

Attachment to the covering note from Jennifer Gale

OJECTIONS TO THE BRENTWOOD LOCAL PLAN 2015-2030

VILLAGE OF WEST HORNDON AND ENVIRONS (Core Policy CP4)

The village of West Horndon is an ancient and historic settlement. Its size is currently around 500 homes, with another 200 in outlying areas - a community of less than 1900 people. The current housing stock has evolved over 85-90 years (although there is a Victorian public house and station, and the ancient church of East Horndon - currently unused for worship - is a significant landmark)

The Preferred Options document, published by Brentwood Borough Council, proposes a major development of 1500 houses on both brown site and Metropolitan Green Belt land; this development represents 43% of the entire allocation for Brentwood's proposal for new homes, to be sited at one end of a tiny community.

NPPF paragraph 120 states that:

Planning policies "should ensure that new development is appropriate for its location. The effects (including cumulative effects) of pollution on health, the natural environment or general amenity, and the potential sensitivity of the area or proposed"

Planning policies and decisions should aim to:

- *avoid noise from giving rise to significant adverse impacts on health and quality of life as a result of new development;*
- *recognise that development will often create some noise and existing businesses wanting to develop in continuance of their business should not have unreasonable restrictions put on them because of changes in nearby land uses since they were established; and*
- *identify and protect areas of tranquillity which have remained relatively undisturbed by noise and are prized for their recreational and amenity value for this reason. (NPPF paragraph 123)*
- *promote the retention and development of local services and community facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship". (NPPF, paragraph 28) and guard against the unnecessary loss of valued facilities and services, particularly where this would reduce the community's ability to meet its day-to-day needs" (paragraph 70)*

The Brentwood Borough Council Local Plan appears to contravene the National Planning Policy Framework (2012) for the following reasons.

Major Development and West Horndon

(References: BBP, SO1; CP2, NPPF, para 120, DM1-4, 6, 9, 11, 13, 14, 17, 21, 23-29)

Objections

- a) The development would triple the size of the village within a 15 year period, probably quadruple the number of residents, seriously damage the nature of the current “settlement identity” (NPPF, para 182), and not “*take account of the different roles and character of different areas, promoting the vitality of our main urban areas . . . recognising the intrinsic character and beauty of the countryside and supporting thriving rural communities within it*”. (NPPF, para 17).
- b) Because of the size of the proposed development (1500 homes), this would, in effect, create a saddle development, splitting the village in two and creating an “old” and “new” West Horndon; thus, this development will not “strengthen the village centre” (*Ch 2, S1, para (b); SO1; Justification, para 3.7*), but actually divide it. The proposal would also undermine the current “*settlement hierarchy and role of key settlements*” (*Policy CP2*).
- c) The plan provides no details to support the proposed allocation of 1500 homes (which is almost 5 times the allocation in the plan proposed 2 years ago).
- d) Although there seems to have been a company required to put forward a scoping plan (*Peter Brett Associates, BBCLP, para 2.30*), there has been no consultation with the Parish Council, or indeed the residents, of West Horndon, between the proposals set out in 2011 (which were more restrained and sensible), and the current plan 2015-2030.
- e) That scoping plan seems simply to have been based on the fact there is a station and road links at West Horndon, but has been written without any in-depth assessment of the environment or the impact on the infrastructure or residents in the existing village. That scoping plan seems to have been accepted at face value, on what appeared to be feasible on paper, with no questioning or testing of the proposals.
- f) While the Plan makes reference to infrastructure, there is no detail of this (only that “*an Infrastructure Delivery Plan is forthcoming*”), and the council seems to have no idea of the scale of the infrastructure needed or the costs of such development. Such infrastructure would need to be installed in advance of any building because of the detrimental impact on the current village. Infrastructure would need to cover: traffic lights or a roundabout at the junction with the A128; new, improved slip roads (possibly off Childerditch Lane) onto the A127; new sewage and drainage facilities in the existing village; better traffic calming on Station Road; other exits out of the village apart from Station Road; new or enlarged school; better, larger health facilities; improved exit strategies for traffic leaving the proposed new site to reach the station or turn left over the railway bridge; strengthened railway bridges in West Horndon and Childerditch Lane to deal with vastly increased traffic and heavy vehicles leaving what remains of the industrial estate.

2. Flood Risk

(References BBCLP, CP2, DM 32, 35, 36)

The Environment Agency’s website shows that West Horndon (as well as the neighbouring village of Bulphan), is in a flood plain, at constant risk of flooding: it flooded in 1958, 1981 and as recently as Christmas 2012.

DM35 (Flood Risk) states that:

“a. Proposals are located in the lowest appropriate flood risk zone with regard to guidance set in the Brentwood Strategic Flood Risk Assessment as part of the sequential test

b. The development would not constrain the natural function of the flood plain, either by impeding flow or reducing storage capacity

c. The development is constructed so as to remain operational even at times of flood through resistant and resilient design

d. The applicant has contacted the sewerage provider to assess the capacity of the receiving foul sewer network and the need to contribute to any additional off site connections for the development”

DM35 also states that *“No new development is to be at risk from floods or to increase the risk of flooding.”*

Objections

a) DM35, paragraph 4.160 states that *“Areas at risk of fluvial flooding in the Borough are mainly rural, and include low lying areas south of the A127 west and east of West Horndon”*. This contradicts what BBC has said in *paragraph (c) of CP2 (“... areas where development should not take place . . . risk of flooding)*.

b) Many houses in West Horndon, which have flooded in the past, have problems in obtaining household insurance. This would be the case for houses built on the buffer Green Belt land that currently protects the village from more serious flooding.

c) Thorndon country park rises above the village, and water runs down from the hills towards the village. Water run off is a constant, and the north side of Childerditch Lane often has puddles even when there has been no rainfall for several days/weeks.

d) Currently, the Green Belt land around the village and alongside the A127 acts as a soakaway (*including development plot area 037*), absorbing most of the moisture and preventing the village and the A127 from flooding more frequently. Any change in the water table will remove the soakaway, causing flooding on the A127 and in West Horndon itself, and certainly on 1000 new homes to be sited on the current Metropolitan Green Belt (*area 037*).

e) There is a large lake in Thorndon Park, which has overflowed in the past. Although there is now a sluice to prevent this, in heavy rain the lake becomes very full. The culverts in West Horndon are suppose to prevent flooding from water flow and from the lake, but were blocked at Christmas 2012 - resulting in flooding in the village.

f) DM32 states that *“It is widely acknowledged that green infrastructure and open space has a major role to play in mitigating against and adapting to climate change, for example, urban cooling, encouraging sustainable travel choices and flood alleviation. Through the provision of green corridors the policy can help overcome habitat fragmentation and improve the ability of the natural”*. This paragraph would seem to suggest that, particularly in a flood plain, a “green corridor” would help to alleviate flooding: this argument is contrary to the BBC Local Plan proposal to take away some of that “green corridor” in West Horndon, which

currently alleviates flooding in the village.

g) The water table in the village is fragile: sheds/outbuilding placed in the wrong area in back gardens (ie near to concrete foundations/concrete fence foundations) can result in constant flooding of gardens in heavy rainfall. Smaller gardens, and the foundations of houses placed too close together, will create heavily flooded gardens (which will overflow into the houses in heavy rainfall). A density of between 30-65 dwellings per hectare will increase the likelihood of homes on the new development flooding more frequently, and at higher water levels than have been experienced so far (because the current housing stock is further from the A127 than the proposed development).

h) Significant infrastructure would be necessary to cope with such flooding (*CP2, paragraph (e) "significant infrastructure requirements"*). However, any infrastructure to take the floodwater from the village (which would mean new culverts under the railway) will push the water towards Bulphan, moving flooding to another settlement. Bulphan is sited on a Fen (the lane parallel to the A127 which runs through Bulphan is called Fen Lane), which by its nature is land reclaimed and prone to flooding. This Fen stretches from the South and South West of West Horndon Station, to Fen Lane and the village of Bulphan.

The proposed new development is certainly in a risk from flooding, and is certain to increase the risk of flooding within the village of West Horndon, in both the new development and the existing village boundary.

3) Impact on Roads and Junctions **(References CP13, Sustainable Transport; DM 1-4)**

CP13 states that "*traffic and car parking will be carefully managed to encourage sustainable development*" and that "*New developments reduce the need to travel*". The current Plan proposes 1500 new homes, which potentially means at least 1500 new cars within the village, trying to exit onto the nearby highways and using the main thoroughfares; it is unlikely that the plan would reduce the need to travel.

The proposals do not seem to have investigated the current capacity problems with the A127, and traffic from West Horndon trying to access both the A127 and A128 out of the village.

Objections

a) A development of 1500 homes will probably mean at least 1500 cars. If the village is split in two (as the current plans propose), it is unlikely that parents on the far side of the development will walk their children to the school in Thorndon Avenue, thus increasing the amount of traffic in Thorndon Avenue and increasing the danger to schoolchildren. At the moment, people live within walking distance of the school (not more than half a mile).

b) West Horndon has a 30 mile an hour speed limit through the village: this is ignored, especially by the heavy good vehicles from the industrial estate (whether during the day or at night), and also by the majority of cars travelling along Station Road. While there is a flashing 30 mile an hour sign at each end of the village, these signs are also largely ignored by drivers. There are no other traffic calming methods. There is a pedestrian crossing outside the hall, which is used by children walking to and from from the railway side of the village to the primary school in Thorndon Avenue; additionally, in the grounds of the village hall, is a nursery which is sited on Station Road. An additional 1500 houses would mean a huge

increase in cars driving through the village, mostly along Station Road, and would seriously endanger residents and their children trying to cross that road.

c) Station Road is a road with a number of blind bends, with residential housing on each side. It is difficult for home owners to park and exit their own properties because of the amount of traffic, and also the speed at which they travel. The bend near the village hall is particularly dangerous (a lorry, speeding round that bend, stopped only 6 inches short of my vehicle when I exited into what had been a clear road, and remonstrated with me for actually deigning to drive out of my property). An additional 1500 houses, whose owners who would be driving through the village, would almost triple the traffic and thus triple the amount of dangerous incidents/accidents along Station Road.

d) The A127 is an overcrowded, fast road between Gallows Corner and Southend. The only way to turn right from West Horndon onto the Southend carriageway is through Station Road, turning left onto the A128 and then right at the roundabout on the A127. Traffic seems to have quadrupled in the last 5 years, mainly due to the A127 being unable to cope with the current level of traffic. This is due to more housing being built along the A127 trunk road, as well as an increase in airport traffic (Southend Airport is now a busy tourist airport). An additional 1500 homes will mean a huge increase in traffic through the village, along Station Road. Station Road is already swamped in the rush hours with traffic using it as a "rat run" to avoid the overcrowded A127.

e) It is possible to turn left onto the A127 via Thorndon Avenue, Childerditch Lane or Warley Hall Lane. However, there are no proper slip roads onto the A127 and it is increasingly dangerous (and almost impossible during the rush hour) to turn left onto the A127 trunk road: the traffic is very fast moving, and there are hardly any gaps during rush hours. Increased traffic emerging onto the fast moving trunk road has the potential to create even more accidents, or at the very least traffic jams and tailbacks, on the A127.

f) The A128 is already a very busy road during the rush hours, and it can sometimes take 5-10 minutes to find a gap in the traffic to turn left out of the village, and even longer to turn right. An additional 1500 homes, with cars, would consequently increase the danger of turning onto the A128, as well as creating even longer traffic tailbacks into the village. Traffic lights or a roundabout would be needed to manage the traffic onto the A128, but this would not alleviate the huge increase in traffic on Station Road.

g) If traffic avoids the roads around West Horndon and travels down St Mary's Lane towards Upminster, increased traffic would create more danger at the junction with the Brentwood Road (between Upminster, Great Warley and Brentwood). This is currently a dangerous right turn, with traffic coming around a blind turn from Upminster. This junction also flooded last year, with cars stranded on the road.

h) Because of problems with the A127 (accidents, flooding etc), traffic is often diverted through West Horndon. This currently means that residents using cars are unable to exit their homes on Station Road because of heavy traffic; 1500 homes, with cars, would make such diversions dangerous for residents and severely undermine their quality of life.

i) The traffic on the A128 is already dense, undermining the quality of life for people in Herongate and Ingrave, and ultimately causes traffic jams at the traffic lights at Seven Arches Road and Wilson's Corner in Brentwood town centre. An increase of 1500 homes, with cars, would increase the traffic on the A128, with a consequent increase in traffic in Herongate, Ingrave and Brentwood town centre.

j) There are only two small convenience stores in West Horndon, and most people need to drive to outlying supermarkets, or have shopping delivered to their home (by van). An additional 1500 homes would mean that the majority of those people would also travel by car to the large supermarkets - increasing dramatically rather than reducing traffic through the village. Even if there is a small shopping parade on the new development, residents will not use it to buy their weekly/monthly shopping.

k) People living on the new development will, currently, need to travel to the other end of the village to access the doctor's surgery (and, if a new health centre is built on the new development, people in the existing village will need to travel in the opposite direction). This will increase car use dramatically, wherever the surgery is sited. This will also increase parking outside the surgery (currently in Station Road), increasing traffic jams/tailbacks in the rush hour.

4. Current Transport Facilities **(References BBCLP, Paragraph 1.26, DM1-4)**

The plan appears to have simply looked at existing transport facilities, with no investigation of how those facilities worked, either their frequency or capacity to cope with increased demand, or the impact that that demand would have on those facilities. It also took little account of the isolated nature of West Horndon, and its lack of frequent and reliable links to the rest of the borough.

a) There are no fast trains to Fenchurch Street/Southend through the village. There are currently 4 trains an hour during the rush hour (with 8 carriages), but only 2 (with 4 carriages) the rest of the time. All trains are packed, and it is difficult to get a seat (even outside the rush hour the trains are packed); 1500 homes would increase the number of people using the station, causing even greater discomfort for commuters and travellers alike. The current train provision cannot cope with a large increase in travellers; C2C (the rail provider) has no plans to increase either the number of trains, or the number of carriages on this line.

b) West Horndon Station has limited parking facilities (with little possibility of increasing them); people from outlying villages use the station, and the car park is usually full very early in the morning. Commuters living in homes towards the back of the proposed site (on 037) would be likely to use their cars to get to the station, and would park on Station Road if there was no room in the car park (more and more commuters are doing this, in spite of the yellow lines, because Station Road is not policed). Such additional parking would create more traffic problems on Station Road, particularly in the rush hour.

c) There are a large number of steps to manoeuvre in order to access the London bound platform at West Horndon Station (or indeed, manoeuvre in order to access the station exit if one is returning from the Southend section of the line). There is no lift, and C2C has no plans to install one (when the station was refurbished a few years ago, no lift was installed). This is difficult enough for elderly or infirm travellers, but impossible for wheelchair bound passengers/commuters. The only way for a wheelchair user to access the London bound line is to arrange for the staff at the station to install boards over the line between trains: I have lived here 16 years, and commuted for 14, and have never seen this facility in action (as laid out in the station guidelines). In fact, the station is not staffed late in the evenings, and not staffed at all on Sundays, meaning that disabled/wheelchair travellers are unable to travel for leisure pursuits at the weekend. Thus, the station is unsuitable for disabled/wheelchair users, compromising their independence, and compromising the Local Plan's commitment to the Disability Discrimination (Amendment) Act 2002.

d) The entrance to West Horndon Station is at the foot of the railway bridge. Traffic coming over the bridge has to make a 90 degree blind turn onto Station Road, past what would be the entrance to the proposed estate (currently the industrial estate), and then another 90 degree turn into the station car park. Traffic coming from the Station Road entrance to the new estate would have to access the station by cutting across two lanes of traffic, one lane of traffic coming straight off the railway bridge - a dangerous manoeuvre that few vans (and even fewer lorries) coming from the industrial estate attempt (most traffic from that site turns left onto Station Road). At the moment, the village is to one side of the station and residents needing to use their cars to access the station can take a left turn into the car park, causing few traffic problems. Wherever the entrance to the proposed estate is sited, it will cause serious and dangerous traffic problems.

e) Although there is a train line, this does not serve the borough. Anyone using it will be taking their retail, work and leisure needs outside Brentwood (to retail, work and leisure areas along the line towards London or Southend).

f) There is only one bus route in the West Horndon: one that goes to Lakeside and Brentwood, through the villages. The Brentwood bus is infrequent, with only 4 buses to and from Brentwood; another bus service has already been cut. Outside the school term, there are even fewer buses. There are no buses at all on Sundays. It is almost impossible to get to Brentwood and back without a car: 1500 new homes, and subsequent cars, would significantly increase the traffic through the village (along Station Road), and throughout the borough generally to get to the town centre.

g)) There is a re-cycling centre opposite the station, and most people need to use their car to transport bags/bottles to that site. The centre is to the right of all housing in West Horndon and, at the moment, this requires people to drive down as far as the site and then do a dangerous U-turn at the foot of the railway bridge/in front of the industrial park. If this site is not moved, the amount of traffic exiting the proposed new development of 1500 houses would be likely to cause serious accidents with people trying to access the re-cycling centre.

5. Metropolitan Green Belt **(References BBCLP Paragraph 1.32, CP10, DM11)**

As mentioned in paragraph 2 above, current Green Belt land protects the village from even more severe flooding. In fact, it is possible that the Green Belt around West Horndon, along the A127 and beneath the hills of Thorndon Country Park, should be classified as "**safeguarded land**" (NPPF 85) to prevent flooding to the village and the A127.

There are, however, other reasons why that Green Belt land is important, and the plan seems to contradict the NPPF

Objections

a) Thorndon Country Park is acknowledged as being an area of outstanding natural beauty. The view from the top of the hill in the park looks down across West Horndon (an historic settlement, with established housing) and has uninterrupted views almost to the River Thames (the QE2 Bridge is visible from the hill). The 1500 new homes to be built in West Horndon, and on Green Belt land, would seriously damage that view and "*area of natural beauty*".

b) The NPPF states that “*The Government attaches great importance to Green Belts. . . the fundamental aim of Green Belt policy is to prevent urban sprawl by keeping land permanently open; the essential characteristics of Green Belts are their openness and their permanence*” (NPPF 79). The NPPF is clear that development in the Green Belt is “*inappropriate and harmful, and that exceptional circumstances must exist to justify the loss of Green Belt land*” (NPPF 83). The Government has recently clarified that housing demand is unlikely to constitute “*exceptional circumstances*”; this is particularly true when there are numerous brownfield sites within the Brentwood borough that would be more suitable, and sensible, to develop. The Borough Plan appears to be in direct contradiction to the NPPF by suggesting that housing development is a reason to justify the loss of Green Belt land.

6. Sustainable development - impact on the residential amenities of the village (References BBP CP1, CP13, DM 1-4)

“Sustainable” is defined as “*ensuring that better lives for ourselves don’t mean worse lives for future generations*”. In practice, the essential requirement is that new home owners will not be over-dependent on the car for journeys to work, school, shops, leisure activities and other services and amenities.

CP17, para 3.75 states that “*All development, regardless of size, places additional demands on services and facilities, will affect their ability to meet the needs of the community.*” These “additional demands” will be exceptional in the case of West Horndon, and may fail to meet the needs of the current and future community for the following reasons.

Objections

a) West Horndon is a small village of fewer than 1900 residents, and there are very few amenities: two convenience stores, two hairdressers, an Italian restaurant, and about 4 other small businesses which rely on customers outside the village. Any additional shops built on the proposed new estate would be remote from the remainder of the village; a car would need to be used if there was a small branch of a major supermarket there. The new residents would be unlikely to increase the footfall/use of the current businesses (except perhaps the Italian restaurant) as they would not pass them on foot on the way to the station, and would be unlikely to use them if they had their own facilities.

b) Residents, whilst making good use of the village shops, have shopping delivered or drive (or take the train) to the nearest supermarkets outside the borough (to Basildon, Upminster or Lakeside); they also make use of the Sainsbury’s in Brentwood. All these visits require transport and take business mostly outside the borough: this would continue with the 1500 additional homes, creating even more traffic through and around the village and on the already congested A127.

c) The small primary school is currently at full capacity. An additional 1500 homes would, as a conservative estimate, mean about 500 children needing a school. This would need to be built on the new estate, or the current school extended. Primary school children who were unable to get a place in the school would need to be bused out of the village, or taken by car (again, increasing the traffic along Station Road as that is the only exit into Brentwood and Essex).

d) There is no secondary school within the village and pupils have to be bused to schools in the borough of Brentwood (there are only a few places allocated outside the borough in Havering). I do not know what the capacity is in secondary schools within Brentwood, and

whether there would be places. However, this means that a large number of children are reliant on a school bus to get them to and from the village, and cannot stay late for extra-curricular activities unless they are able to procure a lift home (again, increasing the traffic through the village). At the moment, one bus suffices for all the secondary school age children, but this provision would need to be increased significantly - again adding significantly to traffic within the village, and the borough generally.

e) The doctor's surgery in the village is at full capacity, and there can be a 3 day wait to see a doctor. While there is a second surgery in South Ockenden, this is a car journey away or an hour by public transport (it is necessary to change trains at Upminster). And, again, it is not always possible to get an appointment in South Ockenden as there are only 3 doctors. Dispensing is undertaken on the surgery site because there is no local chemist (the nearest ones being in Upminster, Lakeside, Basildon or Brentwood town centre). An additional 1500 homes, and probably double or treble that figure in new residents, would require a new health centre equipped to deal with such a threefold increase in population.

f) There is no dentist nearby. This requires a train or a car journey out of the village to Upminster or Basildon, (or; if an appointment can be managed within the bus timetable, Brentwood). Again, this would create a significant rise in traffic in and around the village: as the new development is so large, it may cause enormous strain on the existing dental practices in those areas, with some people unable to receive dental treatment locally.

g) The main sewer in the village (in Station Road) cannot cope with heavy rainfall; in the last few years, heavy rainfall has resulted in raw sewage being washed back into gardens when the manholes have become full of water. The last sewage overflow required Anglian Water to come and clear it as the main sewer was blocked. Drains also have problems clearing water from the gardens in heavy rain. Because of this, at least two, very small, development projects (on the sites of existing bungalows) have been refused because the current drainage systems cannot cope with more development. New/better sewers are needed in the current existing village, as the current sewage/drainage system could certainly not cope with an additional 1500 homes running. This would be a major health hazard.

h) There are community leisure activities within the village hall, and a small tennis club. The hall is well-used and could not manage to increase activities to meet the needs of a village three times its current size; the tennis club would have problems in providing court space for a huge increase in members.

i) The village is remote from the larger centres of Brentwood, Basildon and Upminster, although is served by the train to two of these centres. Brentwood is difficult to get to because of the poor bus service, and a car is necessary for evening leisure pursuits. Evening classes cannot be accessed without a car, whether in the borough or not: in fact, it is probably more convenient to attend classes in Havering, as they can be accessed via public transport.

j) There are no swimming pools/leisure centres nearby: the Brentwood Centre is the other side of Brentwood, some 5/6 miles away, and can only be accessed by car in the evening or two buses during the day. It is easier to get to the swimming pool in Hornchurch, whether driving or on public transport. Again, 1500 new homes would seriously increase car traffic in the borough, or take take revenue outside the borough to Havering, Thurrock or Basildon. Although there is a private leisure centre in Warley Hall Lane, by the A127, two miles away, this is almost at capacity (and people have been turned away from the swimming pool this summer because it was dangerously full); again, this is not accessible for the majority of people without private transport as there is no public transport to that leisure centre.

k) Because of the lack of transport to Brentwood, anyone using the proposed new cinema and retail complex in William Hunter Way would need to use their car as there is no other public transport in the evening. At the moment, because there is little parking after 8pm in Brentwood, and one has to use a car anyway, residents are more likely to use facilities at Upminster (where one can park on the road after 6pm) or Lakeside/Bluewater (where there is also free parking) for the cinema or restaurants, thus taking revenue out of the borough.

**7) Impact on the countryside and setting of the village
(References BPP paragraph 1.31; DM1, paragraphs a-h, DM3-4)**

West Horndon is currently a small, lower density settlement surrounded by open countryside - some of which is designated as an area of "natural beauty". The village is characterised by larger plots, the majority backing onto open fields, creating natural habitats for birds and wildlife.

A wide variety of wildlife can be seen in and around the village (also in gardens): rarer birds such as the Dunnock, Thrush, Finch (including Goldfinch), Nightingale, Skylark, Kestrel, Buzzard, Tawny Owl, Woodpecker, Coots, Partridge and Pheasant. There are also colonies of Sparrows (becoming more rare), as well as the more common Robins, Blackbirds, Wood Pigeons, Starlings and Magpies. There are also butterflies, such as the Small Blue, Red Admiral, and Wall Brown, as well as colonies of Bees (which have suffered dramatic losses in recent years). In addition, there is a large variety of wildlife such as the Water Vole, Great Crested Newts, Pipistrelle Bats, Badgers (no danger to dairy cattle as there aren't any nearby), Foxes, Squirrels and, of course, Rabbits.

Objections

a) Such a large development on the edge of the village, and on a large tract of Metropolitan Green Belt, will create a serious loss of large expanse of open countryside, destroying the open setting of the village and its rural character

b) The impact of size of the building site(s), and the loss of Metropolitan Green Belt will have a serious impact on the current variety of wildlife. No thought seems to have been given to the loss of wildlife and bio-diversity issues.

c) The beautiful aspect to the Thames, from the hill in the "area of natural beauty" (Thorndon Park), will be lost forever - damaging that "natural beauty" and replacing it with bricks and mortar. This contravenes the proposals set out in DM1 (paragraph a) that development will "*have no adverse effect on visual amenity, the character or appearance of the surrounding area*".

d) Thorndon Park (the "area of natural beauty") cannot cope with the amount of visitors during fine weather at weekends and bank holidays. A settlement of 1500 homes will seriously increase the number of visitors to the park, creating damage through overuse, and ultimately destroying the "natural beauty" of the park.

**8. Loss of employment land
(References Policy DM5)**

The proposals involve the redevelopment of the current industrial estate (some 16.23 hectares of employment land). While the lorries on the estate cause significant problems in

the village and the majority of villagers would welcome their disappearance, removal of employment opportunities within walking distance may have a serious impact on those employees without access to independent transport.

Objections

a) Some businesses have renewed leases and have had no indication that the industrial estate may be moved, nor have they been involved in any consultation about re-siting the industrial estate.

b) The “green bus” to take employees to a new industrial estate is a good idea for those without independent transport. However, the route through Thorndon Avenue (along a narrow, double-parked avenue) and out onto the A127 creates significant difficulties. It turns a residential area, where the local school and scout troupes are located, into a main highway and will turn a quiet road into a dangerous area for the children. There will also be little flexibility for those working shifts or working flexible hours, who may need to use a car - thus adding to the traffic within the village. The left turn onto the A127 is also dangerous, particularly in the rush hour (when this would be running), especially for a slow-moving vehicle such as a bus.

Arguments for

i) It would be a real improvement to village life if the heavy lorries could be taken away from Station Road. These cause untold damage to housing (cracks, noise, disregard of the village speed limit),

ii) Some local employment, for example some of the premises on the Childerditch Lane side of the site which do not use heavy lorries, should be retained to sustain some of the local employment opportunities.

iii) Additional transport is an excellent idea to take employees to another site; however, the route really needs re-thinking, and timetabling needs to be flexible.

9. Robustness of the Borough Plan

The National Guidance states that local plans should “*develop robust and comprehensive policies that set out the quality of developments that would be expected in the area, responding to local character and being visually attractive*”.

Any plans submitted by a local planning authority should also be “sound,” regarding its preparation, whether proposals are properly justified, whether it can actually be delivered, and whether it is consistent with national policy.

Objections

a) Taking into account the concerns outlined above, the Brentwood Borough Plan with regard to West Horndon clearly has fundamental shortcomings. It does not, therefore, meet the criteria of being either “sound” or “robust”.

b) There was no explanation of how this current Borough Plan was achieved, and why it should differ so dramatically from the one that was presented two years ago. The current plan fails the “soundness test” set out in NPPF, paragraph 182.

c) This plan cannot be said to respond to local needs without a further, in depth study of West Horndon, taking into account infrastructure, services, amenities, public transport and, most importantly, the possibility of flooding, being undertaken, in full consultation with the Parish Council and residents of the village.

