



3rd March 2018

To Brentwood Borough Council, Planning Policy Team
Town Hall, Brentwood, CM15 8AY

**BRENTWOOD DRAFT LOCAL PLAN CONSULTATION –
PROPOSED GREEN BELT DEVELOPMENT AT HONEYPOT LANE**

I am writing to express my **total opposition** to Honeypot Lane being proposed as a preferred site under the local plan and wish to see the site removed as a preferred site for additional homes.

My reasons are as follows:

- For years Honeypot Lane has been used as a rat run. The Lane, note a Lane not a road, would not cope with the significant extra traffic that 200 homes plus a Care Home would bring if it were used as an access to/from the proposed site. It is narrow and has been designated a 20 mph limit area for good reason.
- There is a major safety issue – there have been accidents in Honeypot Lane due to the speed of traffic, even though it is a restricted speed area.
- In addition, any such development would put lots of extra pressure on the pinch point in Weald Road, which at the moment is too narrow for 2 cars to pass each other on route to or from the High Street.
- If cars cannot reach the High Street via Weald Road, the traffic will then impact on other cut-through roads, e.g. Sandpit Lane, Park Road etc. to Ongar Road or London Road, bringing major congestion and the increased probability of accidents. In the case of vehicles heading for the A12/M25, Honeypot Lane will grind to a halt and the Homestead estate will also be swamped with vehicles. In fact, all surrounding roads that provide access will be affected.
- When there are problems on the A12/M25, which occur with great regularity, the resulting extra traffic trying to avoid the town centre is already a problem; these extra cars will just exacerbate the chaos and will add to the impact on Brentwood.
- The impact of the additional movements of a possible 500 extra cars, together with parcel/shopping delivery and other vehicles, from the proposed development to Brentwood/Shenfield stations, local schools, access to the A12 and M25, together with its effect on all the surrounding roads, which were not built for this volume of traffic, will bring even more disruption at crucial times of the day. Any construction traffic will make the resultant traffic chaos unimaginably worse.

- There have already been a significant number of houses built in the vicinity of Brentwood town centre in recent years; this further proposed development will add to the over-development.
- The noise and pollution resulting from the A12 is already a problem; further building would only exacerbate the problem.
- Our nearest local schools, St. Peter's and Holly Trees, are already oversubscribed. Therefore, this will add to the traffic chaos surrounding Brentwood when parents have to travel further afield to take their children to schools out of area.
- Our local doctors' surgeries are already at capacity – in fact, it already takes 3 to 4 weeks to obtain an appointment.
- The proposed site is already subject to flooding. In fact, there is a stream that runs through it, which flows from the higher ground around the High Street/London Road.
- If any new development were built on this proposed area, then it would increase the risk of flooding to other nearby areas – water will always find a way out. The houses would have huge problems obtaining buildings insurance, if indeed it were possible at all, in light of Insurance companies reviewing their stance due to an increase in flooding claims and the effects of climate change. It seems totally irresponsible to consider building homes on land that will flood, especially in light of the effects of previous planning disasters which have seen residents forced out of their homes in places like Cumbria, Somerset and in the Thames Valley.
- It is to be pointed out the Brook Road, Talbrook, etc.- nearby roads - have their names for a reason!
- Drainage has always been a problem in Honey Pot Lane, which I am sure even your own records will confirm.
- Wildlife, such as bats, badgers, pheasants, foxes, newts, etc. use the proposed site and nearby area.

In addition to the above, I would draw your attention to the following further arguments against the suggested development at Honey Pot Lane.

You are suggesting a major development on greenfield site on the edge of the built up area.

When the site was originally put forward the Council, rejected it because it did not meet the Spatial Strategy.

The spatial strategy states that:-

“To meet local needs fully there will be limited release of Green Belt for development within transport corridors, in strategic locations to deliver self-sustaining

communities with accompanying local services, and urban extensions with clear defensible physical boundaries to avoid further sprawl and provide development swiftly.”

And that all development sites will be identified having regard to whether they:

- a. are accessible to public transport, services and facilities;
- b. will have no significant impact on the Green Belt, visual amenity, heritage, transport and environmental quality including landscape, wildlife, flood-risk, air and water pollution; and
- c. are likely to come forward over the Plan period.

The plan provides no details to support the proposal, only the boundaries and location of the proposed site, and the number of dwellings it might accommodate. There is no explanation as to why the site is thought to be suitable for this scale of development.

The proposal makes reference to an evidence base and infrastructure, but is only able to say that an “Infrastructure Delivery Plan is forthcoming”. No other evidence is put forward.

National guidance states that Local Planning Authorities should assess the quality and capacity of infrastructure, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, and flood risk, and its ability to meet forecast demands. This has not been done.

Local residents are being asked to comment on a major proposal, having been presented with only an outline of what is proposed. It is not known therefore what benefits, if any, there might be for the area, or how the scheme might seek to mitigate against the many harmful impacts.

The Borough Council are therefore attempting a consultation exercise on a proposal which is at best sketchy, is poorly researched, and premature in terms of an evidence base. Overall therefore it is ill-conceived.

The National Planning Policy framework says that local planning authorities should aim to involve all sections of the community in the development of Local Plans and in planning decisions, and should facilitate neighbourhood planning.

It also says that:-

“Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

In passing the Localism Act the Government has said that:-

“Too often, power was exercised by people who were not directly affected by the decisions they were taking. This meant, understandably, that people often resented what they saw as decisions and plans being foisted on them.”

The plan and the consultation process have so far been a top down process, with little regard for the involvement of the local community.

The National Planning Policy Framework states that:-

“The Government attaches great importance to Green Belts. The fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence.”

The proposal is within the Green Belt. National planning guidance is clear that development in the Green Belt is by definition inappropriate and harmful.

Exceptional circumstances must exist to justify the loss of Green Belt land. The Government has clarified that housing demand is unlikely to constitute the exceptional circumstances to justify such loss.

The site would project out into open Green Belt land, bounded only by narrow lanes, with open fields beyond.

Whether new development can be proved to be sustainable is central to planning policy.

Sustainable is defined as “ensuring that better lives for ourselves don’t mean worse lives for future generations”. In practice the essential requirement is that new homeowners will not be over dependent on the car for journeys to work, school, shops, leisure activities, and other services and amenities.

The proposed site is on the western edge of the town, over 1 kilometre from the centre of the town and further still from Brentwood railway station and access to the A12/M25.

If the residents of the new development have no choice but to make most journeys by car, the site does not offer a sustainable location.

A development of some 200 houses would increase traffic levels on roads and junctions that are already inadequate.

There is no indication as to where the main access to the site would be located, or what improvements to Honeypot Lane and Weald Road might be necessary, if indeed they are feasible, or how they will be funded.

The Council's website indicates that the impact and the need for infrastructure supporting new development will be considered in greater detail by the Infrastructure Delivery Plan and the Local Plan.

Council have only just on (29th January) launched an infrastructure Delivery Plan website. There is no information about Honeypot Lane.

The proposals are not clear on the mix and proportion of land uses, with what appears to be a leaning towards an almost wholly residential scheme.

There is no question that a development of the scale proposed will greatly increase the volume of traffic passing through the surrounding residential streets.

Overall the concern is that the people of the local community are most likely to suffer the harmful impacts of the development by way of increased traffic, overlooked gardens and properties, loss of rural character, without any discernible benefits.

There is no evidence that the Council has carried any assessment of drainage in the area.

National guidance states that:- "Local Plans should develop robust and comprehensive policies that set out the quality of developments that would be expected of the area, responding to local character and being visually attractive."

A local planning authority should also submit a plan for examination which is "sound", in respect of how it is prepared, whether proposals are properly justified, whether it can be delivered, and whether it is consistent with national policy.

Given the level and extent of the concerns as set out above, the plan clearly has fundamental shortcomings. It is not therefore sound or robust.

In view of the aforementioned, I contend that the posited development of Honeypot Lane be scrapped and that the faceless land owners, who are not part of the local community, are informed that their speculative venture has failed, as a result of overwhelming location opposition and for the many reasons referred to above.

Keith McIntyre

I also completely agree with this letter

Norma McIntyre