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**BRENTWOOD
BOROUGH COUNCIL**

Brentwood Borough Local Plan

Strategic Growth Options Consultation

January 2015

Consultation questionnaire

This consultation questionnaire relates to the Brentwood Local Plan Strategic Growth Options Consultation and is provided for you to make comments. Please take the opportunity to read the consultation document before filling in this form and returning to:

Planning Policy Team, Brentwood Borough Council Town Hall, Brentwood, Essex, CM15 8AY
or by email to planning.policy@brentwood.gov.uk

Comments need to be received by 5pm on Tuesday 17 February 2015

If you need any help completing this form please contact the Planning Policy Team using the contact details given above or by telephoning 01277 312620.

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Questions

The Council is seeking responses on key issues. Focused questions appear in bold boxes throughout the Strategic Growth Options document. These questions are summarised in this consultation questionnaire. More information can be found at www.brentwood.gov.uk/localplan.

Please use an additional sheet if necessary. Please note that all responses will be published online.

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.

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

Yes

- Splitting the borough in to the three areas of "North", "A12 Corridor" and "A127 Corridor" appears to make sense given the different characteristics of these areas.

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

No

- Road and rail infrastructure in the A127 Corridor is already at (and during the rush hour well over) capacity.
- 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.
- The consultation document also implies that the A127 has greater development potential due to it having a "different landscape character". 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.
- 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.

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

Yes

- 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 West Horndon village, although probably at a lower density than the 500 indicated in the 5 year land supply . It should be noted however that development 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.
- 037A, B and C, 038A and B, and 126, are all Green Belt sites surrounding West Horndon village. 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. The consultation document makes no reference to the major flood problems that would occur if development took place on any of these sites.

- Site 200 (Dunton Garden Suburb) would be strongly preferred to 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. However, given the level of infrastructure that would be required, again this would need to be managed in a sustainable and appropriate manner to safeguard the existing West Horndon community, and create a self sufficient community within the Garden Suburb. It would also be necessary to ensure a sufficient buffer of land is maintained going forwards, between the Garden Suburb and the land surrounding West Horndon village. WHPC suggest that this could be achieved through creating a woodland area reaching from the west of the Garden Suburb, 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?

- 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.
- In line with our response above, site 200 (Dunton Garden Suburb) is "preferred" to all other sites in the A127 Corridor as development on this site will create the least harm.
- West Horndon Parish Council feel that, if undertaken in a sensitive manner, site 200 has the potential to provide Brentwood Borough Council with the required level of residential development, whilst creating a self sufficient, sustainable development with access to a levels of infrastructure funding that would offer the best chance for a positive outcome for existing and new residents of the A127 Corridor.
- Developing site 200 would also enable potential residential development in and around West Horndon village to be limited to the existing industrial estates, which, taking the Strategic Housing Allocation numbers faced by Brentwood in to 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.
- Whilst site 200 is our preferred option (versus the alternative of potentially extensive development in and around West Horndon village), an appropriate buffer zone needs to be incorporated on the western edge of the development up to the A128 to prevent future urban creep, and minimise the impact of development on existing residents.
- Development of the land immediately adjacent to the village would destroy the current village environment.
- 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.
- 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?

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.

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 the Green Belt)?

- 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.
- 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.

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?

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?

Yes

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

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:

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

Q11: To what extent do you think the following are present in the landscape near where you live (on a scale of 1 to 4):

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

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

Yes

- 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).
- 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.
- 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.
- 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.
- 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?

- 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.

Dunton Garden Suburb Response

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.

- Dunton Garden suburb, if well planned and managed, is probably a “least harm option” to achieve the robust Local Development Plan and thus the protection of the Green Belt immediately adjacent to the village of West Horndon and the rest of the Parish.
- West Horndon Parish Council also feel that the potential scale of the Dunton Garden Suburb could create stronger potential for a sustainable, self sufficient community with access to sufficient infrastructure funding. This is not necessarily the case if more significant expansion of West Horndon village is undertaken instead.
- Thus, with reluctance we accept the principle of the Dunton Garden Suburb provided that further planning addresses a number of problems that the development would create to minimise the impact.
- Infrastructure requirements – these include:
 - Transport – road and rail infrastructure are at present at capacity much of the time and will need to be carefully managed, with consideration taken to the development plans of local councils along “shared” infrastructure including the A127 and Shoeburyness-London rail line.
 - The development must take place in such a way that it does not increase rail commuters from outside the immediate village parking cars to use the station at West Horndon (current parking provision is insufficient as it is).
 - The A127 needs to be expanded and/or some other means to prevent traffic *rat-running* through the village to bypass traffic jams on the A127. This is against a backdrop of potentially limited scope for material widening of the A127, and being bounded by London and Southend congestion.
 - The C2C rail line is currently at capacity so given the extra demand that the Dunton Garden Suburb (and other housing developments to meet strategic housing allocations) will create the capacity on this line needs to be significantly increased.
 - Schools – West Horndon Junior school is currently at capacity & extra senior school pupils travelling to the centre of Brentwood would further increase the over capacity problems on the A128 through Ingrave & Herongate.
 - Adequate doctors and other medical facilities need to be planned for.
 - There need to be robust buffer zones created so the communities of West Horndon and the Dunton Garden Suburb cannot at some future stage be challenged to meet more housing need in the future – we suggest the land between the A128 and the stream is turned into woodland. This would also have the effect of reducing flood risk, and provide an attractive green space that could link up to Thorndon Country Park.

NOTE it is most important that the infrastructure demand created by the development is met before or at the very least concurrently with the development. The situation of the housing development going ahead without the necessary infrastructure being created must NOT be allowed to happen given the materially negative impact this situation would have on both the existing West Horndon residents, and the sustainability of any new development within Dunton Garden Suburb.