

The Brentwood Local Plan was not positively prepared.

Housing in the Borough of Brentwood is high compared to other parts of South Essex. There is a need for houses and especially affordable houses in the Town of Brentwood, Pilgrims hatch, Hutton, Shenfield, Mountnessing and Ingatestone along the A12 corridor where most of the population is concentrated. The Northern villages also have a need for housing to allow the rural economy to grow. The A12 is receiving huge investment to expand it to three lanes through Brentwood. The Crossrail Elizabeth line has been extended through Brentwood and Shenfield. Without investment in housing in these areas this investment in transport infrastructure will be wasted.

Brentwood council do not see it this way. Instead of planning development in these areas they seek to put most of their assessed need for housing in the furthest corner of their borough South of the A127. They plan a garden village at Dunton Hills next to Basildon, with further development in West Horndon. This accounts for half of their assessed need. Even their employment expansion is assigned to a new Enterprise Park south of the A127 by the M25. According to the council leader Louise McKinlay "New garden villages protect existing villages from over expansion" She goes on to say "we are seeking to preserve the nature of Brentwood and protect the rural environment of our villages"

See <https://www.conservativehome.com/localgovernment/2017/01/louise-mckinlay-new-garden-villages-protecting-existing-villages-from-over-expansion.html>

Development in the area South of the A127 will provide houses for Basildon, not for Brentwood. This area is only connected to the rest of Brentwood by low capacity roads such as the A128 which passes through the villages of Herongate and Ingrave where speed is limited to 30mph. These narrow roads are already congested at busy times. New housing in this area cannot serve the needs of Brentwood Town for affordable housing. The desire to "protect" the borough from development north of the A127 is not a means to prepare positively for a growing economy. It seeks only to preserve the high house prices for affluent residents.

Since 2013 Brentwood Council have run five public consultations to try to garner public support for development South of the A127. Preferred Options (2013), Dunton Garden Suburb (2015), Strategic Growth Options (2015), Draft Local Plan (2016), Preferred Options (2018). Each time they failed to get the support they needed. There was considerable opposition from people in the South of the Borough and in Basildon and Thurrock. For the last preferred options consultation in 2018 they sent notifications to every house in Brentwood in the hope that support from within the borough would outweigh that from neighbouring boroughs. This also failed. They did not produce a statement of consultation as required by law. Most of the responses provided just say something like "objection noted" The comments and responses were not published before the council decision to submit the Local Plan so they could not be taken into account by councillors.

Brentwood Council approved the Local Plan for publication in November 2018, but they did not start the regulation 19 consultation until three months later. Many important evidence documents were published in January and February 2019 so they were not taken into account by councillors when making their decision. These included a Green Belt Study by Crestwood Environmental Ltd (January 2019) Habitats Regulation Assessment January (January 2019), Health Impact Assessment (January 2019) Infrastructure Delivery Plan (February 2019) Site Analysis Overview (February 2019) Strategic Flood Risk Assessment (November 2018) and even the Sustainability Appraisal (January 2019)

The Sustainability Appraisal compares a number of different strategic options for development. These were never listed before this document was published in 2019 at the last minute. The options include development sites such as an area by South Weald that never appeared in any of the consultations. The conclusions in the SA are ludicrously biased in favour of development at Dunton Hills. This document was never put before any public council meeting for discussion or criticism.

I am particularly concerned about a procedural trick used by the council administration to move 200 homes from a site at Honey Pot Lane in Brentwood to Dunton Hills Garden Village. The site was included in the draft Local Plan presented to the council meeting for approval. An amendment was then used at the meeting to remove the site from the Local Plan and add the 200 houses to Dunton Hills instead. The amendment was then accepted by the council administration without debate being possible. The opposition therefore had no opportunity to challenge the reasons for the change. I consider this to be an illegal means to make such a decision.

In summary, the Local Plan was not positively prepared with a goal to provide housing development in the places that the borough needs them. Instead it was prepared with the aim of fulfilling development requirements while “protecting” most of the borough from development that could have made houses more affordable in those areas. The procedures used to approve the plan did not take into account the evidence because that evidence was not ready in time.