The Dunton Hills Garden Village development poses a risk of flood both within its own area and in downstream areas of Thurrock including West Horndon, Bulphan and further down the Mardyke Valley.

With housing and road surfaces forming a development, a proportion of surface rain water that currently sinks into the ground will instead be directed through surface water drainage into the Mardyke tributary that runs across the site. At present the low lying areas of the Dunton Hills Gold Club serve as a natural wash area at an altitude above sea level of about 15m. In the plans presented by the developer CEG this area is reserved for a school. This is inappropriate. It needs to be used as a large attenuation pond.

Flooding in West Horndon is a real threat as seen during the floods of 2013

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## **Christmas Flooding**

Following a wet summer and autumn the very heavy rain on Christmas morning brought flooding to West Horndon and much of the surrounding area.

Water drains from Thorndon Country Park under the A127 and through drainage ditches which form the flood alleviation scheme. This runs across the fields north of the park and then turns south to go through a culvert under Station Road and across the field to pass under the railway.



This was blamed on poorly maintained drainage ditches, but if Dunton Hills is developed without a significant investment in flood mitigation this could become a common outcome for West Horndon and Bulphan. There are also flood alert areas around the lower Mardyke that require management. Increased measures will be needed there if this development is to go ahead and this needs to be costed to demonstrate viability.

I have looked through the Local Plan, the Sustainability Appraisal and the Strategic Flood Risk Assessment. I cannot find anything that adequately addresses the consequential flood risk from developments that extends beyond the boundaries of Brentwood into Thurrock.

Paragraph 156 of the NPPF says that strategic policies should consider cumulative impacts in, or affecting, local areas susceptible to flooding. This has not been done adequately so the development policy for Dunton Hills is unsound as not compliant with national policy.

To correct this the quantum of development at Dunton Hills should be reduced by about 1000 homes to reduce the downstream impact of flooding and to allow space for an attenuation pond of sufficient size to be included in the design.