



23/03/2016

Planning Policy Team  
Brentwood Borough Council  
Town Hall  
Brentwood  
Essex, CM15 8AY

Dear Sir/Madam

**Brentwood Borough Council Local Development Plan January 2016**

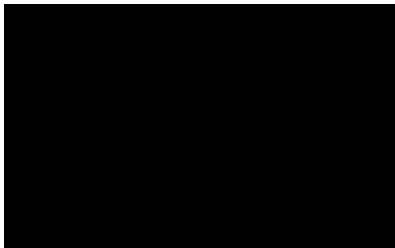
AECOM are acting as planning agent on behalf of Crest Nicholson PLC in respect of land West of Basildon within the area related to Policy 7.1 in the draft Local Plan (site reference 200). Attached to our detailed representations is a Site location plan showing Crest Nicholson's land interests within the allocation for Dunton Hills Garden Village.

Our client strongly supports the allocation of this land. Our representations set out a series of comments and suggested amendments based upon the draft Local Plan (see overleaf).

We would welcome a meeting with Brentwood officers and Essex County Council Highways Authority to discuss the content of our submission as the plan evolves prior to Publication Consultation (under Regulation 19).

If you have any queries please do not hesitate to contact me.

Yours faithfully,



**David Carlisle**  
**Principal Planner, AECOM**



## Local Plan Representations

In general, our client supports the approach set out in the draft Brentwood Local Development Plan which seeks to direct development to the A127 corridor and allocate land at Dunton Hills Garden Village. The below detailed comments address elements of the plan that are of interest to our client and their land interest in the South East of the Borough.

### Policy 5.2: Housing Growth

The plan makes provision for 7,240 new residential dwellings (net) to be built in the Borough over the Plan period 2013-2033 at an annual average rate of 362 dwellings per year distributed as follows:

	Net homes	%
Completions 2013/14 & 2014/15	383	4%
Extant permissions (April 2015)	444	6%
Permitted development allowance since April 2015	300	4%
Urban areas (brownfield)	1,296	18%
Brownfield land in Green Belt	97	1%
Strategic Site	2,500	35%
Greenfield urban extensions in Green Belt	1,292	18%
Windfall allowance	928	14%
<b>Total</b>	<b>7,240</b>	<b>100%</b>

Our client supports the principle of development on land designated as a Strategic Site in Policy 7.1 (Dunton Hills Garden Village). The plan notes that this allocation will make up 35% of the total housing development pipeline for the Borough. Our client's site is capable of delivering approximately 200-250 new homes at a density of between 30-35 dwellings per hectare. This would result in a form of development consistent with the Borough's character and related policies for residential density (Policy 7.1) and design (Policies 10.4, 10.5 and 10.6). Development on our client's site would represent almost 10% of supply for the entire Strategic Site. To deliver this level of growth over the plan period Policy 7.1 must be flexible and allocate sufficient land for the plan period.

The area shown in the Site Location Plan (Drawing No: 01 – appended to this representation) shows our client's land interests in this part of the Borough. We request that the next iteration of the plan (and allocation policy) takes account of the sites potential to deliver a substantial number of homes which will contribute to the Borough's five year supply of housing in the early years of the plan period. Our client's ability to comprehensively plan and deliver this development adjoining site H10a in Basildon Council's draft Local Plan would be prejudiced without this land included as part of an allocation. The site utilises existing field boundary/hedgerows/woodland blocks as logical defensible boundaries for the allocation.

As per the definition in footnote 11 of National Planning Policy Framework ('NPPF'), our client's land is available now, offers a suitable location for development now, and is clearly achievable with a realistic prospect that housing will be delivered on the site within five years. There is a clear demand for residential-led development in this location and we support the Borough's overall spatial strategy for growth. This approach is also encouraged by paragraph 52 of the NPPF which promotes comprehensive extensions to existing towns:

*The supply of new homes can sometimes be best achieved through planning for larger scale development, such as new settlements or extensions to existing villages and towns...Working with the support of their communities, local planning authorities should consider whether such opportunities provide the best way of achieving sustainable development...*

Paragraph 7.5 of the plan recognises that: “development of this size allows the necessary critical mass to provide for local services and infrastructure that otherwise could not come forward with several smaller sites”. We would urge the Borough to consider our client’s site as an integral part of the redevelopment of this wider area within the A127 corridor.

A key test of soundness in the NPPF is the requirement for plans to be positively prepared (paragraph 182). Related to this the NPPF (paragraphs 14 and 157) require plans (and their allocations) to be flexible (our emphasis):

*14. At the heart of the National Planning Policy Framework is a presumption in favour of sustainable development, which should be seen as a golden thread running through both plan-making and decision-taking.*

*For plan-making this means that:*

- *local planning authorities should positively seek opportunities to meet the development needs of their area;*
- *Local Plans should meet objectively assessed needs, with sufficient flexibility to adapt to rapid change;*

*157. Crucially, Local Plans should:*

- *plan positively for the development and infrastructure required in the area to meet the objectives, principles and policies of this Framework;*
- *allocate sites to promote development and flexible use of land, bringing forward new land where necessary, and provide detail on form, scale, access and quantum of development where appropriate;*

By including this site in the final allocation, in alignment with our clients land interests, greater flexibility will be built into the allocation and the plan as a whole.

Paragraph 7.9 confirms that the Borough will continue to work with adjoining authorities via the Duty to Cooperate, including consideration of growth “along the wider A127 Corridor as well as proposed development to the Brentwood border in Basildon”. It is not clear from publicly available materials produced by the Borough or Basildon as to whether either Borough has been requested to meet any neighbouring Council’s objectively assessed housing need (via the Dunton Hills Garden Village/West of Basildon sites). It is apparent that Dunton Hills Garden Village is being pursued separately as an independent settlement with the strategy focused on protecting the character of villages within Brentwood, but it is unclear how this approach will integrate with Basildon’s plans for site H10.

The South Essex Strategic Housing Market Assessment (‘SHMA’) is due to report around the same time as Part 2 of Brentwood’s SHMA. Both are key documents for each Borough’s Local Plan evidence base and our client would welcome an early discussion with officers to understand how the final results may inform the Dunton Hills Garden Village policy and future Duty to Cooperate discussions regarding housing numbers/types. At present there appears to be little coordination in the drafting of Policy 7.1 and Policy H10/E7 (in Basildon’s draft plan) up to this point. For such a key growth area we feel it is important that each emerging policy is prepared reflective of the aspirations on each side of the Borough boundary. This should include robust impact modelling that takes account

of the proposed growth in each Borough and integrated infrastructure planning. Paragraph 14 of the NPPF emphasises a presumption in favour of sustainable development, to achieve a sustainable solution for the land West of Basildon the two allocations will need to be planned in a comprehensive fashion.

Policy 7.1: Dunton Hills Garden Village

Policy 7.1 states that a new Borough village will be brought forward within the A127 Corridor at Dunton Hills and that a Masterplan will be produced to agree the form, mix and siting of development, to form part of the Brentwood Local Development Plan. Our client is supportive of this approach and would welcome early involvement in this exercise.

Paragraph 7.6 recognises that the site lies within Green Belt and that Dunton Hills has the potential to provide a comprehensively planned development (thus restricting urban sprawl elsewhere in the Borough). The wider boundaries of the development (A127, A128, railway line) are cited as providing defined physical features which have the potential to limit the potential for future unrestricted urban sprawl and deny any merging with nearby settlements. Our client's site is well screened offering potential for a well contained development with the potential to be feathered into the wider landscape. Our clients land interest in the site does not serve a purpose for Green Belt and its function as Green Belt would be further diminished with development on H10a within Basildon.

Paragraph 7.7 states that the final boundaries will be defined by a separate Masterplan to form part of the Brentwood Local Development Plan. It is unclear as to whether officers plan to remove land from the Green Belt at this stage or are reliant upon a future DPD to be informed by a Masterplanning exercise. Policy 9.12: (Site Allocations in Green Belt) states: *"These sites will be de-allocated from Green Belt to allow development to take place and provide new defensible boundaries to protect open countryside for future generations. The extent of development at Dunton Hills Garden Village will be de-allocated from Green Belt, to be set by a separate Masterplan for the garden village."*

Our client's view is that the Local Plan should inform the Masterplan (and vice versa) and we would urge the Borough to remove land from the Green Belt via the Local Plan now including land that falls outside of the "development footprint" where it accords with NPPF policy in paragraph 85 (our emphasis):

*85 When defining boundaries, local planning authorities should:*

- *ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development;*
- *not include land which it is unnecessary to keep permanently open;*
- *where necessary, identify in their plans areas of 'safeguarded land' between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;*
- *make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following a Local Plan review which proposes the development;*
- *satisfy themselves that Green Belt boundaries will not need to be altered at the end of the development plan period; and*
- *define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.*

Basildon plan to remove land from the Green Belt for development during the plan period (Site H10a) and safeguard additional land to the south of this allocation (Site H10b). The two Boroughs will need to liaise to ensure alterations are complementary and represent sustainable development in accordance with paragraph 84:

*84 When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development. They should consider the consequences for sustainable development of channeling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Green Belt or towards locations beyond the outer Green Belt boundary.*

The NPPF provides clear guidance at paragraph 83 that Green Belt boundaries should only be altered in exceptional circumstances, through the preparation or review of the Local Plan. Local planning authorities should have regard to their intended permanence in the long term, so that they should be capable of enduring beyond the plan period. In addition, paragraph 153 states that: “*Any additional development plan documents should only be used where clearly justified*”.

The *Assessment of Potential Housing, Employment and Mixed Use Sites in the Green Belt and their Relative Contribution to the Purposes of the Green Belt Designation* (March 2016) found that the whole site had received a High overall assessment rating, however, we would urge the Borough to break the site down into smaller assessment parcels to allow for a finer grain nuanced assessment of openness and performance against the five purposes of the Green Belt. The Masterplan can then utilise this evidence and help to inform strategic decisions on what constitutes ‘sustainable patterns of development’ for this area of the Borough. The Local Plan should include the alterations to the Green Belt and not a later Development Plan Document. Our client would welcome the opportunity to be involved in a more detailed analysis of the Green Belt at Dunton Hills, including consultation on the proposed methodology.

#### Settlement Category 2: Village Service Centres

The draft Local Plan states that Dunton Hills Garden Village will create a new self-sustaining village with provision of new schools alongside retail and health facilities, and so this is likely to result in the new settlement being brought into category 2 of the settlement hierarchy. Paragraph 8.4.8 cites Ingatestone<sup>1</sup> as an example of a category 2 Village Service Centre. A centre of the scale of Ingatestone will need to be considered in the context of the facilities and services also being proposed for the West Basildon Urban Extension (H10) to ensure new local centres within the A127 corridor are complementary. The masterplan exercise can begin to address topics of this nature but the Local Plan will need to set employment land and retail floorspace requirements. Policy 5.4 (Retail and Commercial Leisure Growth) states that new local retail provision will also accompany mixed-use development at Dunton Hills and para 5.77 recognises that new retail provision will need to complement rather than compete directly with the existing local shops. This principle should apply to planned and existing centres in Basildon also.

#### Policy 7.2 Housing Mix, Types and Tenures

The policy states that developments of 100 or more dwellings will be expected to provide a minimum of 5% self build properties. The area for determining whether this policy applies will be the whole original site. The plan states that the policy will allow for the final housing mix, type and tenure to be subject to negotiation including consideration of development viability. This proposed policy will need to be looked at again in the context of the Housing and Planning Bill (once enacted) to assess if it remains deliverable in light of Starter Homes, the definition of affordable housing and permission in principle/brownfield register provisions.

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<sup>1</sup> Ingatestone = A district shopping centre with a good range of jobs, community and health facilities, Ingatestone currently provides the second category in the hierarchy. As the Borough’s largest village, facilities here serve a significant catchment beyond the immediate area. Public transport accessibility is relatively good. The village has a rail station and secondary school.

### Policy 7.8: Housing Space Standards

As well as self-build and specialist housing policies (Policy 7.2), the draft plan includes a requirement to apply the Nationally Described Space Standard. The NPPF permits the adoption of these optional standards provided a need can be demonstrated and it can be shown that viability has been taken into account. The Planning Practice Guidance ('PPG') website covers how local planning authorities should establish need for the internal space standards<sup>2</sup>:

*Where a need for internal space standards is identified, local planning authorities should provide justification for requiring internal space policies. Local planning authorities should take account of the following areas:*

- **need** – *evidence should be provided on the size and type of dwellings currently being built in the area, to ensure the impacts of adopting space standards can be properly assessed, for example, to consider any potential impact on meeting demand for starter homes.*
- **viability** – *the impact of adopting the space standard should be considered as part of a plan's viability assessment with account taken of the impact of potentially larger dwellings on land supply. Local planning authorities will also need to consider impacts on affordability where a space standard is to be adopted.*
- **timing** – *there may need to be a reasonable transitional period following adoption of a new policy on space standards to enable developers to factor the cost of space standards into future land acquisitions.*

Paragraphs 7.70-7.72 set out the Borough's rationale but this does not address the evidence requirements from the PPG that requires evidence on properties currently being built, the potential impact on demand for starter homes and the potential impact on land supply and viability. Without this evidence base the policy should not be applied across all housing types be it market housing, affordable housing, specialist accommodation or starter homes. It is likely to impact the viability of our client's site but affordability is also an issue, as is the need to ensure that there is proper mix of provision that delivers across a whole variety of different needs. Whilst the policy states this policy will be subject to viability, the NPPF requires local planning authorities to assess for viability at the plan making stage (paragraphs 173-174).

### Policy 7.10: Gypsy and Traveller Provision

The policy states that Dunton Hills Garden Village is identified as a broad location for future provision to be planned in an integrated way as part of a mixed use development. Provision will be made for 20 pitches as part of this strategic allocation. We would request that this land is not considered in locations adjacent to market housing identified for the site.

### Policy 10.1: Sustainable Transport

Paragraph 7.8 recognises that further highways work needs to be undertaken with the Highways Authority and Highways England to determine opportunities to improve capacity and traffic flow. Our client, and their appointed transport consultants, would welcome the opportunity to cooperate with the Borough and the Highways Authority on future modelling.

The policy states that developer contributions will be sought to improve links from new development to key destinations and the wider network. This will include new or improved infrastructure, services and promotion to support walking, cycling and public transport, including Quality Bus Partnerships.

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<sup>2</sup> PPG Paragraph: 020 Reference ID: 56-020-20150327

<http://planningguidance.communities.gov.uk/blog/guidance/housing-optional-technical-standards/internal-space-standards/>

Sustainable travel will also be encouraged through the requirement for residential travel plans and packs for major developments, employers and institutions, including provision of charging points for electric vehicles. Our client would support a comprehensively planned solution to the movement network in this area and the proposed Masterplan should include improved east-west links as a key principle. It's currently envisaged that the principal access would be off the A128 but new links to H10a and H10b could be provided as alternative access points to the development.

Any development within Brentwood to the west of Basildon (east of West Hordon) at Dunton Hills needs to be connected to both the east and west. It is vital that any development in this area is fully integrated across the Borough boundary which in transport terms is an arbitrary distinction. To be sustainable a new residential-led development would need to be linked in terms of sustainable transport modes, walking, cycling and public transport. This allows links to local facilities such as schools, shops and community facilities across the areas within both Brentwood and Basildon.

Bus services would be more viable given that they would be servicing a greater number of residential units and could be both local services and longer distance routes to both the main and other towns. Ensuring that the development would support a range of bus services ensures that the site is consistent with the requirements of the draft plan as the site will be well served by public transport.

Including ancillary facilities on the site such as schools, shops and community facilities, as well as employment opportunities, ensures that transport demand is minimised as far as possible and then providing alternative modes of transport to the private car reduces vehicular demand to minimise the impact on the surrounding highway network.

In vehicular terms having an access onto both the A128 Tilbury Road to the west and to the B148 West Mayne would ensure that traffic from the development would be able to access both to the east and west which spreads traffic and offers two alternative connection routes to the A127 strategic route. Given that the most significant employment opportunities within the immediate area of the site are to the east of the site it is important to provide connections in this direction.

Policy 10.8 Open Space in New Development

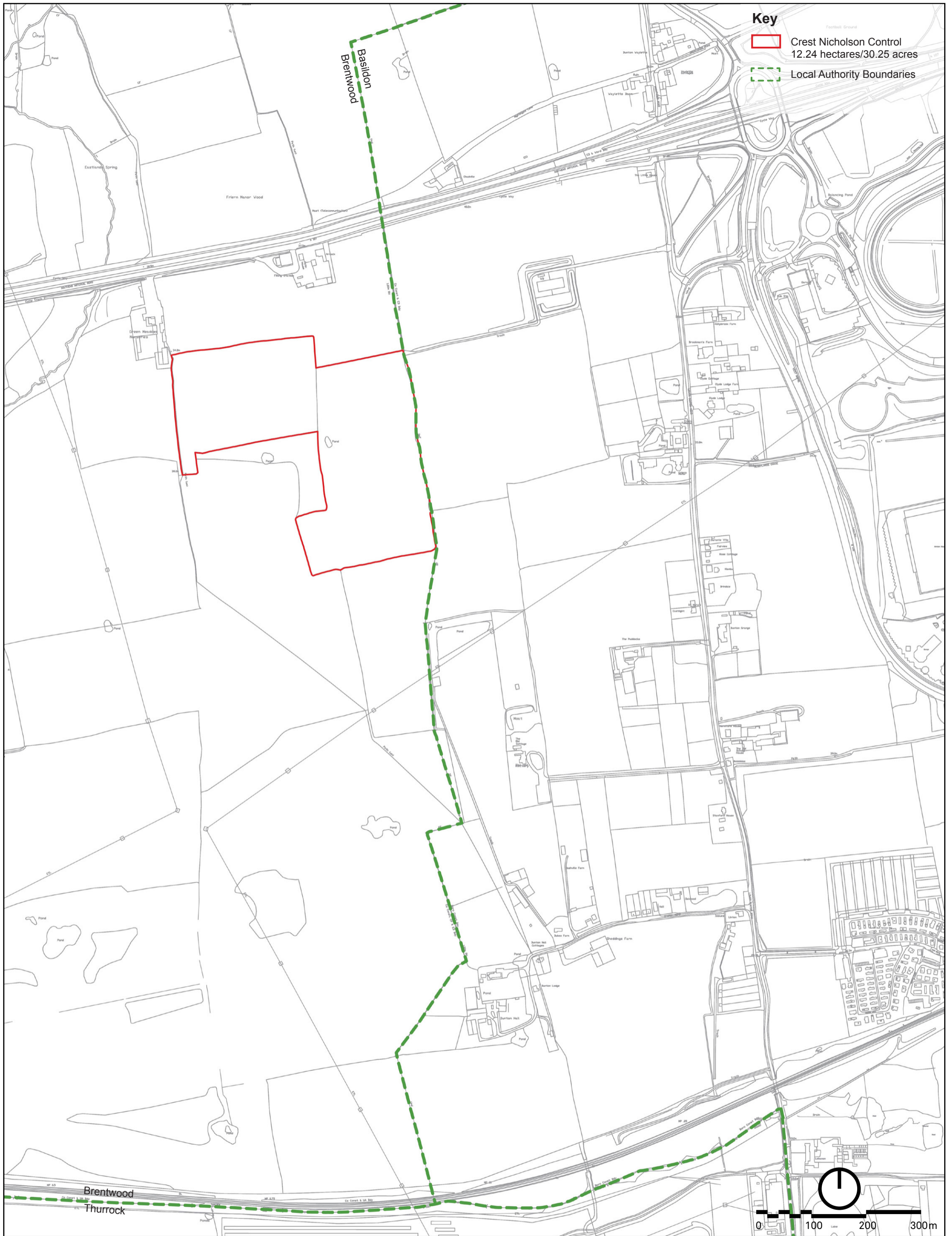
New development proposals are expected to provide functional onsite open space and/or recreational amenities or where appropriate, financial contributions towards new or improved facilities nearby. The policy states that the amount and type of provision required will be determined according to the size, nature and location of the proposal; quantity and type of open space needed; and existing provision accessible to the proposal.

<b>Outdoor Sport</b>	3.15 ha per 1000 population
<b>Children's Playing Space</b>	Between 0.13 – 0.17 ha per 1000 population
<b>Allotments and Community Gardens</b>	0.18 per ha per 1000 population

It is not clear if the open space standards (above) include for semi natural space and playing pitches. It is also unclear if these standards have been fed into the Borough's viability modelling for the site i.e. whether the land take has been factored into the net developable area assumptions for this strategic greenfield site. Nor is it clear what evidence these standards are based upon, the most up to date open space study is from February 2008 which cannot be considered up to date and robust. When the Borough updates their viability evidence our client would request early consultation on this work so that realistic assumptions can be fed into the modelling.

To conclude, our client is generally supportive of the plan and its spatial strategy. However, we would urge officers to consider the more detailed points made in our representations to ensure the plan remains flexible and helps to facilitate development.





# Dunton Hills

**Title:** Site Location Plan  
**Project No:** 60470518  
**Date:** 23 March 2016

**Drawing No:** 01  
**Drawn by:** GV

**Client:** Crest Nicholson  
**Revision:** 000  
**Checked:** MH

**Scale:** 1:6,000@A3  
**Approved:** MH

