



Dunton Park Residents Association

C/O 4 Meadow View, Lower Dunton Road, BRENTWOOD CM13 3GE

Email: duntonparkra@gmail.com | **Web:** www.duntonparkra.co.uk

Date: May 2, 2026

Dear Sharon,

Response to 28-Day Consultation on Proposed Development at Dunton Court

Thank you for notifying us of the 28-day consultation regarding the proposed installation of two new bases in Manstead Close and one new base on Main Drive. We have reviewed the information provided and set out our formal response below.

Based on the limited detail supplied and the significant concerns outlined here, **the Residents' Association cannot support the proposals.**

MANSTEAD CLOSE

1. Loss of Amenity Space

The green area identified for two new homes is one of the few remaining communal spaces available to residents for informal gatherings, summer seating, and community events. Its removal represents a **clear loss of amenity**, contrary to the site licence requirement that:

“Suitable space equivalent to one-tenth of the total area of the site shall be allocated for recreational purposes.”

Pointing to a different green area elsewhere on the park does not negate the loss of this one. If Regency intends to proceed, we would need to involve the Licensing Officer to assess whether the proposal complies with the site licence and the intention behind these safeguards which is to stop this kind of reckless development.

2. Spacing, Safety and Compliance (The 6-Metre Rule)

Based on the dimensions provided (42x20 and 45x20), the proposed plots appear too constrained to meet:

- the 6-metre separation rule
- boundary distance requirements
- safe distance from the road
- the 2008 Model Standards

You have stated that compliance has been “confirmed”, but no technical drawings, measurements, or engineering reports have been provided. The only plan supplied is a basic outline sketch, which is insufficient for residents to meaningfully assess safety or legality.

Your suggestion that infilling land near the macerator will create additional space raises further questions, as no structural, engineering or safety documentation has been provided.

3. Proximity to the Macerator / Pump Station

Good practice typically recommends a **15–30 metre buffer** between residential units and pump stations to mitigate noise, vibration, and odour. The consultation provides no technical assessment, no acoustic report, and no environmental impact information.

Without these, residents cannot reasonably evaluate the risks, and the RA cannot support the proposal.

4. Loss of Outlook

Residents currently overlook a natural, wooded area. Under the proposal, this would be replaced with two large homes and a retaining wall. This is a material change to the character and enjoyment of the area, and the consultation does not acknowledge this impact.

5. Parking Loss and Lack of Evidence

Part of the Manstead area currently functions as essential parking. You state that “adequate parking is available elsewhere”, but:

- no parking survey has been provided
- no count of existing bays has been provided
- no assessment of residents without on-plot parking has been included
- no reference has been made to Model Standards or site licence expectations in terms of minimum number of bays expected for residents and guests.

To say everything is fine appears to be an assumption rather than evidence. The RA cannot accept the loss of parking without a full, transparent assessment.

6. Environmental and Wildlife Concerns

The plan indicates tree removal. Under the site licence, trees must be maintained (subject to necessary consents). Therefore:

- Have you obtained permission from the relevant authority?
- Has a wildlife survey been commissioned?
- Has any ecological assessment been undertaken?

Given the undeveloped nature of the land, wildlife presence is highly likely. The RA would challenge any development with Basildon Council and wildlife protection groups if these statutory steps have not been completed.

7. Emergency Vehicle Access and Turning Circle

The turning circle at Manstead is essential for:

- emergency vehicles
- delivery vehicles
- gas deliveries
- macerator service vehicles

No technical plans have been provided showing how this will be retained while also accommodating two large homes and meeting boundary and spacing regulations.

The site licence also requires that roads provide adequate access for emergency vehicles. We have seen no evidence that emergency services have been consulted.

8. Lighting and Road Width Requirements

The site licence requires:

- adequate lighting between dusk and dawn
- passing places on two-way roads narrower than 3.7m

No lighting plan, road width assessment, or passing-place provision has been included. These are fundamental safety requirements.

9. Macerator Servicing

The area you propose to develop is currently used for **routine servicing of the pump house**, which often requires access for **large gulper lorries**. These vehicles are essential due to the volume of waste generated by the entire park which is likely to increase when the old touring field is redeveloped and this macerator has to handle 70 more homes' waste which we're aware are the plans.

There is **no evidence** in your consultation of:

- how these vehicles will continue to access the macerator
- where they will safely position themselves
- how turning, reversing or manoeuvring will be possible
- how emergency or unplanned call-outs will be handled

This space is not a convenience - it is **critical operational infrastructure** for the whole site. Any obstruction or reduction in access could have serious consequences for waste management, hygiene, and emergency response.

Until a proper assessment is provided, including confirmation from your waste contractors, the RA cannot support any development in this area.

MAIN DRIVE

1. Parking Impact

By our calculation, the proposal would remove approximately **28% of the parking capacity** in that section of Main Drive. You again state that "other parking is available", but this does not reflect the reality of daily parking pressures, particularly for Bulphan residents who already have limited space.

No parking survey has been provided, and no mitigation is proposed.

2. Bin Store Relocation

Your original suggestion to re-site the bin store from near the pond to the corner of Bulphan by the defibrillator seemed problematic. It's a smaller space, and even if the mess hut is removed, it would place the bins directly outside someone's front door. The current location is discrete and works well; relocating it appears to create more issues than it solves. There also appears to be a raised drain that would cause issues too.

Your revised suggestion to convert the old mess hut into an indoor bin store is noted, but several significant issues remain unaddressed.

2.1 Uneven Distribution of Bin Capacity

Relocating the bin store to the corner near Bulphan would create a **highly uneven distribution of bin capacity across the park**. At present, the top, middle and bottom stores are reasonably balanced. The removal of the back-Orchard bin store has already caused significant issues in terms of practical access to waste facilities.

2.2 Unacceptable Walking Distances for Residents

This is not a minor inconvenience. It would mean that some residents, especially those living at the **top end of Back Orchard**, would be expected to walk a long way carrying bags of household rubbish. For many residents - given the age demographic on site - this would be **unacceptable, unreasonable and unsafe**.

As an example, a resident living near the top of Back Orchard would need to walk from their corner of the park, down the hill, across Main Drive, and all the way to the proposed bin store near the Bulphan corner. This is a **substantial distance**, particularly when carrying heavy or awkward waste bags, and especially in poor weather or low light.

2.3 Existing Bin Store Issues Remain Unresolved

The consultation also does not address the long-standing issue that since the closure of the Back Orchard bin store, the remaining stores have become inadequate. The RA raised this weeks ago and has received no response. It is concerning that bin store problems remain unresolved while development proposals are being advanced at speed.

For these reasons, the RA cannot support the proposed bin store relocation.

OVERALL ASSESSMENT

We understand that Regency, as a business, seeks to maximise revenue. However, this must be balanced with:

- resident wellbeing
- site licence obligations
- safety standards
- environmental responsibilities
- long-term sustainability of the park

At present, the proposals appear **under-developed, lacking in technical detail, and insufficiently evidenced**. They would result in:

- loss of amenity
- loss of parking
- loss of outlook
- potential safety and compliance issues
- environmental concerns
- reduced emergency access
- disruption to established infrastructure

For these reasons, **the Residents' Association cannot support the proposals in their current form.**

There are other areas on site that may be more suitable for development and for improved bin store provision. We would welcome a constructive discussion about alternative locations that do not compromise safety, amenity, or the character of the park.

James
Secretary
Dunton Park Residents Association