

DUNTON HILLS

BRENTWOOD

Representations to Brentwood Borough Council
Draft Local Plan, January 2016

Green Belt and Landscape

March 2016



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Dunton Hills,
Brentwood

Green Belt and
Landscape
Representations –
Technical Report

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Section 1: Introduction, Scope and Purpose

- 1.1. Tyler Grange have been appointed by CEG Land Promotions Ltd (CEG) to provide advice on landscape and Green Belt matters to support the promotion of land at Dunton Hills Farm (the Site) within the emerging Brentwood Local Plan.
- 1.2. Land at Dunton Hills is proposed within the Draft Local Plan, 2016 (the DLP) for a housing- led allocation for the development of a new self-sustaining Garden Village (Dunton Hills Garden Village) to deliver: 2,500 homes, open green spaces, employment land, local shops, community facilities, schools and healthcare facilities.
- 1.3. This technical report has been prepared to support representations being made to the Local Plan on behalf of CEG, and considers the soundness of the Plan in respect of Green Belt and landscape matters of relevance to the proposed Dunton Garden Village.
- 1.4. Reference is made to the 'Concept Masterplan' throughout this report. This is contained within the 'Community and Well-being' representations prepared by Broadway Malyan.
- 1.5. At paragraph 182, the NPPF requires local planning authorities to submit Local Plans for examination which it considers to be 'sound', namely that they are:
 - ***“Positively prepared*** – *the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;*
 - ***Justified*** – *the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;*
 - ***Effective*** – *the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and*
 - ***Consistent with national policy*** – *the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.”*
- 1.6. The assessment has included the following stages:
 - Review of the Spatial Strategy and Spatial Objectives of the DLP to meet objectively assessed need, including consideration of Green Belt release;
 - Review of reasonable alternatives within the A127 Corridor Growth Area;
 - Assessment of the sustainability credentials of the Site, with reference to the Interim Sustainability Appraisal and supporting evidence base (Green Belt Review); and
 - Assessment of Local Plan policies of particular relevance to the proposed Dunton Garden Village in relation to landscape and Green Belt considerations, to ensure their consistency with the NPPF and the Councils proposed spatial strategy.



- 1.7. When assessing the consistency of the DLP with the NPPF, reference is made to the sustainability credentials of the site, as assessed by the Interim Sustainability Assessment, 2016¹ and the supporting evidence base, including the Council's Working Draft Green Belt Review.²

¹ Sustainability Appraisal (SA) of the Brentwood Local Plan – Interim SA Report, February 2016

² Brentwood Borough Council – 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 – Working Draft, 01 March 2016



Section 2 – Review of Draft Local Plan Spatial Strategy: Green Belt Release

- 2.1. When considering whether a Local Plan has been positively prepared, it is necessary to ensure that any allocations are based on a strategy that seeks to meet objectively assessed need and infrastructure requirements. This should include the drawing-up of a Spatial Strategy that sets-out the Local Planning Authority's approach to delivering sustainable development throughout the plan area.
- 2.2. This may be based on assumptions such as a preference for development to be delivered within urban areas before looking beyond this to urban edge locations, existing villages and new settlements. The spatial strategy could also be driven by factors such as proximity to transport infrastructure, services and areas of employment.

Presumption in Favour of Sustainable Development

- 2.3. The National Planning Policy Framework (NPPF) is centred on the presumption in favour of sustainable development which should be followed by Local Plans and reflected by their Policies. At paragraph 14, the NPPF states that, for local plan making, this means:

“local planning authorities should positively seek opportunities to meet the development needs of their area.”

- 2.4. When considering Plan Making, the NPPF states at paragraph 151 that:

“Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. To this end, they should be consistent with the principles and policies set out in this Framework, including the presumption in favour of sustainable development.”

- 2.5. Building on this, paragraph 152 goes on to state that:

“Local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three.”

- 2.6. Paragraph 152 therefore makes it clear that none of the dimensions of sustainable development is of greater significance than the other or to be given more weight when identifying a spatial strategy or seeking to identify and assess potential sites within a plan.

- 2.7. More specifically, at paragraph 157, the NPPF gives regard for the need to plan positively for sustainable development, stating that it is critical for Local Plans to:

- *“Indicate broad locations for strategic development on a key diagram and land-use designations on a proposals map;*



- *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.*

Green Belt and Sustainable Development

2.8. The NPPF states at paragraph 84 that:

“When drawing up or reviewing Green Belt boundaries local planning authorities should take account of the need to promote sustainable patterns of development.”

2.9. Paragraph 84 goes on to consider that:

“They should consider the consequences for sustainable development of channelling development towards urban areas inside the Green Belt boundary, towards towns and villages inset within the Greenbelt and towards locations beyond the outer Green Belt boundary.”

2.10. The contribution that land makes to Green Belt purposes is therefore only part of the wider consideration of the broader social, economic and environmental roles of sustainability.

2.11. Considering the above matters, there is therefore a balance to be struck between protecting those areas that are of the greatest importance to the function and purposes of the Green Belt and releasing land that enables sustainable development that meets objectively assessed needs.

2.12. It is the role of the wider evidence base to inform the identification of which of the reasonable alternatives may be best to accommodate the required development through the assessment of impacts upon sustainability and the Green Belt purposes.

Brentwood Borough Council Draft Local Plan - Spatial Strategy and Strategic Objectives

2.13. The Draft Spatial Strategy set-out in the DLP seeks to protect and enhance the Borough’s distinct local character, whilst focussing sustainable growth on land within transport corridors. This approach is consistent with that taken by the Council in the previous Strategic Growth Options Consultation in 2015.

2.14. The Spatial Strategy responds to the lack of existing urban and brownfield land and resulting need for Green Belt land to be released for development to meet the objectively assessed need for both housing and employment. The strategy has considered land uses sequentially, identifying sites within urban areas to retain the character of the Borough and focus development in sustainable transport corridors before considering release of the Green Belt.

2.15. Within the Green Belt, consideration has been given to the following sequential approach:

- Brownfield sites comprising previously developed land adjoining existing urban areas;
- Strategic sites to deliver large-scale development that provide self-sustaining communities with new infrastructure, services and facilities; and



- Urban extensions with defensible boundaries, such as roads or railways to prevent further sprawl.
- 2.16. In addition to identifying rural areas to the north and south of the Borough, two main areas for growth are identified within the A12 Corridor, including Brentwood and Shenfield, and the A127 Corridor to the south of the Borough. There are two proposed strategic allocations within the A127 Corridor, comprising an employment allocation at the M25 Junction 29 (Brentwood Enterprise Park) and Dunton Garden Village.
- 2.17. Policy 5.1 of the DLP summarises the Spatial Strategy, stating that:
- “To meet local needs fully there will be limited release of Green Belt for development within transport corridors, in strategic locations to deliver self-sustaining communities with accompanying local services, and urban extensions with clear defensible physical boundaries to avoid further sprawl and provide development swiftly.....*
- All development sites will be identified having regard to whether 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; and*
 - c. are likely to come forward in the plan period.”*
- 2.18. The Draft Local Plan has adopted a sequential approach to identifying sites, focussing growth on urban areas and transport corridors, and taking a proportionate when identifying release of Green Belt land in sustainable locations to meet local needs, and where there are defensible boundaries to avoid further urban sprawl.
- 2.19. Strategic sites, including at Dunton Garden Village, are identified in order to meet the strategic objectives of the Local Plan, whilst allowing for new development to deliver the required services and infrastructure to support the development.
- 2.20. This approach to identifying sustainable development is sound and in line with the requirements of the NPPF.
- 2.21. Having identified that the Spatial Strategy is sound in its approach to delivering sustainable development to meet objectively assessed need, this report also considers how the land at Dunton Hills performs in relation to Green Belt and landscape as part of the wider sustainability criteria.
- 2.22. In order to do this, reference is made to the Interim Sustainability Appraisal (2016) and the associated evidence base prepared by the Council. Further consideration is also given to the Draft DLP Policies that deal with landscape and Green Belt in Section 6 of this report.



Section 3 – Review of Reasonable Alternatives in the A127 Corridor

Dunton Garden Village

3.1 When considering the creation of sustainable communities, the DLP identifies Dunton Garden Village as a Strategic Housing-led Development that will meet a significant proportion of the Borough's housing need whilst providing supporting services and facilities. As set-out above, this fits with the Council's Spatial Strategy.

3.2 DLP Policy 7.1: Dunton Hills Garden Village states that:

"The Council will work in partnership with the local community and other stakeholders to bring forward a new Borough village for the 21st Century within the A127 Corridor at Dunton Hills. Applying garden village principles, a new self-sustaining community will be created providing for 2,500 new homes, at least 5 hectares of employment land, local shops, community facilities, open green spaces, schools and healthcare services.

A Masterplan will be produced to agree the form, mix and siting of development, to form part of the Brentwood Local Development Plan."

Release of Green Belt and New Boundaries

3.3 As set-out at paragraph 85 of the NPPF, when defining new Green Belt boundaries within a Local Plan, local planning authorities should:

- *"ensure consistency with the Local Plan strategy for meeting identified requirements for sustainable development; and*
- *define boundaries clearly, using physical features that are readily recognisable and likely to be permanent."*

3.4 As considered in Section 2 above, Dunton Garden Village fits with the spatial strategy of sustainable strategic self-sustaining development within the A127 corridor.

3.5 In addition to the proposed Dunton Garden Village being able to provide for significant amount of local housing and employment need and associated infrastructure and facilities, the supporting text to Policy 7.1 recognises that:

"Most importantly, this mixed-use development can be achieved in a sustainable manner in line with the spatial strategy and national policy and guidance. Although the site lies within Green Belt, development here can contribute to Green Belt purposes, such as restricting urban sprawl. The wider boundaries of the development are clearly defined physical features (A127, A128, railway line), which limit the potential for future unrestricted urban sprawl and deny any merging with nearby settlements." (paragraph 7.6)

3.6 The masterplan that will form part of the Brentwood Local Development Plan will define the permanent Green Belt boundaries, ensuring that they are recognisable and defensible boundaries that are in keeping with the landscape character. This is



in accordance with the NPPF when releasing Green Belt land and redrawing the Green Belt (paragraph 85).

- 3.7 As demonstrated on the Concept Masterplan, there are opportunities for the existing defensible boundaries along the A127, A128 and railway line to be supplemented with additional native landscape buffer planting to further strengthen and define the boundaries, whilst containing development and ensuring both physical and visual separation with neighbouring settlements and the wider countryside.
- 3.8 The planting of buffers along these boundaries reflect the management guidelines as set-out in the Mid Essex landscape Character Assessment (September 2006) that forms part of the DLP Evidence Base. Guidelines for the Horndon Fenland Landscape Character Area within which the A127 Corridor Growth Area is situated include the following:
- *“Seek ways to mitigate the visual impact of the railway and A127 corridor through introducing new and strengthening existing parallel shelterbelts where appropriate; and*
 - *Introduce new woodland planting in the form of shaws and copses, as well as hedgerow trees.”*
- 3.9 In addition to the strengthening of the existing boundaries formed by the roads and railway, there is also the potential for the existing field boundaries and woodland that bound the proposed allocation site at Dunton Garden Village to be enhanced through the planting of shaws and copses, as well as enhancements to hedgerows and planting of trees. These would form a recognisable, robust and defensible new Green Belt boundary that is in keeping with the landscape character.

Land at West Horndon

- 3.10 Within the Brentwood Strategic Growth Options Consultation in 2015, both Dunton Garden Suburb and land around West Horndon Village were identified as reasonable alternatives for the delivery of strategic allocations within the A127 Corridor growth area. The DLP recognises that, whilst land around West Horndon may be a reasonable alternative to Dunton Garden Village, it would not meet with the spatial strategy. This is set-out at paragraph 7.10 of the DLP which states that:

“Land around West Horndon village remains a reasonable alternative because it can provide for similar development numbers towards local needs. However, it has not been selected as a preferred site in this Draft Plan owing to the impacts on the existing village, which would not be consistent with the emerging spatial strategy. It has also been considered that proposed redevelopment within West Horndon village will bring forward significant residential development, altering the character of the village but utilising brownfield land. Further development of Green Belt surrounding West Horndon is deemed disproportionate when considering the size of the existing village and how this fits with the spatial strategy for our Borough of villages.”

Dunton Garden Suburb

- 3.11 The DLP also acknowledges the possibility for a larger area of land at Dunton Hills to be developed as ‘Dunton Garden Suburb’. This would include additional land within



Basildon Borough between Basildon and the boundary with Brentwood Borough being released from the Green Belt. Paragraph 7.9 of the DLP states that:

“Work will continue with adjoining authorities and other bodies as part of the Duty to Cooperate. This includes consideration of growth along the wider A127 Corridor as well as proposed development to the Brentwood border in Basildon.”

- 3.12 The release of land to the east of the Dunton Garden Village allocation to form a Garden Suburb would continue to meet with the aspirations of the Brentwood DLP spatial strategy by focussing strategic growth within the A127 corridor.
- 3.13 Whilst no longer a standalone settlement in spatial terms, the Garden Suburb would act as an extension to Basildon and would remain contained from the wider Green Belt and countryside by the A127, A128 and railway line. There would also be the opportunities to provide combined Green Infrastructure, including open space and landscape mitigation to ensure a cohesive masterplan that responds to the local and landscape context.



Section 4 – Brentwood Sustainability Appraisal and Evidence Base

- 4.1 This section considers the Council's Evidence Base that supports the DLP, including the assessment of the performance of the Dunton Garden Village Strategic Site in relation to both Green Belt and Landscape, both of which form part of the sustainability credentials to be considered when identifying the suitability of land for allocation within the emerging Local Plan.
- 4.2 Reference is made to the Interim Sustainability Appraisal, 2016³ (the SA) and Working Draft Brentwood Green Belt Review, 2016⁴ (the Review). Whilst it is understood that Brentwood Borough Council are preparing a Landscape Capacity Study, at the time of writing this has not been published.

Findings of the Interim Sustainability Appraisal of the Brentwood Local Plan, 2016

- 4.3 The Council appointed AECOM to undertake a Sustainability Appraisal of the DLP. The Interim Sustainability Appraisal Report, 2016 undertakes a high level assessment of the Site Options and Spatial Strategy Alternatives in order to identify any likely significant effects of implementing the plan and reasonable alternatives.
- 4.4 Reasonable alternatives in the A127 Corridor have been assessed against a range of Sustainability Topics and objectives, including for landscape. The SA identifies a number of reasonable alternatives to be appraised, including at Dunton Hills Garden Village within the A127 Corridor Growth Area (Option 1).
- 4.5 Since the publication of the SA, the Council have published a Working Draft Green Belt Review that forms part of the evidence base for the DLP. It is understood that the Council have also undertaken a Landscape Capacity Study, which has yet to be published. Matters relating specifically to Landscape and Green Belt are considered in more detail in **Section 5** of this report, with reference to the Concept Masterplan for the proposed development at Dunton Garden Village.

Appraising Reasonable Alternatives

- 4.6 The SA includes an appraisal of six reasonable alternatives, including West Horndon and Dunton Garden Village within the A127 Corridor Growth Area. The primary conclusion drawn from the appraisal is that:

³ Sustainability Appraisal (SA) of the Brentwood Local Plan – Interim SA Report (February 2016)

⁴ Brentwood Borough Council 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, - WORKING DRAFT (March 2016)



“... in terms of the majority of objectives, a strategic allocation at one or either of the A127 locations (West Horndon or Dunton Hills Garden Village) is to be supported.” (SA Table 7.2)

- 4.7 The table shows Dunton Garden Village as having the potential for ‘significant’ landscape effects, although it is acknowledged that there is a need for much further work to investigate the issues.
- 4.8 The findings in relation to the Landscape Topic, which also includes Green Belt considerations, are considered below, with reference to both the summary assessment (Part 2 of the SA) and more detailed appraisal (Appendix III of the SA).

Landscape Sustainability Topic - Summary Assessment

- 4.9 When appraising the DLP, the SA provides a commentary on the spatial strategy, other policies and an appraisal of the DLP in relation to each Sustainability Topic. These are considered below for the proposed Dunton Garden Village in relation to the landscape topic. Whilst not a landscape designation, this also includes Green Belt.

Commentary on the spatial strategy

- 4.10 The SA acknowledges that there are no important designated landscapes within the borough, but identifies that approximately 89% of the borough is designated as Green Belt.
- 4.11 The SA recognises that the DLP identifies urban extensions within the A12 corridor and Dunton Garden Village in the A127 Corridor, considering that these greenfield allocations are necessary given the limited availability of available or deliverable brownfield sites.
- 4.12 With regard to Dunton Garden Village, the findings of the SA are summarised at paragraph 18.1.3, which states that:
- *There are clearly landscape sensitivities, with consultees (notably Thurrock Council) suggesting the potential for impacts to valued landscapes, and loss of Green Belt that serves a clear purpose (particularly in the sense of preventing coalescence and / or sprawl);*
 - *It is anticipated that there will be good potential to avoid / mitigate effects; however, there is some uncertainty and a need for further work to examine options; and*
 - *It is noted that; whilst there is the potential to make use of some clearly defined physical features (A127, A128, railway line), it may be a challenge to ensure a defensible long term boundary separating the Garden Village from west Basildon (where there is a planned urban extension).*

Commentary on other policies

- 4.13 The SA recognises at paragraph 18.1.6 that Policies 9.1, 9.3 and 9.10 will help to protect and enhance the Borough’s rural landscapes and their distinctiveness.



- 4.14 This report considers each of the DLP policies that are of particular relevance to the landscape issues associated with the Dunton Hills Garden Village strategic site allocation in Section 6.

Analysis of the draft plan as a whole

- 4.15 At paragraph 18.1.17, the SA states that:

“Brentwood Borough is heavily constrained from a landscape perspective, and in this context it is likely that the preferred strategy goes as far as it can to minimise impacts.”

- 4.16 Whilst acknowledging that the preferred strategy has evolved and responded to concerns, especially in relation to West Horndon, the SA considers it appropriate to flag the potential for significant negative landscape effects given the uncertainty that remains regarding Dunton Hills Garden Village.

- 4.17 It is taken that the uncertainty regarding Dunton Garden Village may relate to the general nature of the assessment being made and assumptions about the scale of development. As discussed further below, the proposals at Dunton Garden Village shown on the Concept Masterplan allow for the sensitive development of the site to respond to the landscape and Green Belt context, containing development and conserving distinctive landscape features.

Spatial Strategy Alternatives Appraisal (SA Appendix III)

- 4.18 The full appraisal of the Landscape Sustainability Topic is contained at Appendix III of the SA. The appraisal identifies the potential for significant landscape and / or Green Belt effects arising from a strategic allocation in this location. A copy of the appraisal is included at **Appendix 1**.

- 4.19 The appraisal uses the conclusions drawn from the January 2015 Interim SA Report, considering that these ‘generally hold true at the current time’. At the time of writing the SA, no further studies had been undertaken. However, it is referenced that the analysis was based upon both the findings of the Mid Essex Landscape Character Assessment (2006) and the unpublished draft findings of work undertaken to examine landscape capacity and contribution to Green Belt purposes at select sites by Crestwood environmental Ltd. It is not stated which sites were covered by this unpublished work.

- 4.20 The appraisal was informed by an incomplete evidence base when establishing the baseline conditions. Combined with the high level nature of the options being considered, the methodology acknowledges that the ability to accurately predict effects is inherently challenging and limited by the understanding of the baseline. It is stated at paragraph 9.2.2 that:

“Every effort is made to predict effects accurately; however, this is inherently challenging given the high level nature of the policy approaches under consideration, and understanding of the baseline (now and in the future under a ‘no plan’ scenario) that is inevitably limited. Given uncertainties there is a need to make assumptions, e.g. in relation to plan implementation and aspects of the baseline that might be impacted. Assumptions are made cautiously, and explained within the text. The aim



is to strike a balance between comprehensiveness and conciseness/accessibility to the non-specialist.”

- 4.21 Dunton Garden Village is identified as impacting on a landscape with a ‘low’ capacity to accommodate development.
- 4.22 Without having sight of the landscape capacity work undertaken for the Council, it is not possible to provide comment on the findings in relation to the proposed allocation at Dunton Garden Village. The SA also references the Mid Essex Landscape Character Assessment 2006, which forms part of the DLP evidence base, as informing the assessment of potential landscape impacts.
- 4.23 The Dunton Hills Concept Masterplan demonstrates how development may be achieved that responds to the landscape context and respecting distinctive features and recognised sensitivities. This is considered further at Section 5 of this report.
- 4.24 Within the SA, comments received through the Growth Options consultation are referenced, including those made by Thurrock Council. These include the following:
- “Green Belt release along the A127 corridor in any of the proposed locations would result in harm to the openness and strategic function of the Metropolitan Green Belt. In this location the Green Belt prevents urban sprawl and prevents coalescence between Basildon and West Horndon.”*
- “The fenland area around the A127 has been recognised by the Thames Chase Heritage Lottery Fund as a ‘distinctive landscape character worth conservation’ and has been identified by the CPRE as a nationally significant area of tranquillity in the metropolitan greenbelt. The urban areas are set back from view by steep slopes. It is highly likely from the outcomes of landscape capacity studies that any development greater than discreet infill plots would significantly harm the landscape character... The larger fenland landscape character area would be affected by any further development. It is considered that development of the scale of the Dunton Garden Suburb or an extension east of West Horndon will significantly harm the open rural character of the broad fenland and the setting of rolling farmland and wooded hills of Thurrock.”*
- 4.25 The appraisal concludes that the Dunton Garden Village scheme may have the potential to allay some of the concerns that were raised during the Growth Options consultation in relation to the Garden Suburb scheme. It is noted that this is dependant of the location of the scheme, but there are no further details provided as to how the Garden Village scheme may be more appropriate.
- 4.26 Issues raised within the SA are addressed with reference to the Concept Masterplan for the development of Dunton Hills Garden Village in Section 5 of this report. This demonstrates how the sympathetic development of the site can ensure limited impacts on the function of the Green Belt, contained by strong defensible new Green Belt boundaries to prevent urban sprawl, merging of settlements and encroachment into the countryside, and which responds to landscape character and associated sensitivities.
- 4.27 Since the publication of the SA, a Working Draft Green Belt Review has been published. The findings of both the Landscape Character Assessment and Working Draft Green Belt Review are considered below.



Green Belt Evidence Base

Working Draft Brentwood Green Belt Review, 2016

- 4.28 The Council have published a Working Draft Green Belt Review of housing and employment sites. Whilst still at a Working Draft stage, the Review forms part of the Evidence Base to the DLP. The Review was prepared to assess the relative contribution that potential housing sites considered as part of the SHLAA and put forward during consultation on the emerging Local Plan make to the Green Belt purposes. It does not seek to make recommendations for the release of Green Belt land or review Green Belt boundaries.
- 4.29 The Review has assessed the majority of the land at Dunton Hills as making an overall 'High' contribution to Green Belt purposes. It should be noted that the Review acknowledges that Green Belt is only one of a range of sustainability criteria that need to be taken into consideration when allocating land.
- 4.30 Whilst Green Belt is just part of the wider sustainability criteria to be considered when allocating sites for development, the findings of the Review are flawed in material respects and, for example, fail to properly consider the strong boundaries to the Site, which serve to limit urban sprawl and the potential for merging of settlements.

Application of Assessment Methodology and Findings at Dunton Hills

Purpose 1 – to check the unrestricted sprawl of large built up areas

- 4.31 The assessment records that the relative contribution of the Site to purpose 1 is 'Not Contained', equating to a High contribution.
- 4.32 The assessment records incorrectly that there are no boundaries to the Site. To the contrary, the Site is bounded on three sides by strong, defensible boundaries, including the A127 to the north, the A128 to the west and the London-Southend railway line to the south.
- 4.33 By including these boundaries in the assessment and giving due weight to the important role that they play in preventing unrestricted sprawl, the relative contribution to this purpose should be reduced.

Purpose 2 – to prevent neighbouring towns merging into one another

- 4.34 The assessment records that the relative contribution of the Site to purpose 2 is 'Significant Separation Reduction', equating to a Medium contribution.

Interlying Physical Barriers

- 4.35 The assessment identified interlying physical barriers as being 'Unsubstantial but functional'. This is incorrect. The presence of the A128 between the Site and West Horndon is a 'strong barrier' as defined by the methodology. Indeed, the comments on the assessment sheet reflect this, stating that: "*Site does not extend to Basildon and A128 is significant barrier to West Horndon – physical coalescence cannot occur*".



Purpose 3 – To assist in safeguarding the countryside from encroachment

- 4.36 The assessment records that the Site makes a relative contribution of 'Functional Countryside', equating to a High contribution to this purpose.
- 4.37 The assessment is based on the land use being assessed as 'Typical 'Countryside' uses' and land cover as 'Natural / landscaping'.
- 4.38 This assessment does not take into account the presence of the following non-countryside development on the Site:
- Residential properties along the A128 and at Dunton Hills Farm; and
 - Dunton Family Golf Centre buildings, car park, driving range, wind turbine and associated access roads.
- 4.39 The Site lies adjacent to the A127, the A128 and the London to Southend railway line. The Ford centre on the edge of Basildon is a detracting feature on the skyline to the east, and the Site is crossed by numerous electricity pylons.
- 4.40 Considering the above, the assessment for the Site should be amended to reflect the existing built development and detractors within and adjacent to the Site, as well as the strong boundaries limiting encroachment into the wider countryside.

Revised Overall Assessment

- 4.41 As summarised above, the Review assesses the Site to make a High overall contribution to the Green Belt. Having identified significant errors with the methodology and interpretation of the criteria utilised within the Review it is considered that the Site should be re-assessed to reflect the strong boundaries and containment, as well as the separation with West Horndon and Basildon (both physical and visual) and the urban fringe context and partial development of the Site.
- 4.42 When correctly assessed, the contribution of the Site to Green Belt purposes is no more than land at West Horndon that is identified as a reasonable alternative within the A127 Corridor in the DLP.
- 4.43 The Review also stops short of recognising the role that these boundary features would have as forming a robust, defensible new Green Belt boundary preserve the function and openness of the wider Green Belt by checking urban sprawl, maintaining separation with West Horndon and preventing encroachment into the countryside.
- 4.44 As considered above, there is also the opportunity for the eastern boundary of the Site to be enhanced with characteristic woodland and s haws to provide a robust Green Belt boundary to provide physical and visual containment and maintain separation with Basildon.
- 4.45 Both the SA assessment and comments made by Thurrock Council fails to give due consideration to the function of defensible boundaries in forming new GB boundaries and restricting urban sprawl and preventing coalescence and merging with West Horndon.



Landscape Evidence Base

Mid Essex Landscape Character Assessment, 2006

- 4.46 Although the Council have appointed Crestwood Environmental Ltd to undertake a Landscape Capacity Study of selected sites across the Borough, the findings of this work have not been published and therefore cannot be considered as part of the DLP evidence Base at this time. The Mid Essex Landscape Character Assessment (LCA) forms part of the DLP evidence base, and has been used by the SA to assist in its appraisal. In addition to identifying the character and features of the landscape, the LCA also identifies sensitivities to change as well as landscape planning and management guidelines for each of the character areas. The LCA forms part of the evidence base to the DLP.
- 4.47 Land at Dunton Hills lies within the Hordon Fenlands Landscape Character Area as identified by the LCA. Key characteristics of the area include the following:
- *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 hills to the north; and*
 - *Long distance views to pylons and Tilbury power station to the south.*
- 4.48 When summarising the overall character of the area, the LCA states that:
- “This predominantly flat arable farmland is situated to the south of A127 and most of the Fenchurch Street to Southend railway line, and encompasses West Horndon settlement. Fields are generally large, with low hedgerows at field boundaries.... Sense of tranquillity within the area is disturbed by constant background traffic noise associated with the A127 and also the corridor to the south. To the north and east, a sense of general enclosure is provided by views to low wooded hills.”*
- 4.49 Visual characteristics of the area identified by the LCA include:
- *Long and short distance, glimpse and open views to surrounding wooded hills to the north and east; and*
 - *Long distance views to pylons and Tilbury power station to the south.*
- 4.50 Sensitive key characteristics of the area are identified by the LCA include the following:
- *Mature hedgerow field boundaries;*
 - *The flat, open nature of the landscape, overlooked by wooded hills to the north and east makes the landscape visually sensitive to new development; and*
 - *Sense of historic integrity resulting from historic field boundaries (drains) and distinctive tall hedgerows along lanes.*
- 4.51 Land management guidelines identified for the Horndon Fenland LCA are to:



- *“Conserve and enhance the existing hedgerow network by planting hedgerow species appropriate to local landscape character;*
- *Establish arable field margins as important nature conservation habitats;*
- *Seek ways to mitigate the visual impact of the railway and A127 corridor through introducing new and strengthening existing parallel shelterbelts where appropriate; and*
- *Introduce new woodland planting in the form of shaws and copses, as well as hedgerow trees.”*



Section 5: Dunton Garden Village Development Proposals

- 5.1. Within this section, consideration is given to how the land may be released from the Green Belt and developed sympathetically to respect the landscape and associated sensitivities. Reference is made to the Concept Masterplan to demonstrate how this may be achieved.
- 5.2. For clarity, specific issues raised within the SA and Working Draft Green Belt Review (as identified above in Section 4) are set-out on the table at **Appendix 2**, along with a response to each of the points made. This demonstrates how the development of the Dunton Garden Village may respect the landscape and Green Belt context.

Contribution to the Green Belt and Release of Green Belt Land

Working Draft Green Belt Review

- 5.3. As set-out in Section 4, the Council's Working Draft Green Belt Review incorrectly applies the methodology and assessment criteria when assessing the contribution that land at Dunton Hills makes to the purposes and function of the Green Belt.
- 5.4. The Review does not take into account the role of 'significant boundaries' that contain the site (A127, A128 and the railway) and which serve to prevent unrestricted sprawl and fails to recognise the role of the A128 in preventing merging with west Horndon. When assessing the contribution the land makes to preventing encroachment into the countryside, non-countryside uses and development across the site are not taking into consideration.

Draft Local Plan Policy 7.1 and Release of land at Dunton Garden Village

- 5.5. As identified by DLP, the A127, A128 and railway line serve to contain development at Dunton Garden Village, preventing urban sprawl and maintaining separation with West Horndon.
- 5.6. These boundaries may form defensible, robust and permanent new Green Belt boundaries to contain development, and prevent urban sprawl. This is recognised by Policy 7.1 and the proposed allocation and release of land at Dunton Hills within the DLP. This is in line with the Council's Spatial Strategy and proposals for sustainable release of land within the A127 corridor.
- 5.7. Dunton Hills includes a number of urban fringe land uses and development that affect the quality of the landscape and its contribution to the countryside. This includes the buildings, car park and access roads associated with the golf course as well as the designed landscape of the golf course itself, degraded field pattern, electricity pylons, wind turbine and influence of the busy main transport routes bounding the site affecting the tranquillity.
- 5.8. As illustrated on the Concept Masterplan, there is the potential to strengthen existing field boundaries with characteristic shaws and copses. These would enhance the



existing field boundaries to create a recognisable and robust Green Belt boundary, as well as screening development and maintaining the visual separation with Basildon to the east.

- 5.9. The planting of copses and s haws would reflect management guidelines and objectives for the Horndon Fenland Landscape Character Area as set-out in the Mid Essex Landscape Character Assessment and provide enhancements to the degraded landscape structure on the urban fringe.

Dunton Garden Suburb

- 5.10. If the land within Basildon were to be released, the settlement would no longer be a standalone Garden Village, but an urban extension to Basildon. There would be no need to have a defensible boundary to the east, as the whole area would be released from Green Belt as a strategic removal, whilst limiting sprawl, etc. through the use of existing defensible boundaries along the A127, A128 and railway.

Green Belt Summary

Release from the Green Belt	The area is well contained by the A127, A128 and the railway line. These represent recognisable, robust and permanent boundaries.
Contribution to Green Belt purposes	
<i>Check unrestricted sprawl of large built up areas</i>	Due to the containment by the A127, A128 and A 127, development would preserve the fundamental aim of the wider Green Belt in preventing urban sprawl.
<i>Prevent neighbouring towns from merging into one another</i>	The A128 provides a well-defined boundary with the open agricultural land and separation from West Horndon.
<i>Assist in safeguarding the countryside from encroachment</i>	The land makes a limited contribution to this purpose, and includes built development and detractors on the site (pylons, wind turbine) as well as the golf course. Contained by main transport corridors limiting the potential for encroaching into the wider countryside. There are opportunities through the development of the Site to protect and enhance landscape features and field boundaries.

Accommodating Development within the Landscape

- 5.11. The land at Dunton Hills is separate from, and does not share the characteristic features of the flat, expansive, undeveloped and open landscape that is typical of the wider Horndon Fenland to the west and southwest. The use of the Site as a golf course, comprising a manicured, designed landscape, and including a club house,



driving range, car parking and associated access roads introduce development within the site area. The bounding of the site by the busy A127, A128 and railway line serve to greatly reduce the tranquillity of the area. Tranquillity is further eroded by electricity pylons crossing the site, a wind turbine and detracting development on the edge of Basildon, including the Ford buildings.

5.12. The points below set-out the site specific character and context of the Site at Dunton Hills:

- Elevated land to the east of the area viewed in context with development on skyline at Basildon in views from the wider countryside to the northwest and southeast. This land is not visible from the lower lying land to the west, being set beyond the ridgeline;
- Lower lying land to the west is relatively well contained within the wider landscape, including areas within the golf course that are contained by the local topography;
- The sloping landform and ridge that crosses the site north–south forms a distinctive feature in the local landscape. Ancient Woodland and watercourse with associated riparian vegetation are also distinctive; and
- The field pattern across much of the area is degraded, with gappy hedgerows and a loss of hedgerow trees, distinctive copses and shelterbelts.

5.13. Opportunities for the development of the area include the following:

- Landscape led approach to development with significant areas of Green Infrastructure informed by the landform and character of the site;
- Retention of the open ridge that crosses the site as a distinctive feature in the local landscape. Opportunities to incorporate publically accessible vantage points within open space from which extensive views may be obtained;
- Opportunities exist for the enhancement of field boundaries including planting of new characteristic woodland and hedgerow trees. This includes to the east of the area to define a new Green Belt boundary; and
- Provision of a landscape buffer along the A128 would provide a soft edge to the development at the interface with the countryside beyond.

Dunton Garden Village Concept Masterplan

5.14. Whilst the Site contains sloping, elevated land, the Concept Masterplan demonstrates how the land at Dunton Garden Village may be developed sensitively to respect this landform, retaining it as part of substantive green space within the development.

5.15. Through the setting back of development from the ridgeline and enhancements to existing field boundary hedgerows, supplemented with copse and shaw planting to field and site boundaries, the masterplan retains the elevated land as a feature in the local landscape, whilst enhancing the wooded skyline, mitigating the visual impacts of the A127 and railway and preserving distant views towards the wooded hills to the north and east.

5.16. The recognised distinctive features of the wooded hills as a backdrop to the wider landscape would remain unharmed by the proposals. The siting of development away from the sloping land and ridgeline will respect the landform, maintaining the slopes



as a backdrop to views across the flat fenland to the south and east. Combined with enhancement of field boundaries to include new tree and woodland planting, the sensitive development of land at Dunton Hills would reflect the well treed skylines and backdrop in views from within the lower-lying fenland that are typical of the area.

5.17. In addition to the above, the development for the Dunton Garden Village would also allow for the provision of a number of sustainable development benefits, including the following:

- There would be opportunities for the creation of new walking and cycling connections with Basildon and Langdon Hills Country Park to the east;
- Owing to the extent of land available and existing on-site features, there would be the potential to create a multifunctional network of open spaces and green corridors throughout the development and linking with surrounding areas of open space and countryside; and
- There are also opportunities for delivery of education and local facilities within the site, as well as employment uses that are well linked to the strategic road network and proximity to improved public transport.



Section 6: Brentwood Draft Local Plan, January 2016 – Review of Policies

- 6.1 Spatial Policies and Policy 7.1 – Dunton Hills Garden Village have been considered above in relation to the soundness of the Spatial Strategy, reasonable alternatives in the A127 Corridor and in relation to the Dunton Hills Garden Village allocation and release from the Green Belt.
- 6.2 Whilst there are a number of Green Belt polices contained within the Draft Local Plan, it is assumed that these have been drafted on the assumption that strategic releases (including at Dunton Hills) have already been made. Therefore, these Policies have not been considered within the review.
- 6.3 On the table below, consideration is given to other Policies contained within the DLP that are of relevance to landscape. These are primarily Development Control Policies. Each policy is considered below, along with a summary of how the development of the Dunton Garden Village (as illustrated on the concept masterplan) may meet policy aspirations.
- 6.4 The soundness of each policy is also considered against the provisions of the NPPF.

Brentwood Borough Council Draft Local Plan, 2016 – Review of Landscape Policies in relation to strategic allocation 7.1 – Dunton Garden Village



Brentwood Borough Council Draft Local Plan, 2016 – Review of Landscape Policies in relation to strategic allocation 7.1 – Dunton Garden Village

Draft Local Plan Policy	Commentary in relation to Dunton Garden Village and Concept Masterplan	Consistency with the NPPF
Landscape		
<p><i>Policy 9.1 Historic and Natural Environment Landscape Character</i></p> <p><i>The Council is committed to safeguarding the diversity and local distinctiveness of the Borough, including its varied landscapes, heritage, biodiversity and habitats. Development should foster a sense of place and local identity, and respect, and where possible, enhance the character of the area. In assessing individual proposals, regard will be given to:</i></p> <ul style="list-style-type: none"> <i>a. sensitivity of an area to change;</i> <i>b. importance of retaining the individual identity of separate settlements and parts thereof;</i> <i>c. protecting, conserving and, where appropriate, enhancing heritage assets and their settings in order to conserve their significance;</i> <i>d. potential impact of development on non-designated heritage assets including archaeology;</i> <i>e. conserving and enhancing biodiversity and habitats, including through the creation of new habitats;</i> <i>f. Thames Chase Plan; and</i> <i>g. cumulative impact of development on heritage assets and the natural environment.</i> <p><i>The Council will designate and keep under review Conservation Areas in order to protect or enhance their special architectural or historic interest, and will seek to protect the character, significance, and setting of Listed</i></p>	<p>Dunton Garden Village offers the opportunity to provide development that respects the character and landscape sensitivities of the land at Dunton Hills, as recognised by the Mid Essex Landscape Character Assessment, 2006, incorporating substantial areas of open space and Green Infrastructure incorporating both existing and new habitats and landscape features that reflect the landscape character and strengthen the landscape structure.</p> <p>As demonstrated by the Concept Masterplan, development of the land to meet the requirements of Policy 7.1 allows for the retention of sensitive features on the site and retain the key characteristics of the landscape.</p> <p>The ridge that crosses the site is a distinctive feature within the landscape. The proposals maintain the ridge as undeveloped land, managed as publically accessible open space. This includes the potential for a public park allowing for expansive views across the wider landscape towards the London skyline with access for the local community.</p> <p>Tree and woodland planting to field boundaries, including on the ridgeline, would provide enhancements to the degraded landscape, providing physical and visual containment to development and reflecting the local character.</p> <p>As illustrated on the Concept Masterplan, there is the potential to strengthen existing field boundaries with characteristic shaws and copses. These would enhance the</p>	<p>Complies with paragraph 9 through the provision of positive improvements associated with sustainable development.</p> <p>The policy meets the requirements of the NPPF that requires polices to set out the quality of development in an area, based upon an understanding of the defining characteristics of an area.</p>



<p><i>Buildings, Historic Parks and Gardens, and Protected Lanes.</i></p>	<p>existing field boundaries to create a recognisable and robust Green Belt boundary, as well as screening development and maintaining the visual separation with Basildon to the east. Provision of a landscape buffer along the A128, A127 and railway would provide a soft edge to the development at the interface with the countryside beyond. This would also serve to lessen the impact of traffic using these routes and provide enhancements to the landscape character and structure, reflecting management guidelines for the Horndon Fenland.</p> <p>The planting of copses and shaws would reflect management guidelines and objectives for the Horndon Fenland Landscape Character Area as set-out in the Mid Essex Landscape Character Assessment and provide enhancements to the degraded landscape structure on the urban fringe.</p>	
<p><i>Policy 9.3: Landscape Protection and Woodland Management</i></p>	<p>As demonstrated by the Concept Masterplan, the Dunton Garden Village development incorporates existing ancient woodland, hedgerows and trees, as well as providing significant additional structural landscape planting, including characteristic shaws and copses to field boundaries and tree belts along the A127, A128 and railway line.</p>	<p>The supporting text to Policy 9.3 recognises the requirements of the NPPF at paragraph 113 to protect valued landscapes and set criteria based policies for the protection of landscape areas that should be based on landscape character assessments which assess landscape sensitivity.</p>
<p><i>Development will not be permitted where it would have a detrimental effect on, or result in the loss of, significant landscape heritage or a feature of ecological importance, including trees, woodlands or hedgerows.</i></p> <p><i>Where appropriate development proposals will be required to be accompanied by:</i></p> <ul style="list-style-type: none"> <i>a. an ecological survey as required by appropriate to the nature and scale of the proposal, identifying links to similar ecosystems within proximity of the development site in line with Policy 10.10 Green Infrastructure;</i> <i>b. a landscape scheme detailing new planting requirements and where appropriate, replacement trees of a value commensurate or greater to that which is lost, boundary treatments and proposals for ecological enhancement;</i> <i>c. an arboricultural assessment detailing the measures to protect and/or justification for the removal of any trees or hedgerows during onsite construction;</i> <i>d. details of landscaping maintenance arrangements; and</i> 	<p>As well as providing additional landscape planting, development at Dunton Hills would also retain existing features, within areas of open space as part of a n integrated network of Green Infrastructure across the site, connecting with the wider area.</p> <p>As demonstrated by the Concept Masterplan, development of the land to meet the requirements of Policy 7.1 allows for the retention of sensitive features on the site and retain the key characteristics of the landscape.</p> <p>Proposals for the Dunton Garden Village may provide a landscape framework to demonstrate how both existing and new landscape features and strategic planting have been</p>	<p>However, the actual policy wording does not make specific reference to the Council's emerging Landscape Capacity Study and the existing Landscape Character Appraisal which identifies specific landscape features. By adding this</p>



<p><i>e. a method statement for any land raising and/or dispersal of excavated or dredged materials.</i></p> <p><i>Areas of landscape, biodiversity and geodiversity interest and local distinctiveness within the Borough will be protected from harm and their retention, enhancement and restoration will be encouraged. Where feasible, proposals should promote the use of trees, hedges, wildlife gardens, allotments, ponds, green roofs/walls, roosting boxes and wider habitat creation.</i></p> <p><i>In exceptional circumstances, where the landscape, biodiversity, social or economic benefits of a proposal are considered to outweigh the loss of a feature, impact on landscape character, or existing habitat, development may be permitted subject to adequate compensatory measures being implemented.</i></p> <p><i>In line with the NPPF, planning permission will not be permitted for development resulting in the loss or deterioration of irreplaceable habitats, including ancient woodland and the loss of aged or veteran trees found outside ancient woodland, unless the need for, and benefits of, the development in that location clearly outweigh the loss.</i></p> <p><i>The Council supports the Essex Wildlife Trust Living Landscapes” vision to “restore, recreate and connect wildlife habitats” for areas 19 (Havering and Brentwood Ridge) and 23 (Thorndon Woods) in conjunction with Policy 10.10 Green Infrastructure. The extents of the Living Landscapes in the borough of Brentwood are identified on the Proposals Map. Within each Living Landscape, opportunities for the preservation, restoration and recreation of priority habitats, ecological networks and populations of priority species will be supported in order to protect and enhance strategic wildlife corridors and habitats in Essex. Development proposals that would deliver these</i></p>	<p>incorporated into the development to reflect the landscape character and retain features of value.</p>	<p>reference, the policy would provide the required flexibility to respond to the sensitive and / or valued characteristics and features within any given area.</p> <p>It is acknowledged that the supporting text to the Policy sets-out the various landscape character, sensitivity and capacity studies that are contained within the evidence base.</p>
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<p><i>opportunities will in principle be supported, subject to other policies within this plan.</i></p> <p><i>Development resulting in a significant adverse impact on the ecological function of these Living Landscapes will be refused.</i></p> <p><i>The impact of proposed development on Protected Lanes and on Historical Parks and Gardens is a material consideration in the determination of planning applications. There are 3 historic parks and gardens in Brentwood on the Register of Parks and Gardens of special Historic Interest: South Weald Country Park, Warley Place and Thorndon Country Park.</i></p>		
<p><i>Policy 10.10 Green Infrastructure</i></p> <p><i>Development should adopt an integrated approach towards the provision of Green Infrastructure which enhances the Borough's network of multi-functional green space including open space, parks, sport, recreational and play opportunities, flood storage, green roofs, habitat creation, woodlands, street trees, allotments, private gardens, footpaths, bridleways and cycleways, food growing and climate change mitigation.</i></p> <p><i>New development will be required to maximise opportunities for the creation, restoration, enhancement, expansion and connection of Green Infrastructure and connection of the development site to the local Ecological Network. All major development proposals should seek to include elements of Green Infrastructure and Ecological Networks, such as but not limited to SuDS, allotments, street trees, green roofs, recreational areas, areas of new and existing natural habitat, green corridors through the site and waterbodies, and existing networks including Thames Chase Forest.</i></p>	<p>The provision of substantial Green Infrastructure within the proposals, including public parks, recreation and sports facilities will provide significant benefits to the provision of Green Infrastructure locally.</p> <p>The retention of existing Green Infrastructure, including woodland, trees and hedgerows within areas of Green Infrastructure is central to the Concept Masterplan, including the following measures:</p> <ul style="list-style-type: none"> • Retention of brook corridor within strategic open space, retained and enhanced for biodiversity benefits • Retention of ancient woodland and opportunities to provide significant areas of open space within a landscape led development incorporating Garden Suburb principles • There are also opportunities for existing site green and blue features to be enhanced for ecological and biodiversity benefits. 	<p>Policy encourages the promotion of land to achieve multiple benefits and positive planning for creation, protection, enhancement and management of GI networks (paragraph 114)</p>



<p><i>Where this is not possible, financial contributions to facilitate improvements to the quality and extent of existing Green Infrastructure in Brentwood Borough will be sought.</i></p>	<p>As illustrated in the 'Community and Well-being' report to support the representations, Dunton Hills can deliver integration with the existing recreational routes, as well as connections with the wider Green Infrastructure network, including country parks.</p>	
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Section 7: Conclusions

- 7.1. This report has given consideration to the soundness of the Brentwood Borough Draft Local Plan 2016 in relation to Green Belt and landscape matters.
- 7.2. When considering release of Green Belt land and defining new boundaries, the NPPF requires local planning authorities to take account of the need to promote sustainable patterns of development, with releases being consistent with the Local Plan spatial strategy. The contribution that land makes to the Green Belt needs to be considered in balance against the identified need for development and other sustainability topics covering the economic, social and environmental roles.
- 7.3. The release of Green Belt land at Dunton Garden Village is in keeping with the Draft Local Plan spatial strategy which seeks to channel development towards sustainable transport corridors. This is a sound approach and meets the requirements of the NPPF.
- 7.4. As emphasised within Policy 7.1 of the Plan, the A127, A128 and railway line provide robust, defensible boundaries to development in this location, serving to check sprawl, maintain separation with west Horndon and prevent encroachment into the wider countryside. Policy 7.1 also provides for the strengthening of existing boundaries to the east to ensure physical and visual separation with Basildon, should the allocation of adjacent land within Basildon Borough not come forward.
- 7.5. Release of land at Dunton Hills would be contained and separated from the wider Green Belt, protecting the Green Belts' main function of preventing urban sprawl. The A127, A128 and railway line would form the new Green Belt boundary.
- 7.6. In addition to the proposed allocation of land for the release of Green Belt land and development of Dunton Garden Village (Policy 7.1), this report has also given consideration to other policies of particular relevance to landscape matters, including: Policy 9.1 'Historic and Natural Environment Landscape Character', Policy 9.3 'Landscape Protection and woodland Management' and Policy 10.10 'Green Infrastructure'.
- 7.7. All of these policies are sound and comply with the requirements of the NPPF, as well as reflecting the aspirations of the local plan, its spatial strategy and strategic objectives. Dunton Garden Village could be delivered in accordance with these policies to provide a new development that responds to the local landscape context, providing significant Green Infrastructure benefits, including the retention of existing landscape features and the provision of new strategic landscape planting as part of an integrated masterplan to mitigate development and provide enhancements.
- 7.8. Whilst the Council's Interim Sustainability Appraisal identifies the Dunton Garden Village allocation as having the potential to have significant impacts on Green Belt and Landscape, it acknowledges that these could be remedied subject to further work.



- 7.9. The Sustainability Appraisal is underpinned by the findings of the Draft Local Plan Evidence Base, including the Working Draft Green Belt Review and Mid Essex Landscape Character Assessment, 2006. Whilst the Council have undertaken some initial work relating to the landscape capacity of selected sites, this information has not been published.
- 7.10. The Working Draft Green Belt Review identifies land at Dunton Hills as making a high overall contribution to the Green Belt. The Review has incorrectly applied the methodology and criteria when assessing the role of the A127, A128 and railway as boundaries that provide containment and prevent urban sprawl and merging of settlements. The Review also fails to consider existing development on the site and detracting features when assessing the role of the land in protecting the countryside from encroachment.
- 7.11. The proper application of the criteria and interpretation of the methodology may lead the Council's review to identify that land at Dunton Hills does not make a high contribution to the Green Belt, being contained by strong boundaries. This assessment would reflect the recognition by Policy 7.1 that the A127, A128 and railway would serve to provide robust, defensible new Green Belt boundaries preventing urban sprawl, merging of settlements and encroachment into the countryside if land at Dunton Hills were to be released from the Green Belt.
- 7.12. As set-out within this report and demonstrated by the Concept Masterplan, Dunton Garden Village can be delivered to respect the landscape and distinctive features, incorporating measures that would help to mitigate the negative impacts of existing transport infrastructure (A127, A128 and railway) whilst strengthening the degraded landscape structure through the enhancement of boundaries. This is in accordance with published management guidelines for the Horndon Fenland as set-out in the Mid Essex Landscape Character Assessment.
- 7.13. The development of the Dunton Garden Village Strategic Site can be delivered to limit impacts on the function of the Green Belt and respect the landscape context, addressing issues raised within the SA and Working Draft Green Belt Review and reflecting the DLP Spatial Strategy for sustainable development in the A127 Corridor.



Appendix 1: Brentwood Local Plan Interim Sustainability Appraisal, 2016 - Appendix III: Spatial Strategy Alternatives Appraisal - Landscape






strategic allocation would have less potential to deliver affordable housing (i.e. a less potential to make a high proportion of housing available at below market rates for those with a demonstrable need), given the smaller site area and the likely need to fund a new junction on the A12; however, there is no certainty in this respect.

Other factors that could potentially assist with differentiating the alternatives are: variation in housing needs across the Borough; and the need to meet housing needs in the rural villages.

- In terms of the former, there is no evidence available to inform a discussion, but it seems likely that this is not a major factor given that the main urban area is central within the Borough. It should be the case that housing delivered in the A127 corridor helps to meet the needs arising from Brentwood/Shenfield and (perhaps to a lesser extent) Ingatestone.
- In terms of the latter, there is little or no potential to differentiate between the alternatives. Option 3 might be assumed to involve a scenario whereby relaxed development management supports windfall housing at rural villages; however, it is not clear that this would be the case given other locations around the urban area (e.g. Key Gateways).

Sustainability Topic: Landscape

	Option 1 Dunton Hills Garden Village	Option 2 West Horndon	Option 3 North of Brentwood	Option 4 Land to the East of Running Waters, Hutton	Option 5 North of Brentwood & Dunton Hills Garden Village	Option 6 North of Brentwood & West Horndon
Rank	4			5	4	
Significant effects?	Yes	No	No	Yes		No

Discussion

There are no nationally important designated landscapes within the Borough; however, around 89% of the Borough is designated Green Belt, which is designated in order to perform a number of ‘purposes’.⁹⁷

The January 2015 Interim SA Report concluded that options involving a strategic allocation at West Horndon (currently Option 2) or North Brentwood (currently Option 3)⁹⁸ perform relatively well, as both areas have a ‘medium’ or ‘high’ landscape capacity and make only a ‘moderate’ contribution to Green Belt purposes. Conversely, a strategic allocation at Dunton Hills Garden Village (currently Option 1) or at ‘Land East of Running Waters, Hutton’ (currently Option 4) would impact on landscapes with ‘low’ capacity to accommodate development, with Option 4 performing particularly poorly as some land here is known to make a ‘high’ contribution to Green Belt purposes⁹⁹. This analysis was based on the findings of the Mid Essex Landscape Character Assessment (2006),¹⁰⁰ and also unpublished draft findings of work to examine landscape capacity and contribution to Green Belt purposes at select sites.¹⁰¹

These findings from 2015 generally hold true at the current time. No further detailed studies have been completed, although a number of relevant comments were received through the Growth Options consultation. Perhaps most notable are Historic England’s comments in relation to ‘Land East of Running Waters, Hutton’, which highlight the value of the open

⁹⁷ Green Belt purposes are: to check the unrestricted sprawl of large built-up areas; to prevent neighbouring towns merging into one another; to assist in safeguarding the countryside from encroachment; to preserve the setting and special character of historic towns; and to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

⁹⁸ With regards to a North Brentwood strategic allocation, the conclusion reached in 2015 did not account for sensitivities associated with site 089, which is a large parcel of land comprising the Brentwood Centre and its sports pitches. It is now assumed that this parcel of land would fall within a strategic allocation, although the leisure centre and its sports pitches would be retained.

⁹⁹ With regards to a scheme in the Dunton area, there was a lack of evidence in 2015 to indicate impacts to Green Belt.

¹⁰⁰ See <http://www.brentwood.gov.uk/index.php?cid=966>

¹⁰¹ Work undertaken by undertaken by Crestwood Environmental Ltd.

landscape to the setting of historic assets. Also, a number of comments were received from Thurrock Council, including the following:

- *“Green Belt release along the A127 corridor in any of the proposed locations would result in harm to the openness and strategic function of the Metropolitan Green Belt. In this location the Green Belt prevents urban sprawl and prevents coalescence between Basildon and West Horndon.”*
- *“The fenland area around the A127 has been recognised by the Thames Chase Heritage Lottery Fund as a ‘distinctive landscape character worth conservation’ and has been identified by the CPRE as a nationally significant area of tranquillity in the metropolitan greenbelt. The urban areas are set back from view by steep slopes. It is highly likely from the outcomes of landscape capacity studies that any development greater than discreet infill plots would significantly harm the landscape character... The larger fenland landscape character area would be affected by any further development. It is considered that development of the scale of the Dunton Garden Suburb or an extension east of West Horndon will significantly harm the open rural character of the broad fenland and the setting of rolling farmland and wooded hills of Thurrock.”*

In **conclusion**, it is suggested that Options 1, 4 and 5 perform least well and would lead to significant negative effects. This conclusion is in line with appraisal findings from 2015; however, there is now less certainty in respect of Options 1 and 5. This is on the basis that a Dunton Hills Garden *Village* scheme, depending on its location, has the potential to allay some of the concerns that have been raised (Growth Options consultation) in relation to a Dunton Garden *Suburb* scheme. With regards to the other options, it is difficult to differentiate. A strategic allocation North of Brentwood performs relatively well, including on the basis that it would make some use of brownfield land; however, windfall developments could well lead to the erosion of sensitive landscapes around the edge of the urban area and around villages.

Sustainability Topic: Soil and contamination

	Option 1 Dunton Hills Garden Village	Option 2 West Horndon	Option 3 North of Brentwood	Option 4 Land to the East of Running Waters, Hutton	Option 5 North of Brentwood & Dunton Hills Garden Village	Option 6 North of Brentwood & West Horndon
Rank	4	4	★ 1	4	2	2
Significant effects?	No					
Discussion	<p>All options would lead to significant loss of agricultural land, although options involving a North Brentwood strategic allocation would lead to good potential to make use of brownfield land, and it can also be assumed that windfall sites will often be brownfield (or at least non-agricultural). It is not possible to differentiate between the alternatives any further, as all would involve loss of Grade 3 agricultural land,</p> <p>The relatively low quality of agricultural land set to be lost suggests that significant effects are unlikely, although this could warrant further investigation as a sub-category of Grade 3 land ('Grade 3a') is classed by the NPPF as 'Best and Most Versatile'.</p>					

Appendix 2: Summary of Landscape and Green Belt Matters raised within Interim Sustainability Appraisal and Draft Local Plan Evidence Base



Appendix 2: Summary of Landscape and Green Belt Matters raised within Interim Sustainability Appraisal and Draft Local Plan Evidence Base

Issues Raised in Brentwood Draft Local Plan Evidence Base¹	Response²
<p>Green Belt</p> <p><i>“Green Belt release along the A127 corridor in any of the proposed locations would result in harm to the openness and strategic function of the Metropolitan Green Belt. In this location the Green Belt prevents urban sprawl and prevents coalescence between Basildon and West Horndon”</i> (Interim SA Report 2016, Appendix III – Assessment of Site 200 at Dunton Hills)</p>	<p>The land at Dunton Hills is bounded by the A127, A128 and railway line. These form strong, defensible boundaries to contain development and serve to check unrestricted sprawl, maintain separation with West Horndon and prevent encroachment into the wider Green Belt and countryside.</p> <p>The role of these boundaries as defensible and permanent new Green Belt boundaries associated with the release of land for Dunton Hills Garden Village is recognised within Draft Local Plan Policy 7.1</p>
<p><i>“Whilst there is the potential to make use of some clearly defined physical features (A127, A128, railway line), it may be a challenge to ensure a defensible long term boundary separating the Garden Village from west Basildon (where there is a planned urban extension).”</i> (Interim SA Report 2016, paragraph 18.1.3)</p>	<p>There is the potential to enhance the existing field boundaries along the eastern edge of the area on the Brentwood Borough boundary to provide a clearly defined and defensible Green Belt boundary.</p> <p>This would provide the opportunity to enhance the hedgerows with trees and tree belts as well as incorporating characteristic woodland planting comprising shaws and copses to field corners.</p> <p>The planting of hedgerow trees and woodland is recognised as a land management guideline within the Council’s Landscape Character Assessment for the Horndon Fenland character area.</p> <p>Land to the east of the Site is proposed for release from the Green Belt within the Basildon Draft Local Plan to allow for an urban extension to Basildon. The development of land to the east of the site, combined with Dunton Hills will create a larger Garden Suburb, bounded by the A127, A128 and railway as defensible, robust Green Belt boundaries.</p>



<p>The Council's Working Draft Green Belt Review assesses Land at Dunton Hills as making an overall 'High' contribution to the Green Belt</p>	<p>As set-out in Section 4, the Council's Working Draft Green Belt Review incorrectly applies the methodology and assessment criteria when assessing the contribution that land at Dunton Hills makes to the purposes and function of the Green Belt.</p> <p>The Review does not take into account the role of 'significant boundaries' that contain the site (A127, A128 and the railway) and which serve to prevent unrestricted sprawl and fails to recognise the role of the A128 in preventing merging with west Horndon. When assessing the contribution, the land makes to preventing encroachment into the countryside, non-countryside uses and development across the site are not taking into consideration.</p> <p>The correct application of the criteria would identify the land as making a similar contribution to that east of West Horndon.</p> <p>The Review also stops short of recognising the role that these boundary features would have as forming a robust, defensible new Green Belt boundary preserve the function and openness of the wider Green Belt by checking urban sprawl, maintaining separation with West Horndon and preventing encroachment into the countryside.</p> <p>As considered above, there is also the opportunity for the eastern boundary of the Site to be enhanced with characteristic woodland and shaws to provide a robust Green Belt boundary to provide physical and visual containment and maintain separation with Basildon.</p>
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Landscape

“... a strategic allocation at Dunton Hills Garden Village... would impact on landscapes with ‘low’ capacity to accommodate development.”

(Interim SA Report 2016, Appendix III – Assessment of Site 200 at Dunton Hills)

Note:

Analysis within the SA based upon findings of Mid Essex Landscape Character Assessment and unpublished findings of draft landscape capacity studies.

Landscape Character and Sensitivity

The Mid Essex Landscape Character Assessment identified the area as being of a *Moderate* sensitivity.

Sensitive key characteristics of the area are identified by the LCA include the following:

- Mature hedgerow field boundaries;
- The flat, open nature of the landscape, overlooked by wooded hills to the north and east makes the landscape visually sensitive to new development
- Sense of historic integrity resulting from historic field boundaries (drains) and distinctive tall hedgerows along lanes.

Whilst these characteristics are typical of the Horndon Fenland landscape within the wider landscape to the west and southwest, the land at Dunton Hills does not share many of the features typical of the flat, low-lying fenlands.

The land form of the site is undulating, including a gently sloping ridge that rises to the east and forms a plateau to the west of Basildon. The Site is not flat and as open as the fenland, and therefore does not share the same visual sensitivities.

The landscape pattern and character at Dunton Hills is degraded in places, with the golf course and large arable fields replacing the former historic field pattern and associated hedgerows.

Dunton Garden Village Concept Masterplan

Whilst the Site contains sloping, elevated land, the Concept Masterplan demonstrates how the land at Dunton Garden Village may be developed sensitively to respect this landform, retaining it as part of substantive green space within the development.

Through the setting back of development from the ridgeline and enhancements to existing field boundary hedgerows, supplemented with copse and shaw planting to field and site boundaries, the masterplan retains the elevated land as a feature in the local landscape,



	<p>whilst enhancing the wooded skyline, mitigating the visual impacts of the A127 and railway and preserving distant views towards the wooded hills to the north and east.</p>
<p><i>“The fenland area around the A127 has been recognised by the Thames Chase Heritage Lottery Fund as a ‘distinctive landscape character worth conservation’ and has been identified by the CPRE as a nationally significant area of tranquillity in the metropolitan greenbelt.</i></p> <p><i>The urban areas are set back from view by steep slopes. It is highly likely from the outcomes of landscape capacity studies that any development greater than discreet infill plots would significantly harm the landscape character...</i></p> <p><i>The larger fenland landscape character area would be affected by any further development. It is considered that development of the scale of the Dunton Garden Suburb or an extension east of West Horndon will significantly harm the open rural character of the broad fenland and the setting of rolling farmland and wooded hills of Thurrock.”</i> (Interim SA Report 2016, Appendix III – Assessment of Site 200 at Dunton Hills)</p>	<p>The land at Dunton Hills is separate from, and does not share the characteristic features of the flat, expansive, undeveloped and open landscape that is typical of the wider Horndon Fenland to the west and southwest. The use of the Site as a golf course, comprising a manicured, designed landscape, and including a club house, driving range, car parking and associated access roads introduce development within the site area. The bounding of the site by the busy A127, A128 and railway line serve to greatly reduce the tranquillity of the area. Tranquillity is further eroded by electricity pylons crossing the site, a wind turbine and detracting development on the edge of Basildon, including the Ford buildings.</p> <p>The recognised distinctive features of the wooded hills as a backdrop to the wider landscape would remain unharmed by the proposals. The siting of development away from the sloping land and ridgeline will respect the landform, maintaining the slopes as a backdrop to views across the flat fenland to the south and east. Combined with enhancement of field boundaries to include new tree and woodland planting, the sensitive development of land at Dunton Hills would reflect the well treed skylines and backdrop in views from within the lower-lying fenland that are typical of the area.</p>

¹ Sustainability Appraisal (SA) of the Brentwood Local Plan – Interim SA Report (February 2016) and Brentwood Borough Council 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, - WORKING DRAFT (March 2016)

²As illustrated on the Dunton Hills Garden Village Concept Masterplan



D U N T O N H I L L S

BRENTWOOD

