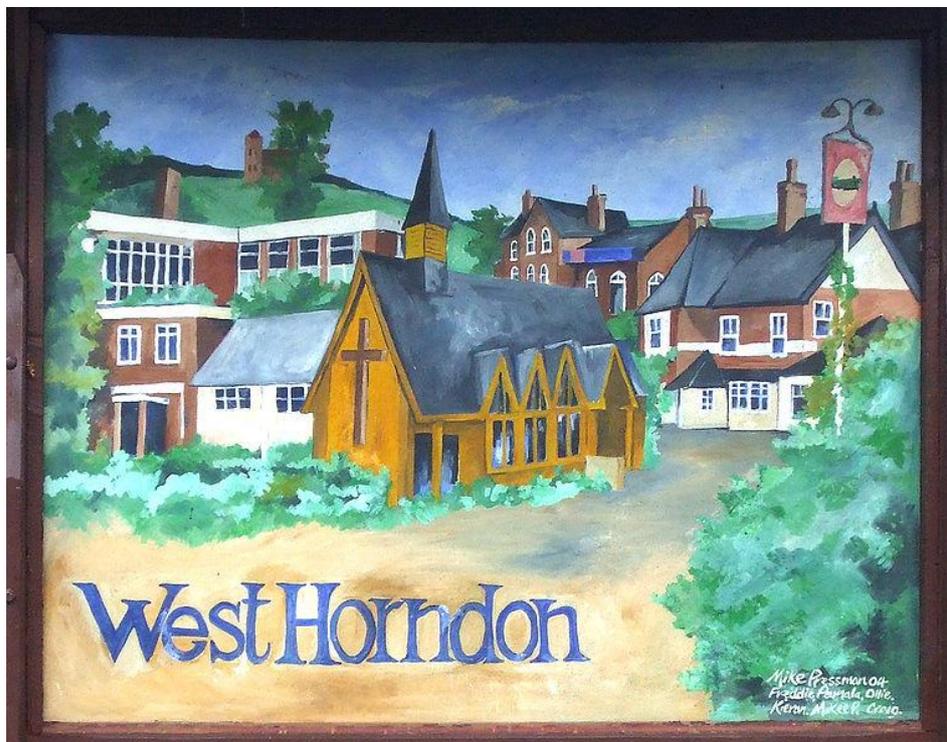


**BRENTWOOD BOROUGH LOCAL PLAN  
PREFERRED OPTIONS**



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

**IN RESPECT OF**

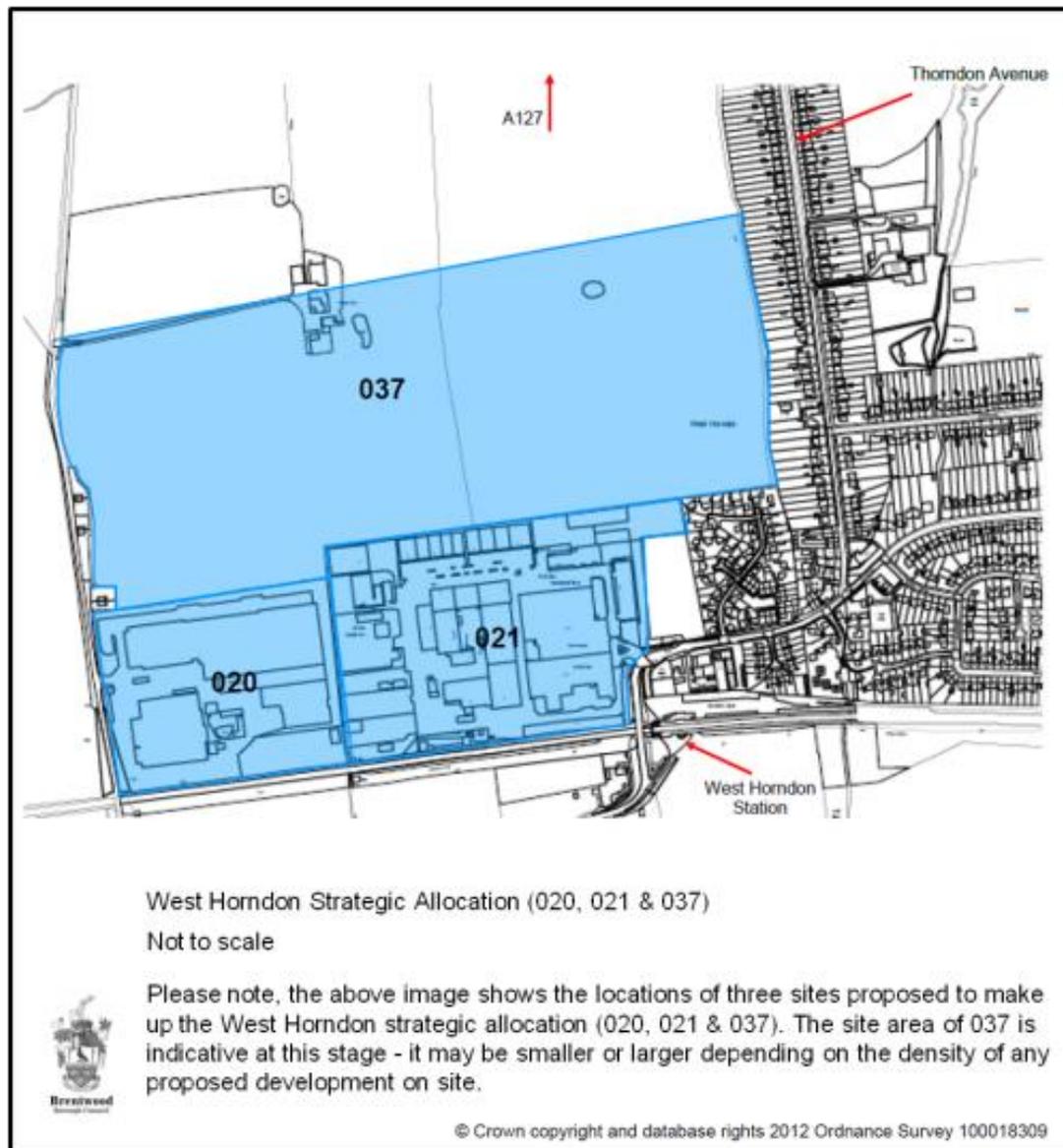
**THE PROPOSED WEST HORNDON  
STRATEGIC ALLOCATION**

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**Appendix 1** – Extracts from the National Planning Policy Framework

## 1.0 Introduction

1.1 This document has been prepared on behalf of West Horndon Parish Council by SJK Planning, and puts forward representations in respect of the Brentwood Local Plan - Preferred Options. The Local Plan proposes the allocation of a site on the west side of the village, for a mixed use development for Housing, Employment, Retail, Community, Open Space, Education and Health purposes. An Appendix to the Plan suggests that the current allocation could accommodate some 1500 new dwellings. The plan also suggests that “West Horndon could give rise to further capacity”.



The allocation as shown in the Local Plan - Preferred Options

## 1.2 The preferred options document states that:-

“The Council will seek a community masterplanning exercise, to agree the form, mix and siting of development which best reflects local aspirations and the wider Borough Spatial Strategy.

West Horndon could give rise to further capacity depending on its ability to accommodate a self sustaining community and provision of infrastructure can be met over the plan period.”

1.3 The plan is not clear as to the site area of the proposed allocation. Areas 020 and 021 as shown above extend to a total of 16.23 hectares, and the plans says that the extent of area 037, Green Belt land, is “indicative” at this stage. The part of area 037 currently shown on the plan extends to some 25 hectares, with the provision that this could be larger depending on the density of the proposed development.

1.4 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.

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

1.6 This document questions the major scale of the proposed development, adjacent to a small community of only 1800 people. It questions why West Horndon should be asked to take some 43% of the Borough’s total housing provision up to 2030. It questions why the plan and the consultation process have so far been a top down process, with little regard for the involvement of the local community. It looks closely at West Horndon and establishes that it is not a sustainable location for 1500 more houses. The Borough Council have not carried out an infrastructure study. It questions

how the release of a large area of Metropolitan Green Belt can be justified, without any exceptional circumstances having been put forward. It objects to the loss of open countryside and the destruction of the setting of the village, and to the loss of residential amenities resulting from the development. It also asks why, in an area prone to flooding, the development is being proposed before a flood risk assessment has been carried out.

**1.7** The industrial part of the site is excluded from the Green Belt, and therefore 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. This 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. To support and plan for this, the Parish Council would initiate and fully commit to a Neighbourhood Plan. From consultation and discussion it is clear that the majority of residents would see this as a positive and acceptable way forward.

**1.8** This document first sets out a summary of the representations. The following section takes a close look at West Horndon, its character and history, the level of amenities and facilities, and the accessibility in terms of transport modes, and proximity to larger settlements. Section 4 looks at the local plan and the nature of the strategic allocation. Section 5 sets out the planning issues and representations in detail. Section 6 outlines the Parish Council's preferred approach to shaping the future of the village.

## 2.0 Summary of Representations

2.1 This section summarises the Parish Council's objections to the plan as follows:-

### **1) Major development and West Horndon**

2.2 This objection is to the disproportionate scale of the proposals both in relation to the size of West Horndon, and in terms of the proportion of the Borough's housing numbers the village is being asked to accommodate.

2.3 The Borough Council proposes a major development alongside a small community. The number of dwellings proposed for West Horndon represents some 43% of the total number to be provided in the Borough up to 2030. It is also suggested that in the longer term "West Horndon could give rise to further capacity", although it does not put a figure on this.

2.4 The scale of development proposed would swamp the existing village, effectively creating a new settlement. There is no explanation as to why West Horndon, as a small village, should accept a wholly disproportionate number of new houses.

### **2) Neighbourhood Planning and Localism**

2.5 This objection is on the grounds that the Plan has been presented as a top down process from the Borough to the Parish without first establishing whether, in principle, the village is prepared to consider such a proposal.

2.6 The National Planning Policy framework says that local planning authorities should aim to involve all sections of the community in the development of Local Plans and in planning decisions, and should facilitate neighbourhood planning.

In passing the Localism Act the Government has said that:-

“Too often, power was exercised by people who were not directly affected by the decisions they were taking. This meant, understandably, that people often resented what they saw as decisions and plans being foisted on them.”

### **3) Metropolitan Green Belt**

**2.7** This objection is on the grounds that the large proportion of the land allocation is within the Metropolitan Green Belt, and no exceptional circumstances have been put forward to justify the release of Green Belt land.

**2.8** The National Planning Policy Framework 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.”

**2.9** The larger part of the allocation is within the Green Belt. National planning guidance is clear that development in the Green Belt is by definition inappropriate and harmful.

**2.10** Exceptional circumstances must exist to justify the loss of Green Belt land. The Government has recently clarified that housing demand is unlikely to constitute the exceptional circumstances to justify such loss. In a direct contradiction the Borough Plan is suggesting that Green Belt land should be released to satisfy housing demand.

### **4) Is West Horndon a sustainable location?**

**2.11** This objection is on the grounds that, even with improvements to the level of facilities and infrastructure, West Horndon is clearly not a sustainable location for the scale of development proposed.

**2.12** Whether new development can be proved to be sustainable is central to national planning policy.

**2.13** The NPPF looks for an integrated approach to the provision of housing with accessible local services, or provide a high quality built environment. It also says that planning should be a collective enterprise. That planning has tended to exclude, rather than to include, people and communities.

**2.14** Section 3 below looks closely at West Horndon. It is small village of only 1800 people, with a very limited range of amenities and facilities. It has few shops, no secondary school, and is remote from the larger centres of Brentwood, Basildon and Upminster. The Primary School is at full capacity. There is three day wait to see a doctor. There is an infrequent bus service. A railway station provides a commuter route into London, but has limited additional capacity. The railway does not cater for the important local journeys, such as to Brentwood. The station car park already struggles, with many cars parking in the village.

**2.15** Many of the roads and junctions in the area are at full capacity, and it is simply not practical to widen the A128 or the A127.

**2.16** If the residents of the new development have no choice but to make most journeys by car, the village, quite clearly, does not offer a sustainable location.

**2.17** It is possible that improvements could be made to the infrastructure and public transport, and new local facilities provided. But given the major scale of the proposed development such measures will not overcome the fact that West Horndon is not a genuinely sustainable location.

**2.18** National guidance states that Local Planning Authorities should assess the quality and capacity of infrastructure, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, and flood risk, and its ability to meet forecast demands. This has not been done.

## **5) Impact on the countryside and setting of the village**

**2.19** This objection is on the grounds that the development would destroy a large expanse of open countryside.

**2.20** West Horndon is a small lower density settlement surrounded by open countryside. The village is characterised by larger plots backing onto open fields. The construction of 1500 or more houses on the edge of the village, and the consequent loss of a large expanse of open countryside, will destroy its open setting and rural character. No consideration has been given to wildlife and bio-diversity issues.

## **6) Impact on the residential amenities of the village**

**2.21** This objection is on the grounds that major new development will result in a large volume of extra traffic passing through the village.

**2.22** There is no question that a development of the scale proposed will greatly increase the volume of traffic, say for example along Thorndon Avenue to reach the A127.

**2.23** Overall the concern is that the people of the local community are most likely to suffer the harmful impacts of the development by way of increased traffic, overlooked back gardens, loss of rural character, without any discernable benefits.

## **7) Flood risk**

**2.24** This objection is on the grounds that inadequate consideration has been given the increased risk of flooding in the area.

**2.25** The village of West Horndon has been subject to at least three serious flooding incidents since substantial development of the village took place in the mid-1950s. The

first of these was in 1958 when much of the village flooded. A second was in 1981 and a third on Christmas day 2012. Each of these incidents followed very heavy rain.

**2.26** It is clear that any development on the land identified as 037 has a significant potential to increase flood risk. The magnitude of this increase has not been properly assessed and thus its significance is unknown. Development on this land must be rejected until it can be demonstrated that any increase in flood risk is insignificant both in the area of the development but also for the surrounding locations.

### **8) Loss of employment land**

**2.27** This objection is on the grounds that the development would result in the loss of local employment generator with no clear indication as to how this might be replaced.

**2.28** The proposals involve the redevelopment of some 16.23 hectares of employment land. An important question is whether existing local businesses can be relocated on nearby sites, or as part of the new development. Otherwise local employment will be lost.

### **9) Is the Borough Plan sound and robust?**

**2.29** This objection is on the grounds that the plan in its present form does not pass the tests as set out in the National Planning Policy Framework, which states that:-

“Local Plans should develop robust and comprehensive policies that set out the quality of developments that would be expected of the area, responding to local character and being visually attractive.”

**2.31** Given the level and extent of the concerns as set out in this document, the plan clearly has fundamental shortcomings. It is not therefore sound or robust.

## 3.0 The Village of West Horndon

**3.1** This section takes close look at the village of West Horndon, describing its history and character, its countryside setting, the level of provision of services, facilities, and amenities, the degree of accessibility, and the availability of public transport.

### The history and character of the village

**3.2** West Horndon is a small village in the Metropolitan Green Belt with a population of some 1800 people. It is located on the southern edge of the Borough of Brentwood with the railway forming the boundary with Thurrock.

**3.3** The main part of the village was developed pre-1970, with a smaller areas constructed in the 1980s. The original growth of the village was due to the convenience of railway travel and the main residential areas are concentrated immediately to the north of the railway, with the exception of Thorndon Avenue extending to a length of some 500metres from Station Road, and connecting to The A127.

**3.4** There is no clearly identifiable village centre with the village hall, church, public house, school, shops, and station all being dispersed in different locations. The housing is characterised by a large proportion of bungalows, many with long gardens backing onto open fields. There is an industrial area on the west side of the village.



Thorndon Avenue



The Railway Hotel



Clavering Gardens – Showing the typical style of housing in the village

### The setting of the village

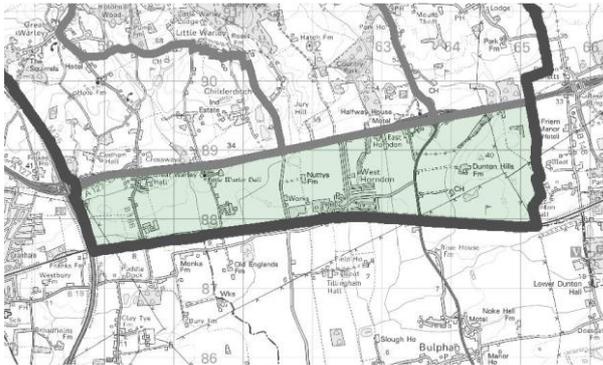
**3.5** Being surrounded by countryside West Horndon is still very rural in character. Open arable fields are bounded by hedgerows, with several footpaths around the edge of the village.



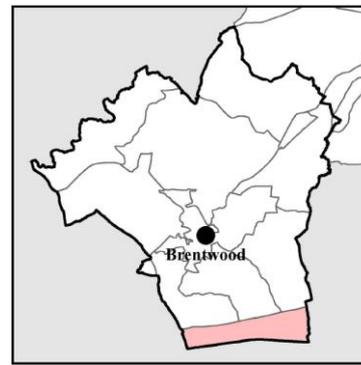
West Horndon and surrounding countryside

3.6 The Mid Essex Landscape Character Assessment (September 2006) 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



Location



An image from the assessment showing the characteristics of the countryside

## Services, Facilities, and Amenities

**3.7** The village has a primary school, a public house, and a small tennis club with two courts. There are three small parades of shops which include two hairdressers, a newsagent, a general store, a fireplace shop, and a café. There are 3 or 4 vacant units.

**3.8** The primary school dates back to 1962 and is smaller than average with a total of around 115 pupils, but understood to be at full capacity.

**3.9** It has a station which is on the London, Tilbury and Southend Railway main line from London to Southend. It is currently known as the Essex Thameside Route by Network Rail. Previously in the latter part of the 20th century in about 1998 the station building on the London bound platform had been demolished. A more modern structure was erected, which provides very little shelter, unlike the original building. During the latter part of 2008 the ticket hall, customer toilets and ticket office were refurbished. Automatic doors were provided between the street and the ticket hall, and to and from the platform.



The Church



Local Shops

**3.10** For secondary education the village falls within the Brentwood County High catchment area, some 6 kilometres from the centre of the village.

**3.11** Further afield to the southeast of the parish is the Dunton Hills golf course. At Little Warley in the north-west there is a small number of houses and the Clearview sports centre. The West Horndon Park and playground were opened in 2004.



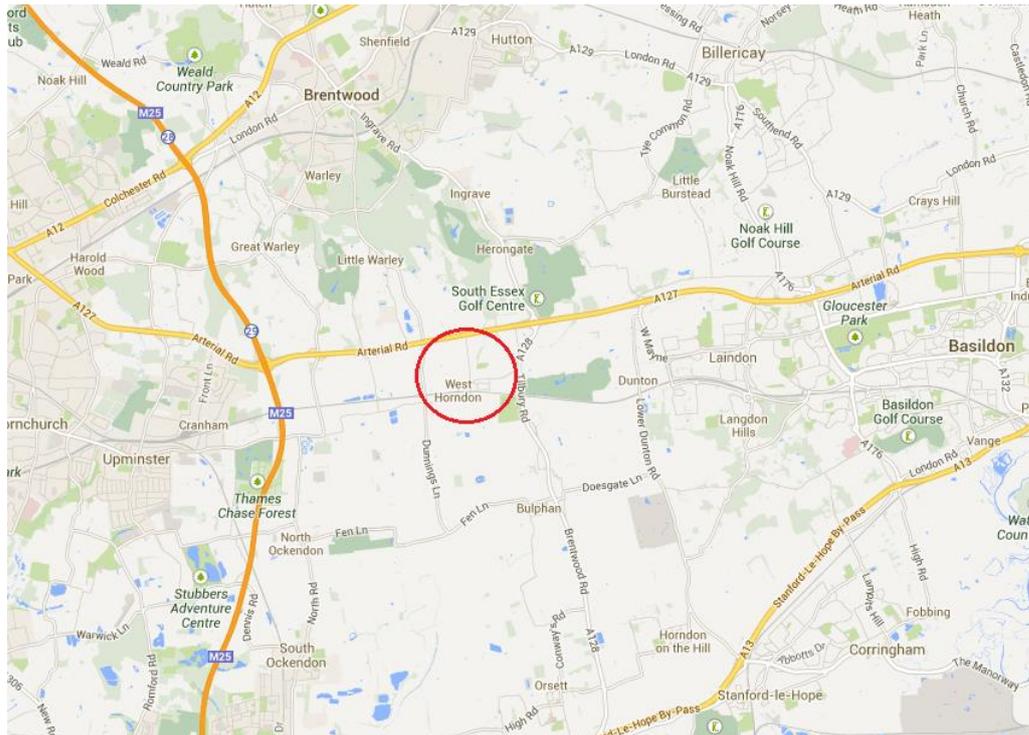
West Horndon Park and playground

### Accessibility and Public Transport

**3.12** North of the town and parallel to the railway is the A127 Southend Arterial Road. West Horndon is east of junction 29 of the M25 motorway.

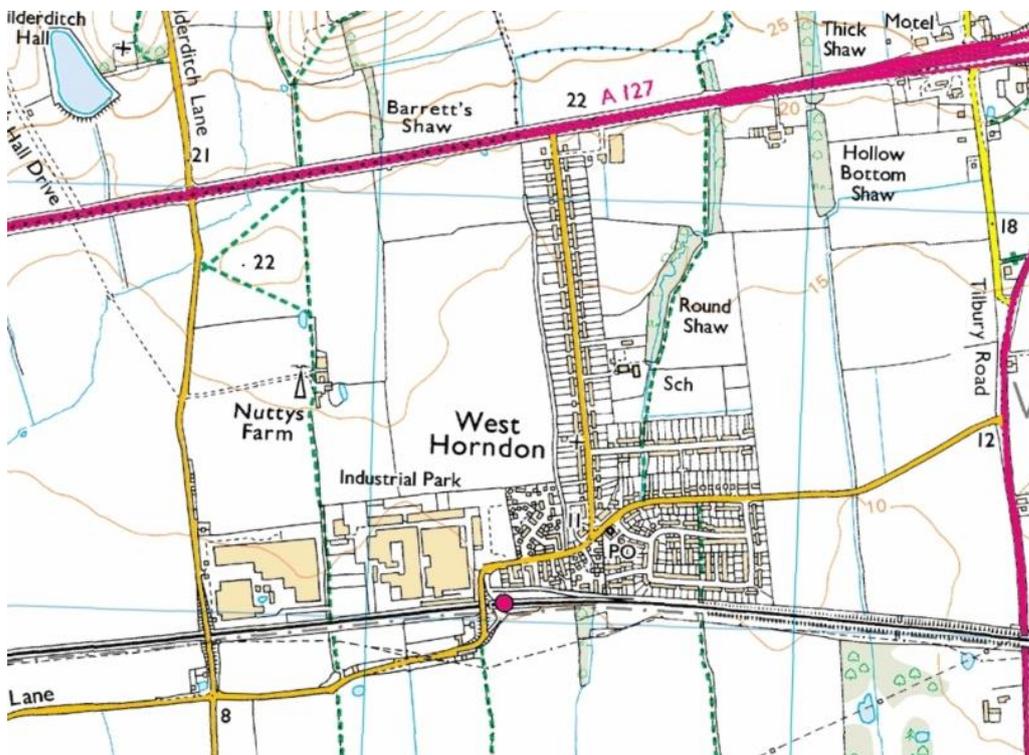
**3.13** The station attracts commuters along the A128 from Brentwood who find it easier to drive south and catch the train here in order to avoid congestion in Brentwood or Basildon. It is also the case that as a commuter train it is very much at full capacity.

**3.14** Although it has a railway station and is close to the A127, the village is not conveniently located in relation to larger settlements, being some 6 km south of Brentwood, 10km west of Basildon, and 8 km east of Upminster and Hornchurch.



Location of the village, 6km south of Brentwood, 10km west of Basildon, and 8km east of Upminster.

3.15 The village is served by two bus routes which both terminate in Brentwood.



Roads and footpaths in and around the village

**3.16** Despite the fact that the village has a railway station, it is reasonable to assume that the majority of journeys from the village, for schools, shops and work are undertaken by car. The station provides a route into London but does not connect to Brentwood. A larger part of the village, given its ribbons of development are not conveniently located for the station. It is recognised that these issues would need to be properly researched by way of a detailed study.



The station car park



The station building

**3.17** Roads and junctions in the area are only just coping with the existing levels of traffic. The A127 is at a standstill most mornings heading into London with heavy traffic going toward Southend. On the A128 towards Brentwood the current levels of traffic are close to breaking point.

## 4.0 The Local Plan and The Strategic Allocation

**4.1** The plan sets out a long term vision for how the Borough should develop by 2030 and the Council's strategy and policies for achieving that vision.

**4.2** In looking at the key characteristics of the Borough the plan notes that all of the Borough's countryside lies within Metropolitan Green Belt and that the Borough contains attractive countryside with a variety of landscapes and settlements ranging from the town of Brentwood, the historic village of Ingatestone, to small villages and hamlets.

**4.3** The plan sets out a strategic objective as follows:-

“SO1 Direct development growth to the existing urban areas of Brentwood, Shenfield and West Horndon in locations well served by existing and proposed local services and facilities.”

**4.4** Another objective is stated as to:-

“SO7 Safeguard the Green Belt and protect and enhance valuable landscapes and the natural and historic environment.”

**4.5** The spatial strategy reads:

“S1: Spatial Strategy

The Council's preferred spatial strategy for the Borough aims to protect the Green Belt and local character and foster sustainable communities by focusing the majority of new development between 2015 and 2030 on land within accessible settlements.”

**4.6** With regard to identifying sites it says that:-

“All development sites will be identified having regard to whether they:

- a. are accessible to public transport, services and facilities
- b. will have no significant impact on the Green Belt, visual amenity, heritage, transport and environmental quality including landscape, wildlife, flood-risk, air and water pollution
- c. are likely to come forward over the plan period”

#### 4.7 Referring to West Horndon it says:-

“Having good road and rail access, local shops, employment and community facilities, West Horndon offers potential for sustainable development over the long term. Developing here provides an opportunity to address conflicts arising from heavy freight passing through the village, strengthen the village centre, and improve service provision. Significant improvements to infrastructure and services would be required to support growth at West Horndon.”

#### 4.8 Provision is made for 3,500 new dwellings (net) to be built in the Borough between March 2015 and March 2030 at an annual average rate of 200 new dwellings 2015-2020 rising to 250 new dwellings 2020-30.

#### 4.9 With regard to Green Belt it says that:

“Policy CP10: Green Belt

The general extent of the Green Belt across the Borough will be retained subject to minor allocations made in this Plan affecting Green Belt, where new development has had the effect of consolidating settlement patterns so as to create a defensible boundary.”

4.10 Policy CP3 lists the strategic sites with West Horndon at the top of the list. The Policy reads as follows:-

“Policy CP3: Strategic Sites

In order to meet identified development requirements in accordance with the spatial strategy the following strategic sites are allocated:

West Horndon – Mixed Use Development – housing, employment, community/education/health, open space, retail

William Hunter Way – Mixed Use Development – retail, leisure, housing

The Baytree Centre – Mixed Use Development – retail, housing

Brentwood Enterprise Park – Employment2

4.11 The plan states that the sites are deemed strategic because they are critical to delivering the Plan. Other site specific allocations are set out in Development Management Policies.

4.12 Referring specifically to West Horndon Policy CP4 reads:-

“Policy CP4: West Horndon Opportunity Area

The Council will work in partnership with the local community to identify and realise opportunities for regeneration and improvement through redevelopment of employment land and a strategic allocation to provide mixed use development for Housing, Employment, Retail, Community, Open Space, Education and Health purposes. The Council will seek a community masterplanning exercise, to agree the form, mix and siting of development which best reflects local aspirations and the wider Borough Spatial Strategy.

West Horndon could give rise to further capacity depending on its ability to accommodate a self sustaining community and provision of infrastructure can be met over the plan period.”

4.13 The justification is set out as follows:-

#### **“Justification**

3.7 Having good road and rail access, local shops and community facilities, West Horndon offers potential for sustainable development to the benefit of the local community. As well as meeting the village’s longer term needs, developing here provides an opportunity to address current conflicts from competing uses, most notably, heavy freight passing through residential areas; improve the quality of the public realm; provide multi-functional, accessible green space; and strengthen the village centre.

3.8 It is envisaged that development here would provide a mix of uses, including housing, community, health and neighbourly (ie compatible) employment uses. To ensure that development takes into account long term community aspirations for the village the Council will seek a community masterplanning exercise to determine the precise scale, nature and siting of development and associated works.

Evidence:-

Infrastructure Delivery Plan (forthcoming)

Modelling work (forthcoming)”

## 5.0 Detailed Representations

**5.1** This section looks the planning considerations and puts forward the Parish Council's representations in detail.

**5.2** Representations are made under the headings as follows:-

- 1) Major development and West Horndon.**
- 2) Neighbourhood Planning and Localism.**
- 3) Metropolitan Green Belt.**
- 4) Is West Horndon a sustainable location?**
- 5) Impact on the countryside and setting of the village.**
- 6) Impact on the residential amenities of the village.**
- 7) Flood risk.**
- 8) Loss of employment land.**
- 9) Is the Borough Plan sound and robust?**

### **1) Major development and West Horndon**

**5.3** This objection is to the disproportionate scale of the proposals both in relation to the size of West Horndon, and in terms of the proportion of the Borough's housing numbers the village is being asked to accommodate.

**5.4** The Borough Council proposes a major development alongside a small community. The allocation extends to some 40 hectares, of which 25 hectares is Green Belt land. The development would treble the size of the village, changing the character of the whole area. The number of dwellings proposed for West Horndon represents some 43% of the total number to be provided in the Borough up to 2030. The plan indicates that the area of Green Belt land as currently shown is only an indication, and that it might have to be larger. If is to accommodate some 1000 houses this would have be at a very high density of 40 to the hectare, whereas the larger part of the existing village is less

than 20 units to the hectare. Not only would this be completely out of character with the village, it would also mean that there is very little space available for other land uses, such as open space, shops or a community centre. To accommodate 1500 houses, and provide any real benefits for the village, the site area would have to be half as much again.

**5.5** It is also suggested that in the longer term further Green Belt land could be released although it does not put a figure on this. It is known however that the same development company that is promoting the current allocation, controls large areas around the village, which would allow development to quadruple in size.

**5.6** The scale of development proposed would swamp the existing village, effectively creating a new settlement. There is no explanation as to why West Horndon, as a small village, should accept a wholly disproportionate number of new houses.

**5.7** The plan provides no details to support the allocation, only the boundaries and location of the proposed site, and the number of dwellings it might accommodate. There is no explanation as to why West Horndon is thought to be suitable for this scale of development.

**5.8** The preferred options document makes reference to an evidence base and infrastructure, but is only able to say that an “Infrastructure Delivery Plan is forthcoming”. No other evidence is put forward.

**5.9** National guidance states that Local Planning Authorities should assess the quality and capacity of infrastructure, water supply, wastewater and its treatment, energy (including heat), telecommunications, utilities, waste, health, social care, education, and flood risk, and its ability to meet forecast demands. This has not been done.

**5.10** The village is being asked to comment on a major proposal, having been presented with only an outline of what is proposed. It is not known therefore what benefits, if any,

there might be for the village, or how the scheme might seek to mitigate against the many harmful impacts.

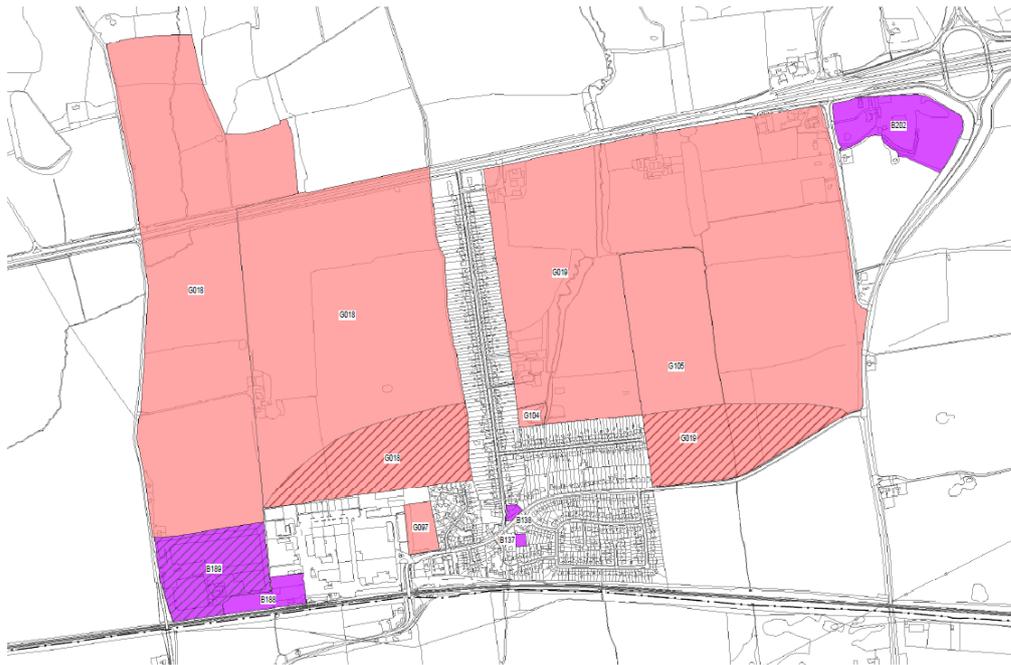
**5.11** The Borough Council are therefore attempting a consultation exercise on a proposal which appears to be poorly researched, and premature in terms of an evidence base.

**5.12** The Parish Councillors and residents in the village feel strongly that housing provision should be spread more equitably around the borough, so that the village does not have to take 43% of the total.

**5.13** The Parish Council had followed that process of identifying suitable sites through the Borough wide Strategic Housing Land Availability Assessment (SHLAA). Although extensive areas were put forward for development around West Horndon by landowners and developers, the conclusion of the document was that the village was suitable for a much smaller share, with limited Green Belt release, and stating that:-

“Any development that provides for more than the local needs of West Horndon would need to be based on an agreed change in the role of West Horndon village, conformity with a spatial strategy based on Transport corridors and major infrastructure and service improvements for the village. An indicative maximum of 10ha is used for this purpose, located adjacent to the existing village boundary, but the extent of development of this area would also be considered along with Site G019 [site ref 038].”

**5.14** It is not known by what process this conclusion came to be ignored in arriving at the Strategic Allocation for West Horndon. See extract from the map below.



Extract from the SHLAA. Only the hatched areas were considered to have potential.

**5.15** The progress of any master plan to realise the allocation is dependent on the co-operation between the land owners to arrive at a joint scheme. At the moment there are no indications that the three owners intend to initiate any form of master plan for the village.

## **2) Neighbourhood Planning and Localism**

**5.16** This objection is on the grounds that the Plan has been presented as a top down process from the Borough to the Parish without first establishing whether, in principle, the village is prepared to consider such a proposal.

**5.17** The National Planning Policy framework says that local planning authorities should aim to involve all sections of the community in the development of Local Plans and in planning decisions, and should facilitate neighbourhood planning.

**5.18** It also says that:-

“Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential. A wide section of the community should be proactively engaged, so that Local Plans, as far as possible, reflect a collective vision and a set of agreed priorities for the sustainable development of the area, including those contained in any neighbourhood plans that have been made.”

**5.19** In passing the Localism Act the Government has said that:-

“Too often, power was exercised by people who were not directly affected by the decisions they were taking. This meant, understandably, that people often resented what they saw as decisions and plans being foisted on them.”

**5.20** The NPPF says that “Early and meaningful engagement and collaboration with neighbourhoods, local organisations and businesses is essential.” This has not taken place. The plan and the consultation process have so far been a top down process, with little regard for the involvement of the local community.

### **3) Metropolitan Green Belt**

**5.21** This objection is on the grounds that the large proportion of the land allocation is within the Metropolitan Green Belt, and no exceptional circumstances have been put forward to justify the release of Green Belt land.

**5.22** The National Planning Policy Framework 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.”

**5.23** The larger part of the allocation is within the Green Belt. National planning guidance is clear that development in the Green Belt is by definition inappropriate and harmful.

**5.24** Exceptional circumstances must exist to justify the loss of Green Belt land. The Government has recently clarified that housing demand is unlikely to constitute the exceptional circumstances to justify such loss. In a direct contradiction the Borough Plan is suggesting that Green Belt land should be released to satisfy housing demand.

**5.25** The NPPF is clear 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.”

**5.26** The NPPF is also clear that new development inside a Green Belt is inappropriate development unless it is for one of the purposes set out in the guidance at paragraph 89. The proposed development for Housing, Employment, Retail, Community, Open Space, Education and Health, does not accord with any of these purposes. The proposals would therefore constitute inappropriate development in the Green Belt under the terms of the NPPF.

**5.27** Such development would therefore, by definition, be harmful to the Green Belt and should not be approved except in very special circumstances. (Extracts from the NPPF are provided at **Appendix 1**).

**5.28** Planning policy does not provide for different grades of landscape quality within the Green Belt. Its purpose is to keep land open and not give greater protection to areas of greater landscape quality.

**5.29** There is currently a contradiction in the Local Plan. It confirms in Policy CP10: Green Belt that “The general extent of the Green Belt across the Borough will be retained subject to minor allocations”. The spatial strategy reads:-

## “S1: Spatial Strategy

The Council’s preferred spatial strategy for the Borough aims to protect the Green Belt and local character and foster sustainable communities by focusing the majority of new development between 2015 and 2030 on land within accessible settlements.”

In complete contradiction to the stated spatial strategy the same plan proposes the removal of an extensive area of land from the Green Belt at West Horndon.

### **4) Is West Horndon a sustainable location?**

**5.30** This objection is on the grounds that, even with some improvements to the level of facilities and infrastructure, West Horndon is clearly not a sustainable location for the scale of development proposed.

**5.31** Whether new development can be proved to be sustainable is central to national planning policy.

**5.32** 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 homeowners will not be over dependent on the car for journeys to work, school, shops, leisure activities, and other services and amenities.

**5.33** The NPPF looks for an integrated approach to the provision of housing with accessible local services, or provide a high quality built environment. It also says that planning should be a collective enterprise. That planning has tended to exclude, rather than to include, people and communities.

**5.34** Section 3 above has looked closely at West Horndon. It is a small village of only 1800 people, with a very limited range of amenities and facilities. It has few shops, no secondary school, and is remote from the larger centres of Brentwood, Basildon and

Upminster. The Primary School is at full capacity and the nearest secondary school is at Brentwood. There is three day wait to see a doctor. There is an infrequent bus service. A railway station provides a commuter route into London, but has limited additional capacity. The railway does not cater for the important local journeys, such as to Brentwood. The station car park already struggles, with many cars parking in the village. The 565 Bus to Brentwood runs 6 times a day Monday to Friday and 5 times on Saturday.

**5.35** Many of the roads and junctions in the area are at full capacity, and it is simply not practical to widen the A128 or the A127. The traffic from another 1500 homes would seriously worsen the congestion in the area.

**5.36** Before putting forward the strategic allocation the Local Plan does not seem to have looked at West Horndon in any detail. It does not consider the suitability of the village for large scale development or refer to any consultations that have taken place with the local community. The allocation does not follow a Transport Assessment to measure the impact of such development and to explore how people will travel to work, school, the shops, and leisure activities.

**5.37** If the residents of the new development have no choice but to make most journeys by car, the village, quite clearly, does not offer a sustainable location.

**5.38** It is possible that improvements could be made to the infrastructure and public transport, and new local facilities provided. But given the major scale of the proposed development such measures will not overcome the fact that West Horndon is not a genuinely sustainable location.

## **5) Impact on the countryside and setting of the village**

**5.39** This objection is on the grounds that the development would destroy some 60 acres of open countryside.

**5.40** West Horndon is a small lower density settlement surrounded by open countryside. The village is characterised by larger plots backing onto open fields. The Green Belt land as allocated for development comprises arable farmland bounded by the industrial estates to the south, by the backs of properties along Thorndon Avenue to the east, and by Childerditch Lane to the west. The northern boundary as currently shown follows a track to a farm and then cuts across a field.



View along Childerditch Lane and part of the area proposed for development

**5.41** A landscape study commissioned by the Council refers to “large arable and pasture fields, predominantly flat topography, mature hedgerow field boundaries which contain several single mature trees, and a relatively sparse settlement pattern”.

**5.42** The construction of 1500 houses on the edge of the village, and the consequent loss of a large expanse of open countryside, will destroy the open setting and rural character of the village. In addition to which, no consideration has been given to wildlife and bio-diversity issues.

## **6) Impact on the residential amenities of the village**

**5.43** This objection is on the grounds that major new development will result in a large volume of extra traffic passing through the village.

**5.44** There is no question that a development of the scale proposed will greatly increase the volume of traffic, say for example along Thorndon Avenue to reach the A127.

**5.45** There is no consideration as to how the new development behind existing houses with no road frontage to any existing roads or footpaths, can be integrated into the existing settlement pattern.

**5.46** Overall the concern is that the people of the local community are most likely to suffer the harmful impacts of the development by way of increased traffic, overlooked back gardens, loss of rural character, without any discernable benefits.

## **7) Flood risk**

**5.47** This objection is on the grounds that inadequate consideration has been given the increased risk of flooding in the area.

**5.48** The village of West Horndon has been subject to at least three serious flooding incidents since substantial development of the village took place in the mid-1950s. The first of these was in 1958 when much of the village flooded. A second was in 1981 and a third on Christmas day 2012. Each of these incidents followed very heavy rain. After the first two incidents some infrastructure changes were made to reduce the risk of flooding but clearly they are not reduced to a level that prevents flooding in extreme weather conditions. There have also been other less serious incidents.

**5.49** As set out above Chapter 10 (paragraph 100) of the National Planning Policy Framework puts flood prevention at the core of all planning decision making.

**5.50** There are basically three outcomes that could happen:

- a. The new homes could flood following heavy rain.

- b. Water could be diverted away from this buffer storage area and increase the flood risk in nearby areas such as Thorndon Avenue or Childerditch Lane.
- c. If to prevent these risks further drainage systems were installed then this would increase the speed with which the excess water drained into the river systems to the south of the railway line and thus increase the risk of flood to Bulphan and the surrounding areas. While this could be mitigated by even further drainage/flood protection systems this would be likely to be expensive.

**5.51** Any or all of these could occur. None of them are consistent with the philosophy expressed in the NPPF - to not develop in areas of flood risk or increase flood risk to surrounding areas.

**5.52** It is clear that any development on the land identified as 037 has a significant potential to increase flood risk. The magnitude of this increase has not been properly assessed and thus its significance is unknown. Development on this land must be rejected until it can be demonstrated that any increase in flood risk is insignificant both in the area of the development but also for the surrounding locations.

## **8) Loss of employment land**

**5.53** This objection is on the grounds that the development would result in the loss of local employment generator with no clear indication as to how this might be replaced.

**5.54** The proposals involve the redevelopment of some 16.23 hectares of employment land. An important question is whether existing local businesses can be relocated on nearby sites, or as part of the new development. Otherwise local employment will be lost.

## **9) Is the Borough Plan sound and robust?**

**5.55** This objection is on the grounds that the plan in its present form does not pass the tests as set out in the National Planning Policy Framework.

**5.56** National guidance states that:-

“Local Plans should develop robust and comprehensive policies that set out the quality of developments that would be expected of the area, responding to local character and being visually attractive.”

**5.57** A local planning authority should also submit a plan for examination which is “sound”, in respect of how it is prepared, whether proposals are properly justified, whether it can be delivered, and whether it is consistent with national policy.

**5.58** Given the level and extent of the concerns as set out above, the plan clearly has fundamental shortcomings. It is not therefore sound or robust.

## 6.0 A Preferred Approach

6.1 These representations have set out objections to the proposed Strategic Allocation at West Horndon. This section sets out the Parish Council's preferred approach to planning the future of the village, and meeting housing demand in the Borough.

### **A Study of West Horndon**

6.2 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.

### **A Neighbourhood Plan**

6.3 The industrial part of the site 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.

6.4 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. The open land between the industrial estate and Petresfield could also be included within the development. From consultation and discussion it is clear that the majority of residents would see this as a positive and acceptable way forward.

6.5 To support and plan for this, the Parish Council would initiate and fully commit to 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**

**6.6** 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 some 1000 houses short of their target figure.

**6.7** 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.

**6.8** A number of locations have been put forward through the SHLAA process. There are for example, older industrial estates, similar to those at West Horndon. Local people and Councillors, knowing the area south of Brentwood, suggest that the Council look at the Timmermans Nursery, Millmans Transport Yard, and the former Elliots nightclub site.

**6.9** Other landowners and developers will no doubt be putting their sites forward for development at this stage of the local plan. These should be looked at carefully, particularly if they provide an opportunity to distribute new development more equitably throughout the Borough.

## 7.0 Conclusion

**7.1** The Parish Council has have worked hard over the consultation period to publicise and explain the Plan to the local people. They have listened to and responded to their concerns. Local people 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.

**7.2** In putting forward the objections we have examined how the proposals sit against the requirements of the National Planning Policy Framework. The Local Plan in its current form fails the tests in respect of sustainable development, infrastructure, Green Belt, and flooding. The Parish Council therefore has fundamental and in principle objections to the scale of the proposed housing allocation.

**7.3** 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 development of up to 500 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.

**7.4** The importance of the local plan process for the future of the village cannot be underestimated. This document has suggested a positive way forward. The 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.