

Summary of objections - consistent with national policy and justified

1. The Reg 19 Plan is not sound in respect of the Dunton Hills Garden Village because it does not adequately demonstrate that it is consistent with national policy. As stated in the NPPF, such consistency is required to enable the delivery of sustainable development in line with the policies in the Framework. In order to do this, full and careful consideration must be given to, amongst other things, promoting sustainable transport and meeting the challenge of climate change and flooding – both objectives of the NPPF.
2. The Reg 19 Plan is not sound in respect of DHGV and its transport policies because it is not justified. It is not based on proportionate evidence to inform what the Plan acknowledges is a key principle that is used to justify the overarching strategy, namely the ability to deliver infrastructure that enables more sustainable movement. The reason that it is not based on proportionate evidence is because the evidence base fails to properly assess the impacts of growth on the A127 and to articulate – and cost – the provision of a sustainable movement strategy which has sufficient capacity to accommodate the increased demand. In this regard, the lack of evidence as to how the increased passenger numbers on the South Essex railway line through West Horndon station are of particular concern to the Parish Council.
3. The Reg 19 Plan is not sound in respect of DHGV and its policies in relation to flooding for two reasons. First, it has not undertaken a Level 2 Strategic Flood Risk Assessment, despite there being clear concerns raised in the Sustainability Appraisal (SA) about the ability to accommodate the levels of growth proposed on the site whilst adequately mitigating the flood impacts. Second, the SA has failed, in light of this, to consider reasonable alternatives. Both of these matters mean that the preparation of the Reg 19 Plan is not consistent with national policy.