

**BRENTWOOD BOROUGH LOCAL PLAN**

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

**IN RESPECT OF**

**DUNTON GARDEN SUBURB CONSULTATION**

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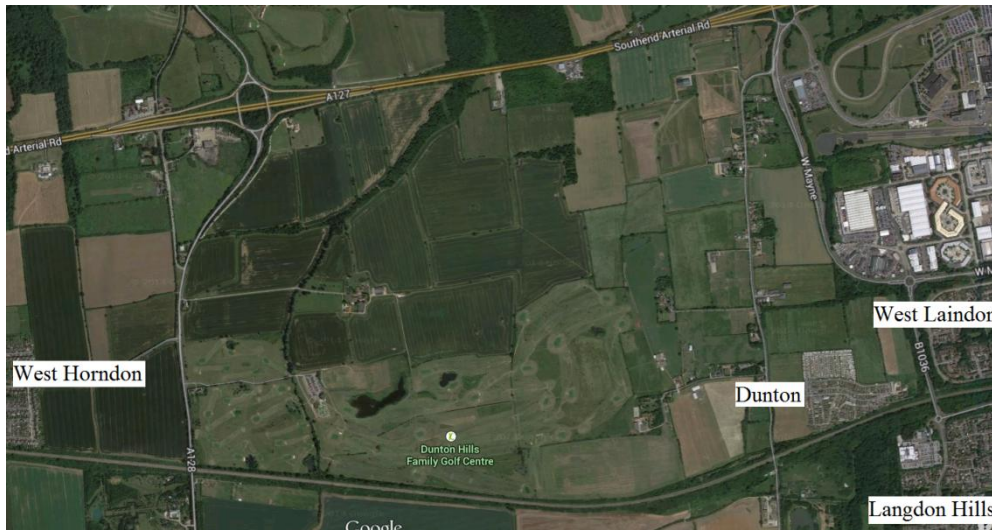
## 1.0 Introduction

**1.1** This document has been prepared on behalf of West Horndon Parish Council by SJK Planning. It should be read alongside an accompanying document setting out supplementary representations in respect of the Brentwood Borough Strategic Growth Options Consultation. A letter dated 17th February has outlined the Parish Council's response to the Strategic Growth Options consultation, but they formally reserve their right to respond further in due course.

**1.2** The Dunton Garden Suburb consultation is in the form of a 10 page leaflet style document. The intention is to seek views on the concept rather than the practicalities or what form it might take, posing general questions such as "Do you think this is a good idea" and "How do you feel about this". At the moment it is not supported by evidence as to the viability of such a scheme, and in particular whether suggestions such as a new station are actually deliverable. It says that it "could lead to the establishment of a joint project between the councils to carry out further testing and assessment against their evidence base as part of their plan-making responsibilities".

**1.3** In outline the Garden Suburb proposes a strategic release from the Green Belt that would include:-

- 4,000-6000 dwellings of different sizes and tenure;
- New commercial and employment land;
- Gypsy and Traveller pitches;
- Possible new railway station and other transport improvements;
- Local cultural, social and community facilities;
- Open space provision and new links to existing parks;
- Land set aside for biodiversity.
- A wedge of green countryside to be retained between the proposal and the A128 to the west.



The area between West Horndon and West Laindon

**1.4** The Parish Council would prefer not to see any greenbelt development however, notwithstanding the limitations of what has been presented to them so far, in general terms, the Parish Council may prefer to see development at Dunton in preference to the expansion of West Horndon. In saying this the Parish Council feel there is very little evidence that the garden suburb proposals are viable or realistic. There is no comfort in what are described as only “possible” benefits. We suggest that a lot more work is needed, perhaps involving a significant reduction in the number of houses proposed. If some 6,000 houses are proposed we need to be consulted on a scheme that can be proved to be both sustainable and self-sufficient.

**1.5** The potential positives do not seem to be put forward with any degree of certainty. In particular the suggestion is that the development “could” fund improvements to the A127, and “could” provide a new station. It is our view that such a major development of up to 6,000 houses (about 10 times the size of West Horndon), must pay for improvements to transport infrastructure. If such development cannot be largely self-sufficient it would have significant implications for a small adjoining village such as West Horndon, with the resulting pressure on local facilities and infrastructure.

1.6 The Strategic Growth Options Consultation (SGOC) and the Dunton Garden Suburb Consultation (DGSC) are being run in parallel. The SGOC specifically considers spatial options and specific sites to be considered as part of the Brentwood Local Development Plan. Within the SGOC the Dunton Garden Suburb proposal is presented as a key spatial option and indeed, a key specific site. Both documents have important implications for the future of the village and the Parish Council has rightly made a case that they should be considered together within the same timescale. The two consultations are inextricably linked and closing one before the other reduces the ability for reasoned and balanced responses across all of the key issues being consulted on.

1.7 The Parish Council does not want to come across as unnecessarily obstructive or to appear to want to shy away from Brentwood Borough's Council's challenge to meet housing demand. They also want to continue a working relationship with the Borough, and progress a neighbourhood plan for the village.

1.8 The representations that follow in this document first set out the Parish Council's overall views on meeting housing demand, and The Dunton Garden Suburb. It then carefully sets out what are considered to be the key issues, with reference in particular to infrastructure delivery.

## 2.0 The Representations

2.1 The Parish Council has set out its position in respect of the consultation as follows:-

### **"Dunton Garden Suburb Response"**

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

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

Thus in the unfortunate circumstance where Green Belt does have to be sacrificed in order to meet the statutory obligations of the Strategic Housing Allocation it is essential that only the minimum amount of land is sacrificed and that this is done in locations and in such a way that harm and urban creep is kept to an absolute minimum.

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

## 2.2 The representations are set out under the headings as follows:-

- Evidence base
- Green Belt Strategy
- Highways and Transportation
- Community Infrastructure
- Education Requirements
- Sustainability
- Deliverability and Phasing

## Evidence base

**2.3** The Garden Suburb concept is included as potential growth area in the SGOC. A supplementary response from the Parish Council has set out concerns with regard to the limitations of the current evidence base. In particular the following key information, which is described as 'forthcoming', but not presently available for consideration:-

- Green Infrastructure Study
- Landscape Capacity Assessment
- Housing Viability Study
- Objectively Assessed Housing Needs (published 10 February)
- Crossrail Economic Impacts
- Highways Modelling
- Open Spaces Study
- Sports Strategy

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

**2.5** The Parish Council would therefore like to see a full evidence base and a further consultation stage, before the Borough moves towards a draft plan.

## Green Belt Strategy

**2.6** It is recommended that a comprehensive review of Brentwood's Green Belt boundaries should be carried out to ensure the most appropriate long term strategy is progressed. Any review should cover all three broad areas within the Strategic Growth Options so all appropriate options for growth are considered in terms of the scale of

development, be it large scale strategic allocations; urban extensions to existing settlements or individual site releases.

**2.7** The Parish would be seeking an assurance that, in arriving at a robust Local Development Plan, the Green Belt around the village, will be confirmed and protected in the long term, to prevent coalescence.

**2.8** There needs to be a robust buffer zone created so the communities of West Horndon and any development on the west side of Basildon cannot at some future stage be further expanded to meet more housing need in the future. We suggest that the land between the A128 and the stream is turned into woodland. This would also have the effect of reducing flood risk, and provide an attractive green space that could link up to Thorndon Country Park.

### Highways and Transportation

**2.9** The main concerns in this respect are:-

- Impact on strategic highway network - A127, A128 and A13;
- Impact on the local highway network including within Thurrock;
- Lack of transport modelling and mitigation measures;
- Impact of possible Lower Thames Crossing route on land and infrastructure capacity;
- Concern over the deliverability of a railway station at Dunton;
- Assumptions and scoring in the SA/SEA.

**2.10** Road and rail infrastructure are at present at capacity much of the time and will need to be carefully managed, with consideration taken to the development plans of local councils along “shared” infrastructure including the A127 and the Shoeburyness-London rail line.



**2.11** The development must take place in such a way that it does not increase rail commuters from outside the immediate village parking cars to use the station at West Horndon (current parking provision is insufficient as it is).

**2.12** The A127 needs to be expanded and/or some other means to prevent traffic rat-running through the village to bypass traffic jams on the A127. This is against a backdrop of potentially limited scope for material widening of the A127, and being bounded by London and Southend congestion.

**2.13** The C2C rail line is currently at capacity so given the extra demand that the Dunton Garden Suburb (and other housing developments to meet strategic housing allocations) will create the capacity on this line needs to be significantly increased.

**2.14** The suggestion is made that the development could fund a new station. It is important to establish at an early stage whether this is viable and deliverable. If a station is not economically viable and cannot be provided, then the whole concept of a sustainable garden suburb is jeopardised.

### Community Infrastructure

**2.15** At an early stage the plan must address the viability and deliverability of housing land allocations, including the provision, commitment and timing of infrastructure? It is imperative that the costs of providing infrastructure as a direct result of development proposals, particularly those related to early years and childcare, primary and secondary schools, and highways, are included in the viability assessment from the outset, to ensure provision is guaranteed. It would not be acceptable to only secure land for education purposes without the necessary and full financial contributions as it is deemed unviable. Adequate doctors and other medical facilities need to be planned for.

## Education

**2.16** West Horndon Junior school is currently at capacity and extra senior school pupils travelling to the centre of Brentwood would further increase the over capacity problems on the A128 through Ingrave and Herongate.

**2.17** Education needs must be adequately assessed as the preparation of the Local Plan continues.

## Sustainability

**2.18** The SGOC places some emphasis on creating sustainable communities. This will not happen if the suburb becomes another large urban extension with the majority of people relying on the car. If it is to be taken forward we would look to see some early thought as to how it will be laid out, what level of local facilities and amenities will be provided, and whether public transport can be central to the plans.

**2.19** There needs to be some more thought as to what is meant by the term “garden suburb”. What does this mean in practice and what will it look like? Are there good examples of where a similar concept has been successful? The suspicion at the moment is that the term is being used in a marketing way, such that a development of 6,000 houses can seem more palatable.

## Deliverability and Phasing

**2.20** With the planning, design, and infrastructure requirements for a garden suburb it could be at least 10 years from now before any houses become available. There is the issue therefore, in the interim, as to how the Borough can maintain a 5 year housing supply. This needs a realistic assessment and has been raised as an issue by adjoining authorities and Essex County Council.

**2.21** Other landowners and developers will no doubt be putting their sites forward for development. These should be looked at carefully, particularly if they provide an opportunity to maintain a five year supply and distribute new development more equitably throughout the Borough.

## 3.0 Moving Forward

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

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

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

## **Neighbourhood Plan**

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

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

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

## **Housing Numbers and Previously Developed Land**

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

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

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

## **4.0 Conclusion**

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

**4.2** The initial reaction of the Parish Council was that the development of a garden suburb, rather than the major expansion of West Horndon, could be a preferable option.

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

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

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