

BRENTWOOD BOROUGH LOCAL PLAN

**REPRESENTATIONS ON BEHALF OF
WEST HORNDON PARISH COUNCIL**

IN RESPECT OF

**THE STRATEGIC GROWTH OPTIONS CONSULTATION
(Supplementary Comments)**

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1.0 Introduction

1.1 This document has been prepared on behalf of West Horndon Parish Council by SJK Planning. It should be read alongside an accompanying document setting out representations in respect of the Dunton Garden Suburb Consultation.

1.2 The Strategic Growth Options Consultation (SGOC) and the Dunton Garden Suburb Consultation (DGSC) are being run in parallel. The SGOC specifically considers spatial options and specific sites to be considered as part of the Brentwood Local Development Plan, for which the consultation period ended on 17th February. A request from the Parish Council for an extension of time to the SGOC consultation has been turned down, but agreement was given for the Parish Council to submit a supplementary response based on new and additional information becoming available. This document sets out a supplementary response.

1.3 An outline response was provided on 17th February and is attached at **Appendix 1**.

1.4 The Parish Council supports the fact that the Borough has taken a step back to consider the broad options for growth, rather than simply suggest a strategic allocation at West Horndon, as proposed in the original Preferred Growth Options document prepared by Brentwood Borough Council. The SGOC does however refer to far greater housing numbers, principally it is understated, as a response to comments from neighbouring authorities. The level of growth now being suggested of some 5,500 new houses was firmly rejected in the Preferred Options document which stated that:-

“Reason for rejection: This level of growth would require significant Green Belt release, significantly worsen congestion in Brentwood Town Centre and irrevocably change the rural character of the Borough. Significant investment in infrastructure and services would be required to support this level of growth and there is no guarantee this would be forthcoming. This option fits poorly with the Council’s preferred spatial strategy and available alternatives.”

1.5 Another important concern is that the supporting information to both consultations fails to consider key infrastructure issues in any detail. Consulting on spatial strategies and potential sites without such information prevents responders from providing a fully informed view on the options.

1.6 The Dunton Garden Suburb proposal is a key spatial option and indeed, a key specific site. Both documents have important implications for the future of the village of West Horndon, and the Parish Council has rightly made a case that they should be considered together within the same timescale. The two consultations are inextricably linked, and closing one before the other reduces the ability for reasoned and balanced responses across all of the key issues being consulted on. The feedback from residents has been that many are puzzled by the Borough Council appearing to want to separate comments on the proposed “garden suburb” from the document setting out growth options. Many have found themselves having to repeat objections to ensure that they are heard.

1.7 Referring to the A127 corridor the SGOC suggests that “Due to the different character and availability of suitable land the capacity for growth is potentially greater than elsewhere in the Borough”. Building some 3000 new houses on the edge of West Horndon is still being put forward as an option. The SGOC does not express a preference for the Garden Suburb against such a strategic allocation at West Horndon. It is important to stress therefore that the Parish Council maintain their objections to major development at West Horndon. Such objections followed extensive consultation with residents. They are still relevant and we request that the Borough consider them as part of the response to this representation. (The objections are included at **Appendix 2**).

1.8 The Parish have kept local residents informed about the consultation process and urged everyone to respond with their views. Pointing out that a strong response from

West Horndon will once again help ensure that the views of our community are listened to when Brentwood are developing their next draft of the Local Development Plan.

1.9 The Parish Council does not want to come across as unnecessarily obstructive or to appear to want to shy away from Brentwood Borough's Council's challenge to meet housing demand. The Parish also wants to continue a working relationship with the Borough, and progress a neighbourhood plan for the village. They are aware of the dangers of not having a Local Development Plan in place, and the risk of inviting aggressive speculative applications. Their views in this respect have been set out on the Parish Council website as follows:-

“Strategic Growth Options Consultation

West Horndon Parish Council supports the principles set out in the National Planning Policy Framework for the protection of the Green Belt to prevent urban creep. We strongly oppose inappropriate development in the green belt except in exceptional circumstances where the benefits clearly outweigh the harm and we also support the view that housing need alone does not constitute exceptional benefit.

However, we acknowledge the challenge that the Strategic Housing Allocation numbers present to Brentwood Borough Council. We recognise that without clear locations for the necessary houses identified by the Strategic Housing Allocation, Brentwood Borough Council will be highly unlikely to have a robust Local Development Plan approved. That presents the risk of aggressive speculative developers attempting to obtain planning approval anywhere in the borough and that the appeals system could result in inappropriate and poorly coordinated development taking place.

Thus in the unfortunate circumstance where Green Belt does have to be sacrificed in order to meet the statutory obligations of the Strategic Housing Allocation it is essential that only the minimum amount of land is sacrificed and that this is done in

locations and in such a way that harm and urban creep is kept to an absolute minimum.

All our responses to the questions in the consultation must be viewed in this light.”

1.10 In putting forward representations the next section of this document sets out our understanding of the purpose and content of the SGOC, and responds to the 13 questions within the text. We have picked out the essential points and sought to clarify our understanding of where we are in the process, and what the document is trying to achieve. In some instances it is felt that the questions themselves are biased in that they appear to seek a certain response. An example is question 4 which asks “Given the greater capacity for growth along the A127 Corridor, which of the sites put forward do you think is the best location for growth?” There does not appear to be a question specifically about the loss of Green Belt land.

1.11 The representations follow consultation with the members of the Parish Council, who in turn have canvassed the views of the residents of the village, both through discussion and public meetings.

1.12 The representations carefully examine how the document sits against the guidance in the National Planning Policy Framework (NPPF), in terms of sustainability, Green Belt boundaries, neighbourhood planning, flooding, infrastructure, and plan making.

2.0 The Representations

2.1 The introduction to the SGOC sets out what has changed since 2013 and describes the purpose of the document as follows:-

“This consultation document provides the opportunity to reconsider issues and sets out development options for public comment.”

2.2 The consultation sets out what it considers has changed since 2013 under the headings as follows:-

- Objectively assessed housing need:
- New employment land and job provision
- Crossrail
- Sustainability:
- Planning for Gypsies & Travellers:
- Basildon Borough Council proposals:

2.3 Paragraph 1.13 says that it is essential that the Local Plan is informed by robust and up to date evidence. A large part of the evidence base is however described as “forthcoming”, as highlighted in the list as follows:-

Economic Evidence

Brentwood Economic Futures 2015-2030 (December 2014)

Revised Retail & Commercial Leisure Study (December 2014)

Environmental Evidence

Renewable Energy Study (April 2014)

Green Infrastructure Study (**forthcoming**)

Landscape Capacity Assessment (**forthcoming**)

Surface Water Management Plan for Brentwood Borough (**forthcoming**)

Housing & Demographic Evidence

Strategic Housing Market Assessment (SHMA) (July 2014)

Greater Essex Demographic Forecasts Phase 6 (September 2014)

Objectively Assessed Housing Needs for Brentwood Borough (December 2014)

Housing Viability Study (**forthcoming**)

Transport Evidence

Crossrail Economic Impacts (**forthcoming**)

Highways Modelling (**forthcoming**)

Leisure & Facilities Evidence

Open Space Study (**forthcoming**)

Sports Facilities Study (**forthcoming**)

2.4 Some of the forthcoming documents are perhaps more important than others in deciding where growth might take place. We would contend however that there should be more evidence in respect of environmental and transport matters to inform the plan. There is no indication at the moment as to when such evidence might be available.

2.5 Essex County Council shares the concerns in this respect. An extract from their response reads as follows:-

“However, for the reasons outlined below there is a concern regarding the omission of essential evidence base to inform the Strategic Growth Options in this consultation and future Spatial Strategy, most notably:

- Transport Evidence: Crossrail and highways modelling (forthcoming)
- Objectively Assessed Need for Housing (not available at the start of the consultation)
- Surface Water Management Plan (forthcoming)
- Housing viability (forthcoming)
- Review of the Metropolitan Green Belt Boundary (not proposed)
- Other forthcoming technical evidence (eg Landscape Character Assessment)

In the absence of the supporting evidence, ECC withholds its support for any of the Strategic Growth Options until key pieces of evidence are publicly available for consideration.”

2.6 The NPPF makes it clear that evidence or 'objectively assessed development needs' should underpin the overall strategy and each policy in the local plan. It is imperative that evidence should inform what is in the plan, rather than being collected retrospectively in an attempt to justify the plan. The preparation of any spatial strategy needs to be based on a proportionate evidence base.

2.7 It is the view of the Parish Council that the increased housing numbers, without such evidence, have not been objectively assessed in accordance with the NPPF.

2.8 On page 7 the SGOC asks the question “What are we consulting on?”, and sets this out as follows:--

“Consultations starting in January 2015

Brentwood Borough Strategic Growth Options Consultation

6 January - 17 February 2015

Prepared by Brentwood Borough Council

Consultation on areas for potential growth and specific sites across Brentwood Borough, informs the emerging Brentwood Local Plan.

Dunton Garden Suburb Consultation

6 January - 17 February 2015

Prepared jointly between Brentwood and Basildon Borough Councils

Exploring the potential opportunities for cross boundary development focused on land west of Laindon/Dunton (Basildon Borough) and east of West Horndon/A128 (Brentwood Borough), This document does not form part of the emerging Brentwood

Local Plan, but instead provides an opportunity for both Councils to consult on an initial concept, to then determine whether it should be taken any further”

2.9 The actual date now set for the Dunton Garden Suburb Consultation is 16th March. It would appear from the above text that the original intention was to run the two consultations together, finishing on the same date. We are still unclear as to why this did not happen. Although it says that it does not form part of the Local Plan, as put forward above, it is inextricably linked, in that it would as an option meet virtually the total housing requirement.

2.10 A reference to the plan period possibly not being adequate appears to imply that a greater housing provision figure could be required.

2.11 Page 9 of the document sets out what are considered to be the strategic objectives, as follows:-

Managing Growth

Sustainable Communities

Economic Prosperity

Environmental Protection & Enhancement

Quality of Life & Community Infrastructure

2.12 Managing growth is dealt with in Section 2 and asks two questions. The first of which is:-

Q1: Do you agree with the three broad areas, for the purpose of considering approaches to growth?

2.13 The three areas are described as North of the Borough, The A12 Corridor, and the A127 Corridor. The three areas together comprise the whole Borough. Splitting the

Borough as such appears to make sense given the different characteristics of these areas.

2.14 There are important differences between the three areas which are explored further below. Most importantly, the narrow A127 corridor as it passes through the Borough, only has the existing small settlement of West Horndon, whereas the A12 Corridor comprises the main built up area of the Borough. It is clear therefore, without detailed analysis, that the A12 Corridor must provide the most sustainable location for development, having the transport links, shopping centres, schools, employment, and all other facilities and amenities.

Q2: Do you agree with the issues raised for each of these three areas?

2.15 The Parish does not agree with the issues raised particularly in respect of the A127 Corridor. Our comments in this respect are as follows.

(A) North of the Borough

2.16 The report says that:-

“It is important to consider allowing villages to grow in order to provide for local need. Brownfield land in Green Belt could be redeveloped on limited sites (where appropriate), and/or sites on the edge of villages could be released.”

2.17 We agree that smaller settlements could take a larger proportion of housing numbers, all of which are in reasonably sustainable locations, close to the A12 Corridor.

(B) A12 Corridor

2.18 As the document rightly says, this is where the majority of the built up area of the Borough is located. It is our view that it should therefore provide the most sustainable locations for development.

(C) A127 Corridor

2.19 The report says that:-

“2.18 The A127 Corridor contains the single settlement of West Horndon. This part of the Borough has a different landscape character (fenland landscape, see page 28).

2.19 Due to the different character and availability of suitable land the capacity for growth is potentially greater than elsewhere in the Borough. Although the A127 suffers from congestion problems it has more scope for improvements than the A12.”

2.20 It is a fact that the road and rail infrastructure in the A127 Corridor is already at capacity, and is certainly over capacity during the rush hours.

2.21 It is not clear why the A127 Corridor has greater potential for improvements than the A12. The A127 is tightly bounded by Southend (where it is in essence, a local road) and the London area where traffic is extremely heavy. There are also many areas where houses run all the way to the edge of the A127. As such, widening of the A127 is not necessarily easy. The A12 could potentially be expanded in a number of areas without material impact to the surrounding residential properties. There has been no study to determine the extent to which the A12 would need improvements to enable more housing to be provided.



Figure 9: Sites which have come forward for Housing in the A127 Corridor

The housing site options surrounding or adjacent to West Horndon.

2.22 It is acknowledged that West Horndon is the only settlement in the A127 Corridor, as it passes through the Borough. There is an argument that Herongate and Ingrave are also within the A127 Corridor in the same way that Warley for example is in the A12 Corridor.

2.23 We are not sure why, in the context of finding development land, there is a reference to fenland landscape. The consultation document also implies that the A127 has greater development potential due to it having a “different landscape character”. The inference seems to be that the landscape is less attractive than elsewhere in the Borough. Whilst it does indeed have a different landscape character to say, the North of the Borough, the local residents’ value of the open space and farmland should not be considered any lower than residents of the North of the Borough. The open, fenland landscape is valued extremely highly by local residents, and contributes to an open rural feel to this area and local settlements.

2.24 The principle behind Green Belt have always been that it is necessary to prevent coalescence, not to protect what might be subjectively considered as more attractive areas. There has been no assessment of Green Belt quality in the Borough. Such an exercise is being carried out by the neighbouring Green Belt authority, Epping Forest, as a pre-requisite to considering development sites in the Green Belt.

2.25 Flood risk is not addressed for any of the sites. It is clearly a major problem in the A127 Corridor and needs to be fully assessed before any development decision can be made. The Borough must be aware of the recent problems with local flooding on land South of West Horndon.

2.26 Section 3 of SGOC is headed “Sustainable Communities”. It starts by saying that:-

“The Council is required to meet projected local housing needs. This need is significantly higher than previous requirements and the amount of new homes built in

previous years. This section sets out the key issues and sites that have been suggested to the Council to meet housing need.”

2.27 The SGOC refers a study to identify objective housing needs for the Borough, which concludes a requirement to provide for around 360 new homes per year. It notes that the previous target in the East of England Plan was 175 homes per year. Over 15 years that comes to around 5,500 homes, some 3,000 more than what can be provided from brownfield sites in urban areas. It says that the shortfall from previous years will also need to be taken into account in the future Plan period, which will increase the overall housing needs figure.

2.28 Two important issues arise from these figures. First, as touched on above, it appears to be in complete contradiction to the Preferred Options Consultation stage. Which, in respect of housing numbers read as follows:-

“Alternative Option 1 – 4,960 to 5,600 dwellings (331 to 373 homes a year) - Objectively Assessed Need

Reason for rejection: This level of growth would require significant Green Belt release, significantly worsen congestion in Brentwood Town Centre and irrevocably change the rural character of the Borough. Significant investment in infrastructure and services would be required to support this level of growth and there is no guarantee this would be forthcoming. This option fits poorly with the Council’s preferred spatial strategy and available alternatives.”

2.29 The level of growth now being suggested has previously therefore been firmly rejected. It is difficult to believe that circumstances have changed, in a short space of time, to a degree that now makes such a high level of growth acceptable.

2.30 Secondly, it is the case that a large part of the evidence base is currently missing. We therefore question whether, in such circumstances, the Borough can confidently claim that the demand has been objectively assessed. The SGOC does not offer a

question in this respect of the level of provision, appearing to suggest that the matter is outside their hands.

Q3: Do you have any comments on the appropriateness of particular sites?

2.31 Separate representations consider the appropriateness of the Dunton Garden Suburb. Sites Ref 037A, B and C, 038A and B, and 126, are all Green Belt sites surrounding West Horndon village. A previous representation in respect of the Preferred Options Consultation looked at the appropriateness of major allocations on the edge of West Horndon. See **Appendix 2**.

2.32 Development of these sites would change the existing West Horndon village beyond all recognition, and put a very significant strain on local residents and infrastructure. West Horndon Parish Council believe that the very significant development this would represent within the Green Belt would be inappropriate development and represent significant harm to the local environment, harm which would not be outweighed by the need for housing within the Borough.

2.33 The number of dwellings proposed for West Horndon in the Preferred Options represented some 43% of the total number to be provided in the Borough up to 2030. It was also suggested that in the longer term “West Horndon could give rise to further capacity”, although it did not put a figure on this. The objections were to the disproportionate scale of the proposals both in relation to the size of village, and in terms of the proportion of the Borough’s housing numbers the village could be asked to accommodate. It is also misleading to talk about “further capacity”, when there is no evidence to back this up. The open ended nature of such a comment is inappropriate and leading in the absence of such evidence. Within the statutory planning process, capacity should be reassessed at the time of any new LDP being prepared and not before.

2.34 Sites ref 020 and 021 (Industrial Estates in West Horndon) are already in the 5 year land supply, and are brownfield sites that could be developed in a positive manner for the village, although at a lower density than the 500 indicated in the 5 year land supply. It should be noted however that development at this density of these sites alone could increase the residential size of West Horndon village by c. 90% and as such, sufficient planning and infrastructure will need to ensure that the impact to existing residents is managed appropriately. The present infrastructure (including roads, school and healthcare provision, and public transport) would be extremely inadequate in light of such expansion of the village.

2.35 The consultation document makes no reference to the major flood problems that would occur if development took place on any of these sites.

2.36 An accompanying document considers the appropriateness of the Dunton Garden Suburb. In principle it is felt that this would be preferred to sites 037, 038 and 126 as a means to provide the required level of housing within the Borough, whilst managing this growth in a sustainable manner. We do have concerns as to whether, in the form as currently presented, it is likely to be a viable and deliverable option. With 6,000 houses proposed, it would require major investment in infrastructure to ensure that it becomes a sustainable and self-sufficient community. We need a technical assessment of what the impact will be and whether suggested road improvements, or a new station can be provided. A development of this scale, even if there is a degree of support, would take a number years to come to fruition. In the meantime, housing numbers are not being provided. Such concerns have also been raised in comments from neighbouring authorities and Essex County Council.

2.37 It is perhaps feasible to look at the area taking a proportion of growth, but work is needed to establish what is practical and sustainable.

2.38 If there is any development on the west side of Basildon it would also be necessary to ensure a sufficient buffer of land is maintained going forwards, between such

development and the land surrounding West Horndon village. The Parish Council suggest that this could be achieved through creating a woodland area reaching up to Thorndon Country Park.

Q4: Given the greater capacity for growth along the A127 Corridor, which of the sites put forward do you think is the best location for growth?

2.39 This does not seem to be a fairly worded question, in that it attempts to direct responses towards the A127.

2.40 In line with our response to Question 2, West Horndon Parish Council questions the statement that the A127 corridor has greater capacity than the A12 corridor. By “greater capacity” is the document referring to larger areas of open Green Belt?

2.41 In line with our response above, site 200 (Dunton Garden Suburb), compared to other locations, is potentially less harmful to the village of West Horndon. As referred to above however there are serious doubts as to whether development of the scale proposed, effectively creating a new settlement, is ever going to be a viable option.

2.42 The allocation of land on the west side of Basildon, whether this be in the form of a garden suburb, or a perhaps a less ambitious scheme, does mean that the residential development at West Horndon could be limited to the existing industrial estates, which, taking the Strategic Housing Allocation numbers faced by Brentwood into account, is West Horndon Parish Council’s preferred strategy. Whilst such development would still significantly alter the nature of West Horndon village, if undertaken appropriately, the village could retain its current “small community” feel, with surrounding farmland, open spaces and nature preserved.

2.43 The Parish Council maintains the view that strategic development of the land immediately adjacent to the village would destroy the current village setting and environment.

2.44 Brentwood Borough Council must use the duty to cooperate to negotiate with other authorities to prevent development taking place in Thurrock to the south of West Horndon. Such development would also cause harm similar to that identified for sites 037, 038 and 126.

2.45 Again we should mention the consultation document fails to identify the flood risk issues, including where it exists and how it will be managed. Given the recent history of flooding in the West Horndon area it is essential this is addressed. Sites 037A, B and C, 038A and B, and 126 all act as buffer stores and prone to becoming water logged following heavy rain. Any development in these areas would be contrary to paragraph 100 of the National Planning Policy Framework.

Q5: Should the A12 Corridor accommodate growth by releasing sites on the edge of urban areas?

2.46 Yes. Given the level of projected housing need within the Borough, sustainable development requires Brentwood Borough Council to consider all available and suitable sites across the rest of the Borough. The A12 Corridor has the ability to meet a significant portion of the Borough's increased housing needs, and suitable sites should be included in any spatial strategy.

2.47 Our view is that this has not been properly explored. Have any figures been put together to assess the level of housing provision that could come from the A12 corridor?

2.48 The County Council has identified the need for Brentwood Borough to identify a range of sites in order to ensure that demand is met. If all development is directed toward either Dunton or West Horndon, and either depends on major infrastructure improvements, then they may not be deliverable. This is the danger of simply putting too many eggs into one basket. A range of different sized sites is more deliverable and will

ensure that there is a rolling programme and that a five year supply of housing is maintained.

Q6: In order to provide for local need is it preferable for greenfield sites on the edge of villages to be released, or to develop brownfield sites (both within Green Belt)?

2.49 This is a convoluted and slightly confusing question. Is local need a reference to the Borough's needs or the needs of individual villages? This is also the only question in the whole document that has a reference to Green Belt.

2.50 Where there are available, suitable sites, brownfield should always be considered above greenfield sites. There may be instances where the release of small amounts of Green Belt land around villages provides opportunities for these villages to grow in a sustainable manner. However, this should only be considered once brownfield options have been exhausted, and where the development would create a positive and balanced impact on the community. Releasing all of the Green Belt land around West Horndon village for example would not create a positive or balanced impact on to the existing community.

2.51 There may be some isolated instances where limited development in the Green Belt provides benefits which exceed the harm they cause. E.g. In West Horndon the current access to the park is limited. A small amount of development which improves the access is an example of such a possible development.

2.52 Generally we believe there is much greater scope to release brownfield sites within the Green Belt, some of which will have a capacity of up to 100 dwellings.

Q7: To enable future employment need to be met do you agree that the most sustainable approach is to allocate new sites close to the strategic highway network?

2.53 Yes. With the industrial estates at West Horndon expected to be developed for primarily residential development, it is key that replacement employment opportunities are provided within the local area (A127 Corridor). These must however be accessible via public transport as well as via road.

Q8: In order to ensure that the Town Centre remains economically sustainable, do you agree that a “Town Centre First” approach should be taken to retail development?

2.54 Yes. Whilst local shops need to be provided at the village level, primary “destination” shopping locations should be focused within existing town centres.

2.55 Town Centre First retail development must also be accompanied (or preferably, preceded by) appropriate infrastructure improvements including regular and reliable public transport to all areas including the more rural ones, car parking facilities, and improvements to the road network to prevent unmanageable congestion.

Q9: Are there opportunities for more open space provision in the area where you live?

2.56 Yes. West Horndon village currently benefits from a small community park on Cadogan Avenue. As part of any potential future development within the village (and indeed, the Dunton Garden Suburb), there are significant opportunities to enhance this park, both from a facilities and access perspective.

Q10: Please rate the level to which you value the landscape near where you live (on a scale of 1 to 5), as compared to other areas within Brentwood Borough, for the following aspects:

2.57 The Parish have completed the table as shown below. We are not sure however how the Borough would intend to use this information as part of their evidence base.

Aspect:	Very Low	Low	Average	High	Very High
Scenic Beauty / Attractiveness	1	2	3	4	5
Outdoor Recreation / Leisure Use	1	2	3	4	5
Wildlife Interest	1	2	3	4	5
Historic Interest	1	2	3	4	5
Tranquillity	1	2	3	4	5
Other – please specify	1	2	3	4	5

Completed table for question 10

Q11: To what extent do you think the following is present in the landscape near where you live: Houses; Commercial buildings; Nature Reserves; Farmland; Woodland; Wasteland; Infrastructure; Leisure Facilities; other?

2.58 The Parish have also completed the table for this question as shown below.

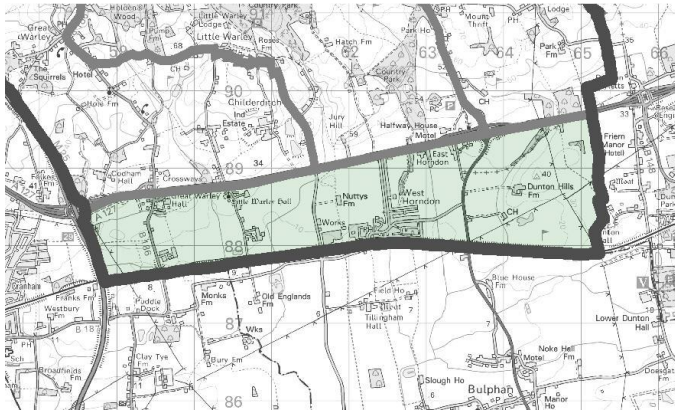
Aspect:	Absent	Occasional	Frequent	Predominant
Houses	1	2	3	4
Commercial / Industrial buildings	1	2	3	4
Nature Reserves / Wildlife	1	2	3	4
Farmland	1	2	3	4
Woodland	1	2	3	4
Degraded / Derelict / Waste Land	1	2	3	4
Infrastructure (Road / Rail / Pylons etc.)	1	2	3	4
Leisure / Recreation Facilities	1	2	3	4
Other – please specify	1	2	3	4

Completed table for question 11

2.59 In this respect we would also refer to the Mid Essex Landscape Character Assessment (September 2006). It refers to the surrounding countryside as Horndon Fenland, which it says is characterised as follows:-

- Large arable and pasture fields.
- Predominantly flat topography.
- Mature hedgerow field boundaries (sometimes gappy), which contain several single mature trees.

- Relatively sparse settlement pattern.
- Views to surrounding wooded hills to the north.
- Long distance views to pylons and Tilbury power station to the south.



The extent of the Horndon Fenland and an image from the assessment showing the characteristics of the countryside.

Q12: Have we considered the main infrastructure issues? Are there other important issues to consider?

2.60 Development must not increase the challenges to the Borough's infrastructure (i.e. it must be small enough not to create a significant demand on current infrastructure, or big enough to generate money to create/improve infrastructure to meet the new need).

2.61 Whilst transport is considered, the focus appears to be on Crossrail and links to Brentwood Town Centre. Although important, given the scale of potential development within the A127 Corridor, a completely fresh transport strategy needs to be developed for this area. This will need to consider both the impact of Brentwood and Basildon's

development along the Shoeburyness to Fenchurch Street rail line, and other local councils looking to develop along this line as well (significant knock-on impact that may not be considered by looking at just Brentwood and Basildon's plans alone). It also needs to consider how residents of the Garden Suburb (if developed) travel to West Horndon, Laindon and Basildon, and how West Horndon village residents travel to the Garden Suburb, Brentwood and Basildon town centres. The transport strategy will also need to incorporate regular public transport to local employment locations given the potential redevelopment of the West Horndon industrial estates.

2.62 From a road perspective, the consultation document focuses heavily on the A12 and A127. However the A128 links these two roads, and importantly links the south of the Borough to Brentwood Town Centre (including related infrastructure (importantly, secondary schools). Any development within the A127 or A12 corridors will need to consider how to alleviate what will become intolerable strain on this specific road.

2.63 In addition to transport; education, healthcare, community facilities and green infrastructure are all identified as significant infrastructure considerations. The detail on these within the consultation document is limited and significantly more detail will be necessary to ensure future development is carried out sustainably.

2.64 Timing of infrastructure needs to have a stronger focus than currently seen in the consultation. Given the scale of potential development within the A127 Corridor, supporting infrastructure needs to be in place first, to prevent a significant and materially negative impact on existing residents. This will also ensure that any new development is undertaken in a sustainable manner.

Q13: What do you think the priorities for infrastructure spending should be?

2.65 Given the scale of development proposed within the A127 Corridor, whilst there will be priorities, the development will require infrastructure spending across all categories (education, healthcare, transport, green space, community facilities etc.). Failure to

provide any one element of this infrastructure will have a materially negative impact on both existing residents, and the new development. As such, whilst there may be priorities in areas where development is expected to be lower/less significant, in areas expected to see high levels of development, a holistic infrastructure plan needs to be delivered to ensure the development is undertaken in a sustainable manner.

3.0 Moving Forward

3.1 The Parish Council have looked carefully at both the SGOC and the DGSC. In response to the previous consultation the Parish set out a preferred approach to planning the future of the village, and meeting housing demand in the Borough. These comments made still stand. In particular, the Borough Council, in consultation with the village, is urged to carry out a detailed study of West Horndon, focusing on infrastructure, housing needs, services, amenities, and public transport. Only after this has been carried out can the planning process claim to be properly informed.

3.2 We have looked into what can be considered to be an objectively assessed housing need. The Borough states this as a matter of fact and does not invite questions with regard to whether the level is considered to be correctly or objectively assessed. It is a fact that the previous consultation exercise dismissed a high level of growth, saying that it would be seriously damaging to the character of the Borough. What mitigation measures will be put in place to prevent this? The County Council questions whether housing numbers can be objectively assessed, when a large part of the evidence base is missing.

3.3 The Parish Council maintain their objections to a major expansion of West Horndon. In respect of the SGOC and the DGSC we have set out a detailed response. We have concerns with regard to the evidence base and the practicalities of creating a self-sufficient community. If the concept is to be taken forward, infrastructure demands must be properly assessed.

Neighbourhood Plan

3.4 The industrial part of the potential housing land at West Horndon is excluded from the Green Belt, and is brownfield by definition. Both estates although fairly well occupied do not provide modern adaptable units. They also result in heavy freight passing through the village. The Parish Council's preferred approach is to plan for their redevelopment for housing, and protect the open Green Belt land surrounding the village. The redevelopment for housing should be at a density reflective of the existing village.

3.5 Such a development could provide up to 500 new houses, and therefore close to doubling the population of the village. It would therefore require a significant and commensurate package of improved facilities and investment in infrastructure. From consultation and discussion it is clear that the majority of residents would see this as a positive and acceptable way forward. It should be mentioned however that although a figure of 500 is suggested in the 5 year land supply, such a high density would be out of character with much of existing housing in the village. The Parish Council suggests a figure closer to 350 in keeping with current density and village character.

3.6 To support and plan for this, the Parish Council are fully committed to drafting and executing a Neighbourhood Plan. This must reflect the needs and aspirations of the local community, an objective at the heart of government advice. The local plan process is a one off opportunity for the Parish to work together with the Borough and plan responsibly. West Horndon can benefit from well-designed new housing, an improved and distinctive village centre, a new medical centre, an extended or new primary school, an improved road and footpath network, improved public transport, sports facilities, and open space.

Housing Numbers and Previously Developed Land

3.7 The Parish Council recognises that it is the responsibility of the Borough Council to provide for a level of new housing up to 2030. However, the consultation process with West Horndon has clearly established, with good reason, that the village is unable to provide a major strategic location. The Parish is aware that this leaves the Borough short of their target figure.

3.8 The Parish Council cannot rewrite the local plan with a list of alternative sites. We would however contend that there is further scope to identify and bring forward previously developed sites for housing, whether they are within or outside settlement limits. The full potential of these sites needs to be fully explored before releasing open Green Belt Land. A number of locations have been put forward.

3.9 Other landowners and developers will no doubt be putting their sites forward for development as the plan progresses. These should be looked at carefully, particularly if they provide an opportunity to distribute new development more equitably throughout the Borough, and provide a range of sites, deliverable within reasonable timescales.

4.0 Conclusion

4.1 The Parish Council have again worked hard over the consultation period to publicise and explain the consultation process to local people. They have listened to and responded to their concerns. The residents of West Horndon have a thorough knowledge of local circumstances, the character of the village and its surroundings, its road network, the railway line, the level of facilities and amenities, its accessibility and connections with Brentwood.

4.2 The initial reaction of the Parish Council was that the development of a garden suburb, rather than the major expansion of West Horndon, could be a preferable option. Having now studied the consultations in some depth, and read some of the informed comments from other authorities, they share the view that it is unlikely to ever be a realistic proposition. In putting forward comments we have examined how the SGOC and the DGSC sit against the requirements of the National Planning Policy Framework. The framework requires that a local plan can pass the tests in respect of sustainable development, infrastructure, Green Belt, and flooding. The Parish Council respectfully suggest that a lot more work is needed before a garden suburb might become an option.

4.3 The Parish Council fully appreciate that there is a need for housing land over the period 2015-30, and that very difficult and politically sensitive choices have to be made. The Parish Council would be prepared to accept a redevelopment of the industrial estates to provide up to 350 units, thereby taking a substantial share of the Borough's new housing. In doing so the Borough and Parish must work together to realise the significant benefits this can bring, and to mitigate against any potentially harmful impacts.

4.4 The importance of the local plan process for the future of the village cannot be underestimated. New housing can be a catalyst to plan responsibly for the future of the village, with a simple objective in mind; to ensure that West Horndon is an attractive and sustainable place to live.