



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



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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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.



Representations on behalf of Countryside Properties

Brentwood Borough – Draft Local Plan, 2013 - 2033

January 2016

and

Sustainability Appraisal (SA) of the Brentwood Local Plan –
Interim Report (AECOM)

February 2016

Land to the East of West Horndon

March 2016
AM-P 13035



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APPENDICES

- 1 Representations and Appendices to the Brentwood Borough Local Plan – Preferred Options, 2015 – 2030, on behalf of Countryside Properties. October 2013
- 2 Representations and Appendices to the Brentwood Borough Local Plan – Strategic Growth Options and Interim SA, on behalf of Countryside Properties (UK) Limited. January 2015
- 3 Draft Local Plan Representations, including a Review of Peter Brett Associates strategic Development Modelling Report for BBC. Odyssey Markides, March 2016.
- 4 Presentation by Countryside Properties to Brentwood Borough Council, 11 November 2015 – Station Road, West Horndon.



1.0 SUMMARY OF THE REPRESENTATIONS

1.1 Objection is raised to the Draft Local Plan 2013 – 2033 (DLP) on the basis that it is unsound as currently drafted for the following reasons:

- The absence of an appropriate, comprehensive and up-to-date evidence base as national planning guidance requires.

A number of key documents are not yet available or require updating, and therefore have not influenced the Plan:

Documents described as ‘forthcoming’:

- *Green Belt Review.*
- *Infrastructure Delivery Plan.*
- *New economic evidence including the impact of Crossrail.*

Documents requiring an Update/Further Assessment:

- *A Green Infrastructure Study.*
- *Transport Assessment.*
- *Objectively Assessed Housing Needs.*
- *Strategic Housing Market Assessment (SHMA).*
- *Strategic Housing Land Availability Assessment.*

The Plan is therefore supported by a limited evidence base, which by the Council’s own admission is “emerging and ongoing” (DLP, paragraph 1.22). Paragraph 2.16 confirms: “several pieces of evidence are being undertaken alongside Local Plan preparation to inform policies as they are being developed and ensure the Council is able to produce a Plan as quickly as possible”.

We submit that a robust and credible evidence base must inform the content of the emerging Local Plan. Local Plan policies must be justified by evidence in order to be considered sound. Failure to publish these and other technical documents will deprive interested persons of the opportunity to comment upon them and fully comprehend how the preferred spatial strategy for growth has been decided.

- Further work is required to demonstrate whether the Draft Plan will meet its full objectively assessed need (OAN) for housing as required by the National Planning Policy Framework (NPPF, paragraph 182).

To date no account has been taken of the duty to cooperate and the need to consider unmet needs in adjoining authorities. Proper engagement has yet to be had with the Mayor of London and the London Boroughs on the matter of migration. In the light of past long term trends in jobs growth and the likely impact of Crossrail on the economy, there is potentially a need for higher growth in housing than currently proposed.

- The absence of an adequate sustainability assessment (SA). The Draft Local Plan for Brentwood is open to legal challenge on the ground that there has been a failure to comply with the relevant EU Directive and Regulations made to implement it. The Environmental Report does not comply with the Directive and Regulations in terms of its content. The SA



to date has not influenced the Plan and there has been a failure properly to assess both the preferred options for growth and rejected alternative sites.

- 1.2 The matters addressed above are so central to the overall strategy that the emerging plan as it stands cannot be found sound. A substantive revisiting of the plan strategy is required, to include the preparation of a thorough and effective SA that takes into account a proper testing of the alternatives for growth in the context of a full and up to date assessment of OAN for housing.
- 1.3 Support is extended in principle to the key strategic objectives of the Draft Plan that set out how the Council intends to achieve its vision. In particular we support SO1 and SO2 that confirm how growth will be managed in the Borough. These strategic objectives direct development to the Borough's transport corridors and urban areas in locations well served by existing and proposed services and facilities.
- 1.4 However it is not clear how the strategic objectives are then translated into a spatial strategy for growth, including land allocations to meet the Borough's needs. Nor is it possible to understand whether the allocated sites represent the best opportunities for growth. This failing of the plan is rooted in the absence of a complete, up-to-date and robust evidence base and following on from that an SA that has not fully appraised either the preferred options or the reasonable alternatives.
- 1.5 At a very late stage in the preparation of the Plan the Council signed a "Memorandum of Understanding" with the adjoining Borough of Basildon to work together to consider cross boundary strategic planning issues. They consulted on a proposal that investigated whether land to the west of Laindon (in Basildon Borough) and to the east of West Horndon (in Brentwood Borough) had the potential to meet some of the development needs of both Councils through a cross boundary development. This land, known as Dunton Garden Suburb, was proposed to provide some 4,000 to 6,000 homes and other mixed uses. A pamphlet providing only the briefest of information was prepared to introduce the proposals. A negative public response to the consultation process has led to the abandonment of this proposal. The two Councils have subsequently proceeded to promote land in this general area, within their respective local authority boundaries. In Brentwood this has resulted in a strategic proposal to provide 2,500 homes on the south eastern edge of the Borough on an area of land that remains to be determined and in respect of which there is a complete absence of detail about the proposed development. The proposals have been re-named Dunton Hills Garden Village (DHGV).
- 1.6 This land allocation in the DLP represents the only strategic site for housing and is described as "*critical to delivering the plan's key objectives i.e. meeting needs for new homes and new jobs*" (DLP paragraph 6.29). Paragraph 6.30 states that all such strategic sites have their own individual policy within the Plan to "*set out clearly what type of development is expected from each*". This level of detail is not however set out in the Draft Plan. Nor has such a key strategic site that is proposed to meet some 50% of the Borough's housing needs been tested in the context of a sustainability appraisal. There is no evidence to demonstrate feasibility/achievability, site capacity, infrastructure requirements, or timescales for delivery.
- 1.7 Land at West Horndon has been promoted by Countryside Properties for development via the Local Development Framework for Brentwood 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.

- 1.8 As the Local Plan has progressed the settlement of West Horndon - situated in the A127 transport 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 relatively unconstrained from a landscape perspective. Since the early SHLAA the Council has acknowledged that there is potential to develop land to the east and west of the existing settlement of West Horndon. It has been argued by Countryside Properties in promoting land to the east that this is unconstrained and could be delivered early in the plan period.
- 1.9 Late in the process of preparing the Draft Plan, land at West Horndon has been rejected for strategic growth in favour of an allocation at Dunton. At paragraph 7.10 the Draft Plan confirms *“Land around West Horndon Village remains a reasonable alternative because it can provide for similar development numbers towards local needs.”* The only justification given for rejecting this highly sustainable location for growth is 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.”*
- 1.10 The rejection of this alternative site is not supported by sustainability assessment. Indeed the limited assessment that has been undertaken gives more support to West Horndon as a strategic site for growth, based on landscape impact. We would add to this 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 conclusion is summed up in the latest SA Interim report of February 2016 that states:
 - “The process of the assessment of sites that are suitable, available and deliverable for development within the Borough is on-going.”
 - “The appraisal finds that the Draft Plan is set to result in significant positive effects in terms of housing and economy/employment objectives, but significant negative effects in terms of landscape objectives.”
 - 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”. (The key words are highlighted in bold and in red print by the authors of the Interim SA).



2.0 SUSTAINABILITY APPRAISAL AND THE EVIDENCE BASE

The role of a Sustainability Appraisal

- 2.1 Planning Practice Guidance (PPG para 001, ref ID 11-001-20140306) confirms that a sustainability appraisal is a systematic process that must be carried out during the preparation of a Local plan. Its role is to promote sustainable development by assessing the extent to which the emerging plan, when judged against the reasonable alternatives, will help to achieve relevant environmental, economic and social objectives.
- 2.2 Section 19 of the Planning and Compulsory Purchase Act 2004 requires a local planning authority to carry out a sustainability appraisal of each of the proposals in a Local Plan during its preparation. More generally, section 39 of the Act requires that the authority preparing a Local plan must do so “with the objective of contributing to the achievement of sustainable development”.
- 2.3 The Planning Advisory Service (PAS) advise local planning authorities that the carrying out of a sustainability appraisal (SA) of their plans is an essential part of the plan-making process. It is not a one-off exercise but needs to be integrated into the various stages of plan making. As it provides them with evidence, helps to test the evidence and helps with developing options, it cannot just be done as a ‘looking back’ exercise at the end. *It is a legal requirement.*

The SEA Directive and the Regulations

- 2.4 Sustainability appraisals incorporate the requirements of the Environmental Assessment of Plans and Programmes Regulations 2004 (commonly referred to as the ‘Strategic Environmental Regulations’), which implement the requirements of the European Directive 2001/42/EC (the ‘Strategic Environmental Assessment Directive’) on the assessment of the effects of certain plans and programmes on the environment.

The Scope of an Environmental Report

- 2.5 There is much case law regarding SEA and the preparation of Environmental Reports. This frequently focuses on two central issues: the proper content of an environmental report; and the question of whether it has taken into account reasonable alternatives.
- 2.6 For the SA, establishing the scope is the first step. This should identify an initial range of topics for which relevant evidence is required. Suggested topics are:
 - Air quality
 - Biodiversity and green infrastructure
 - Climate change adaptation and flood risk
 - Climate change mitigation and energy
 - Community and well-being
 - Economy and employment
 - Historic environment
 - Housing
 - Land (including agricultural land, brownfield land, and contaminated land)
 - Landscape
 - Rural areas



- Transport
- Waste
- Water

2.7 As a minimum, consultation is required on the scope of the SA and the SA report accompanying the Draft Plan. It is best practice for consultation to take place on SA during the plan preparation process for example through the production of interim SA Report and other means such as workshops and working groups.

Testing the Options and Reasonable Alternatives

2.8 For SA, the effects of the options and the emerging plan policies must be appraised in relation to the baseline situation. The appraisal of emerging and preferred options of the plan document is a critical role of SA. PAS advises that where possible quantitative modelling should be used. For example, the results of transport modelling may be helpful in distinguishing between spatial options in terms of likely impact on air quality, amenity and climate change. Strategic options will raise uncertainties such as ‘what might happen if critical infrastructure doesn’t follow development?’ The appraisal should explore how options, preferred options and policies will be effectively delivered on the ground to help avoid unrealistic assessment.

2.9 The PPG advises on ‘reasonable alternatives.’ (ref ID 11-018-20140306). These are defined as different realistic options considered by the plan-maker in developing the policies in its plan. They must be sufficiently distinct to highlight the different sustainability implications of each, so that meaningful comparisons can be made. The alternatives must be realistic and deliverable.

2.10 The SA should outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in the light of the alternatives. It should provide conclusions on the overall sustainability of the different alternatives.

The evidence base

2.11 The PPG advises on the evidence needed to support the policies in a Local Plan (ID: 12-014-20140306). It states “Appropriate and proportionate evidence is essential for producing a sound Local Plan, and paragraph 158 onwards of the National Planning Policy Framework sets out the types of evidence that may be required. This is not a prescriptive list; the evidence should be focused tightly on supporting and justifying the particular policies in the Local Plan.” This includes such topics as housing, business, infrastructure, environment, historic environment, health and well-being, viability and deliverability.

2.12 The PPG advises “evidence needs to inform what is in the plan and shape its development rather than being collected retrospectively. It should also be kept up-to-date. For example when approaching submission, if key studies are already reliant on data that is a few years old, they should be updated to reflect the most recent information available (and, if necessary, the plan adjusted in the light of this information and the comments received at the publication stage).”

2.13 It continues “Local planning authorities should publish documents that form part of the evidence base as they are completed, rather than waiting until options are published or a Local Plan is published for representations. This will help local communities and other interests consider the issues and engage with the authority at an early stage in developing the Local Plan. It will also help communities bringing forward neighbourhood plans, who may be able to use this evidence to inform the development of their own plans.”



Soundness and examination of the Local Plan.

- 2.14 The NPPF requires a local plan to be examined by an independent inspector whose role is to assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements and whether it is sound. In considering soundness the Inspector will seek to ensure that the plan is based on a strategy which meets objectively assessed development and infrastructure requirements, including unmet requirements from adjoining authorities and consistent with achieving sustainable development. The inspector will want to be satisfied that the plan is the most appropriate strategy when considered against the *reasonable alternatives* and based on *proportionate evidence*.
- 2.15 There is considerable case law on local plans where SA has not been carried out prior to submission. Although this can potentially be dealt with via an addendum/correcting addition, that process should not be underestimated. Furthermore, if the reasoning process did not take place at each appropriate stage of plan making, thereby influencing the plan, then this cannot be 'cured'. The only thing that can be cured is the failure to include in the SA the documents showing that the legally adequate reasoning process did in fact occur (*Cogent Land LLP v Rochford DC [2012] EWHC 2542 (Admin)*). In the 2012 High Court case of *Heard v Broadland DC [2012] EWHC 344 (Admin)*, it was suggested that in order to show that they have followed the correct process Councils could do this "by reference to earlier documents" but only "if the earlier documents had contained the required material" (paragraph 62). The case of *Save Historic Newmarket Ltd v Forest Heath DC [2011] EWHC 606 (Admin)*, set out the need to examine fully previous documents in reaching a decision whilst in *Heard* the contents required to be included in an addendum was established. The addendum would also need to be consulted on for it to be legally compliant.
- 2.16 The process of correction of an SA requires the Council to show how it has influenced the final outcome of the plan. It cannot just 'patch up' the short comings. It must be the subject of public consultation and the responses will need to be considered. This raises the issue that in doing so a different conclusion may result. We submit that this work is therefore best undertaken now to avoid the plan being found unsound and because we doubt that a correction to the work undertaken to date in preparing an SA, is in the context of case law referred to above, capable of being 'cured'.

Criticisms of the SA of the DLP for Brentwood.

- 2.17 The SA to date is based on an incomplete and out of date evidence base. This falls considerably short of the guidance in the NPPF and PPG that the evidence cannot be collected or published retrospectively. Fundamental elements of the evidence base needed to test the plan are missing. In a Borough where 89% lies within the Green Belt, and from where land is essentially required to meet growth needs, there has been no attempt to undertake an appropriate review of the Green Belt boundaries, as required by national guidance.
- 2.18 Various versions of the SA including two scoping reports have been prepared during the preparation of a local plan for the borough. These have failed to identify a full scope and crucially have not identified transport as a topic to be examined. There is a complete hole in the evidence base in relation to transport and traffic impact.
- 2.19 During the preparation of the plan and SA work undertaken alongside it, land at West Horndon has been considered as a reasonable alternative for growth. The SA interim report of January 2015 compared West Horndon against the joint proposals for Dunton and three other strategic scale proposals. It undertook an assessment of each option, albeit based on scant information regarding the form and content of proposed development. The options were compared in a single table to highlight 'significant effects' and 'relative merits'. Scores of 1-5 were given to rank the performance of the options against 12 key topics. Score 1 rated the best option with 5 indicating the poorest

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performing. Additionally the use of a colour coded system of red and green indicated likely significant adverse and beneficial effects, respectively.

- 2.20 The option based upon West Horndon, scored the lowest and therefore represented the ‘best’ option for strategic growth, according to the Council’s own SA. West Horndon as an option for growth showed no significant adverse effects. This set it apart from all other five options that showed significant adverse effects against at least two topics. As an aside, we objected to the assessment as being flawed in its judgement of some topics and how individual options scored relative to each other. By way of example in assessing the topics of Air Quality, Climate Change and Community and Well-being, the issue of accessibility and limiting the need for travel was identified as a key consideration. The SA objectives stated that the greatest potential for development to occur is where it is possible to limit the need for additional vehicular travel. Due to a lack of baseline evidence and sufficient detail on the individual development proposals, we found the assessment to be flawed where it placed the greatest development potential at Dunton, compared to West Horndon which has an existing railway station. This criticism relates precisely to the guidance given by PAS and set out in paragraph 2.8 above.
- 2.21 In Brentwood, transport modelling is only now being undertaken and has not to date influenced the DLP. This has resulted in unrealistic assessment as cautioned above. It has not helped to distinguish between spatial options for growth. The Dunton proposals were justified on the basis of joint proposals linking growth to the built up area of Basildon and featuring a proposed new railway station. The potential for uncertainties whereby critical infrastructure does not come forward to support growth (as suggested in paragraph 2.8 above) is exactly the scenario that is seen at Dunton. The now separate promotion of Dunton by Brentwood has resulted in a location that relates poorly to the existing built up area and will not be served by a new railway station. The sustainable argument for growth at this location has fallen away.
- 2.22 It is in assessing landscape capacity to accommodate growth that West Horndon has historically scored well, relative to Dunton. West Horndon has consistently been found to have a medium to high capacity to accommodate growth and likely to make only a ‘moderate’ contribution to Green Belt purposes. Dunton has been assessed as having a ‘low’ capacity to accommodate growth with likely adverse landscape effects.
- 2.23 Since 2013 the Council had been commissioning consultants to assess potential housing and employment sites in the Green Belt. This work was not published until February this year just after consultation began on the DLP. This is contrary to guidance in the PPG that advises local planning authorities to publish documents that form part of the evidence base as they are completed rather than waiting until the options are published or a local plan published for representations (see paragraphs 2.12 and 2.13 above). This report by Crestwood Environmental Limited is 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 contravene the DLP strategy for growth and identification of Dunton as the sole allocation for strategic growth.
- 2.24 The study by Crestwood concludes that Dunton, the Council’s preferred strategic site, is one of 7 sites out of 203 assessed that 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. Development on land to the east of the settlement would decrease the gap to Basildon but still retain a functional open area 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.

2.25 Aside from the lack of highway evidence to inform the SA, it suffers from the lack of up-to-date guidance on OAN for housing and jobs. Without a target for growth it is not possible to know how much land will be required for development. We consider in more detail below the issue of OAHN and impact on the emerging plan.

2.26 The latest SA Interim Report is clear in highlighting the uncertainties that exist over the DLP proposed strategy for growth and land allocations chosen to meet this. The SA Non Technical Summary (NTS) confirms considerable doubts over the site identified at Dunton, relative to land at West Horndon:

- “The process of the assessment of sites that are suitable, available and deliverable for development within the Borough is on-going” (page 6)
- “...the Council remains open to considering matters further” (page 6)
- “Brentwood Borough Council acknowledges the complexity and challenges raised by the Sustainability Appraisal and anticipates further investigation of these matters including through the on-going commissioning and publication of evidence. The DLP consultation will enable further comments on the development of the Plan and the identified sites, which will be used to inform the next iteration of the Plan” (page 6).
- “the primary conclusion to draw from the table (Summary of Spatial Strategy Alternatives Appraisal Findings) is that in terms of a majority of objectives, a strategic allocation at one or either of the A127 locations (West Horndon or Dunton Hills Garden Village) is to be supported” (page 5)
- In summarising ‘landscape’ “at the current time it remains appropriate to ‘flag’ the potential for **significant negative effects** (highlighted bold and red in the report) given the uncertainty that remains regarding Dunton Hills Garden Village.” (page 9)
- The appraisal finds that the draft plan is set to result in significant positive effects in terms of ‘housing’ and ‘economy/employment’ objectives, but significant negative effects in terms of ‘landscape’ objectives.” (page 9).



3.0 COMMENTS ON THE DRAFT STRATEGY, PLANNING POLICIES AND PROPOSED LAND ALLOCATIONS IN THE DRAFT LOCAL PLAN

- 3.1 The preparation of a new Local Plan for Brentwood began some six years ago. During this time we have made representations on behalf of Countryside Properties and in relation to land at West Horndon. A response was made to the Preferred Options Plan in October 2013 and to the Strategic Growth Options in January 2015. We have appended our representations and their appendices, because points made then remain relevant (Appendix 1 and 2).
- 3.2 The representations made in 2013 include a sustainability appraisal of land at West Horndon, carried out by consultants on behalf of Countryside Properties to address the absence of such assessment by the Council. This considers the issues of transport and access, landscape and design, and delivery and viability. Appendix 1 to the 2013 representations comprises a report by Rummey Design that explores a landscape-led urban extension to West Horndon.
- 3.3 The representations submitted in 2015 provide further justification for growth at West Horndon and include a critique of other strategic growth options being considered by the Council, such as Dunton. The appendices to the 2015 representations include comprehensive assessment of a number of issues including transport, landscape and Green Belt Assessment, archaeology and ecology, to demonstrate that there are no overriding constraints to strategic growth at West Horndon. These two sets of representations and accompanying appendices will be summarised further in section 4 below.
- 3.4 We have expressed fundamental concerns about the lack of an evidence base and SA and have called for the Council to address these now. This additional work can then be used properly to inform what is in the plan and shape its development. National planning policy guidance makes clear that evidence is needed to inform the plan and that it cannot be prepared retrospectively. After all this time, many evidence base documents are being hastily prepared and published on the Council's website. A number of the key studies are reliant on data that is a few years old. They should be updated to reflect the most recent information available. On 16 March 2016, the Council published on its website the commencement of work towards a revised Strategic Housing Market Assessment and invited comments by 29 March 2016. We submit that, in line with government guidance, the new and revised documents coming forward should be used to adjust the plan. Relevant consultation is also required. The plan prepared to date has not been informed by these documents and it must therefore be looked at again.
- 3.5 In this context, our representations on the DLP are confined to broad topics.

Spatial Strategy

- 3.6 Support is extended in principle to all 13 strategic objectives of the Plan that set out how the Council intends to achieve its vision. In particular we support SO1 and SO2 that confirm how growth will be managed in the Borough. These seek to direct development to the Borough's transport corridors and urban areas, in locations well served by existing and proposed services and facilities.
- 3.7 The government places a strong emphasis on the importance of infrastructure planning. National planning policy formally requires local authorities to demonstrate that sufficient infrastructure exists, or will be provided, to support their strategies for new development, as set out in local plans. It is therefore unacceptable that the Local plan has been prepared in the absence of an Infrastructure



Delivery Plan (IDP). Proposed land allocations for strategic growth have been identified in the absence of a proper understanding of the level and distribution of existing infrastructure and where new provision is required.

- 3.8 Government policy as set out in the NPPF (paragraph 52), and consultation on proposed changes in December 2015, extends support for the supply of new homes through larger scale developments such as urban extensions and new settlements. These should be located where they can meet the sustainable development objectives of national policy. Changes to the NPPF seek to ensure that housing is delivered on land allocated in plans and recognises the significant benefits to encouraging development around new and existing commuter hubs – reducing travel distances by private transport, making effective use of private and public sector land in sustainable locations, and helping to secure the wider regeneration and growth of the local area. In this context the government is keen to see higher density housing development around commuter hubs wherever feasible.
- 3.9 In an assessment by Essex County Council and Southend-on-Sea Borough Council, the A127 corridor has been found to have the greatest capacity for growth in the Borough. It is viewed as a vital artery to economic competitiveness. New Development along the corridor is considered to have advantages in terms of the assistance it will give in the funding and delivery of a number of transport related benefits that have historically been sought. As the Local Plan for Brentwood has progressed the A127 corridor has been identified by the Council as the location for strategic growth.
- 3.10 Policy 5.1 - Spatial Strategy, directs growth to Brentwood and Shenfield in the A12 corridor and confirms that there will be two strategic allocations in the A127 corridor. This strategy is supported by a need to limit the release of Green Belt land and the objective to deliver self - sustaining communities, which avoid sprawl and provide development swiftly. All development sites are to be identified having regard to whether they:
- are accessible to public transport services and facilities;
 - 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
 - are likely to come forward over the Plan period.
- 3.11 The supporting text to this policy identifies a new strategic allocation at Dunton Hills Garden Village to provide a new mixed use community. It also promotes a strategic employment allocation at junction 29 of the M25 and the redevelopment of existing industrial land in West Horndon for a residential-led, mixed-use scheme.
- 3.12 Objection is raised to this policy which although reinforces key spatial objectives for managing growth, in the absence of a robust evidence base or SA has not then moved on to select the most sustainable location in the A127 corridor to deliver large scale development. The plan has distanced itself from the previous proposals for cross boundary development with Basildon, following issues raised in the consultation process for a single Garden Suburb. The consultation resulted in considerable objection (84% of responses) based on potential environmental damage and loss of Green Belt, lack of infrastructure provision, and the feasibility of delivery. Both Councils are now independently promoting growth in this general location. The separate proposals are disjointed and will not individually achieve the benefits to be had from economies of scale and a single comprehensively planned scheme. They are unable to deliver a railway station as previously suggested. Nor do the proposals for each Borough comply with the duty to cooperate, as national policy requires.



- 3.13 There is a complete lack of information regarding the Dunton Hills Garden Village proposals in Brentwood. It stems from a failed attempt at cross boundary development and has resulted in a contrived location that is not sustainable. The DLP Site Allocation Maps show an area of 237.49ha of land from the A128 in the east to the Borough boundary with Basildon in the west. The proposed use is confirmed to be “Housing led mixed use” to include 2,500 dwellings. The plan is annotated “entire land shown, final location to be confirmed”. Thereafter, despite the fact that this site is to provide some 50% of the new housing proposed in the Borough over the plan period, there is a complete absence of any information regarding its likely form or content.
- 3.14 Analysis of this site in the SA cannot be relied upon because there have been no proposals for it to test. As the PPG advises (see paragraph 2.9 above) the options to be tested in the SA must be sufficiently distinct to highlight the different sustainability implications of each, so that meaningful comparisons can be made.
- 3.15 The land is also in multiple ownership and its deliverability is therefore called into question. Due to a number of constraints to development as well as generally slow lead in times for large scale developments, land at Dunton is not likely to come forward early in the plan period. The Local Plan Housing Trajectory (appendix 3 to the DLP) is silent on the proposals for Dunton.
- 3.16 An assessment by transport consultants - Odyssey Markides - on behalf of Countryside Properties, shows that the land cannot be accessed by road (Appendix 3). Previous linkages with Basildon Borough and a new station proposed in the adjoining Borough (now abandoned) will no longer make it accessible via public transport. The site is at high risk of flooding (zone 3). It is questionable, given land required for open space and landscaping, whether there is sufficient capacity to provide 2,500 new homes and other non-residential uses. The recently published study by Crestwood Environmental Limited entitled “Assessment of Potential Housing, Employment and Mixed Use Sites in the Green Belt” (commissioned by BBC), found that out of 203 sites assessed the majority made a ‘moderate’ contribution to the Green Belt. Only 7 sites were found to make a ‘high’ contribution and this included land at Dunton. This assessment gives a damning report of land at Dunton, and as national planning policy advises, the Plan requires adjustment in the light of this new evidence.
- 3.17 There is little to satisfy a local plan inspector that the DLP represents the most appropriate strategy when considered against the reasonable alternatives. Recently emerging evidence contradicts the strategy and choice of its key strategic site for growth.
- 3.18 To date previous versions of the Local Plan for Brentwood and Sustainability Appraisal have found favour in land at West Horndon for strategic growth. Representations on behalf of Countryside Properties have included a justification for land to the east of the settlement and provided supporting evidence in the light of the deficiencies of the Council’s own evidence base and SA. This evidence is reproduced at Appendix 2.



Housing

- 3.19 Policy 5.2 - Housing Growth, makes provision for 7,240 new homes to be built in the Borough over a twenty year period from 2013 -2033 at an average annual rate of 362 dwellings per year. This claims to be an increase in the amount of development proposed when compared to previous versions of the plan. However, in 2013 when the Preferred Options plan was published the plan period selected was from 2015 to 2030. Some 3,500 homes were proposed over the fifteen year period, amounting to the provision of 233 homes per annum. Three years later the plan period proposed to be covered is twenty years, from 2013 – 2033. The 7,240 homes to be built take into consideration some 383 homes completed in the period 2013/2014 and 744 extant permissions and ‘permitted development’. This leaves a requirement of some 339 homes per annum over the remaining 18 years of the Plan.
- 3.20 The target for growth should be questioned on the basis that this relies upon an out of date evidence base. The figure of 362 dwelling per annum is based on a report on Objectively Assessed Housing Needs undertaken by Peter Brett Associates in December 2014. This report confirmed that it required updating to take account of the 2012 based household assumptions and the need to consider potentially much higher outward migration flows from London. Since then the Greater Essex Demographic Forecasts (phase 7) have been published (May 2015) and these include the latest household figures and show that employment forecasts are substantially higher. They also show a step change in out-migration from London from 2018. Additional work to form a final OAN has not been undertaken and the proposed growth of 362 homes per annum in the draft plan cannot be substantiated.
- 3.21 The DLP should include full and realistic targets for the growth of homes and jobs in line with the latest government guidance. The Council should proceed swiftly to ensure a plan is in place by 2017 if it wants to avoid intervention by the government. Research into Local Plans and housing requirements by NLP (“Signal Failure? - A Review of Local Plans and Housing Requirements”, March 2015) shows that those plans found to be ‘sound’ at examination, since the NPPF, have consistently aimed to provide more homes than indicated in the household projections for their areas. In addition they have adopted a ‘larger than local’ approach. The Local Plan for Brentwood should consider full objectively assessed need for market and affordable housing, which now needs to reflect the government’s latest initiative towards building 400,000 affordable homes, of which 50% should be starter homes. To cater for such initiatives and meet new ‘delivery tests’ that are proposed in further reforms, the Plan must look to higher targets than previously considered. It must include an up to date supply of specific deliverable sites to provide a rolling five-years worth of housing plus an additional buffer of 5% to 20%. (Those plans found sound at examination and referred to in the NLP report tended to show an extra 20% provision of new homes above the household projections). In its Autumn Statement the government announced a package of measures to accelerate housebuilding over the next five years. This includes a new ‘delivery’ test to ensure that housing commitments set out in local plans can be delivered in a reasonable timeframe. This will act as a further threat for under-performing authorities, alongside the implications of failing to identify a five-year supply of deliverable land. The new Local Plan needs to bear this in mind and ensure that it concentrates on growth for the area and that it is focused on the delivery and the practicalities of housing the population.
- 3.22 The NPPF (paragraph 159) requires local planning authorities to have a clear understanding of housing in their area through a Strategic Housing Market Assessment (SHMA) and Strategic Housing Land Availability Assessment (SHLAA). The SHMA for Brentwood was prepared in 2013 and re-dated 2014. It does not take account of the latest household projections nor consider an appropriate Housing Market Area. The notion that Brentwood is a self-contained district lacks credibility when the OAN report itself attests to the Borough’s strong inter-connectivity with Essex and London. The



Borough is located with the London Arc and the construction of Crossrail will only increase this connectivity. The HBF and others consider that Brentwood should be assessed in a joint SHMA with Basildon, Chelmsford and Epping Forest. It is unclear how the Council has engaged with the Mayor of London and the London Boroughs on the matter of migration. The Inspector appointed to consider the London Plan refers to this in his report dated 18 November 2014. He notes that the Mayor's SHMA "includes assumptions relating to migration...likely to be material to the preparation of local plans outside London" (paragraph 8 of the report). Papers relating to a SHMA – Part two were published on 16/03/2016, on the Council's website. It is not yet known what impact these will have.

- 3.23 The OAHN report by PBA did acknowledge the potential problem of London but stated that it was unable to assess the implications of the Mayor's new plan until it had been adopted. The report implies therefore that the OAN figure of 360 dwellings per annum was very much a provisional one. We submit that there needs to be an increase in supply to compensate for potentially higher numbers of people moving to the Borough as well as fewer people leaving to live in London. Unmet housing need in London is estimated to be at least 7,000 dwellings per annum and rising. This cannot be ignored with the advent of Crossrail and the likely influx of more affluent households expected to move to the area, and acquiring homes at the expense of local people. It is likely that affordable housing need will increase ever more sharply. We call for the Council to adjust its supply of housing to counter issues of affordability in view of observations in the Draft Plan about the problems of affordability in the Borough. The trend - derived figure of 362dpa will not provide the 'significant boost' to supply sought by the government through the NPPF.
- 3.24 Providing jobs in line with the past long-term trends would generate a need for 411 dwellings per annum. This would represent a more appropriate OAN for Brentwood as it would align housing supply in accordance with the long term trends in the economy.
- 3.25 We object to the over reliance upon windfall development (14% of the net homes proposed). Although the NPPF does permit Councils to make an allowance for windfall sites, including in the five year supply, there should be compelling evidence that such sites have consistently become available in the local area and will continue to provide a reliable source of supply. In a local authority area where 89% lies within the Green Belt, such a supply will be a declining source. It is submitted that a key objective of the NPPF is for planning to proactively drive development and make every effort to identify and then meet housing, business and other development needs of the area. This is best achieved by maintaining a supply of genuinely available sites and not relying on windfalls. Where lack of deliverability is a problem the reliance of windfalls will only exacerbate the lack of housing supply, with Councils allocating too little land.
- 3.26 The Draft Plan proposes to meet nearly 50 % of its needs going forward, on a strategic site at Dunton, for which there is are no proposals or justification that this can be achieved or when it could be delivered. This will not solve the problem identified in the Draft Plan of "moving from significantly lower housing delivery up to (what the Council perceives as) full objectively assessed needs in a short space of time". This requires the Council to be realistic about the likelihood of sites coming forward and the Plan states that "more evidence will be required to prove this moving forward to the next stage of the plan making process".
- 3.27 We submit that a complete lack of detail on the proposals for DHGV, that is expected to deliver 2,500 homes, does not equate to a "clear commitment"..... "to bring forward land as quickly as possible to meet housing needs swiftly in line with national policy and guidance" (paragraph 5.46 of the Draft Plan).



- 3.28 Other land is available in the A127 corridor at West Horndon that is sustainable and capable of meeting housing needs early in the plan period, specifically within the first five years.

Job Growth and Employment.

- 3.29 Evidence is awaited on the impact of Crossrail. However the available evidence on jobs and the economy demonstrate strong levels of growth. This calls into question a spatial strategy for growth that seeks to redevelop existing employment land at West Horndon. Strategic growth at this settlement could accommodate both homes and jobs. Furthermore, proposed public transport measures could potentially link the new homes with proposed employment land at the M25 (junction 29).

Managing Growth

- 3.30 Policy 6.1 - Sustainable Development, encourages the approval of planning applications without delay where they accord with policies in the Local Plan, unless material considerations indicate otherwise. Support is extended for the general objective of promoting sustainable development, however objection is raised to the policies of the plan that identify land allocations to meet the Borough's needs, that do not in themselves represent the best opportunities for growth. These will not result in sustainable development and they have not been the subject of robust assessment alongside the alternatives for growth.
- 3.31 Policy 6.2 - Managing Growth, identifies a hierarchy of settlements and locations for growth starting with existing urban areas and the use of brownfield land and buildings. The policy accepts that due to the limited availability of these types of sites, and to maintain a five-year supply of housing, some Green Belt land is to be allocated for development during the plan period. Policy 6.2 is not however supported by an up to date evidence base to guide the identification of new development allocations. This requires information on infrastructure requirements and an appropriate review of the Green Belt. Without this analysis the plan cannot be found sound.
- 3.32 Explanatory text at paragraph 6.13 refers to the importance of phasing and the timing of delivery of development in relation to land assembly and the provision of infrastructure. In this regard further objection is raised to the identification of land at Dunton and the unknown position on required land-take, land ownership, and the requirement for supporting infrastructure. In the absence of this information there must be uncertainty over its deliverability.
- 3.33 Policy 6.3 - General Development Criteria, requires proposals for development to meet all of nine specified criteria. These require a robust evidence base assessment of visual impact and landscape character, access and transport, health, noise impact, biodiversity, heritage, and impact on local services and community infrastructure. It is without question that the plan is not supported by a robust and complete assessment along these lines that would permit the identification of preferred allocations for growth and the rejection of alternatives.
- 3.34 Explanatory text at paragraph 6.18 states that in order for a scheme to be acceptable, development will be required to make satisfactory arrangements for vehicular, cycle and pedestrian access into the site. Transport consultants to Countryside Properties have assessed the location for the DHGV and find that the land proposed as a strategic allocation cannot be accessed (Full report of Odyssey Markides is attached at Appendix 3). Without land in Basildon Borough, there is insufficient land to create a new grade separated junction onto the A127. Furthermore, access from the A128 is constrained by issues of flooding in the western part of the site. Even if issues of flooding could be overcome a scheme of the size proposed would need three to four access points which could not



feasibly be positioned on the same road. They would also have an unacceptable traffic impact on the A128. In terms of visual amenity and landscape character we refer to the report of Crestwood Environmental which finds that development at Dunton would have a harmful impact on this area of open countryside.

- 3.35 Policy 6.6 - Strategic Sites, identifies sites to provide a mix of uses and refers to DHGV as a housing-led scheme. The general soundness of the entire plan must be called into question when sites such as this are identified as 'critical' to delivering the plan's key development objectives including homes and jobs, but where there is a complete lack of assessment to demonstrate that the land in question can be delivered. The explanatory text at paragraph 6.32 refers to the removal of land at West Horndon as a strategic area for growth, in order to protect its village character. We submit that this conclusion cannot be drawn in the absence of an appraisal of the likely significant effects on the environment of implementing the plan and reasonable alternatives. There is simply insufficient information regarding the proposals for DHGV to allow any assessment to be undertaken or meaningful comparisons to be made.
- 3.36 West Horndon is the only settlement along the A127 that benefits from a rail station, together with a grade separated junction, making it the most sustainable in this transport corridor. Most of the village including proposed development land to the east is within walking distance of the station and key local facilities and services. The nearest railway station to DHGV location is also West Horndon. This is not within easy walking distance and if developed the occupiers of the development using the train would be likely to drive or make use of a shuttle bus if one were provided. Overall the proposals at Dunton would have a significant impact on the village character at West Horndon in terms of an increase in traffic and parking.

Sustainable Communities

- 3.37 Policy 7.1 - Dunton Hills Garden Village, proposes a self-sustaining community to include 2,500 new homes, at least 5 hectares of employment land, local shops, community facilities, open green spaces, schools and healthcare services. This is not supported by assessment of the site and potential constraints to ascertain whether there is sufficient land available to achieve the scale of development required. In the context of joint proposals with Basildon it was made clear that a significant wedge of open land would be required to the west of the site to maintain an open gap between Brentwood and Basildon. To achieve the scale of development now proposed, this open gap would have to be considerably eroded. The site is also subject to high flood risk.
- 3.38 Paragraph 7.10 confirms that land around West Horndon village remains a reasonable alternative to DHGV because it can provide for similar development numbers towards local needs. We submit that it represents a more sustainable option for strategic growth. The settlement of West Horndon had been emerging as the preferred location for strategic growth until the conception of the joint proposals for Dunton Garden Suburb a year ago. Although evidence regarding the development proposals for West Horndon has been submitted to previous versions of the Local Plan, to demonstrate its suitability and sustainability, this evidence and details have not been used by the Council and its consultants to inform the SA. Instead DHGV has emerged as the preferred option for growth, without the benefit of a full and comprehensive SA. The rejection of land at West Horndon as an option for growth is based on the single statement: "It has not been selected as a preferred site in this Draft Plan owing to the impacts on the existing village, which would not be consistent with the emerging spatial strategy." The DLP cannot be found to be sound based on the rejection of this option for growth without an SA that complies with the Directive and Regulations. Furthermore, we would argue that based on case law, this lack of assessment could not be 'corrected' at a later stage



by an addendum because that would require evidence to show that a legally adequate reasoning process had occurred and influenced the plan, albeit not clarified or reproduced in a transparent way.

- 3.39 In the context of our overriding objection to the plan we do not comment further at this stage on detailed policies including housing size, type mix, tenure, and residential density.

Housing Allocations

- 3.40 Policy 7.4 - Housing Land Allocations, refers to a list of housing allocations set out in table 7.2 to meet growth needs in the plan period. This list has not been assessed in an SA and there is no evidence to demonstrate that the sites represent the most appropriate strategy for growth in the Borough. Some of the sites are very small, proposing only 10 dwellings. We object to the implied encouragement of early applications that accord with the list, which would be premature given that the sites have not been tested under SA, as legally required. The statement in paragraph 7.30 that the sites have been assessed against criteria, including a long list such as suitability for housing, accessibility to public transport infrastructure provision, impact on Green Belt etc, is wholly incorrect. There is no evidence to demonstrate such assessment has been undertaken.
- 3.41 In terms of phasing, paragraph 7.37 states that the Council has estimated when each allocated site will come forward over the lifetime of the plan. It refers to the Housing Trajectory at Appendix 3 to the DLP. However DHGV - the key strategic site proposed to deliver half the Borough's growth in housing going forward - is not included in the table at Appendix 3.

Draft Allocation – West Horndon Industrial Estate

- 3.42 Land being promoted on the Industrial Estate at West Horndon is not achievable early in the plan period, and should not be relied upon to meet the Council's five year housing land needs. This draft allocation proposes up to 500 residential units, at a very high density, with little room for public open space or community facilities. Development at such a high density would result in predominantly smaller units which would not meet the needs of the Brentwood housing market. The existing industrial estate has a number of thriving businesses including 11 freehold and some 20 leasehold titles. Many of the leases have long unexpired terms extending to 7, 26, 36 and even 991 years. For this land to be developed in the plan period the owners will need to demonstrate:
- agreement has been reached between various freeholders for the merger of their respective interests and promotion of a comprehensive development scheme;
 - agreement has been reached with the leaseholders for the termination of leases;
 - that existing tenants do not have rights under the Landlord and Tenant Act 1954, or these cannot be waived; and
 - there are no restrictive covenants or other limitations that impinge on delivery.
- 3.43 The multiple freehold and leasehold titles will act as an impediment to the release of this land for redevelopment within the plan period, and certainly in the early years of the plan.

Affordable Housing

- 3.44 The evidence base as it relates to affordable housing is out of date. This is being addressed in ongoing work towards an update to the SHMA, published on 15 March 2016. This update needs to address recent government announcements and measures that propose to considerably increase provision. The DLP should consider full objectively assessed need for market and affordable housing,



which now needs to reflect the government's latest initiative towards building 400,000 affordable homes, of which 50% should be starter homes.

Economic Prosperity

- 3.45 We support the Council's objective to promote economic growth. The DLP states in Policy 8.1 the ways in which this will be secured. The first refers to the economic benefits arising from Crossrail. However, background evidence assessing the impact of Crossrail is not available and has not therefore influenced this plan.
- 3.46 The DLP confirms that a high proportion of the Borough's residents commute to work elsewhere and that employment provided by small businesses is growing. Furthermore, the A127 will see significant economic growth based on plans to redevelop land at junction 29 of the M25, some growth at Childerditch Industrial Estate, and as part of DHGV.
- 3.47 We submit that strategic growth including new jobs and homes, is best provided at West Horndon that would be well-placed to meet all these employment objectives. The settlement lies in the A127 corridor and is easily accessible to the main arterial routes (including A127, A12 and M25). It is served by a railway station and public transport links to key urban areas. Economies of scale would allow some local employment provision, specifically aimed at small businesses, which would be accessible by walking and cycling. In addition it lies close to the proposed M25 employment location and public transport measures could be introduced to improve linkages between the two.
- 3.48 There is inconsistency in terms of the proposals for redevelopment of existing employment land for housing at West Horndon, when this serves as an important and much needed employment resource.

Environmental Protection and Enhancement

- 3.49 Given the strategic objectives of the plan that seek to safeguard the Green Belt (SO9) and protect and enhance valuable landscapes (SO10) it is a major failing of the DLP that it has not been guided by background evidence on these issues. This is particularly surprising given the Council's more recent acceptance (Strategic Growth Options consultation in January 2015) that it needs to meet its full needs for market and affordable housing, and that this will require the release of some land in the Green Belt.
- 3.50 The government's position on the protection of the Green Belt is set out in section 9 of the NPPF. This acknowledges that it is for local authorities to define and maintain Green Belt land in their local areas. The government expects LPAs with Green Belts to establish boundaries in their Local Plans, which can be altered as part of the plan review process. At that time authorities should consider Green Belt boundaries having regard to their intended permanence in the long term, so that they are capable of enduring beyond the plan period (NPPF, paragraph 83).
- 3.51 In the DLP there is reference to an evidence base document entitled Green Infrastructure Strategy and published in September 2015. We submit that this report fails to draw any overriding conclusions but defers instead to additional work. A note is attached to this report that states that the GIS will require review and update upon receipt of Open Space and Sport Assessment and Landscape Sensitivity and Landscape Capacity Study, commissioned by the Council and due Spring 2016. The broad findings of the report are at odds with the latest interim SA. The report lends some support to Dunton for strategic growth but the results appear contrived. In dealing with Dunton the report also refers to "or another current new development site".



- 3.52 The DLP does not allude to a Green Belt Review. It deals in Policy 9.12 with “Site allocations in the Green Belt”. This policy states that sites allocated to meet housing needs in Green Belt will be expected to provide significant community benefit, both for surrounding existing communities and those moving into new homes on the site. These sites are proposed to be de-allocated from Green Belt to allow development to take place and provide new defensible boundaries to protect open countryside for future generations. It goes on to add that the extent of development at Dunton Hills Garden Village will be de-allocated from Green Belt. Despite this there is a complete lack of assessment of the Green Belt, and nor is there a landscape character assessment, to advise on the most appropriate land to release for development. The only work that has emerged is the assessment by Crestwood that draws the key conclusion that Dunton makes a high contribution to Green Belt contribution. This evidence base document is in full contravention to the DLP.
- 3.53 There is no evidence base in place to have influenced the selection of the DLP’s proposals, nor rejection of alternatives, from a Green Belt or Landscape perspective.
- 3.54 Countryside Properties, together with the promoter of land to the west of West Horndon, has commissioned a Green Belt Review that considers the relative merits of purposes of the Green Belt in Brentwood Borough. This identifies areas where the purposes of the Green Belt perform relatively less well. Most of these are located adjacent to the built up area of Brentwood town/Shenfield, but three other areas stand out as locations where development would have relatively less harm on Green Belt purposes than other parts of the Borough. These are north of Blackmore, the east and west of West Horndon and at Herongate. The report comments upon the rectangular area of land in the south of the Borough that includes the settlement of West Horndon. This is described in landscape terms as featureless and as having the least sensitivity to change. It is identified in the adopted Local Plan as an area for “landscape improvement”. In terms of sprawl as a Green Belt purpose, the land to the east of West Horndon is contained by the A127, A128 and the railway line. It is not visually connected to Basildon but extending development in the gap between the A128 and Laindon would result in a perception of coalescence.
- 3.55 Countryside Properties also independently commissioned Rummey Design to look at Green Belt and landscape issues in relation to strategic options for growth, including Dunton (written when the joint proposals were being considered) and West Horndon. The report prepared by Rummey Design forms part of Appendix 2. The work of Rummey Design finds that the G1 Horndon Fenland Character Area as defined by the Council in a Landscape Character Assessment (2006) has a disturbed tranquillity, largely as a result of road noise. It has a general sense of enclosure to the north and east formed by low wooded hills, but more open views southwards to power lines and Tilbury. The area is assessed as having moderate sensitivity to change due to its open, flat nature, and the fact that it is overlooked. The combination of a well-established network of hedgerows and hedgerow trees with the low level topography of the land causes significant limitation to views of land to the east of West Horndon. Open views of the land are however possible from the footpaths and publically accessible land associated with Thorndon Country Park South. A mix of both rural and urban elements defines the expansive views experienced from the Country Park. These include industrial elements such as chimneys and factories and infrastructure elements such as bridges and wide roads. Existing vegetation within the site at West Horndon and the Country Park limits visibility.
- 3.56 The work of Rummey Design finds that only three of the five statutory purposes of the Green Belt would be affected by development proposals at this location. It would not bring about harm to the ‘setting or special character of any nearby historic towns’ and would not offset any other ‘recycling of urban land’. There would be some adverse impacts on the remaining three purposes of the Green Belt in the vicinity of the proposed development, but relative to other Strategic Growth locations



being considered these would be low. With regard to ‘unrestricted sprawl of large built-up areas’, land to the east of West Horndon would extend the village to a limit that is logical and contained, occupying a small extent of land between West Horndon and Basildon. It would appear as a balanced and well-planned layout, of aesthetically high quality; this would not constitute sprawl. Development to the east of the village would not effect the extent of conurbations of Brentwood or Basildon, nor give rise to a sense that it contributes to their spread across the landscape. The proposal would be perceived as an integral part of the village of West Horndon, not a new town or extension of an existing one. It would therefore not appear to cause ‘merging of nearby towns into one another’. The development of land east of the village might perhaps appear as an encroachment on the countryside, but because it will not be highly visible, this effect will be to a lesser degree than other growth options sites such as Dunton for example. Development would be screened to views from outside West Horndon. Although it would adversely affect the objectives of the Green Belt by taking land into development, it provides the opportunity to enhance its landscape setting and to resolve access, social and design issues of the existing urban environment. It is inevitable that to meet BBC’s full OAN, Green Belt land will have to be identified for release for housing and employment. In a Borough where 89% of land is within the Green Belt this privately owned land that has been subject to years of intensive farming represents one of the least attractive and lower quality parts of the landscape that could be released to meet growth needs. It could provide benefits that could offset the relatively minor harm it would cause the Green Belt.

- 3.57 In considering the joint proposals for Dunton the report of Rummey Design found that there was insufficient detail to undertake a full landscape and visual impact assessment. This remains the case with regard to the separate proposals for DHGV in Brentwood. It was concluded that there are many potentially adverse outcomes that would result from large-scale development in this location. The ‘fit’ of proposed development in landscape context has not been demonstrated. Adjacent land in Basildon Borough is designated as an Historic Environment Zone and considered to be ‘sensitive to change’. Various landscape studies commissioned by the Council, as well as the SA to date, indicate that Dunton has a ‘low’ landscape capacity to accommodate development without adverse landscape impacts. Development would be exposed to views from the south and west and from higher ground to the north. It would be visible from the extensive transport network surrounding the site.
- 3.58 Due to site capacity considerations relating to the separate proposals there is concern that development would now lie closer to West Horndon than envisaged in terms of the joint proposals. It would contribute to a perception of urban sprawl because the site occupies a significant area of the land between two built up areas. The large scale and spread of the proposed development would appear as encroachment within uncontained countryside.

Quality of Life and Community infrastructure

- 3.54 This section of the DLP covers a range of issues that need to be considered when planning for new infrastructure. It is therefore a major failing of the plan that an Infrastructure Delivery Plan is described as ‘forthcoming’. This is contrary to national planning policy that requires local authorities to demonstrate that sufficient infrastructure exists, or will be provided, to support their strategies for new development, as set out in local plans. In the absence of this we highlight the merits of developing land at West Horndon that can build upon the strengths of an existing settlement and add to/complement existing services and facilities. This land is already accessible to public transport, which can be supplemented and improved.
- 3.55 The DLP (paragraph 10.3) describes transport as a key component of sustainable development yet the progression of the plan to date and associated SA demonstrates a complete absence of evidence



on transport. Indeed it is not even mentioned as a topic in the Interim SA that has informed the Draft Plan. Assessment of the DLP from a transport perspective has been undertaken by Odyssey Markides and is attached at Appendix 3. This also assesses the latest modeling work by PBA, published after the commencement of consultation on the DLP.

- 3.56 The key findings of Odyssey Markides (OM) support the view expressed already in these representations that there has been a lack of consideration of transport as a topic in the evidence base and SA. Transport as a topic should include the assessment of links to public transport and in particular to railway stations. It should consider travel by all modes including walking and cycling, public transport as well as vehicles.
- 3.57 Detailed assessment of the land at Dunton by OM, demonstrates that it would be difficult to deliver a safe and suitable access strategy, and that this would be prohibited by cost and environmental considerations. There is insufficient land to create access from the A127 to the north. Access from the west would have to cross a flood plain, impacting on open space, wildlife and presenting safety issues. Access to the east, via the existing urban area of Basildon Borough, would lead to significant capacity issues on local roads. The majority of train users from DHGV would choose to drive to a railway station at West Horndon, Laindon or Basildon thereby putting additional pressure on the highway network and station car parks.
- 3.58 In contrast a strategic allocation at West Horndon would be based on a transport hub, as national policy requires. There is a suitable access strategy and growth could include much needed improvements to the existing station, including access by bus, to benefit existing residents and rail users. The DLP in policy 6.5-“ Key Gateways”, states that locations around railway stations should contribute to the aims of emphasising important gateways into the Borough, through delivery of higher density development to meet local needs in central sustainable locations. West Horndon is one of the key Gateways into the Borough and it is appropriate for this to act as a focus for strategic growth.
- 3.59 Appendix 1 to the report of OM provides a critique of the modelling work by PBA. This finds fundamental issues with the depth of the work carried out, the data presented and conclusions drawn from that data. Critically the work has not been reviewed by the Highways Authority, Essex County Council and Highways England. The methodology used is not clear and the modelling tool is unreliable. For example it does not appear to take account of existing and proposed major development including infrastructure. It lacks depth and serious technical analysis. No real conclusions on the various strategic options for growth can be drawn from it.

Conclusions

- 3.60 The overwhelming conclusion to draw on the DLP is that in all topic areas it has not been influenced by an appropriate and proportionate evidence base. There is no background assessment to support or justify the policies of the Plan. It is flawed in terms of evidence on housing, business, infrastructure, the environment, and in terms of viability and deliverability to list but a few. There has been a complete lack of evidence to inform what is in the plan and the Council is hastily collating and publishing this retrospectively. Some documents that are only now being published were commissioned three years ago. These are now seen to be contradicting the policies of the plan. Without an evidence base there can be no SA. The effects of the options and the plans policies must have been appraised in relation to the baseline situation. The absence of an evidence base and SA mean that the plan cannot be found sound. It is questionable whether this situation can be corrected in due course and we call for the Council to address the matter now and undertake the work required.



4.0 LAND TO THE EAST OF THORNDON AVENUE, WEST HORNDON – A JUSTIFICATION FOR STRATEGIC GROWTH

- 4.1 Representations to the Preferred Options Plan in July 2013 (Appendix 1) included a sustainability appraisal of land to the east of Thorndon Avenue in the settlement of West Horndon. This land continues to be the focus of these latest representations submitted in respect of the DLP, on behalf of Countryside Properties. Back in 2013 the settlement of West Horndon was being considered by the Council for strategic growth to include 1,500 new homes. In January 2015 further representations were made to the Strategic Growth Options consultation (Appendix 2) which for the first time accepted the need to provide for full objectively assessed needs for housing in the Borough. In this context it examined the case for large-scale growth within 5 options, including West Horndon. Throughout the preparation of the Local Plan we have consistently argued that it is not supported by a robust, up to date evidence base as national planning guidance requires. This situation still remains to be corrected.
- 4.2 In the few months leading up to the publication of the DLP, Countryside Properties were invited to present their proposals to Council members (the presentation is attached at Appendix 4). Members and officers appeared to generally welcome the proposals for strategic growth at West Horndon, that are capable of delivery early in the plan period. It was suggested that Countryside Properties should work with promoters of land to the west of the settlement in terms of comprehensive master planning, and place making and potential improvements to the settlement of West Horndon. Officers confirmed that a Green Belt Review would be issued as a draft document alongside the Draft Local Plan, for consultation in January 2016.
- 4.3 It was therefore surprising when in January 2016 the list of allocated sites appeared in the press and this omitted the settlement of West Horndon for strategic growth. At the meeting of the Ordinary Council on 27 January many members were angry at having found out the list of proposed allocations in this manner and so late in the day. Overriding comments at this meeting were that members had not known about the final choice of sites and that this had been determined by a few within the Local Plan Working Group. Several members expressed concern that the spatial strategy for growth was not supported by work on infrastructure requirements and the general feeling of the meeting was that although not perfect the Council should proceed with consultation to avoid delay and risk matters being taken out of its hands.
- 4.4 We submit that West Horndon as a settlement capable of absorbing significant growth, 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. This is supported in the findings of the “Green Belt Review” undertaken by Tetlow King, and work by Rummey Design as referred to in section 3 above.

Representations on behalf of
Countryside Properties (UK) Ltd
Land to the East of West Horndon



- 4.5 As the evidence base to the Plan is beginning to emerge it is confirming support for growth in the A127 corridor and land at West Horndon is proving to be the most sustainable option for growth. 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.
- 4.6 When Countryside Properties were asked to present to members in November 2015, it was seen as preferable for a proposal to be developer-led, rather than a land promotion company. It was felt that Countryside Properties has a strong record of delivering high quality, strategic developments and it can demonstrate how it has worked with existing communities and improved existing services and facilities.
- 4.7 The presentation set out proposals for strategic growth including a number of improvements to the existing settlement of West Horndon:
- 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.
- 4.8 With reference to an illustrative masterplan the presentation highlighted the provision of some 40 hectares of public open space and recreation facilities, improvements to biodiversity, and other infrastructure improvements. As the previous representations to the emerging Local Plan on behalf of Countryside Properties demonstrate, it has commissioned consultants to undertake full assessment of the development proposals to ensure that any impact can be fully mitigated.
- 4.9 In considering ways to improve the existing settlement, Countryside Properties 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 contributing towards improving the ‘heart’ of the village.
- 4.10 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 this Plan. Since the DLP was issued for consultation a hastily prepared report comprising the modelling of various road junctions has been issued retrospectively to support the proposed strategy. Comments on this and its shortcomings have been summarised in paragraph 3.58 above and are attached to the work of Odyssey Markides at Appendix 3.



- 4.11 OM confirm in a report that forms part of 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.
- 4.12 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.
- 4.13 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.
- 4.14 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.
- 4.15 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.
- 4.16 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.

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- 4.17 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 the Interim SA to the Strategic Growth Options consultation and continued into the Interim Report that accompanies the DLP. The latest SA highlights the fact that although the Council appears to be settled on the A127 as the preferred location for strategic growth it is far from decided on a preferred allocation within the transport corridor. Once again land at West Horndon appears to be favoured in terms of ‘significant negative effects’ anticipated as a result of development at Dunton. For this reason the latest SA states that “uncertainty remains regarding DHGV.”
- 4.18 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 even included in the housing trajectory of the DLP.
- 4.19 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.



5.0 CONCLUSIONS – PROPOSED AMENDMENT TO THE EMERGING LOCAL PLAN

- Brentwood Borough Council has spent over six years progressing a Local Development Plan for the Borough. During this time it has described the evidence base that is supposed to inform the contents of the Plan as ‘forthcoming’. Today the evidence base remains substantially incomplete.
- It follows that without an appropriate and proportionate evidence base, the process of Sustainability Appraisal (SA) cannot have been undertaken. The carrying out of an SA is an essential part of the plan-making process. It is a legal requirement.
- The NPPF requires a local plan to be examined by an independent inspector who will assess whether the plan has been prepared in accordance with the Duty to Cooperate, legal and procedural requirements and whether it is ‘sound’. The Inspector will want to be satisfied that the plan is the most appropriate strategy when considered against the reasonable alternatives and based on proportionate evidence.
- A substantive revisiting of the plan strategy is now required to include a thorough and effective SA, based on a full and up to date assessment of objectively assessed needs for housing, against which to properly test the alternatives for growth. The absence of an evidence base and SA mean that the plan cannot be found sound. It is questionable whether this situation can be corrected in due course and we call for the Council to address the matter now and undertake the work required.
- As the DLP has progressed the settlement of West Horndon- situated in the A127 transport corridor – has been identified by the Council as a location for strategic growth for new homes and jobs. In addition to good road and rail access it is served by existing shops, employment and community facilities. In a Borough where 89% of land is within the Green Belt this privately owned land that has been subject to years of intensive farming represents one of the least attractive and lower quality parts of the landscape that could be released to meet growth needs.
- At a very late stage in the preparation of the plan DHGV resulted from a failed attempt at cross boundary development with Basildon to create a large Garden Suburb. DHGV is not a realistic option for strategic growth. The site boundaries and details of the development proposed are not sufficiently distinct to identify the sustainability implications or allow meaningful comparison to be made with the alternatives for growth, such as land at West Horndon.
- The SA has failed to outline the reasons for selecting DHGV as a preferred option for growth and the reasons why land at West Horndon should not be progressed.
- The DLP and SA to date both confirm the Council’s uncertainty regarding the draft strategy for growth proposed and selection of land allocations to deliver this. In places these documents state that the Council remains open to considering matters further and that on-going commissioning and publication of evidence will inform a next iteration of the plan. The latest SA highlights the fact that although the Council appears to be settled on the A127 as the preferred location for strategic growth it is far from decided on a preferred allocation within the transport corridor. Land at West Horndon appears to be favoured when compared against the ‘significant negative effects’ anticipated as a result of development at Dunton. For this reason the latest SA states that “uncertainty remains regarding DHGV.”



Brentwood Borough Local Plan 2015-2030

Preferred Options Consultation (Regulation 18)

Representations

on behalf of

Countryside Properties

Land to the East of Thorndon Avenue, West Horndon

October 2013



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Appendices

Appendix 1 Land East of West Horndon – An Opportunity for a Landscape-led Urban Extension

Rummey Design
October 2013



1.0 Summary of Representations

1.1 Objection is raised to the Brentwood Borough Local Plan 2015-2030, Preferred Options Consultation, on the basis that it is unsound as currently drafted, for the following reasons:

- The absence of an appropriate, comprehensive and up-to-date evidence base.

In particular the following key documents are referred to in the Draft Plan as “forthcoming” and not yet available for public consultation:

- Landscaping Sensitivity Testing and Green Belt Assessment;
- Objectively Assessed Needs Assessment;
- Transport Modelling Work;
- Brentwood Housing strategy;
- Utilities Assessment;
- Infrastructure delivery plan; and
- Strategic Housing Market Assessment (SHMA) Update.

A robust and credible evidence base must inform the content of the emerging local plan. Local plan policies must be justified by evidence in order to be considered sound. Failure to publish these and other technical documents will deprive interested persons of the opportunity to comment upon them and fully to comprehend how the preferred spatial growth strategy has been decided.

- The emerging plan does not propose to meet its full objectively assessed needs (OAN) as advised in the National Planning Policy Framework (NPPF). Seeking to meet such needs is part of the soundness test of being positively prepared (paragraph 182 of the Framework). Proposed provision of 3,500 new dwellings to be built in the Borough between 2015-2030, at an average annual rate of 233 dwellings per annum, is woefully inadequate to meet the needs of Brentwood over the next 15 years. Various studies commissioned by the Council place the housing need target closer to 5000 – 5500 (331 – 362 dwellings per annum) whilst the ONS/CLG projections point to a need for 6000 new dwellings over the plan period (400 per annum).
- There is no explanation given as to how the shortfall in housing would be addressed. In such circumstances the NPPF advises local planning authorities to accommodate unmet need which cannot wholly be met within their own areas, under a ‘duty to cooperate’. The explanatory text to the emerging local plan confirms that the Council is “exploring options to look to neighbouring authorities to meet unmet need through a duty to cooperate” (paragraph 2.21), but there is no evidence that this action has been progressed.
- The absence of an adequate sustainability assessment. We submit that the Brentwood Borough Local Plan is open to legal challenge on the ground that there has been a failure to comply with the relevant EU Directive and Regulations made to implement it.

1.2 The matters addressed above are so central to the Brentwood Borough Local Plan’s overall strategy that the emerging plan, as it stands, cannot be found sound. A substantive revisiting of the plan strategy is required, to include the preparation of a thorough and effective SA that takes into account a proper testing of the alternatives for growth in the context of the OAN for housing that is emerging.



- 1.3 On the basis that the above would need to be subject to full public consultation, it is submitted that the Council should withdraw the draft Local plan, carry out the work specified above, and republish the plan for consultation, together with a full evidence base.
- 1.4 The emerging local plan promotes a spatial strategy for the Borough that directs development growth to the existing urban areas of Brentwood, Shenfield, and West Horndon, in locations well served by existing and proposed local services and facilities (SO1). The strategy is also influenced by policy SO2 that seeks to manage development growth to that capable of being accommodated by existing or proposed infrastructure, services and facilities. Policy SO7 seeks to safeguard the Green Belt and protect and enhance valuable landscapes and the natural and historic environment. No change to the Green Belt is proposed other than that to accommodate a strategic allocation at West Horndon (1500 new homes as part of a mixed use allocation). Within this proposed growth strategy, a strategic allocation at West Horndon is justified on the basis that the location has good road and rail access, local shops, employment and community facilities. Furthermore the Sustainability Appraisal of the Plan, as far as this has progressed, finds that “The focus of a significant amount of growth on Green Belt land in West Horndon is understood to be relatively unconstrained from a landscape perspective”.
- 1.5 West Horndon as a settlement to absorb significant growth is strongly supported in the emerging plan. However since the settlement was first assessed as a potential growth location, the need for new homes has substantially increased. The Council is unable to meet its needs for new housing and in a Borough that has few opportunities for development, it should consider whether there is scope to maximise the potential of this location and increase the quantum of development being proposed.
- 1.6 These representations will demonstrate that there is the potential to develop land to the east and west of the existing settlement and provide a balanced urban extension that builds upon and strengthens the existing village centre by adding to its existing facilities and services. These representations are supported by a detailed landscape analysis and transportation assessment that have influenced an indicative masterplan layout.



2.0 Introduction and Background to Representations

- 2.1 Land to the east and west of West Horndon has been promoted for development via the Local Development Framework for Brentwood, since 2009. It was first put forward in response to a call for sites by Brentwood Borough Council upon commencing a Strategic Housing Land Availability Assessment (SHLAA). This Assessment commenced in October 2009 and was concluded in May 2010. Atkins and Carter Jonas Ltd were commissioned to assist the Council. It was based on a housing target established by the East of England Regional Plan, adopted in 2008. The regional plan required Brentwood Borough to provide 3500 dwellings 2001-2021, i.e. 175 dwellings per annum.
- 2.2 The East of England Plan was revoked in January 2013 and the National Planning Policy Framework now requires local planning authorities to *“boost significantly the supply of housing”* and in doing so should *“use their evidence base to ensure that their local plan meets the full, objectively assessed needs for market and affordable housing..., including identifying key sites which are critical to the delivery of the housing strategy over the plan period”* (paragraph 47).
- 2.3 Paragraphs 158 and 159 of the NPPF confirm that local planning authorities should have a clear understanding of housing needs in their area, and that requires an adequate, up-to-date and relevant evidence base. To form a clear understanding of housing needs in their area they should *“prepare a Strategic Housing Market Assessment (SHMA) to assess their full housing needs, working with neighbouring authorities where housing market areas cross administrative boundaries”* that will *“identify the scale and mix of housing”* and should *“meet household and population projections, taking account of migration and demographic change.”* Furthermore local planning authorities are advised to *“prepare a Strategic Housing Land Availability Assessment to establish realistic assumptions about the availability, suitability and the likely economic viability of land to meet the identified need for housing over the plan period”*.
- 2.3 The base assumptions of the SHLAA, final report dated October 2011, are therefore considerably out-of-date. The supply of land identified may have shown sufficient potential to meet the regional plan target but is grossly inadequate in terms of meeting the current Objectively Assessed Needs (OAN) of the Borough based on the latest demographic statistics. The assessment was defined by its authors as a snapshot in time and it was clarified that additional sites will come forward, and sites discounted at that time may well become available for development in the future, as constraints associated with them are overcome. Added to that we submit that as housing need targets change, the SHLAA will need to adapt accordingly.
- 2.4 A SHMA proposed as part of the evidence base to the local plan and dated January 2010, was in fact undertaken in 2008 and looked at the period 2007 – 2026. More recent work on OAN undertaken by Peter Brett Associates (2013) to guide the Council in defining a preferred level of growth, is yet to be formally published. The explanatory text to the Draft Local Plan confirms however that various studies have placed this level of need at between 331 and 362 homes a year, whilst ONS/CLG projections point to a need for a figure of 400. These estimates all greatly exceed the target figure adopted in the draft plan of 3500 over the plan period, averaging at 233 homes per annum.
- 2.5 The Atkins Assessment of 2010, identified that land at West Horndon – promoted at that time by the West Horndon Development Consortium – was suitable available and achievable for development. This comprised two tranches of land:
- Land East of Childerditch Lane, now being promoted by E and A Strategic Land and identified as a preferred option for growth in the Draft Plan. 10 hectares of Grade 3 agricultural land to accommodate 300 dwellings, with a wider area of 80 hectares being rejected on the basis of insufficient housing need; and
 - Thorndon Avenue and West of Tilbury Road, now being promoted by Countryside Properties and the subject of these representations. This area is referred to in the Draft Plan as an



alternative location for growth. 10 acres of Grade 3 agricultural land to accommodate 300 dwellings, with a wider area of 75 hectares being rejected on the basis of insufficient housing need.

- 2.6 The SHLAA undertaken by Atkins made no substantial distinction between the above two alternative parcels of land, which would have led to the former being identified as the preferred option for growth. On considering the suitability of both sites the assessment confirmed: *“Any development that provides for more than the local needs of West Horndon would need to be based on an agreed change in the role of West Horndon Village, conformity with a spatial strategy based on Transport corridors and major infrastructure and service improvements for the village. An indicative maximum of 10 (hectares) has been used for this purpose, located adjacent to the village boundary but the extent of development of this area would also be considered alongside ...”* (in each case the corresponding alternative parcel of land was referred to). Minor differences in the assessment of the two parcels included comments that land to the east of West Horndon had existing vehicular access and no mention of the arrangements for land to the west, whilst the flatness of that to the east could potentially lead to flood risk. Overall in assessing a development timescale, land to the east was highlighted to come forward in advance of that to the west.
- 2.7 The Atkins report confirmed the need for regular updates and recommended this on a bi-annual basis. In May/June 2011 the Council undertook neighbourhood consultation that included consultation on potential housing sites in the SHLAA. Whilst the findings of this are reported in general terms it is clear that there were no overriding objections to the growth of West Horndon that warranted a special mention, as was the case for other sites and settlements.
- 2.8 Since then the emerging spatial strategy for growth in the Borough has continued to direct development to the existing urban areas of Brentwood, Shenfield and West Horndon, along with the redevelopment of existing land and buildings in the Green Belt. This approach will go a long way towards achieving the Council’s aim of protecting the Green Belt. However, the level of growth proposed falls considerably short of future development needs. The development opportunities that exist in these three identified growth areas require further detailed assessment to ensure that these are being utilised to the full, including the release of greenfield land at West Horndon.
- 2.9 Further Draft Site Assessment carried out by the Council and reported in a document dated July 2013 re-examines land at West Horndon. At this stage land to the west of the settlement (some 44ha of land) came forward as an allocation for mixed-use development as part of West Horndon Strategic Allocation. It would appear that the promoter – E and A Strategic Land – confirmed detail regarding viability and deliverability that gained an advantage relative to the promotion of land to the east. The outcome of re-assessment of land to the east of the settlement was that the current land use should be retained although it was highlighted as a *“Reasonable alternative for mixed use as part of the Strategic Allocation”*. Access continued to be a positive factor in respect of land to the east. It was reported that access from Station Road is considered satisfactory. The access arrangements for land to the west continued to be referred to in the following way: *“Access from Childerditch Lane is considered satisfactory as long as the boundary hedge is partly removed. However, access for pedestrians and public transport is considered poor.”*
- 2.10 At no time has there been any conclusive survey work or assessment that finds clear favour in land to the west of the settlement being identified as the preferred location for strategic growth. The Sustainability Appraisal fails to provide an outline of the reasons for selecting the alternatives dealt with, and a proper description of how the assessment was undertaken. It fails to identify, describe and evaluate the alternatives in a comparable way. There is no clear understanding of why land to the east of West Horndon was not promoted as the best option for growth.
- 2.11 The latest guidance from the government on meeting OAN and boosting the supply of housing, now requires further reassessment of the spatial strategy for growth and identification of more land to



meet the Boroughs needs over the next fifteen years. As these representations will demonstrate, in a Borough that is heavily constrained by Green Belt (80% is covered by this designation) there is an urgent need to optimise growth at West Horndon, justifying the release of land on both sides of the settlement. Furthermore this solution to the expansion of the existing settlement will provide a balanced extension that follows the thinking in the early SHLAA documentation. A quantum of development to the east and west of West Horndon will ensure good accessibility to the village centre and facilitate its strengthening by adding new facilities and services. Crucially some development to the east of West Horndon will enable the entrance to the village to be properly addressed, and presents the opportunity to create an attractive main, new gateway into the settlement.



3.0 Representations to the Development Local Plan Policies and Key Evidence Base Documents.

- 3.1 This section of the representations examines the key policies of the plan that have influenced the proposed spatial strategy for growth in the Borough, notwithstanding our overriding submission that the plan as a whole is not based upon appropriate, or up-to-date evidence base; has not been prepared to meet the objectives of sustainable development: nor specifically to meet, or even come close to meeting housing need and demand within the borough. Due to fundamental concerns about the lack of an evidence base we confine our representations to broad strategic objectives of the plan.

Policy SO1 - Direct development growth to the existing urban areas of Brentwood, Shenfield and West Horndon in locations well served by existing and proposed local services and facilities.

- 3.2 In principle this policy is supported in its aim to protect the Green Belt and local character and foster sustainable communities. Support is also extended to criteria for identifying development sites including whether they:
- are accessible to public transport, services and facilities
 - 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
 - are likely to come forward over the plan period.

The specific exception that the policy makes to allow development in the Green Belt at West Horndon is supported on the basis that it can absorb a significant amount of growth because it is unconstrained from a landscape perspective. Furthermore the location affords good road and rail access and the existing settlement is already served by local shops, employment and community facilities. These offer the potential for sustainable development over the long term.

- 3.3 It is submitted that this policy must be read in the context of the overall target for growth and whether the plan is then capable of delivering sufficient sites to meet the Borough's objectively assessed development needs. The issue of the quantum of development needed will be addressed in response to policy SO2 below.

Policy SO2 – Amount and Distribution of Residential Development 2015-2030.

- 3.4 Provision is made for 3,500 new dwellings to be built at an average annual rate of 200 new dwellings 2015-2020 rising to 250 new dwellings 2020-2030. These are proposed to be distributed between Brentwood and Shenfield Urban area (1800, or 51% of the requirement), West Horndon (1500, or 43% of the requirement) and the remainder distributed between villages both within and excluded from the Green Belt.
- 3.5 Support is extended to the distribution of the proposed new dwellings in accordance with the objectives of policy SO1. However, national planning policy is clear in advising local planning authorities that to comply with one of four 'soundness tests' the plan should demonstrate that it has been 'positively prepared'. This requires the plan to be based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development (NPPF paragraph 182).
- 3.6 The Council is clearly unwilling to depart from the proposed new dwelling total of 3,500 as set out in the draft plan because it considers that this would require significant Green Belt release (a national designation to which the NPPF does attach particular importance), the fact that it would significantly



worsen congestion in Brentwood Town Centre and irrevocably change the rural character of the Borough.

- 3.7 It is a requirement of the NPPF (paragraph 159) that local planning authorities should have a clear understanding of housing needs in their area. Evidence base documents that have been submitted are incomplete and out-of-date in this regard. The 2010 Strategic Housing Market Assessment was undertaken in 2008 and relates to the period 2007-2026. An update commissioned by the Council is said to be “forthcoming”. Crucially various factors have changed in the intervening period including the revocation of the Regional Plan and availability of more up-to-date population and household projections. Emerging figures such as those from Peter Brett Associates confirm an OAN of 4960 to 5600 (331 to 373 home a year). Recent ONS/CLG figures place this need even higher at 6000 (400 homes a year). The NPPF requires the assessment of future housing requirements in local authority areas to have regard to current and future demographic trends and profiles and take into account evidence including the government’s latest published household projections. The household projections provide an important part of the evidence base for the assessment of future requirements for housing.
- 3.8 By contrast the Council suggest that the total housing provision for the Borough should be 3,500 (an average of 233 per annum) because the adverse impacts of meeting its OAN would harm its distinctive quality and character. Availability of supporting services and infrastructure are also said to be key considerations that affect capacity. Although technical work has been commissioned to enable the Council to reach an informed view on OAN and the number of new homes that can be sustainably accommodated, this work has not yet been published. Crucially Transport Modelling, a Landscape and Green Belt Assessment, Utilities Study and SHMA Update, are not yet available. In the absence of these the draft plan makes unfounded assumptions that growth over 3,550 new homes would “significantly worsen existing traffic congestion problems; require sites to be developed in landscape sensitive locations; be difficult to service with necessary infrastructure; and have a generally urbanising effect through widespread loss of Green Belt...”
- 3.9 An up-to-date assessment of housing needs is required by paragraph 47 of the NPPF. Such an assessment should be properly undertaken in the context of a SHMA, the preparation of which is also a requirement of the Framework (paragraph 159). The absence of an up-to-date SHMA prepared in the context of the housing market area, is reason enough alone for the plan to be found unsound.
- 3.10 The draft plan states that the SHLAA identifies more land than would be needed to meet housing requirements. However the full objectively assessed needs of the area considerably exceed the now revoked Regional Plan targets upon which the SHLAA was originally based.
- 3.11 The significance of the Borough’s environmental assets and designation cannot be underestimated, especially given the advice in the Framework, which attaches particular importance to the Green Belt. However, any failure to meet the full, objectively assessed housing needs as a result of constraints arising from those designations would have to be clearly and specifically justified in the terms of the Frameworks policies. The policies of the NPPF do not set out ‘blanket bans’ on housing development. These policies must be read in the context of the Framework as a whole. A recent High Court case between Hunston Properties Ltd and the Secretary of State, determined in September this year, is of relevance. In this Section 78 appeal it was found that a shortfall between objectively identifiable housing need and the housing that could be provided on deliverable housing sites (as identified by the Council) was capable of being a ‘very special circumstance’ to justify what would otherwise be inappropriate development of the Green Belt. In Brentwood it would appear that the justification for not undertaking a Green Belt review derives from the Council’s view that housing sites largely outside the Green Belt (plus land at West Horndon) are available to meet the housing target of 3,500. However given that this target was itself influenced by the presence of constraints, including the Green Belt this is somewhat of a circular argument. We submit that the Council cannot justify its



opposition to a Green Belt review if it is providing less housing than required by a revised needs assessment, once this is complete. Many of the above comments point towards a substantive revisiting of the overall plan strategy.

- 3.12 Finally following on from a lack of housing needs evidence to support the draft plan, we submit that the Council has not satisfied the 'Duty to Co-operate'. In particular it remains unclear whether there are sites outside the Borough of Brentwood that could meet some of the assessed need. The neighbouring planning authority of Chelmsford has submitted strong representations of objection to the draft plan stating that Brentwood is choosing not to make provision to meet its full housing need and looking to neighbouring authorities that are similarly constrained by Green Belt. Brentwood Council's spatial strategy is further queried on the basis that the NPPF makes provision for Green Belt boundaries to be altered in the context of the preparation of a Local plan. Finally concerns are expressed about the failure to complete and publish its Landscape and Visual Assessment - a crucial piece of evidence base work in the light of the preferred spatial strategy for growth.
- 3.13 The draft plan at paragraph 2.21 confirms that the Council is exploring options to look to neighbouring authorities to meet unmet need through a duty to cooperate. However, we submit that to comply with the Framework the Council will be expected to demonstrate evidence of having effectively cooperated to plan for issues with cross-boundary impacts when the Local Plan is submitted for Examination. Coventry City Council is but one example of a Local Plan (in this case core strategy) being suspended by an Inspector and subsequently withdrawn until it has fully explored ways of meeting its shortfall via a joint SHMA with neighbouring authorities under a 'duty to cooperate'.

SO3 – Job Growth and Employment Land.

- 3.14 This policy makes provision for 5,400 additional jobs to be provided at an average annual rate of 285. The broad distribution includes 53 hectares on existing employment sites and 31 hectare within new allocations. We submit that more background work is required to inform the plan in this regard. The NPPF advises local planning authorities to ensure that their assessment of and strategies for housing, employment and other uses are integrated, and that they take full account of relevant market and economic signals. The Employment Land Review carried out by Atkins was undertaken in 2009 in the context of the abandoned Core strategy, and requires updating.
- 3.15 In the context of the above we submit that all or a large proportion of the existing employment in West Horndon should be retained in the interests of promoting a sustainable mixed use community. We would query the promotion of these areas for housing and the allocation of replacement employment elsewhere in less sustainable locations.

Policy CP1- Sustainable Development

- 3.16 Support is extended to the Council's aim to reflect the presumption in favour of sustainable development contained in the NPPF when considering development proposals.

Policy CP2 - Managing Growth

- 3.17 There is a distinct lack of evidence base to properly advise on the precise location of new development, not least the absence of a Landscape Sensitivity and Green Belt Assessment as well as an Infrastructure Delivery Plan and Transport Modelling.



Policy CP3 – Strategic Sites and CP4 – West Horndon Opportunity Area

3.18 Further background work is necessary to determine key strategic sites. Section 5.0 of these representations appraises the settlement of West Horndon as a location for strategic growth. It can be demonstrated that this is a sustainable location, however the West Horndon Opportunity Area as defined in Policy CP4 does not represent the best solution for an urban extension for reasons of transport and access, landscape and visual impact, drainage, and timing of delivery. Policies CP3 and CP4 are said to be based upon a Sustainability Appraisal. As we will argue in section 4 of these representations, the SA is fundamentally flawed because it fails to comply with the relevant EU Directive and Regulations made to implement it.

Policy DM 23, Housing Land Allocations – Major Sites, and Appendices 2 - Preferred Housing Allocations, and 3 - Housing Trajectory.

3.19 This policy and associated appendices confirms the list of sites allocated for development. West Horndon Strategic Allocation is defined as follows:

- Site reference 020 – owned by Threadneedle Property Investments. 6.39 hectares for housing and mixed use to be phased year 2017/18 to 2021/22 at a rate of 50 dwellings a year, (250 dwellings in total). Reference to PREAPP discussions 13/06008.
- Site reference 021 – owned by Hansteen Land Holdings. 9.84 hectares for housing and mixed use to be phased year 2017/18 to 2021/22 at a rate of 50 dwellings per year, (250 dwellings in total). Reference to PREAPP discussions 12/06173.
- Site reference 037A (8.42ha) and 037B (35.8ha – not all allocated). – owned by E and A Strategic Land and proposed for housing and mixed use to be phased year 2022/23 to 2025/26 at 100 dwellings a year and thereafter years 2026/27 to 2029/30 at 150 a year (total of 1000 dwellings).

3.20 The policy confirms that proposals for housing submitted on these allocations in accordance with the phasing indicated, will be approved where the proposed schedule is in accordance with other relevant policies of the plan. An application in advance of its phasing will only be approved where:

- a. early release would not prejudice the delivery of other allocated sites phased in an earlier time period;
- b. the site is required now to maintain a five year supply of deliverable sites; and
- c. infrastructure requirements of the development can be fully and satisfactorily addressed.

3.21 Objection is raised to the detailed allocation of land to provide a strategic allocation since the evidence base upon which it relies is incomplete. Furthermore the SA fails properly to test both the preferred options for growth and the reasonable alternatives. As section 5.0 of these representations will demonstrate there is a more sustainable development solution to growth at West Horndon that can meet the housing needs being promoted in the plan and potentially a higher requirement as reflected in the draft OAN assessment.

3.22 Strong objection is raised to the Council's willingness to consider early applications in advance of the completion of a full evidence base and SA to test the preferred options and the alternatives. Early applications would in this context be premature as they would seriously prejudice the outcome of the emerging plan and the need to promote sustainable development.

3.23 The explanatory text to policy DM23 confirms the Council's own uncertainty on the allocated sites. It states that "Some sites currently in other uses could be considered suitable to provide for residential use in addition to or instead of sites set out in Policy DM23. Where alternatives are considered more



appropriate (through further assessment) this could have potential effects on housing and economic growth over the plan period, both positive and negative.” It then goes on to list the alternative options that may be suitable in order to provide for growth opportunities at West Horndon in line with Policy CP4, as land east of Thorndon Avenue (038) and South of Station Road (126).



4.0 The Sustainability Appraisal process

- 4.1 Under Section 19(5) of the 2004 Act a local planning authority is required to carry out an appraisal of the sustainability of the proposals in each development plan and prepare a report of the findings of that appraisal. This is known as a Sustainability Appraisal (SA).
- 4.2 The Brentwood Borough Local Plan is required to be the subject to a Strategic Environmental Assessment.
- 4.3 The Strategic Environmental Assessment (SEA) Directive requires an SA to identify, describe and evaluate the likely significant effects on the environment of implementing the plan and reasonable alternatives taking into account the objectives and geographical scope of the plan. The objective of the Directive is to provide for a high level of protection of the environment and to contribute to the integration of environmental considerations into the preparation and adoption of plans with a view to promoting sustainable development.
- 4.4 At the start of the public consultation process on the Brentwood Local plan the position with regard to the sustainability process was that the Council had reached the scoping report stage. The purpose of such a report is to indicate in general terms the scope of the issues that need to be addressed. On 6 September the Council posted an Interim SAR on its website and extended the consultation period on this document until 18 October. The 'Interim' report is described as having been prepared *"with the intention of informing the consultation and subsequent preparation of the draft Proposed Submission Plan, due to be published..."* As an 'interim' SA the authors (URS) confirm that it *"does not need to provide the information required of an SA report"*. The full SAR is not due to be published until later in the year, alongside the Proposed Submission Plan. We submit that this is contrary to the Planning and Compulsory Purchase Act 2004 that establishes a requirement for the process of sustainability appraisal to be carried out alongside plan making. In the absence of this, the Council rely on previous work undertaken between 2007-2009 in relation to the then emerging Core Strategy for the Borough (subsequently abandoned).
- 4.5 The final SAR when published alongside the Submission Plan, will take the form of a single report that retrospectively justifies the plan rather than an iterative process carried out during the preparation of the plan.
- 4.6 The sustainability appraisal process carried out to date in respect of Brentwood fails to set out the reasons for selecting the alternatives it has dealt with, and a proper description of how the assessment was undertaken. It fails to give any reasons for the rejection of the alternatives and why they are not considered to be the best option. The Directive is clear in this regard that *"Alternatives to the option being promoted should be evaluated on the same basis and to the same level as the option promoted in the plan..."* Recent case law establishes that a local plan will develop over a period of time. The best practice would be to consult on various draft proposals until the LPA is able to decide what it wants to put in place.
- 4.7 Reliance upon earlier assessment work is acceptable under the terms of the Directive providing that the earlier findings are up-to-date and accurate within the context of the new assessment. In order to form an identifiable report, the relevant information must be brought together: it should not be necessary to embark on a paper-chase in order to understand the environmental effects of a proposal.
- 4.9 One of the purposes of the Directive is to allow members of the public to be consulted about plans, which may affect them. The SAR should therefore enable them to understand why the proposals are said to be environmentally sound. The public must be given an effective and early opportunity to express their opinion on the plan and accompanying environmental report before the adoption of the



plan. If the SAR is not due to be published until the Proposed Submission Plan is consulted upon at the end of the year, then we submit that the public will not have had this opportunity. Since one of the purposes of the Directive is to allow members of the public to be consulted about plans, which may affect them, an early report should enable them to understand why the proposals are said to be environmentally sound. This is not clear from the limited SA work undertaken in respect of the emerging plan for Brentwood.

- 4.10 Environmental reports are required to be of sufficient quality to meet the requirements of the Directive and quality is said to involve ensuring that a report is based on proper information and expertise and covers all the potential effects of the plan. In this regard the evidence base to the plan is substantially incomplete.
- 4.11 We submit that the emerging Local Plan for Brentwood is not accompanied by an SAR that adequately describes and evaluates the likely significant effects on the environment of implementing the plan and reasonable alternatives. With specific reference to West Horndon, it is not possible to understand the reasons for selecting the preferred option nor those for rejecting the alternatives. Furthermore there has been a material change in circumstances since the earlier assessment work, which is relied upon. Key changes to national planning policy guidance have changed the whole basis of the assessment and these are not given due consideration. We submit that they would lead to a wholly different conclusion on the preferred options for growth at West Horndon.



5.0 Sustainability Appraisal of Land at West Horndon – Development Proposals

- 5.1 It is acknowledged that there are limited opportunities for development in the Borough of Brentwood because it is so tightly constrained by Green Belt and other environmental assets and designations. In this context the emerging draft plan is not proposing to meet its objectively assessed need for housing.
- 5.2 Since assessment of potential development sites began back in 2009 (in the context of a SHLAA) there have been key national planning policy changes to influence plan preparation, reintroducing a presumption in favour of sustainable development and encouraging local planning authorities to positively seek opportunities to meet the development needs of their area. Furthermore, Regional Plans have been revoked and up-to-date population and housing projections published that identify a need to “boost significantly the supply of housing” (NPPF paragraph 47).
- 5.3 In the absence of a full evidence base and SA to support the draft local plan, we have sought to examine the settlement of West Horndon as a potential strategic allocation for housing and mixed use. We maintain that the settlement of West Horndon continues to be a sustainable location for growth, however there is no sound reason for solely identifying land to the west of the settlement to accommodate new housing and mixed use, and rejecting land to the east.
- 5.4 In earlier sections of these representations we have called for Brentwood Council to withdraw the draft local plan and complete the evidence base work and an SA necessary to inform its content. This would then need to be the subject of further public consultation. A re-examination of the spatial strategy is required in the context of a need to ‘plan positively for the development and infrastructure required in the area’ (NPPF paragraph 157). This in turn requires the plan to be based on a strategy that seeks to meet objectively assessed needs, consistent with achieving sustainable development.
- 5.5 Ultimately the Council will need to establish a revised, increased housing target and then identify sites to deliver this level of growth. If the Council is not able to find sufficient sites to meet the requirements of a revised needs assessment or find a solution to growth under a duty to cooperate, then it will come under pressure to undertake a review of its Green Belt. To support the above re-assessment work we explore below the full potential for growth that exists at West Horndon.
- 5.5 The settlement of West Horndon is found to be a sustainable location for growth in the context of the emerging local plan policy SO1. Using the criteria set out in policy SO1 for identifying development sites we submit that:
- the site is accessible to public transport, services and facilities. A Transport Appraisal of the settlement has been carried out by Odyssey Markides and its key conclusions are summarised below;
 - it can be demonstrated that new development at this location can be achieved without any significant adverse impact on the Green Belt, visual amenity, heritage, transport and environmental quality including landscape, wildlife, flood risk, air and water pollution. A Landscape and Design Report prepared by Rummey Design examines these issues and develops a landscape-led approach to development that seeks to create an urban extension rooted in its context and offers opportunities for biodiversity enhancement and restructuring. The full report of Rummey design is attached at Appendix 1; and
 - land is available at this location to justify a major strategic allocation to meet an urgent demand for sites and this can be phased to ensure early delivery and contribute towards the five year housing land requirement.



Transportation and Access.

5.6 A Transport Appraisal undertaken in September 2013, by Odyssey Markides examines the opportunity for growth at West Horndon, focusing on land to the west and east of Thorndon Avenue. The appraisal will be submitted to the Council in due course, to influence the emerging evidence base to the plan. In the interim we summarise its key conclusions below:

- The settlement of West Horndon represents a sustainable location for new housing in terms of its accessibility to a range of services and facilities by non-car modes.
- All existing services and facilities, identified as being of relevance in the SA Scoping Report for the Local Plan, will be within walking (and hence cycling) distance of land to the east and west of Thorndon Avenue. Land to the east will be slightly closer to existing facilities than the northernmost part of land to the west.
- Land to the west of Thorndon Avenue does not have a direct pedestrian link to the existing primary school and walking distances from part of this land would exceed the desirable maximum. (This assumes that in planning a new urban extension at this location, the existing school would be extended rather than new facilities provided to accommodate increased pupil numbers).
- Public transport services are within defined acceptable walking distances.
- Transport benefits for the existing community can be maximised by economies of scale. The greater the number of new homes the more support and justification arises to improve rail and bus services.
- Supporting documentation to the local plan seeks the following transport related benefits in permitting new homes at this location;
 - Railway station improvements
 - Improvements to the local rail service (in and out of London)
 - Improved public transport (bus) links to Brentwood Town Centre
 - Road Improvements in terms of links to the A127 (no more HGVs through the village)
 - Footbridge over the A127 for better links to Thorndon Country Park.

A greater scale of new development will assist in funding/delivering this list of benefits.

- It is understood that access to land to the west is proposed to be served principally from the A127 via a left in/left out arrangement. The main potential adverse traffic impacts associated with development on land to the west alone, are as follows:
 - Despite scope for improvement it is possible that the principal access and merge onto the A127 will still have insufficient capacity to accommodate all generated improvements to the A127 westbound and this will have implications on highway safety
 - As a result traffic may find alternative routes which will add traffic to the country lane network or within existing residential areas of West Horndon
 - Traffic to and from the A128 will pass through the existing residential area along Station Road
 - A significant proportion of outbound traffic and the majority of inbound traffic will be added to the A127/A128 intersection and the A128/Station Road junction. The latter will



require some improvement under all scenarios. The former is understood to operate with spare capacity at present so may be able to accommodate the additional traffic.

- Access to land to the east will principally be from the A128/Station Road. This would require capacity enhancements to accommodate growth although the intersection operates with spare capacity at present and could accommodate some additional traffic.
- The development of land to both the east and west will bring about some advantages. Adverse traffic impacts arising from development of land to the west only, would be reduced proportionally. These include limited capacity merges to the A127, traffic flows within the existing residential areas and on the country lanes.

Landscape and Design

- 5.7 Appendix 1 comprises a Landscape and Design report prepared by Rummey Design. The key findings of this report are summarised below. The report concludes with a masterplan layout to demonstrate that the settlement has significant development potential and is capable of accommodating a sustainable and balanced extension to West Horndon.
- 5.8 An environmental assessment of the settlement has been undertaken, focusing on site visibility, landscape character and urban character. Field and desk based assessment is drawn upon to establish whether land adjoining the existing built up area has the capacity for change and if so what form this might take. The analysis looks at key opportunities and constraints to development. It assesses how mitigation measures can be applied to address any adverse impacts of development as well as ways in which to enhance the existing landscape.
- 5.9 The principal area of land being addressed in these representations is located to the east of the main settlement of West Horndon. It lies within easy access to the A127 and A128, and connects well to the existing village and its key community facilities and services, including a primary school and local park. The site comprises low grade agricultural land, which is contained by a strong structure of hedgerows.
- 5.10 Appendix 1 provides an environmental analysis of the site. This examines the history, topography and geology, site visibility, hydrology, landscape character, site characteristics, site designations and technical features, and local settlement character.
- 5.11 Land to the east of West Horndon comprises eight fields within a low lying, level landscape, sloping imperceptibly from north to south. There is a large belt of trees associated with its north-western flank, close to the village of West Horndon. The fields are rectilinear in shape, lined by hedgerows and watercourses, which follow a broadly north-south and east-west orientation. This land is divided by Station Road, which runs broadly in a east-west direction. The early field pattern system appears largely intact. The site is bounded to the west by houses along Thorndon Road. To the north and east it is flanked by the A127 and A128 respectively. These two principal roads are themselves bounded by strong belts of vegetation that enclose the site.
- 5.12 Land to the west of West Horndon has an entirely different character. It comprises a mix of brownfield industrial land to the south, with an area of arable farmland to the north. It is made up of three fields that have a relatively weak hedgerow pattern. The northern boundary to this land is open and defined by a low ridgeline. The eastern boundary is defined by the housing along Thorndon Avenue. To the west the edge of the site is marked by Childerditch Lane, which is lined by hedgerows surrounding a small number of individual dwellings.



- 5.13 The well established network of hedgerows and hedgerow trees, combined with low level topography serve to significantly limit visibility of the eastern site. Land to the west is more visible due to a less well established network of hedgerows and no clearly defined edge to the site. Open views of both sites are possible from the footpaths and publicly accessible land associated with Thorndon Country Park to the north. However the expansive views experienced from the Country Park are defined by a mix of rural and urban elements including industrial chimneys and factories, bridges and major roads. The existing vegetation on land to the east of West Horndon, limits the visibility whereas land to the west, due to its open character and lack of vegetation, is highly visible. A landscape approach to development of land at this location is therefore proposed to enhance the existing character and restore landscape features typical of the area.
- 5.14 It is understood that the settlement of West Horndon is liable to flood risk. Land to the east of the settlement lies adjacent to the flood zone and alongside a main drainage channel. Potential development of this land would therefore present an opportunity to help minimise flooding downstream by capturing and storing surface water and releasing it at a slower rate during flood events. Further analysis is being undertaken into the current problems and potential for new development to offer some form of mitigation. This is necessary in the absence of a complete evidence base to the draft plan.
- 5.15 Land to the east of West Thorndon lies entirely within the Green Belt. However we maintain that the Council's severe shortage of land to meet its objectively assessed needs for housing, coupled with environmental assessment to demonstrate that change can be accommodated without an unduly adverse impact on the landscape, is sufficient reason to justify an exception to policy. Amendments to the plan to reflect an up-to-date SHMA will undoubtedly lead to increased housing targets and the need for a review of the Green Belt more generally within the context of the draft plan.
- 5.16 A masterplan layout presented by Rummey Design, shows a potential form of development at West Horndon to meet an urgent demand for sites in the emerging plan. A balanced extension is proposed that follows the thinking of the early SHLAA, by providing a quantum of development to both the east and west of the existing settlement. The masterplan shows a clear landscape structure with the creation of a new gateway to West Horndon, from the east. It proposes centrally located and connected public open space, wetlands and new residential blocks arranged in a rectilinear layout. Key to the development of a defensible edge are the linear hedgerows that run to the northern quarters of the land both east and west of the existing settlement. This linear feature could connect through the ancient woodland and assist in mitigation of the development by screening it from public viewpoints to the north.
- 5.17 The environmental analysis undertaken by Rummey highlighted a number of key drivers to deliver an appropriate and site specific masterplan. These are summarised as follows:
- enhance the north/south landscape structure;
 - create a new entrance/gateway into the settlement via Station Road/A128 junction. Care will be taken to improve the Station road character as an historic lane and thereby create a central feature to the masterplan;
 - use the north/south alignment of the site to arrange blocks of housing development, based on drainage corridors and hedgerows. This will lead to east/west facing properties that will maximise light;
 - strengthen the existing network of landscape structure to mitigate development on the site. Selectively add hedgerows, and strengthen the green grid. Include additional woodland buffer to the southern edge of Thorndon Country Park;
 - provide wetlands to reduce flood risk and create varying habitats within them. Create public routes through the wetlands to improve amenity;
 - connect new woodland into the ancient woodland to increase local ecological biodiversity;



- connect public open space on the site into West Horndon Park;
- potentially provide an improved access to the Country Park; and
- create opportunities from the site constraints such as location of water and gas mains, by designating a higher proportion of public open space.

5.18 The settlement of West Horndon represents a sustainable opportunity for growth. As the appraisal by Rummey Design demonstrates, there is no justification for the sole selection of land to the west of the existing settlement, in the draft local plan as clearly land to the east has considerable merit and relative advantages. To the contrary, land to the east has many advantages in transport and landscape terms, and in accommodating an urban extension is well placed to address create some benefits in landscape and biodiversity terms. Furthermore, new development could address some technical concerns associated with flood risk. It could also deliver a number of benefits to the existing community in the form of improved transportation measures and provision of additional community services and facilities.

5.19 These proposals are the subject of ongoing work that will be submitted to the Council in due course. This work will complement the evidence base to the emerging local plan and support a revised sustainable spatial strategy for growth in the Borough.

Delivery and Viability

5.20 As the current draft local plan indicates, land to the west of West Horndon is not capable of delivery until later in the plan period. In particular some industrial leases have lengthy durations that would prevent this land coming forward in the first five years of the plan and thereby helping to address the short term housing needs of the Borough. In contrast land to the east is relatively unconstrained and as the early SHLAA assessment indicated could be delivered early in the plan period to address the urgent need for sites



6.0 Summary and Conclusions

- 6.1 It is submitted that the Brentwood Borough Local Plan 2015 – 2030 (Preferred Options) is unsound as currently drafted. It is not informed by an appropriate, comprehensive and up-to-date evidence base. Failure to publish a full evidence base alongside the draft plan has deprived interested persons of the opportunity to comment upon them. In the absence of a robust and credible evidence base it is not possible to comprehend how the preferred spatial strategy for growth has been decided.
- 6.2 The local plan is not supported by an adequate sustainability assessment. There has been a failure to comply with the relevant requirements of the EU Directive and Regulations.
- 6.3 The matters addressed in 6.1 and 6.2 above are so central to the Brentwood Borough Local Plan's overall strategy that the emerging plan, as it stands, cannot be found sound. A substantive revisiting of the plan strategy is required. This should include the preparation of a thorough and effective Sustainability Appraisal that takes into account a proper testing of the alternatives for growth. The options for growth should be considered in the context of the objectively assessed needs for housing in the Borough which should give regard to current and future demographic trends and profiles and take into account evidence including the government's latest published household projections.
- 6.4 A revisiting of the plan as recommended above, would need to be the subject of full public consultation. Therefore the Council should withdraw the current draft plan, carry out the necessary work as specified above, and republish the plan for consultation together with a full evidence base.
- 6.5 Notwithstanding our principal objection that the plan is unsound and should be withdrawn to allow further work and public consultation, we have demonstrated in these representations that to meet the objectively assessed needs for the Borough, a significant number of additional sites will need to be identified. Furthermore, in the absence of the cooperation of adjoining local authority areas to help meet this need, a review of the Green Belt in Brentwood borough is required to accommodate current and future demands for growth.
- 6.6 Our assessment of landscape sensitivity and potential for change to the Green Belt reveals that land at West Horndon is capable of accommodating significant growth to meet the Council's housing needs. In the absence of a proper SA, land adjoining the existing settlement has not been fully assessed. Sites have emerged as preferred options without the benefit of full assessment under the guidelines of the EU Directive and Regulations for undertaking SA. Similarly this inadequate assessment has failed to properly test the alternatives.
- 6.7 These representations consider the potential for growth on land adjoining West Horndon and propose a sustainable and balanced approach to extending the settlement that conforms with government advice. These proposals are promoted within the context of revisions to the local plan and its evidence base, as called for in these representations.



Land east of West Horndon

an opportunity for an enhanced landscape-led urban extension

Appendix 1: landscape and design report

2nd October 2013



Rummey design

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'landscape-led' masterplanning for sustainable
growth...

... to create an integrated community

introduction

purpose of the document

The purpose of this document is to introduce the benefits of the land east of West Horndon as an opportunity area for the growth of the village. It forms an appendix to representations made by Andrew Martin Associates on behalf of Countryside Properites.

Throughout its content the document will present:

1. a sound evidence baseline for 'responsible' development
2. a landscape-led approach to development – settlement rooted in context
3. aspiration for an environmentally sustainable urban extension
4. favourable ground conditions for development
5. a low impact development
6. opportunities for biodiversity enhancement and re-structuring

This document will argue that the site has significant development potential.

summary of the content

The document sets out a summary of the following analyses on the site, its context and regional position:

- site history
- topography and geology
- site visibility
- hydrological overview
- landscape character
- site characteristics
- site designations and technical features
- local settlement character

The analysis chapter concludes with a summary of the analyses and explains the justification for development from a landscape, visual and character position.

The document proposes a masterplan concept building on the analyses. The concept will also be presented in the form of a wider settlement approach to create a sustainable and balanced extension to West Horndon.



view north east across the site from the park with All Saints Church in the background - a perfect location to extend the ancient woodland and provide wetlands to improve ecological biodiversity in the area



approach and methodology

our approach

“‘Settlement’ is where people gather; attracted by a resource, a particular habitat, climate, geology or aspect. Patterns and the form, or morphology of settlement can be directly traced to the underlying geology and the way that it has interacted with the changing climate.”

Elizabeth Staveley, Director Rummey Design

Rummey Design has been commissioned to undertake an environment based evidence assessment, considering the geographical factors that have shaped the landscape (including cultural factors) around West Horndon. A team of environmental and urban designers have undertaken a field and desk based assessment of the cultural and physical factors that make up the Essex Fenlands. From this objective and analytical process, conclusions can be drawn to consider:

1. whether a particular site has the CAPACITY for change
2. what FORM might that change take ie. size and nature of change or development

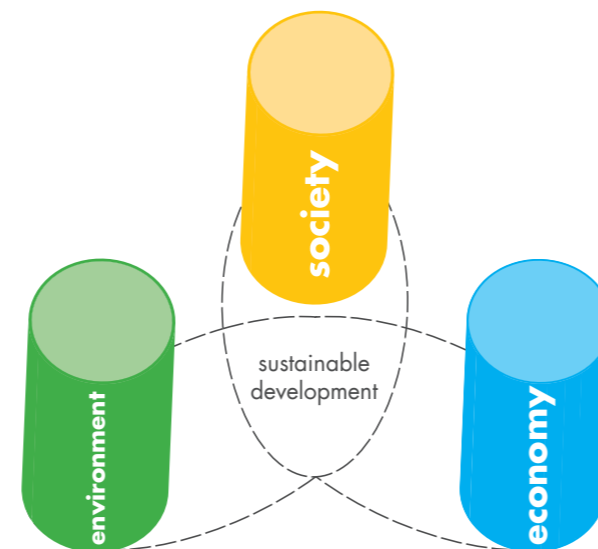
This layered analytical process draws out the essence of a place. This robust technique of assessment has shaped our National Landscape Character Area designations which is an invaluable tool for forward planning and change management. We have applied this approach at a more detailed level to distill local distinctiveness as well as practical considerations for development. These strong analytical foundations allow us to create sustainable developments, rooted in their environmental, rather than political context.

the changing ‘landscape’

Historically people were drawn to where water and food is available and plentiful, the building materials are readily attainable, where there is fuel for heat and where access is good for the trading of skills, stories and goods. As climate, technology and market forces have changed; these attractions have lost and gained power and settlements have shrunk or grown in response.

Over time, these settlements have been shaped by changes in social and economic behaviour. Places, settlements and landscape have become distinctive where the physical and human geography intertwine, creating unique identities that continue to attract investment and create the ‘brand’ of a place.

Settlements that strike a balance between the natural environment and between the social and economic factors become truly sustainable.



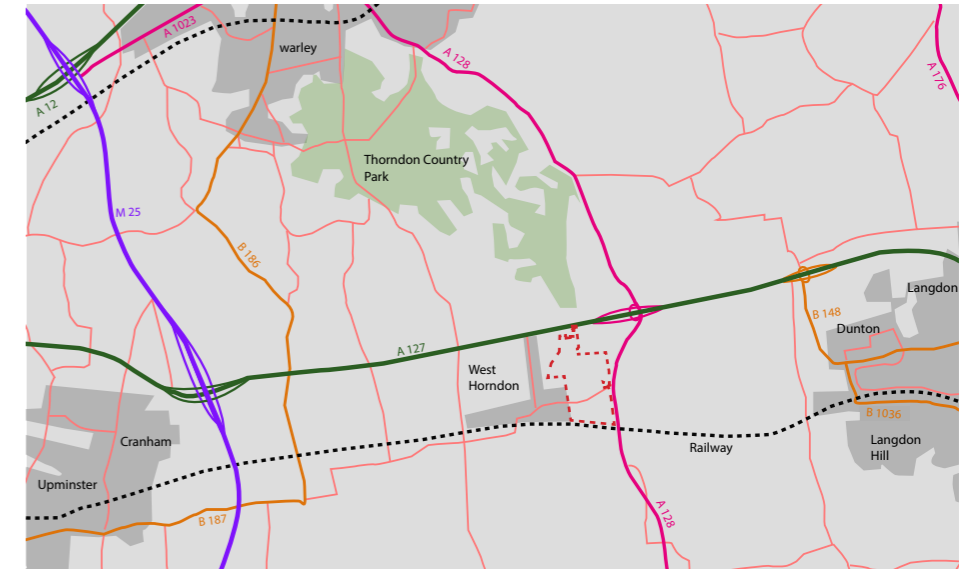
Bruntland's pillars of sustainable development

A process of careful analysis of these influencing factors and the melding of the appropriate and balanced skill set to bring together these three elements in this urban extension creating a community founded in the three pillars of Bruntland's sustainable development; environment, economy, society...

Rummey Design has been practising this approach for 20 years. The design team covers a spectrum of environmental analysis and design skills, combined with an appreciation for high quality and distinctive designs, creating visions and plans for successful place-making for the future, worldwide.

This approach to settlement planning is now being recognised as a valuable and intrinsic process in creating and strengthening communities and it underpins the approach for considering the land east of West Horndon as a viable option for the sustainable urban expansion of the village.

site location and information



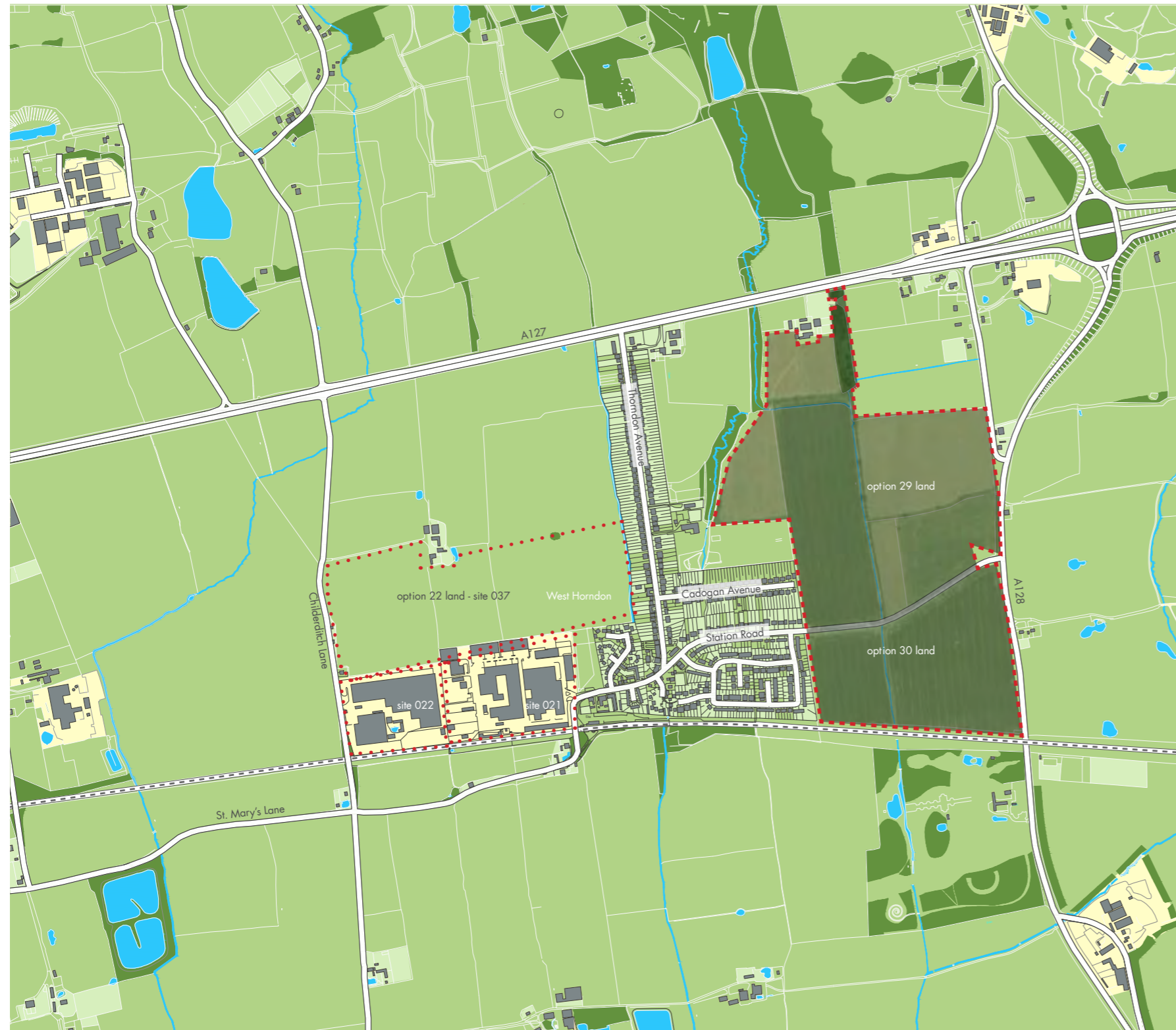
site location plan (NTS)
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- site boundary (option 29 and 30 land from the SAR)
- option 22 land from the SAR (partly promoted by E&A Strategic Land and including sites 037, 021 and 022 from Policy DM23)

the site location

The site is located directly to the east of West Horndon. It is within easy access of the A127 and A128 and connects in to the existing village and its key community facilities of the primary school and local park. It comprises low-grade agricultural land which is contained and parcelled by a strong and intact structure of hedgerows. The site also lies to either side of the main access into West Horndon, Station Road.

The population of the village from the 2011 census was 1537 in an urban area of 0.643km².



existing site plan (NTS)
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0 100m

summary of
analysis

The following analyses have been summarised into the key information that will inform the decision making authorities with the evidence base as to the merits of this site for the purposes of a deliverable housing led mixed use new community. The analyses do not always indicate positive development conditions but also identify if this is the case, what mitigation can be made to at least neutralise the issue.

site history

topography and geology

site visibility

hydrological overview

landscape character

site characteristics

site designations and technical features

local settlement character

site history

The local area has largely been shaped by the natural geography; the Thames, Mar Dyke and Hole Craven Creek to the south and the Langdon/Horndon Hills to the north.

The district is gridded with roads, settlement, hedges and ditches as the lower fenland has been artificially drained, occupied and farmed. Important east – west routes, either rail or road, run perpendicular to north - south drainage, settlement and hedgerow lines that mirror linear parish boundaries.

West Horndon is one of a group of three rectilinear parishes in the north of the district, on the junction between the wooded ridges and the Thames plain.

The area has always been sparsely populated and the character of settlement has its roots in scattered farmsteads and notable country estates. Royalty and gentry have shaped the landscape which has been radically changed in the last century. The Essex sporting gentry frequented the area for hunting and steeplechasing (ca. 1860).

It is likely that there was no road running over the fenland until the early 18th Century. Roads were confined to the hills and many of these are now marked by public rights of way and narrow lanes.

The Three Farms of Nuttys, Tillingham and Blankets occupy ancient sites around West Horndon, which were bisected by the London to Southend Railway extension in 1886. The development of a station at West Horndon stimulated the growth of an 'industrial township' and linear low density residential settlement followed in the 20th Century.

In 1937, The Essex Brick Company began operations on the land to the north of West Horndon, which was taken over by Costain

Concrete Co. in 1946. In 1938 an agricultural machine company opened a factory adjacent to West Horndon Railway Station which has now closed. The current industrial activity located to the west of the station began in 1940 and is still in operation today.

The land around West Horndon has changed with the impact of road and rail development, as well as changes in farming practice. The once grazed lands of the fens have been developed to accommodate modern arable farming practice, resulting in the opening up of the fields and the loss of farm boundaries, which is more noticeable to the west side of the village where the land is exposed and open and the impacts of its industrial setting are significant.

The history of the village of West Horndon is relatively recent and following the building of the railway in 1886 (and known as East Horndon at the time). Prior to this the land was agricultural, broken down in a strong north/south orientation with lanes leading to the Thames Estuary to the south. St. Mary's Lane/Station Road is an old east/west route on which West Horndon station was located, one of few east/west routes in the vicinity.

The landscape structure also contained this strong north/south orientation with linear woodlands and denser hedgerows following drainage channels, also leading to the Thames. These linear routes and landscape have since been broken by east/west road and rail corridors which still presents a clear grid structure to the landscape up to present day.

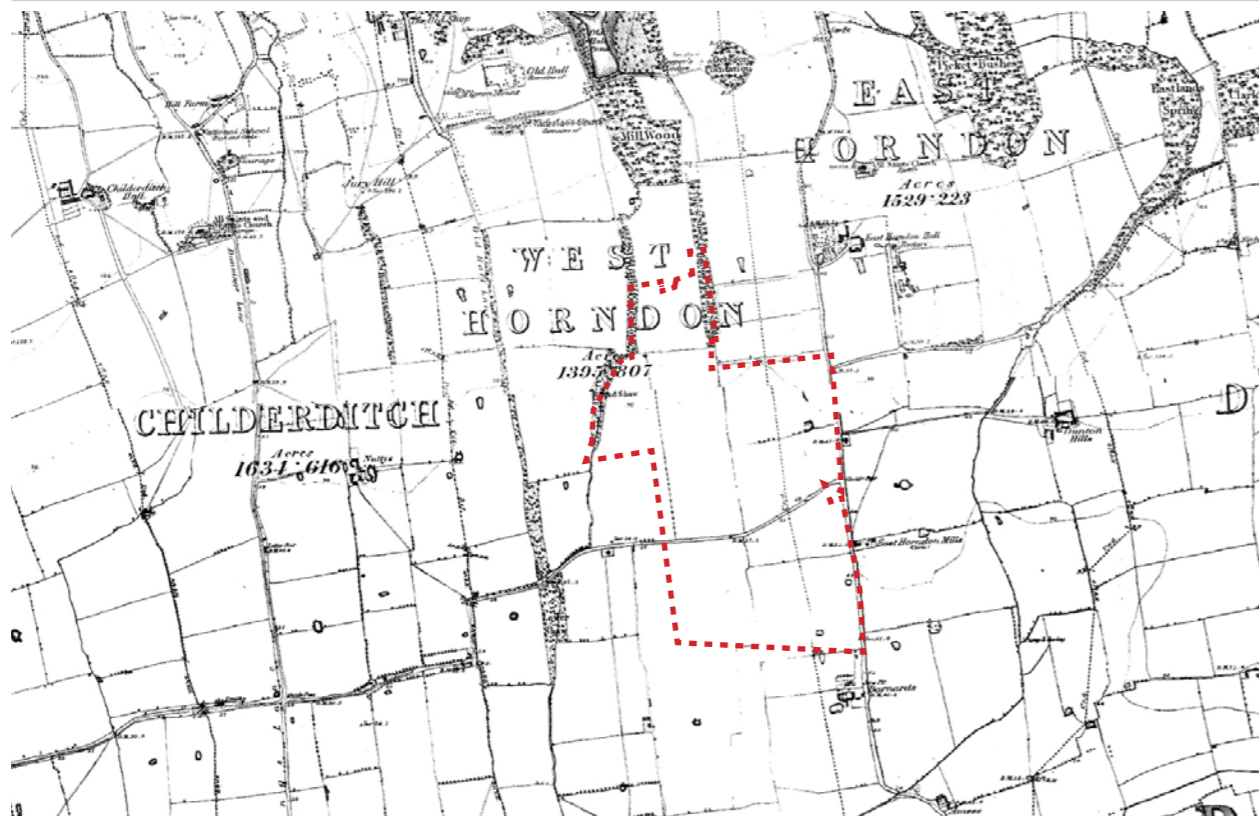
The area has always been sparsely populated and the three manors that comprised the Parish recorded 21 inhabitants in 1066, rising to 184 in 1931.

conclusions for the site justification

- The site still contains drainage channels and strong north/south alignment

drivers for the masterplan

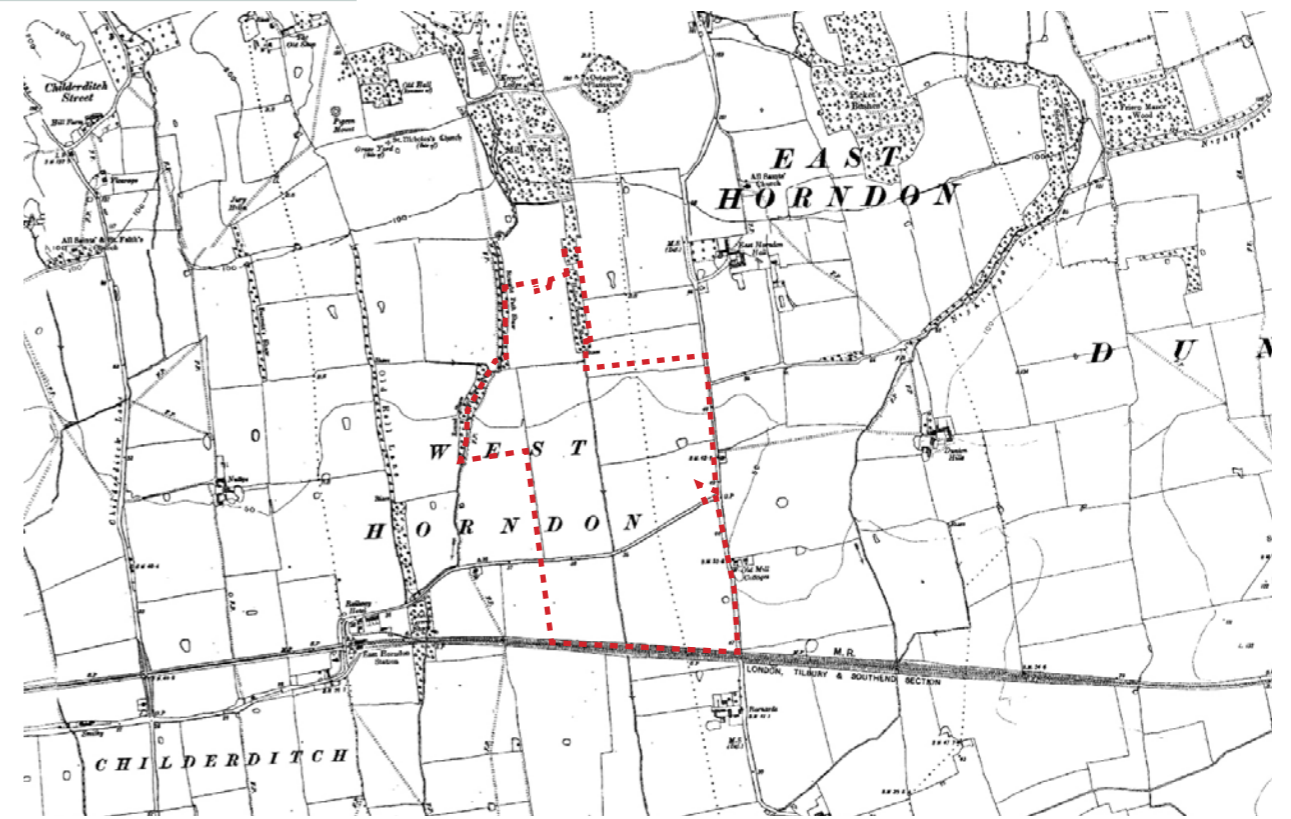
- geometric and gridded green infrastructure to be enhanced
- opportunity to mitigate industrial and cultural patterns through significant buffer planting
- interpret local linear pattern within development
- encourage incorporation of farmstead focus to development hamlets



----- site boundary

Historic mapping of circa 1872-1881

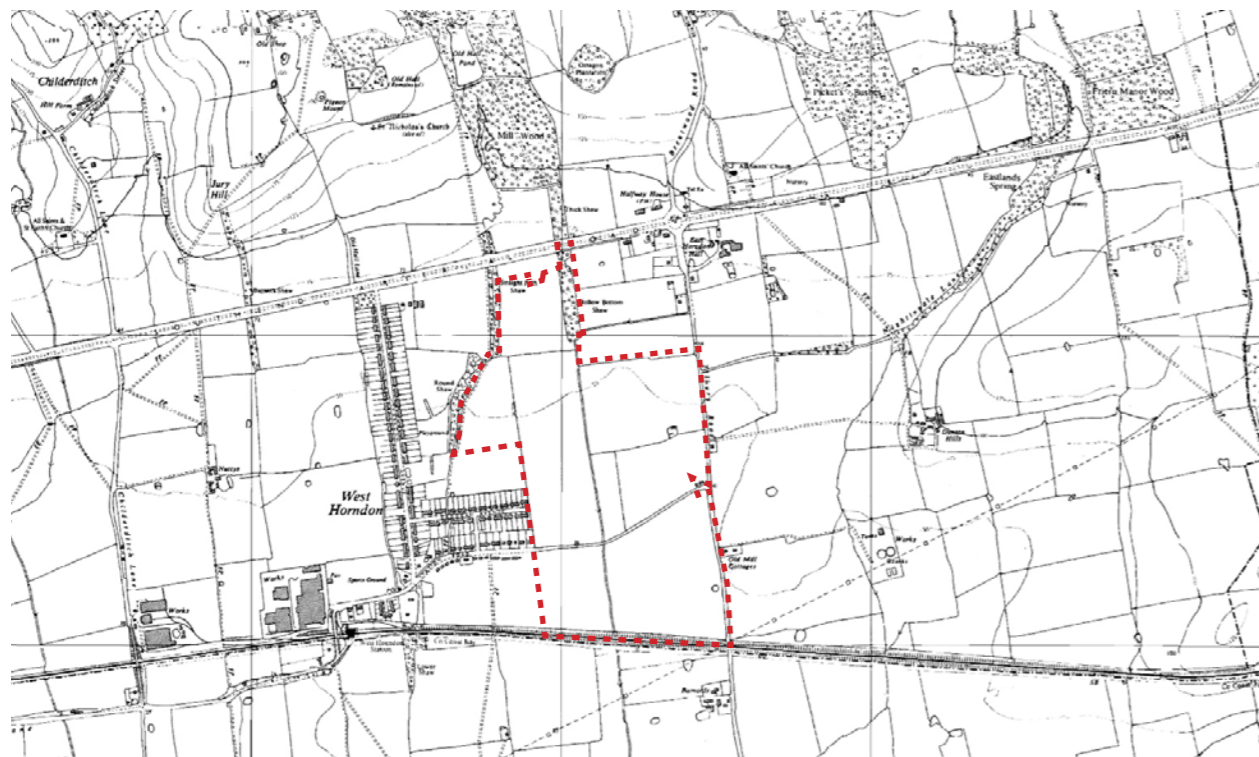
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----- site boundary

Historic mapping of circa 1921

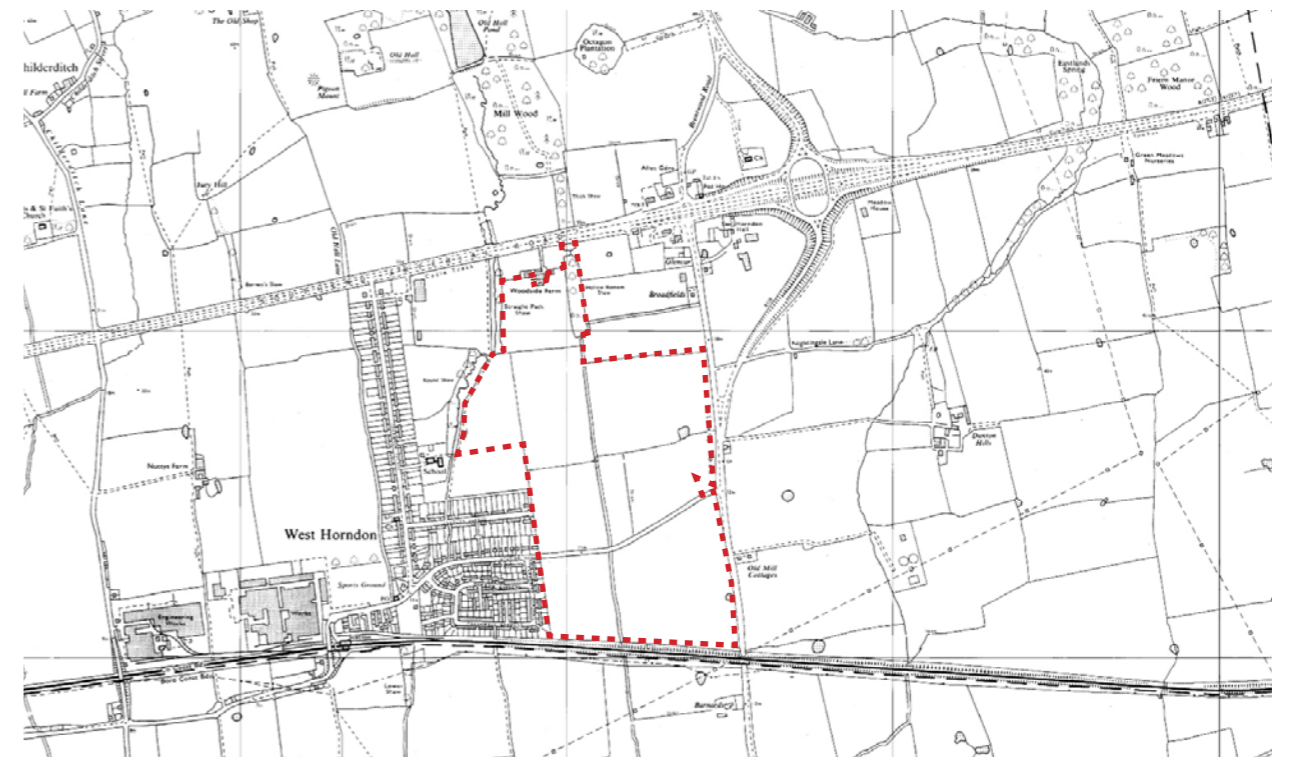
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----- site boundary

Historic mapping of circa 1960

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----- site boundary

Historic mapping of circa 1977-1991

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geology and topography

geology

Bedrock geology

The flooding of the area by the sea in the Eocene period laid down the 'London Clay Formation' in the London Basin. This comprises clays, silts and sands which reach depths of 150m in area local to the site.

To the north of the site, remnants of the superficial geology known as the 'Bagshot Beds' create the localised upland that encloses and shelters the site. These sandy ridges have been heavily eroded by water action creating an undulating topography across the slopes.

Superficial geology

Head geologies of clays silts and sand overlay this London clay, comprising gravel, sand and clay depending on upslope source and distance from source. Poorly sorted and poorly stratified deposits are formed mostly by solifluction and/or hillwash and soil creep. Essentially the area's superficial geology comprises sand and gravel, with lenses of silt, clay or peat and organic material.

Alluvial lines meander through this clay geology in a north - south orientation at regular intervals, marking historic drainage courses.

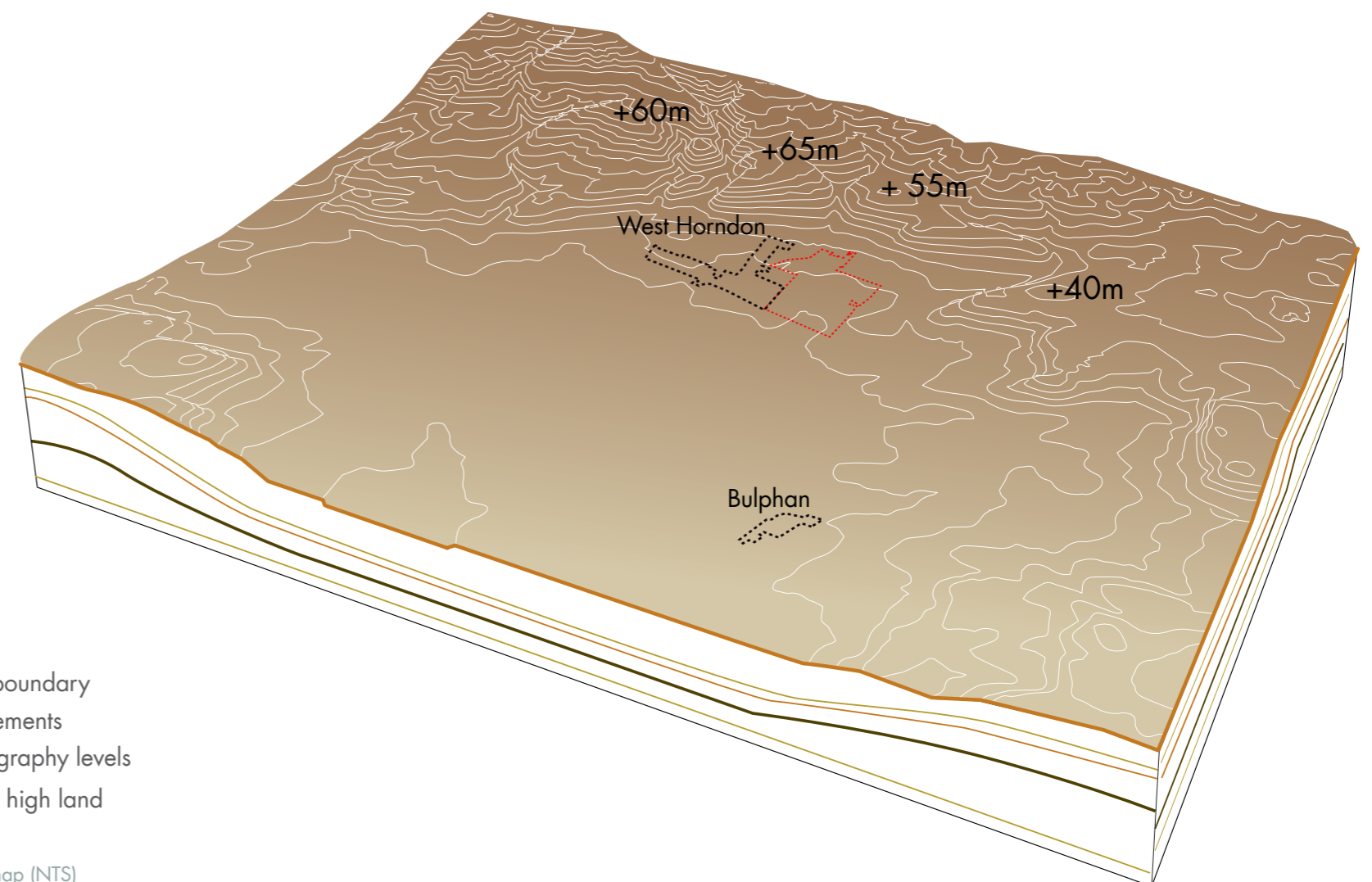
(Sources: British Geological Society and GeoEssex)

topography

The site lies at between 10m and 20m ASL, falling north to south. It is at the same level as the village on the flattening lower slopes of the hillsides to Thorndon Country Park.

The land rises up to the Country Park north of the A127 to a level of up to 65m ASL. These local hills wrap to the north west, overlooking the western side of the village and around to the east at slightly lower levels.

- the site is relatively flat but what slope there is has an ideal southerly aspect with easy access
- the site is enclosed and sheltered by upland to the north and east



topography map (NTS)



- key
- - - site boundary
 - settlement
 - alluvium - clay, sand and gravel
 - head clay, sand and gravel
 - glaciolacustrine deposits, mid pleistocene - clay, silt and sand
 - head - clay, sand and gravel
 - glaciofluvial deposits, mid pleistocene - sand and gravel
 - lowestoft formation - diamicton
 - + local high points

site visibility

overview

An initial visual analysis of the site and its environs identified the enclosure and visual qualities of the site and its relationship with neighbouring settlements and the landscape context. In summary:

The land east of West Horndon (east site) comprises eight fields lying within a low lying, level landscape, sloping imperceptibly to the north from 10-20m AOD. There is a large belt of trees associated with its north-western flank, close to the village of West Horndon. The east site's fields are rectilinear in shape, lined by hedgerows and watercourses which follow a broadly north-south and east-west orientation. The east site is split by Station Road which runs broadly in a east-west direction. The early field pattern system appears broadly intact. The east site backs onto a number of houses within West Horndon. The east site is bound on its northern and eastern flanks by large roads; the A127 and A128 respectively. These two roads are bounded by strong belts of vegetation which enclose the site.

The land to the west of West Horndon (the west site) comprises a mix of brownfield industrial land to the south with an area of greenbelt arable farmland to the north. The three arable fields have a relatively weak hedgerow pattern. Its northern edge is open and marked by a low ridgeline. Its eastern boundary is marked by housing at West Horndon whilst its western edge is marked by Dunning Lane which is lined by hedgerows. The A127 lies north of the site beyond the ridgeline, the road is lined by a dense hedgerow and trees. The site lacks an obvious northern edge to it.

conclusions for the site justification

- The combination of a well established network of hedgerows and hedgerow trees in combination with the low level topography of the land combines to significantly limit visibility of the east site from the surrounding land to the south, east and west. The west site is more visible due to a less well established network of hedgerows and no defined northern edge.
- Open views of both sites are possible from the footpaths and public access land associated with the Thorndon County Park South. These views are sensitive and frequented by many visitors. Nonetheless the expansive views experienced from Thorndon Country Park South are defined by a mix of both rural and urban elements. Industrial elements such as chimneys and factories and infrastructure elements such as bridges and large roads define the character of the views from the park.
- Existing vegetation within the east site and the Thorndon Country Park South limits the visibility of the east site from western sections of the Country Park. In contrast, the west site is very open, lacking a strong vegetation network and is highly visible when viewed from western sections of the park; notably from views 8 and 9.
- A strong network of landscape structure planting would integrate the development of the east site into the wider landscape in time. The existing hedgerow network should be retained and bolstered with new tree planting. New hedgerows and tree planting as proposed on figure 5 will help to integrate the development into the landscape and reduce its visibility from the Thorndon Country Park South. It is assessed that any visual harm resulting from the development of the east site could be limited through mitigation planting. The west site would be harder to assimilate into the landscape. It is highly exposed in

views from the western sections of the Thorndon Country Park South and lacks a clear northern boundary.

- It is therefore concluded that a landscape led approach to the development of the east site will not give rise to any significant landscape and visual effects and will enhance landscape character and restore lost landscape features typical of the area. The lack of an established network of vegetation associated with the west site and the lack of an obvious northern edge to the site means it will be harder to assimilate new housing at the west site into the development.

drivers for the masterplan

- strengthen the existing network of landscape structure to mitigate development on the site
- selectively add additional hedgerows to further assist in mitigating development impact



+ Viewpoints

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site visibility continued



Viewpoint 1: View westwards from Childerditch Lane south of the A127, distance from west site approx 500m; distance from east site approx 1100m; 20m AOD.

Views to the east site are blocked by the vegetation associated with properties in West Horndon. The roofs of houses within west site would be visible. The change in the view would be relatively minor.



Viewpoint 2: View westwards from the Church of All Saints, north of the junction of the A127 and A128, distance from east site approx 600m; distance from west site approx 1400m; 45m AOD.

New houses within the east site would appear within the existing, dense network of vegetation which partially screens portions of both the east site and west site. The houses would appear within the mid ground of the view. A small number of houses within the west site would be visible. The changes in view would be relatively minor. The essential character of the view would not change.



Viewpoint 3: View westwards from Station Road west of the junction with the A128, distance from east site approx 0m; distance from west site approx 1000m; 12m AOD.

The view looking westwards along Station Road is dominated by the road and a low clipped hedge. New housing would appear above the existing hedgerows on either side of the road. This would represent a moderate change in view. A strong landscape structure of additional woodland planting would maintain a rural approach to West Horndon and reduce the visual impact of the housing.



Viewpoint 4: View eastwards from Station Road east of West Horndon with the A128, distance from East Site approx 0m; distance from west site approx 600m; 10m AOD.

The view looking eastwards along Station Road would undergo major change. New housing would appear above the existing hedgerows and block views to the Langdon Hills. A strong landscape structure of additional woodland planting would maintain a rural approach to West Horndon. Field 2 would benefit from being divided by a new hedgerow.



Viewpoint 5: View east from the edge of West Horndon Park, distance from east site 0m; distance from west site approx 1500m; 15m AOD.

XXXXX



Viewpoint 6: View south from Octagon Plantation Country Park, distance from east site approx 700m; distance from west site approx 1500m; 50m AOD.

The east site can be seen in the mid-ground of the view. However the site forms only a small proportion of the overall view and is visually broken up by existing vegetation within the site. New houses would be visible however they would appear as a natural extension to West Horndon. In order to reduce the visual impact of the development, existing hedgerows should be maintained and planted with trees. Field 3 should be bisected by a new hedgerow and trees. Housing within the west site would be largely screened from view. The changes in the view would be minor.



Viewpoint 7: View southwards from public footpath within Thorndon Country Park South, distance from east site approx 600m; distance from west site approx 1100m; 40m AOD.

This 90 degree open, panoramic view takes in the hills of Kent and the towers of London. However roadside planting on the A127 screens a large proportion of both sites. The roofs of houses at both sites would be visible in the mid-ground of the view however the change in view would be minor.



Viewpoint 8: View southwards from public footpath within Thorndon Country Park South, distance from East Site approx 800m; distance from west site approx 900m; 55m AOD.

Views of new housing at the east site would be possible. However the homes would represent a relatively minor and insignificant change in the view. Housing at the west site would be highly visible due to the lack of intervening vegetation between the site and the viewer. This would represent a moderate change in the view.



Viewpoint 9: View southwards from public footpath at Jury Hill within Thorndon Country Park South, distance from east site approx 900m; distance from west site approx 900m; 55m AOD.

Views of new housing at the east site would be blocked by existing vegetation on the hill slope south of the Thorndon Country Park South. Housing at the west site would be clearly visible and appear as a large block of housing in the centre of the view. It would be difficult to screen the new housing at the west site effectively.



Viewpoint 10: View westwards from the junction of the entrance of Nuttys Farm and Childerditch Lane, distance from west site approx 0m; distance from east site approx 1100m; 15m AOD.

No housing at the east site would be visible. The addition of new housing at the west site would significantly change this view.



Viewpoint 11: View northwards from the footpath east of Field House, distance from west site approx 1000m; distance from East Site approx 800m; 8m AOD.

New housing at both sites would be almost entirely screened by existing off and on site vegetation.



Viewpoint 12: View northwards from the footpath east of Blankets Farm, distance from west site approx 2500m; distance from east site approx 2600m; 5m AOD.

New housing at both sites would be entirely screened by existing vegetation off site.



Viewpoint 13: View westwards from Byway to the east of A128 , distance from west site approx 1500m; distance from east site approx 500m; 20m AOD.

The view is highly enclosed by the lane's surrounding vegetation. No new housing would be visible at either of the sites.



Viewpoint 14: View westwards from footpath east of church at Dunton Hall, distance from west site approx 2900m; distance from east site approx 1400m; 35m AOD.

The local topography blocks views to both sites.



Viewpoint 15: View northwards from Dunnings Lane , distance from west site approx 1600m; distance from east site approx 2000m; 6m AOD.

This northward looking view encompasses the Thorndon Country Park South to the north. The foreground of the view is dominated by Dunnings Lane which is enclosed by hedgerows which restrict the openness of the view. Neither site can be seen.



Viewpoint 16: View westwards from car park of Dunton Plotlands Nature Reserve, distance from West Site approx 3400m; distance from East Site approx 2500m; 15m AOD.

This view looking west features rolling arable fields which are dissected by the London to Southend Railway. Views to both sites are blocked by a low ridgeline running through the Dunton Hills Golf Club.

hydrological overview

The context of the site has largely been shaped by the natural and managed hydrology over the clay beds; the site lies within the Thames river catchment area which runs east - west, ca. 5km to the south of West Horndon. Its tributaries of Mar Dyke and Hole Haven Creek create punctuate the Thames plain either side of the village, which is further divided by a series of north - south streams that fill quickly on the impervious soils in heavy rain.

There was a water mill on the Mardyke at Purfleet in the 14th century and from about 1760, sluice gates protected the lowlying land through which the Mardyke flows from the tidal and saline Thames.

In the 19th century and earlier, the Mardyke was navigable to Bulphan. Using a network of drainage ditches, manure from London was brought to local farms and agricultural produce taken to market. In the 18th century, when the river was still tidal, it may have been navigable as far as Orsett Hall at high tide.

The area of West Horndon is gridded with roads, settlement, hedges and ditches as the lower fenland has been artificially drained, occupied and farmed. Geometric gridded fields have been drained into peripheral streams, creating an even mesh of water lines across the clay plain.

As expected the main drainage channels and streams run southwards from the glacial valleys to the north. The low lying land at West Horndon leads to potential flooding in the village. The site lies just outside the 1:100 year flood zone but adjacent to it.

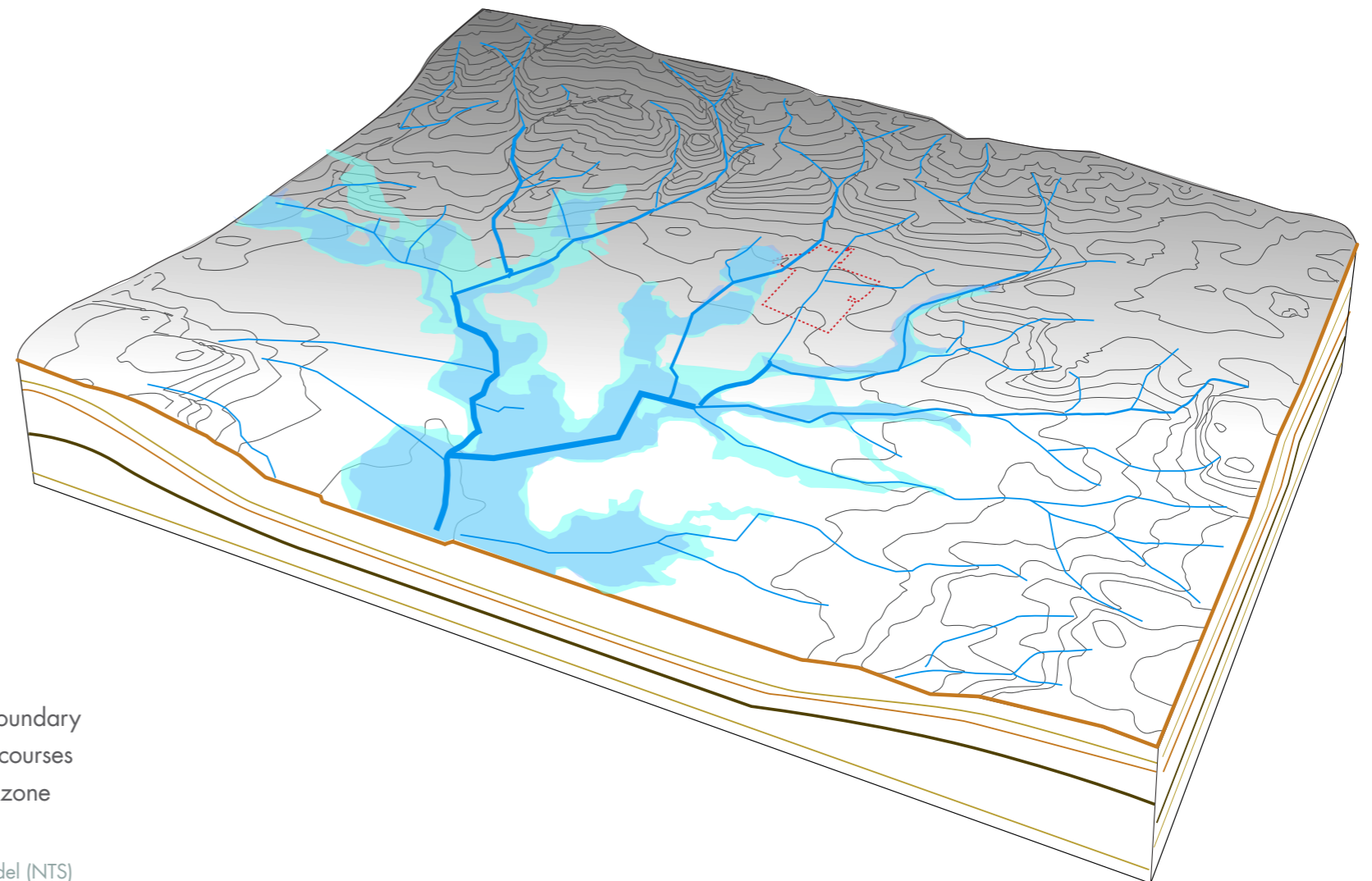
It is understood that West Horndon recently flooded and therefore there is an issue for the village. The site is upstream of the flooding and therefore impacts on the flood zone.

conclusions for the site justification

- as the site lies adjacent to the flood zone and alongside a main drainage channel there is potential to use the site to help minimise flooding downstream by capturing and storing surface water, releasing it at a lower rate particularly during flood events
- the aim should be to reduce any surface water run-off compared to current greenfield rates to assist with local flooding issues

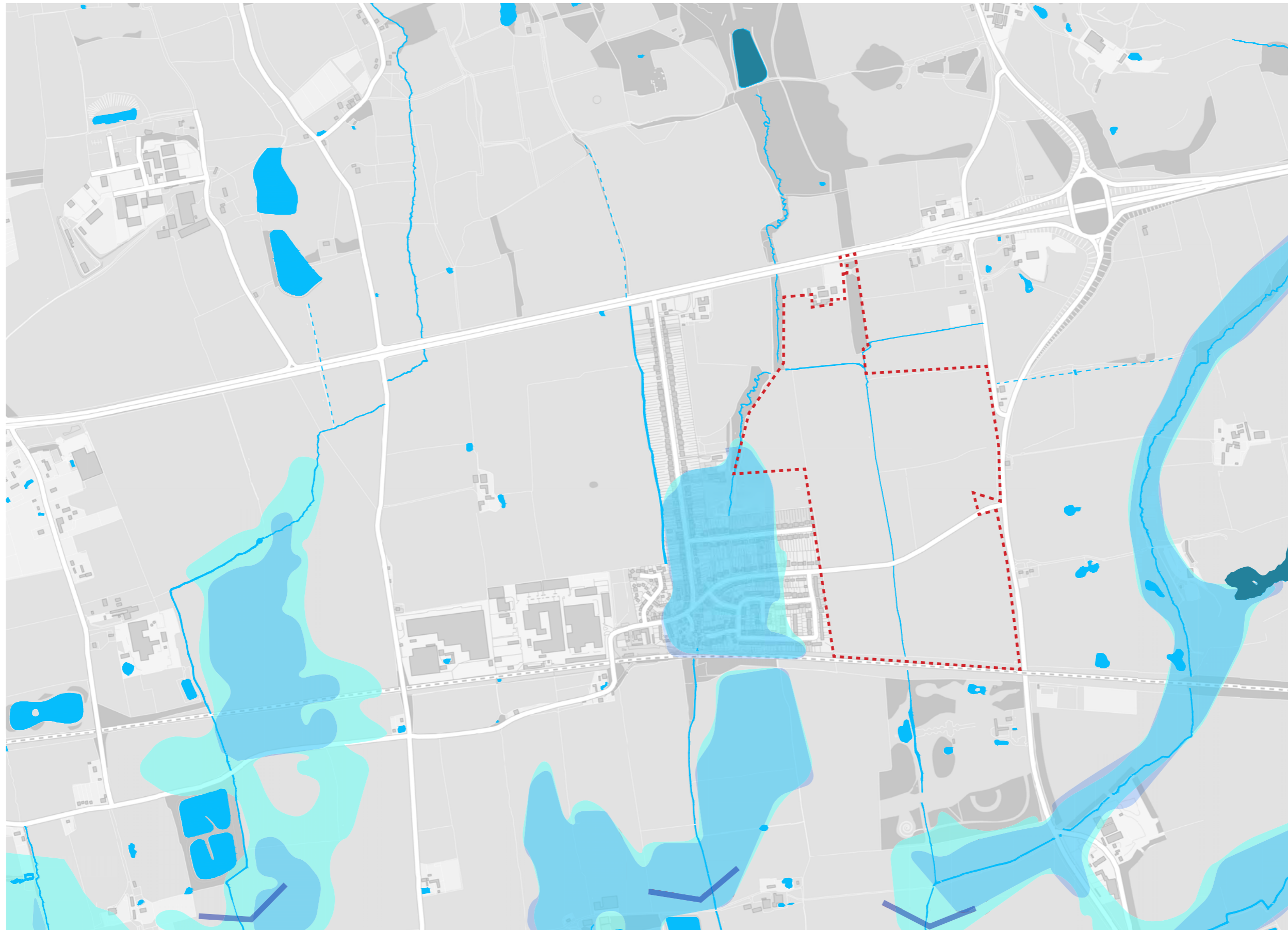
drivers for the masterplan

- provide wetlands to reduce flood risk
- create varying habitats through wetland areas
- create a variety of public routes through wetlands to improve amenity



— site boundary
— watercourses
— flood zone

hydrology model (NTS)



key

- site boundary
- water bodies
- reservoirs
- ornamental pools
- 1:100 flood zone
- extent of extreme flood
- watercourses

landscape character

national landscape study

The national assessment of landscape character designates the landscape around West Horndon as Northern Thames Basin. This relates to:

- an intermediate physiography of rolling undulating areas under 1000ft;
- Clayland landcover; and,
- in a settled agricultural landscape

local scale character assessment

At a Borough scale, identified by Brentwood borough Council, the landscape character around West Horndon the site has been designated G1 Horndon Fenland. The characteristics include:

1. large, arable pasture fields
2. predominantly flat topography
3. Mature hedgerow field boundaries
4. Relatively sparse settlement pattern
5. Views to surrounding wooded hills to the north
6. Long distance views to pylons and Tilbury Power Station

Proposed Landscape Strategy Objectives

Conserve - seek to protect and enhance positive features that are essential in contributing to local distinctiveness and sense of place through effective planning and positive land management measures.

Enhance - seek to improve the integrity of the landscape, and reinforce its character, by introducing new and/or enhanced elements where distinctive features or characteristics are absent.

Restore – seek to reinforce and/or reinstate historic landscape patterns and features that contribute to sense of place and time depth, by repairing distinctive elements that have been lost or degraded.

Suggested Landscape Planning Guidelines

- Conserve the relatively sparse settlement pattern and generally rural character of the area.
- Ensure that any appropriate new development responds to the existing settlement pattern and uses materials which are appropriate to local landscape character.
- Conserve the setting of West Horndon, through careful consideration of the existing landscape structure.
- Conserve views to landmark churches to the north.
- Seek to screen visual detractors (such as the edges of the small industrial estate in West Horndon, and large agricultural buildings).

Suggested Land Management Guidelines

- Conserve and enhance the existing hedgerow network by planting hedgerow species appropriate to local landscape character.
- Establish arable field margins as important nature conservation habitats.
- Seek ways to mitigate the visual impact of the railway and A127 corridor through introducing new and strengthening existing parallel shelterbelts where appropriate.
- Introduce new woodland planting in the form of shaws and copses, as well as hedgerow trees.

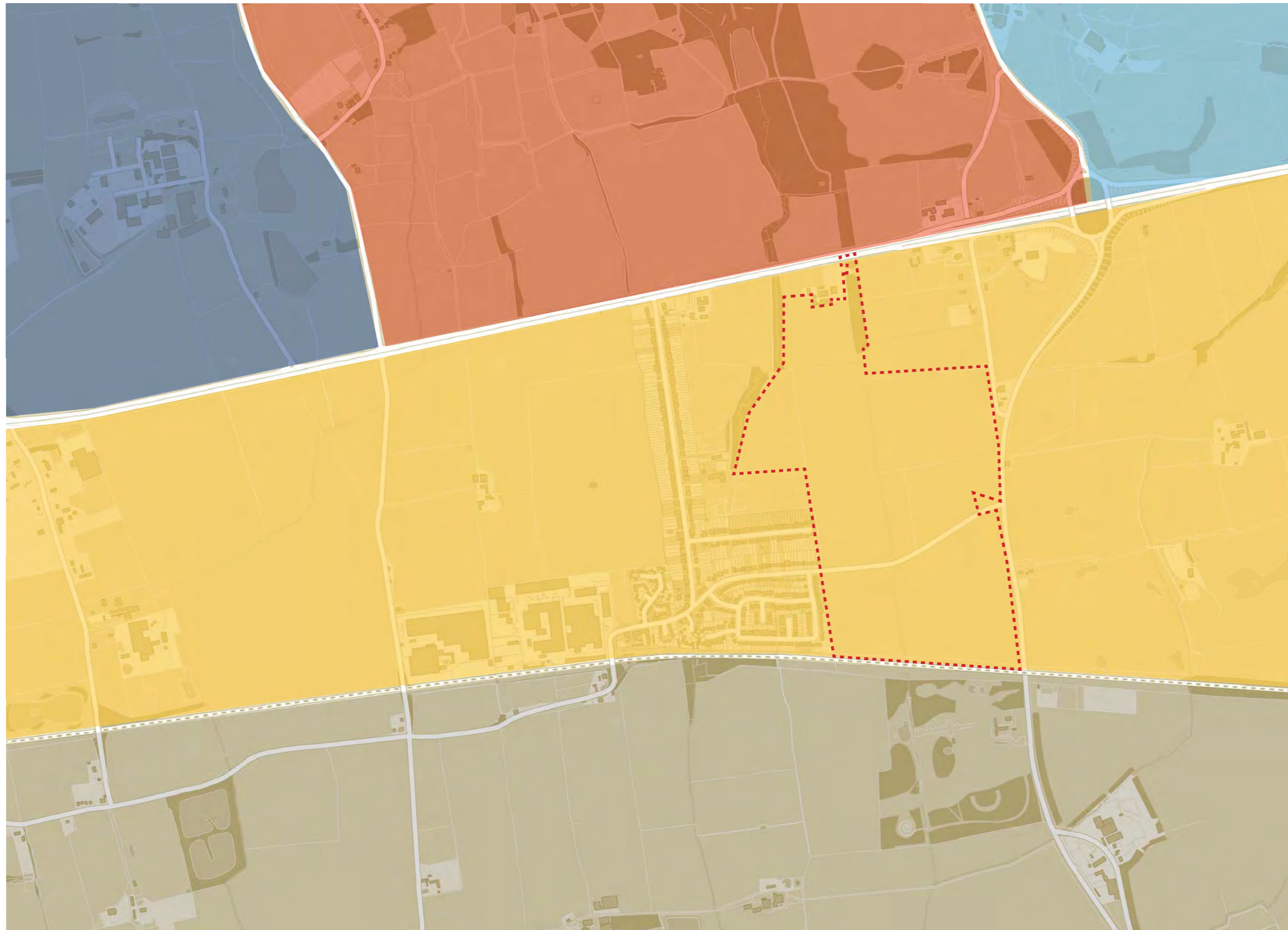
We have also found that the Thurrock character assessment applies similar characteristics to the land immediately to the south of the railway and therefore believe there not to be a separate character to either side of the man made railway embankment, instead the fenlands landscape continues from the lower slopes at the A127 towards the Thames Estuary.

conclusions for the site justification

- the character of this area is a landscape defined grid with north/south dominant features
- the character should be reinstated where necessary or reinforced if not
- seek to meet the suggested Land Management Guidelines

drivers for the masterplan

- strengthen existing east/west hedgerow and north/south woodland grid



key

- site boundary
- F13 Great Warley wooded farmland
- F9 Little Warley wooded farmland
- F14 Ingrave & Herongate wooded farmland
- G1 Horndon fenland
- Bulphan/Orsett fen (Thurrock Borough)

site characteristics

Scale – to the north east of the village settlement area, the land is compartmentalised by small to medium sized fields bounded by ‘treed’ and mature shrub hedgerows to approximately 3-4m high on average. The historic field patterns remain largely intact, as well as fragments of the historic woodland shaw that encloses the southwards running stream. To the north west and south of the settlement, the historic field pattern and boundaries become more disjointed. Larger field patterns give rise to a more open farmed setting, field boundaries have been lost and the landscape character feels more exposed. Further south the fields open out to become large, open arable fields on a slightly higher plateau of land. The historic rectilinear landscape pattern breaks down at this point, along Fen Lane at Bulphan.

Enclosure – fences, clipped hedges, wooded shaws, drainage lines and wooded boundaries are typical of the lowland setting to the village. A mixture of larch lap fence and ornamental hedge planting mark the existing settlement boundaries that range in condition and height. The varied plot boundaries are mixed and weak in terms of robustness of character. The custodianship of management of these private plot boundaries varies considerably and would benefit from enhancement if opportunities arise.

Visual character and key views – views immediately around the village are short to medium distance in length, interrupted by buildings, industry and roads. Historic views to the church spires of Little Warley and East Horndon command views out of the village area to the north, anchoring the settlement into its setting. Views to the south of the settlement are constrained by the railway line, scattered buildings and treed horizons.

Condition and management – the condition of the landscape is disturbed, and while some evidence of the historic grain remains, there are visual and audible distractions on the tranquility and quality of the site. The management of the field boundaries varies;

on the eastern side of the village the boundaries are mature in height but immature in diversity and would benefit from management to enhance their visual and ecological value. To the west and the south of the village, the practice of hedgerow management is different in that many have been grubbed out or cut hard back.

Shape – broadly rectilinear, geometric, straight and dog-legged field boundaries and road patterns create an ordered, legible and organised landscape and settlement grain.

Topography – low lying, gently falling southwards, consistent falls with localised folds marking drainage lines.

Settlement and buildings – scattered historic hamlets and farms, mixed with more contemporary residential settlement, industrial and business use create a fragmented pattern.

Cultural pattern and associations – there are local associations with private landowners, country estates, fenland farming and industrial development. The area has links with gentry and royalty and was used for sporting and farming pursuits.

Distinctive features – industrial skylines, main east-west transport routes and enclosing landform to the north

There are three distinct local character types at a detailed scale;

- 1 the wooded hills and slopes to the north which are in part divided from the Thames plain and West Horndon by the main road. The wooded slope character stretches south past the road alignment in places
- 2 The gridded, small scale field structure including elements of leisure and historic woodland belts to the east of the settlement
- 3 The exposed open farmland to the west and south of West Horndon.

conclusions for the site justification

- the land to the east of West Horndon is more appropriate for phased development parcels as its green infrastructure remains intact and is well established
- the character of the site is well defined and should be enhanced by any development

drivers for the masterplan

- strengthen the green grid;
- connect public open space on the site into West Horndon Park;
- potentially provide improved access to the Thorndon Country Park