



BRENTWOOD
BOROUGH COUNCIL

Local Plan 2015-2030
Preferred Options
July 2013
COMMENT FORM

(For official use only)

Comment
No.

Ack. date

You can comment on the Local Plan 2015-2030 Preferred Options online at www.brentwood.gov.uk/localplan. Alternatively, please use this form to share your views on the contents of the Local Plan.

PERSONAL DETAILS

Title: **Miss** First Name: **Katharine** Last Name: **Turner**

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Job title (if applicable):

Address:

Post Code:

Telephone
Number:

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YOUR COMMENTS

Please indicate which section(s) of the Local Plan you are commenting on (please clearly state the Policy reference or paragraph number): CP4: West Horndon Opportunity Area

Please specify if you Support or Object (tick as appropriate):

Support ☐

Object ☒

Comments (please use additional sheet if required):

Local Plan in its current form, particularly regarding Policy CP4, West Horndon Opportunity Area, is not the most appropriate strategy when considered against the reasonable alternatives, based on proportionate evidence. Hence, it is not justified. Considerations:

- S1 Alternative Option 3, semi dispersed growth, has been rejected due to infrastructure constraints (lack of sewerage treatment capacity in the north of the Borough, limited public transport to serve development, and poor access to services) and greater reliance on green belt sites.
- However, significant infrastructure will be required to build out West Horndon (road access, improved rail services, new local bus routes, additional schools and healthcare facilities, high speed broadband, sewerage etc.) on the basis that the plan triples the size of the village at present. No cost analysis has been prepared to show why it is cheaper to do this in West Horndon vs. lower rates of development spread across different sites which hence require lower levels of infrastructure expenditure.
- Impact to Green Belt in West Horndon under Local Development Plan ("LDP") is extremely significant. 1,000 houses on a key area of Green Belt which prevents Brentwood merging in to Havering/London, and is clearly visible from the stated area of national beauty, Thorndon Park.
- Services in West Horndon noted as strong. In reality there are just 2 small convenience stores, 2 hairdressers and a fireplace shop that is not open during the week. Surrounding villages have equal levels of retail offering, if not stronger.
- Public transport in the case of West Horndon is limited to the C2C rail link. This does not provide any intra-borough access (West Horndon is the only station on the line in Brentwood Borough) and as such, a significant improvement in bus availability, cycle access etc. will be

required to support development. This is in line with that which would be required in any other village/smaller town in the borough.

Considerations with respect to effectiveness, in particular, deliverability:

- Significant number of parties required to take action in order to implement and support the proposed development at West Horndon:
- BT: Required to roll out high speed broadband despite West Horndon being under 1,000 dwellings until 2020.
- C2C/new franchise: Needs to agree to increase train frequencies and/or capacity to support the increased utilisation of West Horndon station.
- Existing leases at industrial estates: Key tenant at Horndon Industrial Estate has just signed a new medium term lease. Significant work needs to be done to prepare this brown field land for development. If leases have to run off first/be renegotiated at a new site, implementation is likely to be more challenging.
- Developers: Need to be comfortable with returns derived from such concentrated development in one small area. Questionable as to whether returns will be sufficient based on 43% of all new housing to be located in one small area.

The Local Plan should enable the delivery of sustainable development in accordance with the policies set out in the National Planning Policy Framework ("NPPF", Mar-12). There are a number of instances with respect to policy CP4, West Horndon Opportunity Area, where this is clearly not the case. These have been categorised below and commented on where appropriate.

Political Guidance

Planning and Compulsory Purchase Act 2004:

- 19 (2) a: LDP must have regard to policies and advice contained in guidance issued by Secretary of State (Eric Pickles).
 - Previous actions and comments indicate Secretary of State does not support building on Green Belt land. Examples:
 - Jul-13: Public enquiry launched in to building of 450 homes on green belt land in Nottinghamshire (Field Farm near Stapleford).
 - Jun-13: Bans councils from building incinerators, slurry pits and landfill sites on Green Belt land.

Geographical Considerations

Town and Country Planning (Local Planning) Regulations 2012

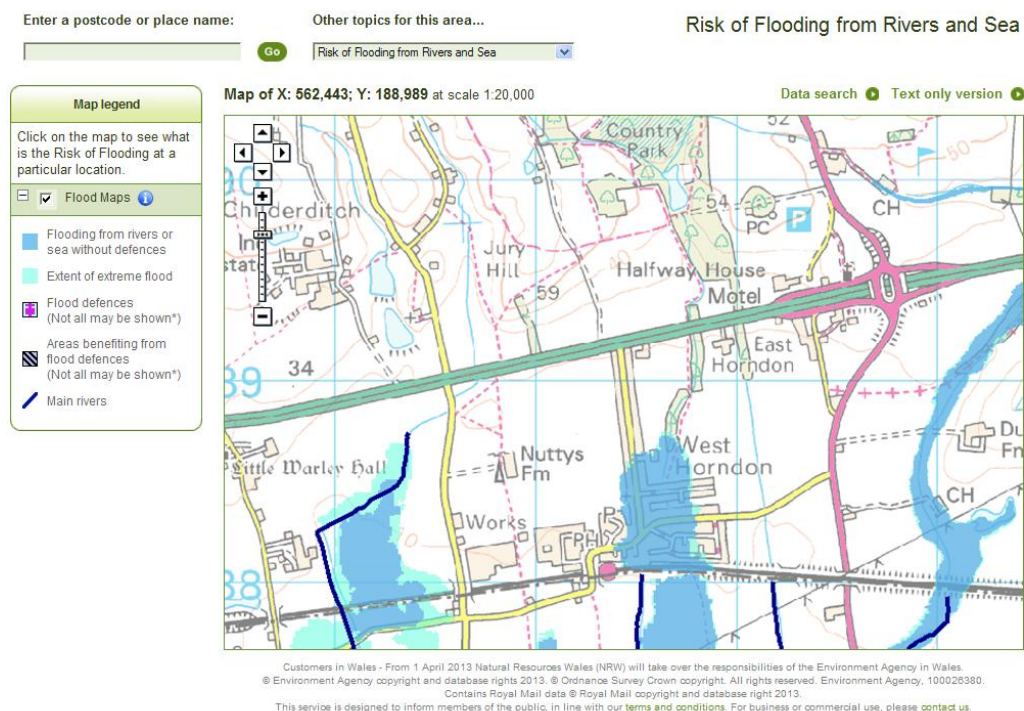
- 9 (c): LDP must contain map illustrating geographically the application of policies.
 - Land in West Horndon Strategic Allocation, and the two industrial parks, has been identified. However, no map or plan has been provided to indicate where key items will be placed. In particular, this land has been earmarked for 14 traveller pitches, yet there is no indication as to where these would be placed.

National Planning Policy Framework (Mar 2012)

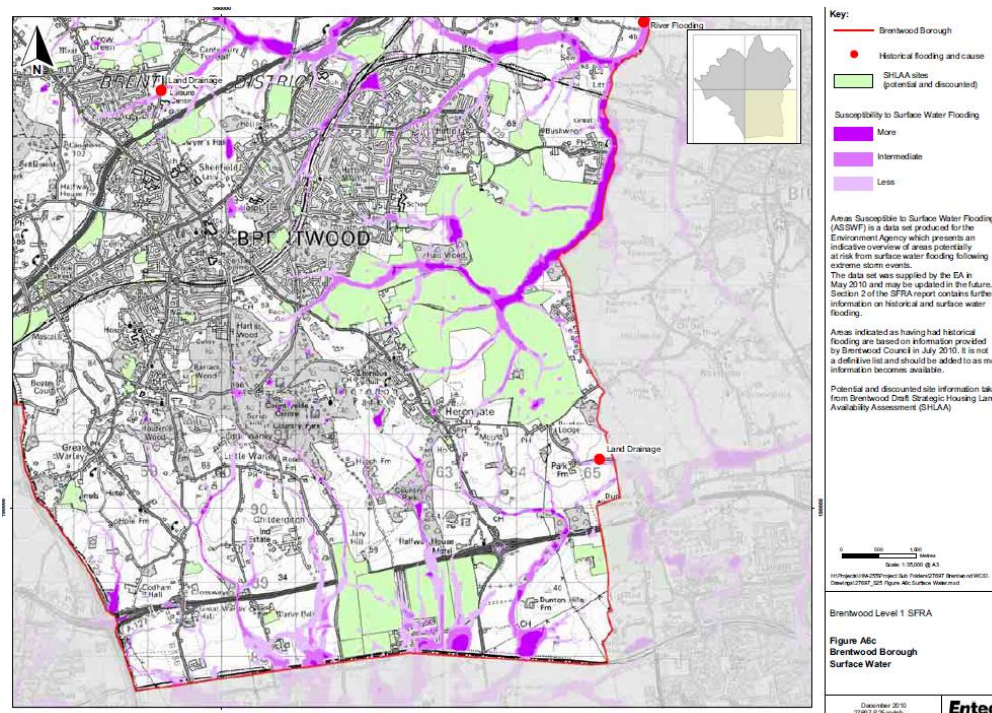
- 10: Plans and decisions need to take local circumstances into account.
 - Local circumstance for West Horndon and wider Brentwood are that the borough is dominated by green belt land. As such, all focus should be on securing available brown field sites, and improving transport across the borough.
- 17: The 12 core planning principles should...take account of the different roles and character of different areas...protecting the Green Belt around them, recognising the intrinsic character and beauty of the countryside and supporting thriving community within it.
 - Scale of development will materially damage countryside views from Thorndon Park.
 - Scale of development on a large area of Green Belt is not necessarily protecting it. Available brown field sites and vacant houses/plots should be developed in priority.
 - Wealth destruction through house price impact on West Horndon and immediate

surrounding area is unlikely to create a thriving community.

- Scale of expansion will act as a natural barrier against a thriving community. Organic development at a slower rate would encourage inclusion and a community feeling currently in existence in this area.
- Character needs to be maintained through family houses with gardens, no retail chains, and countryside views from any point. Vast majority of buildings are one or two stories.
- Plan does not include any definition of character of local West Horndon area (only that of wider Brentwood). Unclear how this requirement can be met if not assessed.
- 17: The 12 core planning principles should...take full account of flood risk.
 - Extract from Environment Agency flood map (below) indicates flood risk extends on to Horndon Industrial Estate.
 - Further impact from poorly maintained culverts across A127 and private land which has resulted in flooding down Thorndon Avenue in Dec-12.



- Additionally. Appendix A to the “Brentwood Level 1 Strategic Flood Risk Assessment Jan 2011” shows West Horndon has a high susceptibility to floor risk (excerpt below), with all three categories referenced. Across all areas identified in the LDP for development, there are areas of susceptibility. In some instances, the Green Belt land identified for development is <200m from high probability Flood Zone 3 Areas, and Industrial Estates <1km between two Flood Zone 3 Areas. The report shows many areas across Brentwood classified as “excellent” for sustainable drainage systems (West Horndon was not part of that assessment).



- 17: The 12 core planning principles should...contribute to conserving and enhancing natural environment and reducing pollution.
 - Conservation of Thorndon area would be better served through construction spread across the borough, with improved intra-borough transport links.
 - Majority of employment opportunities within Brentwood are in Brentwood town centre. The transport links between West Horndon and Brentwood are weak, with no significant plan to improve them in the LDP (one bus route does not count as significantly improving intra-borough transport).
 - At present the industrial estates are served by national rail (C2C). This will no longer be the case.
 - Significant increase in car traffic through a countryside area given 1,500 new homes in a very concentrated area.
- 17: The 12 core planning principles should...encourage effective use of land by reusing land previously developed.
 - >700 disused properties are in Brentwood as per analysis undertaken by a homeless charity using 2012 council tax numbers for Brentwood. There are also unused/underutilised brown field sites across Brentwood.
 - Industrial estates provide effective use of land at present in West Horndon – provide local jobs for the village, and surrounding areas accessible using the C2C network.
- 23: Local planning authorities should recognise town centres as heart of communities and pursue policies to support their...vitality.
 - Removal of industrial estate from West Horndon area will have a negative impact on current community.
 - Wealth destruction (through house price depression) likely to negatively impact a currently thriving community.
 - Lower rates of growth spread over a wider area would achieve this goal without the negative impacts likely to occur at too high rates of development.
- 47: To boost the supply of housing local planning authorities should...identify and update annually a supply of specific deliverable sites sufficient to provide 5 years worth of housing against the housing requirement with an additional 5% buffer...to ensure choice and competition...in the market for land.
 - 43% of available land in one very concentrated area does not constitute choice for developers.
- 47: Sites with planning permission shall be considered deliverable until planning permission expires.

- These are not mentioned in the plan.
- 49: Housing applications should be considered in the context of the presumption in favour of sustainable development.
 - Impact on Green Belt land, environment, travel etc. all point to the level of development within West Horndon as being excessive. Improved transport links intra-Borough combined with build out across the Borough, would result in more sustainable development than that proposed in the LDP.
- 51: Local planning authorities should identify and bring back in to residential use empty housing and buildings in line with local housing and empty home strategies and where appropriate, acquire properties under compulsory purchase power.
 - Not mentioned in the LDP.
- 80: Green Belt serves five purposes...to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
 - Green Belt around West Horndon is key, preventing the further sprawl of London and merging in to Basildon.
 - This is a further reason for focusing on more diversification with respect to location of development (lower impact on key Green Belt area), and use of brown field sites/disused properties.
- 111: Planning policies...should encourage the effective use of land by reusing land that has previously been developed (brown field land).
 - Majority of development proposed within West Horndon is on Green Belt land.
- 152: Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development and net gains across all three. Significant adverse impact on any of these should be avoided and alternative options which reduce or eliminate such impacts should be pursued.
 - Environmental: Significant adverse impact on Green Belt land around West Horndon from material scale of proposed development. Significant increase in traffic within West Horndon and surrounding countryside from the scale of new development.
 - Economic: Immediate, significant decline in house prices in West Horndon and surrounding area given scale of development versus current population and housing volumes.
 - Social: Strong community spirit within West Horndon. Unlikely to survive the material, rapid increase in residents.
- 166: Local plans may require a variety of other environmental assessments...Strategic Flood Risk Assessment.
 - Not provided despite evident flood risk (see above).
- 165: A sustainability report which meets the requirements of the European Directive on Strategic Environmental Assessment should be an integral part of the plan preparation process and should consider all likely significant effect on the environmental, social and economic factors.
 - Has not been provided as part of the LDP hence unable to assess against this requirement.
 - Brentwood Borough Council ("BBC") released a previous report entitles "Landscape Character of Brentwood Borough" which contained the following guidelines on the following areas:
 - Thorndon Country Park: "Conserve existing views across the area" and "seek to screen visual detractors". Note: New development would be easily seen from the this part and unless built at densities in line with the current development, would be a significant visual detractor that could not be screened.
- 170: Where appropriate, Landscape Character Assessment should be prepared, integrated with assessment of historic landscape character, and for areas where major expansion options, an assessment of landscape sensitivity.
 - Not made available as part of LDP hence cannot assess against this requirement. Note points raised against Policy 165 above.

Planning Policy for Traveller Sites

- 4: ...to help achieve this, Government's aims in respect of traveller sites are: that plan-making

and decision-taking should protect the Green Belt from inappropriate development, and for local planning authorities to have due regard to the protection of local amenity and local environment. 14: Inappropriate development is harmful to the Green Belt and should not be approved, except in very special circumstances. Traveller sites (temporary or permanent) in the Green Belt are inappropriate development.

- Traveller site should not be placed on Green Belt land.
- 9: Local planning authorities should, in producing their Local Plan c) consider production of joint development plans that set targets on a cross-authority basis, to provide more flexibility in identifying sites, particularly if a local planning authority has special or strict planning constraints across its area.
 - Brentwood is dominated by Green Belt as a specific constraint. As such, focus needs to be on securing appropriate brown field land.
 - No mention in LDP regarding bordering authorities (Thurrock, Havering). Needs to be joined up to ensure even distribution of traveller sites.
- 11: Local planning authorities should ensure that traveller sites are sustainable economically, socially and environmentally. Local planning authorities should, therefore, ensure that their policies: g) do not locate sites in areas at high risk of flooding, including functional floodplains, given the particular vulnerability of caravans.
 - As highlighted above, both the Green Field and brown field land sits next to a flood plain.
- 15: Green Belt boundaries should be altered only in exceptional circumstances. If a local planning authority wishes to make an exceptional limited alteration to the defined Green Belt boundary (which might be to accommodate a site inset within the Green Belt) to meet a specific identified need for a traveller site, it should do so only through the planmaking process and not in response to a planning application. If land is removed from the Green Belt in this way, it should be specifically allocated in the development plan as a traveller site only.
 - Given there is brown field land available, there does not appear to be an exceptional need to place the traveller site on Green Belt land.

Economic Considerations

National Planning Policy Framework (Mar 2012)

- 7: Planning must perform an economic role...ensuring that sufficient land...is available in the right places...to support growth.
 - Significant wealth destruction in West Horndon area and neighbouring villages Bulphan, Herongate, and the Havering area. 100 new properties in a very concentrated area, every year, for 15 years, will materially depress house prices. Will result in existing residents' spending power significantly reduced, with lower levels of housing mobility (hence, impact on stamp tax revenues).
- 21: In drawing up LDPs, local planning authorities should set out a clear economic vision and strategy.
 - Wealth destruction in West Horndon and surrounding area is inconsistent with any clear economic vision for this area over the plan period.
 - The number of new houses planned will significantly stymie businesses opportunities in the area (limited space available for employment without building at inappropriate residential densities).
- 42: High quality information infrastructure is essential for sustainable economic growth. Development of high speed broadband plays an important role in this. 43: In proposing local plans, local planning authorities should support expansion of electronic communication networks including telecoms and high speed broadband.
 - The cost of building out this infrastructure will be significant versus using existing infrastructure. It is also questionable as to whether the cost is justifiable for the just over 2,000 houses forecasted for the area by plan completion.
 - Rate of construction implies area will remain below 1,000 houses until 2020. The new development would require this new infrastructure early in to construction to support demand.
- 152: If mitigation [of significant adverse impact] not possible, compensatory measures may be

appropriate.

- Compensation to existing West Horndon residents needs to be formally considered given impact to local house prices from rapid expansion in a very small area.
- 173: Pursuing sustainable development requires careful attention to costs:
 - No cost-benefit analysis provided regarding the significant cost involved in building out brand new infrastructure to support the new 1,500 new houses planned for West Horndon given there is no existing infrastructure of the correct scale to support this. Would assumedly be cheaper to spread development out to limit additional new infrastructure requirements.
- 173: The sites and the scale of development identified in the Local Plan should not be subject to such a scale of obligations and policy burdens that their ability to be developed viably is threatened...should provide competitive returns to willing developers.
 - Scale of infrastructure build-out required will significantly limit returns and choice for developers.
- 177: Important that Local Planning Authority understands district wide development costs at the time Local Plan is drawn up. For this reason, infrastructure and development policies should be planned at the same time, in the Local Plan.
 - No cost-benefit analysis or infrastructure plan provided despite the material infrastructure build out required to support the development at West Horndon.
- 187: Local Planning Authorities should...secure developments that improve the economic, social and environmental conditions of the area.
 - Economic impact well discussed above, but immediate impact on house pricing in surrounding area is negative.
 - Environmental impact discussed already, but given extensive building on Green Belt land with countryside views, negative impact.
 - Social: Discussed above, but loss of village community and inability to build a community feel based on rate of proposed development.

Travel

National Planning Policy Framework (Mar 2012)

- 9: Pursuing sustainable development involves...improving the conditions in which people...travel.
 - Trains along the C2C network are already overcrowded at rush hour, with no seats on most peak trains after West Horndon. Significant impact to travellers both at West Horndon and Upminster.
 - Previous C2C trials to lengthen trains on this branch have failed due to insufficient rolling stock.
 - Further, discussions with government would also be required – under the current minimum requirements for this franchise, West Horndon is served by only c. 50% of trains running on the line – this would need to be increased.
 - Moving employment (industrial) away from mainline station will increase travel requirements and complexity.
 - Proposed development does not improve intra-borough transport. Simply increases the number of people using the C2C line that runs directly in and out of the Borough. Employment opportunities within the new development should be taken up locally hence there is no argument to say this requires mainline rail access.
- 17: The 12 core planning principles should...make fullest use of public transport.
 - C2C line runs directly in and out of Borough – there is no intra-borough transport using this line. Construction across the borough, spreading out employment and housing, with improved local bus routes, cycle routes, incentives for car shares etc. would improve the use of public transport to achieve the LDP's goals in a stronger way than using the C2C station as the key area of focus.
- 32: Development should only be prevented or refused on transport grounds where the cumulative impacts of developments are severe.
 - Impact on material increase in rail usage would result in a severe impact on already

- overcrowded trains at peak times.
- 1,500 new homes, each with 1 car as a minimum, would result in a trebling of current journeys in and around the countryside area in which West Horndon is situated. Questionable as to whether local road network can support this, with limited potential to expand road network given Green Belt land surrounds the village.
- 34: Plans and decisions should ensure developments that generate significant movement are located where the need to travel would be minimised.
 - The new industrial estate which should act as a significant employment contributor to the new residential development, is not within walking distance and not accessible by train.
 - Employment opportunities within the new mixed use zone would be insufficient to support the entire new community. With the rail link not linking to any other area in the borough, this does not support local employment growth.
- 35: All developments that generate significant amounts of movement should be required to provide a travel plan.
 - Not provided.
- 37: Planning policy should aim...to minimise journey lengths for employment use.
 - At present a bus is proposed to link the new industrial site to West Horndon and Brentwood. This does not minimise journey lengths however given at present the sites are accessible by rail alone.

Planning & Local Environment

National Planning Policy Framework (Mar 2012)

- 17: The 12 core planning principles should...empower local people to shape their surroundings.
 - At present, LDP states BBC will work with local residents to shape infrastructure and development, however no plans have been set out as to how this would work.
- 17: The 12 core planning principles should...proactively drive...thriving local places...taking account of needs of local residential communities.
 - Inconsistent with immediate wealth destruction in West Horndon and surrounding area (Herongate, Bulphan, Havering).
- 52: The supply of new homes can sometimes be best achieved through planning for larger scale development such as extensions to existing villages and towns that follow the principles of Garden Cities.
 - Plan for local empowerment for West Horndon is not detailed in the LDP.
 - Garden City approach would be preferable on the basis that it allows for protection of local character.
- 58: Local Plans should develop robust and comprehensive policies that set out the quality of developments that would be expected of the area, responding to local character and being visually attractive.
 - No policy is set out for West Horndon despite the materiality of the development proposed.
- 64: Permission should be refused for development...[which] fails to...improve the character of an area.
 - Local Plan for West Horndon required to support improvement of character of West Horndon through the proposed development.
 - Plan for empowerment for West Horndon lacking.
- 66: Applicants will be expected to work directly with those directly affected by their proposals to evolve designs that take account of the views of the community.
 - No process set out in the LDP as to how this will be achieved.
- 162: Local Planning Authorities should assess the quality and capacity of infrastructure, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, flood risk and coastal change management and its ability to meet forecast demands.
 - No information in LDP as to what infrastructure is needed in West Horndon, how it will be built out and how it will be funded.
- 171: Local planning authorities...should work with public health leads and health organisations

to understand and take account of the health status and needs of local population (sports, recreation) including expected future changes [in local population].

- Not included in plan hence cannot assess against this requirement.
- 175: Where practicable, Community Infrastructure Levy Charges should be worked up and tested alongside the Local Plan...should support and incentives new development, particularly by placing control over a meaningful proportion of funds raised with the neighbourhoods where development takes place.
 - Not tested in the LDP.
- 183: "Neighbourhood Planning" gives community direct power to develop a shared vision...Parishes can use Neighbourhood Planning to set planning policies through Neighbourhood Plans to determine decision on planning applications.
 - No clarity as to how this mechanism works.
- 203: Consider whether other unacceptable development could be made acceptable through use of conditions or planning obligations.
 - Further development should not be permitted until a certain ratio (say 90%) of all houses built in the last 12 months have been sold.

Planning Policy for Traveller Sites

- 9: Local planning authorities should, in producing their Local Plan: d) relate the number of pitches or plots to the circumstances of the specific size and location of the site and the surrounding population's size and density. 12: When assessing the suitability of sites in rural or semi-rural settings, local planning authorities should ensure that the scale of such sites does not dominate the nearest settled community.
 - Depending on the number of occupants per pitch, the initial build out looks disproportionate to current village size.

Development Density

National Planning Policy Framework (Mar 2012)

- 47: Local planning authorities should...set out own approach to housing density to reflect local circumstances. 59: Design policies should...concentrate on guiding the overall scale, density, height, landscape and access.
 - LDP does not provide firm guidance on development densities or access for West Horndon.
 - Local circumstances for the area: Surrounding countryside views, views from Thorndon Park of surrounding area. Density needs to reflect this, with limit to 3 story construction.
- 60: It is...proper to seek to promote or reinforce local distinctiveness.
 - Given the LDP should allow a planning decision maker to make a quick and logical decision based on the LDP in future, it is reasonable to expect the LDP to define parameters for development that would maintain local distinctiveness.
 - The LDP does not define the distinctiveness of West Horndon, or provide parameters for new construction to support its maintenance.

Improvements to Local Plan

Based on the above critique of the Local Plan in its current form, regarding Policy CP4, West Horndon Opportunity Area, I recommend that the following improvements are made:

- Locations for development: Limited to the 2 industrial estates (identified as plots 020 and 021 in the Local Plan at present, or West Horndon Industrial Estate and Horndon Industrial Estate, respectively).
- Further sites to be considered within borough. There are alternative sites available, in particular, Hutton Industrial Estate, and Timmermans Garden Centre on the A127 close to West Horndon. These are both brown field sites, and would ensure greater choice of location development than the current land allocation in the draft Local Plan. It would also ensure that key areas of drainage for West Horndon and areas south of the village (Bulphan etc.), namely plot 037 in the Local Plan, are maintained as green belt and functional drainage land.

- Densities on plots 020 and 021 to be limited to that already built up in West Horndon (average of village). This ensures i) maintenance of the village's character and ii) view from Thorndon Country Park is left intact. Height of new builds to be limited to 3 stories to reflect this. Same proportion of social and affordable housing required as that existing in the village.
- Missing key pieces of information, including updated flood assessment report, infrastructure delivery plan, and costing analysis, needs to be presented to Borough residents in support of the Local Plan.
- Neighbourhood plan to be drawn up for West Horndon, and must be approved by the West Horndon Parish Council ("WHPC"). Responsibility for delivery of the neighbourhood plan to lie with the West Horndon Parish Council (or a body assigned by the WHPC), in line with Garden City Principles.
- Proportional share of total Community Housing Levy and New House Bonus received within Brentwood, to be allocated to West Horndon. Proportional share represents proportion of new development within West Horndon versus total development (residential) in West Horndon.
- To avoid a development glut, leading to unsold houses and hence negative impact to West Horndon, new construction should only take place once 90% of all new builds have been sold or let.
- Traveller site to be sited as far out of the village as possible. Pitch number to reflect development, with 14 an absolute maximum. Final site to be signed off by WHPC.
- New infrastructure to be delivered as part of the new development. At the same time of development, not after. To include a new health centre and expanded primary school.
- Borough really needs to consider how best to address secondary school demand in the south of the Borough. Having all children of secondary school age attend just one school, in the centre of Brentwood Town Centre, is not sustainable.

Please return to Planning Policy Team, Brentwood Borough Council, Town Hall, Brentwood, Essex CM15 8AY, or alternatively attach completed form and email **planning.policy@brentwood.gov.uk**

Please note that all responses will be published online. More information can be found at **www.brentwood.gov.uk/localplan**

All responses should be received by Wednesday 2nd October 2013