infrastructure.

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## 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):

### Infrastructure Planning

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):

Brentwood Council continues to develop the infrastructure planning evidence base and is producing an Infrastructure Delivery Plan (IDP) which is being updated as a “live document”. However both the Preferred Site Allocations consultation document and IDP only contain assessments of infrastructure focusing in particular upon education and health. Significant elements of infrastructure such as transport and Green infrastructure are not included. Furthermore the assessments of infrastructure for Dunton Hills Garden Village are not currently included in the assessments and it is stated this work is still subject to ongoing options under master planning for the site.

Thurrock Council has made previous representations with regard to the lack of availability of evidence base and in particular with some aspects of infrastructure including transport. It is considered that significant elements of the infrastructure evidence base are still required to be produced and or published in order to justify the overall level of growth, the approach to the spatial strategy and the sites allocations being proposed by Brentwood Council in the local plan.

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## YOUR COMMENTS

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### Spatial Strategy

Please specify if you Support, Object or are providing a General Comment:  
(tick as appropriate)

Support	<input type="checkbox"/>
Object	<input type="checkbox"/>
General Comment	<input type="checkbox"/>

**Comments** (please use additional sheet if required):

The Preferred Site Allocations consultation document states that the spatial vision and strategy for Brentwood remains largely as set out in the 2016 draft Local Plan consultation with development concentrated on land within the borough's transport corridors with Brentwood and Shenfield the main focus of development in the A12 corridor and strategic allocations in the A127 corridor at Dunton Hills Garden Village and Brentwood Enterprise Park. However the revised strategy restates maximising brownfield development and sustainable urban extensions in the transport corridors but also introduces limited growth at larger villages and reinforces the role of a new settlement at Dunton Hills Garden village including the potential for additional dwelling capacity.

Thurrock Council objects to the spatial strategy and the various elements as proposed. It is unclear why the spatial strategy should advocate a free-standing greenfield settlement in the Green Belt and that this should be the preferred location for development compared to existing settlement expansion or green field urban extensions which are likely to be more sustainable and closer to existing transport and other existing infrastructure and services.

Thurrock Council considers that the most appropriate spatial strategy would be a variation of the previous options with growth including Green Belt release concentrated in the A12 Brentwood/Shenfield corridor but with some potential for Green Belt release at West Horndon.

Further specific issues on the spatial strategy are set out below. This response should also be read in conjunction with comments submitted at the previous stage Growth Options consultation and the separate Dunton Garden Suburb Consultation

### **A12 Corridor.**

Thurrock Council considers there is further significant potential to provide housing and other development in the A12 Corridor Broad Area including the potential for urban edge expansion of settlements. Areas to the north of Brentwood and north, east and south east of Shenfield and Pilgrims Hatch and south of Hutton should be subject to further consideration for edge of settlement expansion as part of a Green Belt Review. It is considered due to the size and extent of the Green Belt in these locations that a limited number of urban expansions are less likely to have a significant harm to the openness of the Green Belt than locations in other broad areas.

The suggested A12 corridor locations have good existing transport services and community infrastructure and open space. The locations are also within reasonable distance of the railway stations.

Thurrock Council considers the role and potential economic and housing benefits of Crossrail in particular with regard to development at Shenfield have not been fully assessed and incorporated into the emerging Brentwood Local Plan, either as part of the current stage or previous consultations.

It is suggested that the role and development of Brentwood and in particular Shenfield as a terminus of Crossrail should be thoroughly investigated and its potential role to accommodate further growth over the period of the local plan and beyond. The implications of the potential to accommodate more growth and associated infrastructure requirements need to be considered with some weight as a way of meeting the undersupply of housing requirement currently identified in the Brentwood Local Plan options and supporting evidence.

The A12 widening and delivery of Crossrail will bring about significant increased capacity and accessibility improvements to transport infrastructure for Brentwood in the A12 Broad Corridor during the later-part of the plan period. This will make the A12 Corridor broad area more suitable for development opportunities.

There is also concern as regards the lack of a published detailed evidence base assessing the transport impacts of the various spatial strategy options and a detailed housing, economic and transport assessment of the impacts of Crossrail and with particular reference to Shenfield. It is understood that the technical assessment is being undertaken.

### **A127 Corridor**

Thurrock Council remains concerned about the proposal for any large scale Strategic Green Belt releases either at Dunton Hill Garden Village or the previous option for the Dunton Garden Suburb. There does not appear to be a sufficiently robust evidence base to justify the development.

#### Dunton Hill Garden Village/Dunton Garden Suburb

Reference is also made below to the key concerns regarding the free standing Dunton Hill Garden Village or Dunton Garden Suburb proposals including:

- Significant impact and harm to the openness of the Green Belt;
- Coalescence of settlements;
- Detrimental impact on the Landscape;
- The lack of certainty regarding the deliverability of the development;
- Lack of detail on location and phasing of such a development;
- Lack of detail on the viability of such a proposal;
- Impact of the scale of development on adjoining housing markets and ability of Thurrock to deliver its housing;
- Infrastructure delivery and funding;
- Impact on strategic highway network - A127, A128, A13;
- Impact on the local highway network including within Thurrock;
- Lack of transport modelling and mitigation measure;
- Assumption and scoring in the SA/SEA.

### Green Belt Issues on the A127 Corridor

The Preferred Site Allocations document 2018 identifies there are several sites for development of brownfield land and Green Belt release along the A127. It is considered that brownfield redevelopment and a Green Belt release at West Horndon would represent a suitable scale of housing development in this location.

It is considered any larger strategic Green Belt development at Dunton Hill Garden Village or the Dunton Garden Suburb or in combination with other development will have significant harm to the openness and function of the Metropolitan Green Belt. The Green Belt west and east of West Horndon meets the purposes of the Green Belt including preventing urban sprawl and coalescence between Basildon and West Horndon in the east and from West Horndon westwards to Cranham and Upminster in London.

The Dunton Hill Garden Village would result in a significant Green Belt release leaving a limited gap between Basildon and West Horndon. Other proposals such as a significant urban extension west of Basildon together with the Dunton Hill Garden Village would also result in potential coalescence and urbanisation of the A127 corridor resulting in significant loss to the openness and strategic function of the Green Belt.

Further Green Belt releases for employment land (Brentwood Enterprise Park) at Junction 29 of the M25 with A127 taken together with a strategic release for housing at Dunton Hills Garden Village will also contribute to a cumulative impact on the openness of the Green Belt in this corridor.

### Road Capacity and Impact

The A127 is at capacity at peak times and does not represent a better road transport alternative to the A12. Any larger development is going to require additional road infrastructure investment to improve access. Further work to understand the capacity and improvements required is being undertaken by the Local authorities and Highway England.

### Employment Provision - Brentwood Enterprise Park

The Brentwood Plan and supporting evidence identifies the requirement for additional employment land. However it is unclear why the employment sites at Brentwood Enterprise Park (Site ref 101A), Land South of East Horndon Farm (site ref 187) and at Dunton Hills Garden Village are proposed in the draft Local Plan. It is not always the case that employment land should be located at busy junctions or along the A127 corridor where it would add to traffic flows on a road at current capacity. The sites are not located close to existing centres and are without easy access for workers other than by car. Alternative locations and options should be investigated including the A12 corridor possibly as part of edge of settlement expansion and in mixed use schemes.

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)

## 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):

### Dunton Hills Garden Village

- Vision
- Strategic objectives SO4, SO7, SO20
- Spatial Strategy
- Summary housing led-allocations
- Settlement Hierarchy and accommodating Growth
- Employment Site Allocations (summary)
- Preferred Site Allocation – Site Reference 200

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):

### Dunton Hills Garden Village

Dunton Hills Garden Village was introduced in the draft 2016 Brentwood Local Plan consultation as strategic location for a stand-alone garden village concept in the A127 Corridor and having a capacity of 2,500 dwellings. The Dunton Hills Garden Village is proposed to be located in the Metropolitan Green Belt east of West Horndon and on the east side of the A128.

The Dunton Hills Garden Village is regarded as a new borough village in the Brentwood Local Plan with 2,500 new homes and supporting schools, shops, healthcare, employment and infrastructure. The Dunton Hills Garden Village concept is expected to make a significant contribution to Brentwood's housing and will have significant implications for the Brentwood Local Plan in terms of the overall spatial strategy, the Green Belt and policies including for the delivery of housing and infrastructure.

Dunton Hills Garden Village is included in the Preferred Site Allocations Document with specific reference in the revised strategic objectives and spatial strategy as well as a specific proposed site allocation for housing and employment. The site is identified as having a capacity of 2,500 dwellings during the plan period to 2033 which represents 30% of the Brentwood housing supply. It is understood the Council continues to develop a comprehensive masterplan for the site to detail the key garden village design principles. The final outcome of the design and master planning work will inform the final submission draft local plan.

Brentwood Council have identified a possible total dwelling yield from the site of 4,000 dwellings or a further 1,500 dwellings in addition to the proposed allocation of 2,500 for the plan period. The Council is giving consideration as to whether the delivery of Dunton Hills can be accelerated to increase its dwelling yield during the plan period by an extra 1,000 dwellings (providing 3,500 in total) if the Council is required to meet the higher dwelling housing requirement over the plan period

as a result of the Governments standardised methodology.

Previously Brentwood Council had consulted on the Dunton Garden Suburb which was a joint approach between Basildon and Brentwood Borough Councils to consider taking forward the concept of a strategic development proposal for land south of the A127, west of Basildon and east of West Horndon. The proposed development straddled the boundary between the two boroughs and is within the Metropolitan Green Belt. Thurrock Council strongly objected to the Dunton Garden Suburb for a number of reasons highlighted in more detail in previously submitted representations.

Thurrock Council expresses its continued concern about the proposed Dunton Hills Garden Village concept and the lack of detailed evidence to justify such a proposal:

#### 1. Lack of Technical Evidence

It is recognised that the Dunton Hills Garden Village is only at a concept stage. However Thurrock Council remains very concerned that considerable elements of the evidence base to justify such a concept have not been prepared and at this stage must call into question the robustness of the concept and the approach being undertaken. There is limited information available to comment on the detail of such a scheme and the existing technical evidence base does not include assessments for development of this scale. The Dunton Hills Garden Village concept in part appears based on assumptions that are not clearly evidenced or available for respondents to make an informed decision.

#### 2. The concept of the Garden Village

It is not considered that Brentwood Council have provided a convincing case as to why a free standing settlement of 2,500-3,500 homes in the Green Belt is the most suitable option to accommodate a large element of the borough's housing need. In addition to the other comments set out below the location does not have any public transport such as a railway station other infrastructure or services compared to existing settlements. It is also unclear as to the spatial extent or further mitigation required to increase site capacity from 2,500 to deliver another 1,000 dwellings.

#### 3. Masterplan Approach

There is significant concern that so much of the detail for a strategic site would be left to master plan stage. Thurrock Council considers that more evidence should be provided on the suitability of the project as part of the local plan process.

#### 4. Green Belt Issues

The Dunton Hills Garden Village in itself would result in a major Green Belt release leaving a limited gap between Basildon and West Horndon and Upminster settlements and therefore causing significant harm to the function of the Green Belt and the openness of Green Belt. It is considered such a development would reduce significantly the openness of this part of the Green Belt and result in urban sprawl along the A127 by spreading the extent of built development further into the Green Belt. The form and scale of the Dunton Garden Village would also cause significant harm to the other purposes of the Green Belt and would result in major encroachment into the countryside whilst also causing harm to the purpose of preventing the merging of neighbouring towns. It is noted that the location scores overall a Moderate to High in terms of meeting the purposes of the Green Belt in the Brentwood draft Green Belt Review.

It is considered any large strategic Green Belt release such as the Dunton Hill Garden Village on its own or in combination with a release at West Horndon will have significant harm to the openness and function of the Metropolitan Green Belt. The Green Belt surrounding West Horndon and along the A127 corridor meets the purposes of the Green Belt including preventing urban sprawl and coalescence between Basildon and West Horndon in the east and from West Horndon westwards to Cranham and Upminster in London.

The Government attaches great importance to the Green Belt as stated in the National Planning Policy Framework (NPPF), the draft review NPPF and the recent ministerial statement of October 2014 in respect of the National Planning Policy Guidance. Paragraph 79 of the NPPF confirms the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open. The essential characteristic of the Green Belt is its openness and permanence.

Other proposals such as a significant urban extension west of Basildon would also undermine the function of the Green Belt in this location as stated above and was subject to formal objections by Thurrock Council at the previous stages of the current Basildon local plan consultation. Any Green belt release west of Basildon together with any Green Belt release east of the existing West Horndon urban boundary would also result in potential coalescence and urbanisation of the A127 corridor resulting in significant loss to the openness and strategic function of the Green Belt.

Additional Green Belt releases including employment land (Brentwood Enterprise Park) at Junction 29 of the M25 with A127 taken together with any longer term strategic release for housing at Basildon will have an even greater cumulative impact on the openness of the Green Belt in this corridor.

## 5. Landscape Impact

Thurrock Council suggests that the potential of larger scale developments such as the Dunton Hills Garden Village would have a much greater negative impact on the landscape than stated by Brentwood Council.

The assessment of both landscape character areas and capacity for development can be undertaken for a range of scale and type. The Dunton Hills Garden Village concept would be considered a large scale urban development likely to have significant impact to neighbouring local character areas.

The character assessments undertaken for Brentwood in the Mid Essex Character Assessment Area G3 South Essex Towns do not reflect the importance of the adjacent large landscape character area of fenland. This has been recognised by the Thames Chase Heritage Lottery Fund as a distinctive landscape character worth conservation and has been identified by Campaign for the Protection of Rural England as nationally significant area of tranquillity in the Metropolitan Green Belt.

Dunton Hill Farm site is on a highly distinctive rise on a raised plateau between Laindon Hills and the Brentwoods Hills and separates the catchments of the Mardyke River to west and the River Crouch to the east. Basildon descends north-east from Langdon Hills to the River Crouch. The urban edges of Brentwood and Basildon are set back from the steeper slopes and screened with woodlands from views across the fenland. The settlements of Upminster and South Ockendon are identifiable in distant views to the east and south-east.

There are built features within the open rural landscape which do not significantly impact the value of the area but may lower the quality or condition of the landscape in field by field character assessments. The impact to the wider fenland character is likely to be greater than the settlements of South Ockendon in the south west. It is highly likely from the finding of landscape capacity studies that any development greater than discreet infill plots would significantly harm the landscape character.

## 6. Deliverability and Phasing

At present no detailed evidence has been provided by Brentwood Council to demonstrate the deliverability of this proposal or its acceptability in planning and infrastructure terms. Thurrock Council requests that more detail is provided as to how such a large scale development would be achieved and that all alternative options have been properly considered through the local plan process.

It is considered Brentwood Council have not produced convincing or robust evidence to back up the assertion that this is the best way in which to meet a significant element of its own dwelling requirement. It is noted at this stage that only indicative figures are given for housing and jobs at the Dunton Hills Garden Village and no detailed information on infrastructure. Without proper assessment of the potential of the site it remains questionable as to whether the concept is deliverable. There are currently no available studies associated with this development and it largely sits outside of the technical evidence of the existing Local Plan.

The size and scale of the Dunton Hills Garden Village would require key partnership arrangements between the local authorities and presumably with key house builders. It has not been demonstrated at this stage as to how that could be achieved. In addition there are no details of the potential involvement and role of other public agencies and key stakeholders.

No evidence is provided for the overall cost associated with a project of this scale and there is no indication given as to the level and the cost of infrastructure required or how this cost is apportioned between stakeholders. Infrastructure requirements and delivery are a key issue for a large scale development. For a large scale development on a greenfield site there is likely to be additional infrastructure requirements and costs. There is no information provided on the infrastructure requirements or its delivery and implementation.

Due to the size and scale of this development it will require significant upfront infrastructure investment and lead in times for house building are likely to be long term. This will have a significant impact on the ability of a development of this scale to contribute to the local plan requirements in the short to medium term. It is questionable therefore whether such a development of this large scale and in this location can be relied upon to significantly meet the dwelling and job requirements of Brentwood Council during a significant part of the plan period. In particular this would undermine the case for Brentwood to rely heavily on such a development as part of its housing requirement.

It is considered that if these issues were not properly addressed and alternative options properly considered through the local plan process then development may not be delivered. This would result in a lack of sufficient housing provision within the council area unless alternative options are brought forward. Failure to deliver any strategic Green Belt release could also put further pressure on adjoining Councils to potentially accommodate such a requirement.



## 7. Viability

No evidence is provided on the viability of such a large scale development and how it would be brought forward. It is requested that viability testing would be a priority in assessing the suitability of such a scheme. There must be serious questions about the market ability to absorb such a large scheme in the short term.

## 8. Impact on Thurrock Housing Market

It is considered the Dunton Hill Garden Village concept would potentially have an adverse impact on Thurrock's ability to deliver its own housing requirement during the plan period and beyond due to the market becoming swamped by competing development including a potential Basildon west extension and in particular due to its scale and location close to potential broad locations in Thurrock (e.g. South Ockendon/North East Grays/East Tilbury).

It would undermine Thurrock's ability to deliver its existing and future housing requirement in and adjoining existing urban areas and the need to meet both the current and future economic, housing, social and community objectives. Such a project would also reduce economic benefits accruing from the co-location of new housing development within Thurrock's own centres and regeneration hubs as resident expenditure would potentially be diverted towards Dunton Hills Garden Village.

Discussions with developers have already revealed that the market already has concerns about the ability of Thurrock's own housing market area to sustain and support competing large scale housing developments given the fragile nature of Thurrock's housing market and persistent problems of under delivery. The justification for also seeking to meet a large proportion of Brentwood's development needs in this location are difficult to justify given it's a location physically, functionally and perceptually separate from Brentwood's main urban area which is also in a separate and distinct Strategic Housing Market Assessment Area.

## 9. Infrastructure and Public Expenditure Funding

Given the need for significant investment in new infrastructure to support the development of a new village at Dunton Hills it would potentially divert already limited public resources away from existing priority areas. It would undermine the scope for new housing development to cross subsidise new community infrastructure and address existing deficits in provision.

## 10. Road Traffic Impact and Transport Evidence.

Thurrock Council considers the transport modelling and impact on adjoining authorities has not been fully assessed by Brentwood Council or published as part of the evidence base.

However no assessment appears to have been undertaken on the impact of such a scale of development on the main highway network of the A127, A128 and A13. Thurrock Council also notes the proposals for significant developments adjacent to Lower Dunton Road and to the west of Basildon as part of the West Basildon Extension. These, potentially, could have the great impact on Thurrock's local road and highway network and the impacts do not appear to have been taken into account. It is also not clearly identified how the Dunton Hills Garden Village would be served by public transport. It is noted that there is a proposed Green Travel Route but with no detail provided.

Thurrock Council is also concerned at this stage that the proposals for development of the Dunton Hills Garden Village do not appear to have sufficient assessment of the mitigation and delivery measures regarding the transport and highway implications to ensure this development can be

brought forward in a sustainable manner in the plan. Thurrock Council requests that further technical evidence on the matters identified be provided to justify the ability to include proposed development in these locations or to provide alternative locations.

#### 11. Design and Layout Issues.

The consultation documents only include an indicative plan for the layout and design of the development and therefore no detailed comments are made.

#### 12. Sustainability Appraisal of the Site

It is noted the Dunton Hills Garden Village site scores poorly across a range of SA criteria of the Interim SA and when compared with other sites in the site options findings. It is considered that the appraisal of the SA score for the site should be reduced to reflect the distance that housing in such a development as Dunton Hills Garden Village would have from the main centres, services, transport and residents in Brentwood.

The impacts in the SA should be scored more negatively to reflect the isolated nature of the development from Brentwood and public transport. The lack of public transport at this development is a fundamental issue which calls into question the access and sustainability of the development. There would be considerable additional road movements and congestion.

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)**

## 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):

### Employment Site –Brentwood Enterprise Park

- Employment Land Need and Supply - Employment Site Allocations
- Preferred Site Allocations (site ref101A)

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):

The Brentwood Plan and supporting evidence identifies the requirement for additional employment land. However it is unclear why the employment sites at Brentwood Enterprise Park (Site ref 101A), Land South of East Horndon Farm (site ref 187) and at Dunton Hills Garden Village are proposed in the draft Local Plan. It is not always the case that employment land should be located at busy junctions or along the A127 corridor where it would add to traffic flows on a road at current capacity. The sites are not located close to existing centres and are without easy access for workers other than by car. Alternative locations and options should be investigated including the A12 corridor possibly as part of edge of settlement expansion and in mixed use schemes.

It is considered such a development would harm the openness of this part of the Green Belt and result in urban sprawl along the A127 by spreading the extent of built development further into the Green Belt. The form and scale of the site would also cause significant harm to the other purposes of the Green Belt and would result in major encroachment into the countryside whilst also causing harm to the purpose of preventing the merging of neighbouring towns. It is noted that the location scores overall a Moderate in terms of meeting the purposes of the Green Belt in the Brentwood draft Green Belt Review.

Any Green belt release here together with any Green Belt release east of the existing West Horndon urban boundary would also result in potential coalescence and urbanisation of the A127 corridor resulting in significant loss to the openness and strategic function of the Green Belt.

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## 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):

**Interim SA Report of the Brentwood draft Local Plan**

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):

Thurrock Council considers the approach set out in the Interim Sustainability Appraisal (SA) is flawed and that a number of assumptions on the way that options have been scored is not supported by the available evidence.

The SA identifies a significant amount of evidence is not available under certain themes to properly assess the options. This may skew the results of the assessment in favour of certain options in the spatial strategy options.

The SA appraises and scores 10 options for the location of development with the assumption that most development would be located in one of the locations and with a strategic scale development at Dunton Hills. The information comparing options is limited as presented in the report and Thurrock Council would request more detail on this matter including a comparison table of scores for each option against the themes.

It is suggested that some of the scoring for the options in the SA has been based on assumptions that may not be correct or realistic and should be reconsidered.

- It is unclear that the options and sites have been comprehensively appraised in terms of access and sustainable transport.
- It is uncertain whether the benefits of improved accessibility brought about by Crossrail and longer term the A12 widening are taken into account.
- It is considered the housing appraisal skews the findings towards meeting the OAN but undermines the location of the housing.
- It is not considered that Housing along the A127 corridor would meet housing needs in Brentwood/Shenfield as well as housing located along A12.
- It is not considered that a new strategic settlement at Dunton Hills would be a self – sustaining community.

There appear to be some value judgement about certain locations such as opposition to development at West Horndon. It is unclear whether this has influenced the output of the appraisal.

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