



**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.

YOUR COMMENTS

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

The plan in general but in particular the West Horndon Opportunity Area CP4

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

Support

Object

Comments (please use additional sheet if required):

My initial comment is that the draft Local Development Plan (LDP) along with its supporting documentation does not constitute a proper consultation because of the lack of evidence that is included. In the main consultation document the evidence section for the CP4 policy the justification just contains a statement that an infrastructure and modelling plans would be forthcoming. This does not support or represent a justification in my view. Also there are other clear planning issues which seem to have been totally ignored. The most obvious of these is the flood risk. To have ignored flood risk is clearly a serious omission, given that West Horndon has been subject to serious flooding on at least three occasions in the last 50 odd years. It is also highlighted with areas at risk of flooding on the Environment Agency flood maps.

Thus all my comments are caveated by the statement that detailed robust evidence must be obtained before any plan can be considered as valid. The council needs to obtain, by whatever means necessary appropriate assessment of the impacts of the plan, make these public and then re-consult in order to meet its statutory obligations.

(Continued on separate sheets)

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

1. Infrastructure Considerations

Before any development takes place it is necessary to demonstrate the appropriate infrastructure can be provided either prior to the development or at the very least concurrently. While it is probably safe to assume that utilities like water, sewerage, gas, electricity and telecommunications can be expanded or upgraded some others such as schooling, doctors will need more consideration. More major infrastructure such as transport need even more careful assessment as these could prove to be breaking points to the plan e.g. the current railway line is operating at more or less full capacity during the peak morning and evening commuting rush. Matters get even worse west of Upminster. Would the railway system realistically be able to increase capacity? We have a statutory obligation not to permit development that creates problems in surrounding areas. Thus an uninformed decision to significantly increase housing units in West Horndon could be contrary to the National Planning Policy Framework (NPPF) by means of the rail travel problems. A similar situation exists for the road network. Although West Horndon is close to major road like the A127, A128 etc. these roads are demonstrably already at or beyond capacity. Unless it can be demonstrated that there are practicable upgrade possibilities further development in the West Horndon area would not be sustainable.

Thus I suggest that a formal infrastructure needs and feasibility assessment is undertaken. I would suggest that this is done as a series of scenario assessments examining the impacts and implications for a different number of housing units expansion. It would then be possible to come to an informed decision from the infrastructure perspective about how many new housing units could be sustainably added to the current community.

2. Development in Area 037

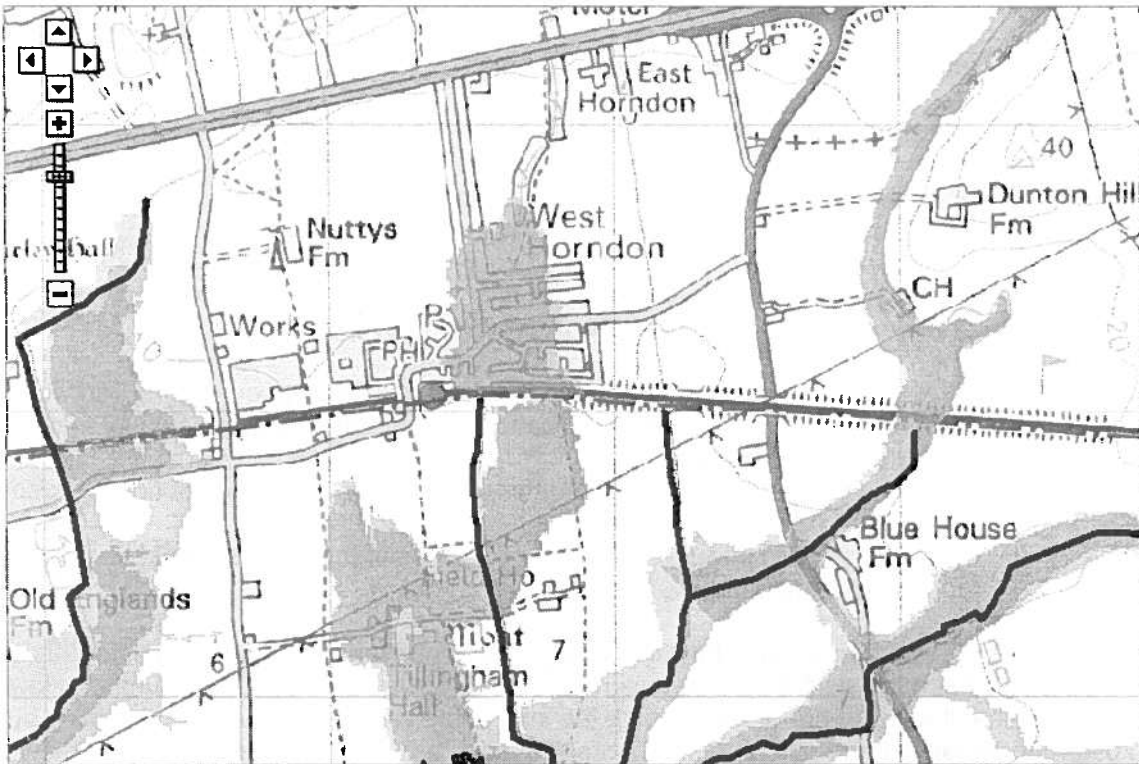
The current LDP identifies an area of land to the north of the current industrial estate plots for the provision of 1000 new units. I am totally opposed to this proposal. The main grounds for this are:

- i. This land is currently Green Belt. The NPPF clearly states that the fundamental aim of Green Belt land is to prevent urban sprawl¹. It also states that development on or modification to Green Belts should only be undertaken in very special circumstances² and that harm to the greenbelt must be clearly outweighed by other considerations. The consultation document does not provide any justification let alone one that clearly outweighs the harm.
- ii. On the green belt issue I also observe that by permitting development on the 037 plot it just invites further development to the north, south and also to the west and north west. This is exactly the type of development sprawl that the NPPF explicitly wishes to prevent.
- iii. Flood risk. This land currently becomes saturated following heavy rain. It acts as a water storage area and in effect is part of the flood management of the wider area. Any development in this land, even if the best Sustainable Urban Drainage systems (SUDS) were used, would significantly reduce the storage capacity this land currently provides. This would increase the risk of flooding both to the development itself but also to surrounding areas. The surrounding areas are already prone to flooding. There have been 3 major flooding incidents in West Horndon since 1958, the most recent being in December 2012. Climate change will only potentially make this worse. The NPPF states that "*Local planning authorities should adopt proactive strategies to mitigate and adapt to climate change, taking full account of flood risk.....*"³ building on an area of land that acts as a water buffer is totally contrary to this policy especially as it is an area that is according to the Environment Agency already subject to fluvial flood risk.

¹ NPPF paragraph 79

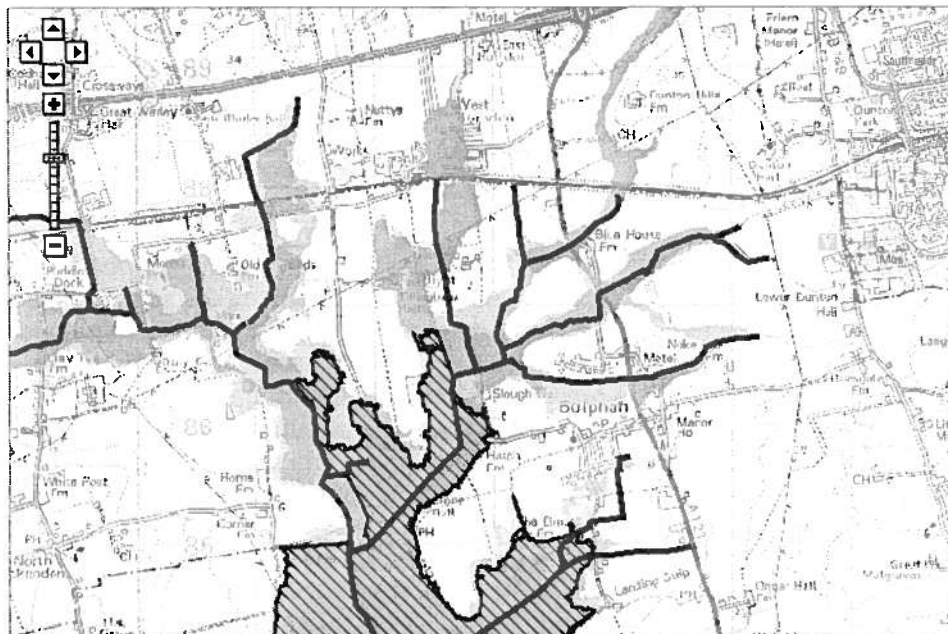
² NPPF paragraph 88

³ NPPF paragraph 94



Map downloaded from the Environment Agency web site 25th September 2013

While it would in theory be possible to construct flood alleviation infrastructure that would in effect speed the progress of the water under the railway line into another area that is also flood prone. Fluvial flooding is a significant risk to the wider area.



Map downloaded from the Environment Agency web site 25th September 2013

The NPPF clearly states *"Inappropriate development in areas at risk of flooding should be avoided"*⁴ it further states that *"where development is necessary, making it safe without increasing flood risk elsewhere."* and *"Local Plans should be supported by Strategic Flood Risk Assessment"*.

⁴ NPPF paragraph 100

The proposal to develop the land 037 does not meet any of these criteria or policies set out in the NPPF and thus I reject it out of hand.

3. Redevelopment of the Industrial Estate Areas 020 & 021

I would broadly support this part of the proposed plan. The industrial estates are currently in a rundown condition and to continue as an industrial area would need major redevelopment. One of the owners of the land has clearly stated at the public *Road Show* they did not consider this to be a commercial viable investment.

Redeveloping this area to mixed residential and light industrial (not activities that would promote heavy lorry traffic) use would have number of significant advantages:

- i. It would materially contribute to the need to provide new housing in Brentwood.
- ii. Extra housing would provide justification for upgrade and/or renewal of facilities and infrastructure in the area.
- iii. Assuming proper SUDs were used throughout the overall level of flood risk could be reduced.
- iv. Heavy lorry traffic through the residential areas of the village should be significantly reduced or eliminated.

The draft LDP which is being consulted on suggests a nominal 500 housing unit for this area. Without further analysis it is difficult to comment on the sustainability of this number. However I observe that it would more or less double the size of the village. In return for accepting such a disproportionately large portion of the overall increase required for Brentwood I think it would be necessary to improve some key parts of the infrastructure such as providing a new doctors/medical centre, improved roads to cope with the extra traffic.

I suggest that the mixed residential area should include mainly family homes (3 & 4 bedroom houses) along with some starter homes as well as residential homes and sheltered accommodation for the elderly. Clearly other bits of infrastructure like the school, recreation areas, would need to be developed to match demand created by the increasing numbers.

There are still questions about the wider critical infrastructure like rail and road transport but if these could be suitably managed then this area would seem to be appropriate for further development. Any expanded development must be limited by the capacity of critical infrastructure to be developed to match any increased demand.

4. Possible Alternative Site

I recognise that the fact that the 037 site is unsustainable that leaves a need to find a location for approximately 1000 homes in order to meet the requirements of the strategic allocation. The Hutton Industrial Estate has not been considered in the consultation document. To have been considered but rejected for a legitimate planning reason I could comprehend but I fail to understand why it has not even been considered. It is a brown field site and I understand is also in need modernisation should it be going to continue as an industrial area. I urge that it is fully evaluated for sustainability as a further mixed residential and light industrial area. It might be suitable for more housing developments and thus be able to take some of the housing that Brentwood needs to find.

In conclusion I am firmly of the opinion that the current version of Local Development Plan has serious flaws. It needs to be modified significantly to ensure that green belt land is preserved and flood risk minimised. Redevelopment of the West Horndon industrial estate is potentially a good idea provided there are not unmanageable infrastructure problems. However, it will only be possible to judge this when proper assessments have been carried out. To progress without the necessary assessment is a significant risk to the Borough as it could result in the adopted plan being undeliverable.