

# DUNTON HILLS

## BRENTWOOD

Representations to Brentwood Borough Council  
Regulation 18 Consultation:  
Preferred Site Allocations and associated evidence  
January 2018

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## **EXECUTIVE SUMMARY**

The following representations on the Regulation 18 Consultation Preferred Site Allocations document are made on behalf of the promoter, CEG, and the single landowner, Peter Dunne, in respect of the Dunton Hills Garden Village (DHGV) preferred site allocations.

The principal purpose of the representations is to provide further clarity on the suitability and deliverability of the Regulation 18 plan's largest strategic housing preferred site allocation. As the promoters of the site a substantial amount of assessment work has been undertaken all of which has enabled the promoters to provide further support evidence and suggest a possible form of draft allocation policy for the site.

These representations refer, where appropriate, to the published Local Plan evidence base and comment on both parts 1 and 2 of the consultation document.

These representations support the approach to establishing and the conclusions on the Vision (para 2.1) and Strategic Objectives (para 2.2) for the Local Plan. We believe that the approach to assessing the Spatial Strategy (para 2.3), Housing Need (para 2.4), Housing Supply (para 2.5), Infrastructure Planning (para 2.6) and Employment Site Allocations (para 2.7) is sound and supported by proportionate evidence. These representations note several pertinent points where additional clarification and evidence support may be required to support a Regulation 19 Plan.

Part 2 of these representations provide further comment on the role, suitability and deliverability of DHGV to assist in meeting the vision and strategic objectives of the Local Plan.



## 1 INTRODUCTION

- 1.1 The following representations are submitted on behalf of the promoter, CEG, and the single landowner, Peter Dunne, in respect of the Dunton Hills Garden Village (DHGV) preferred site allocation.
- 1.2 The principal purpose of the representations is to provide further clarity on the suitability and deliverability of the Regulation 18 plan's largest strategic housing preferred site allocation. As the promoters of the site a substantial amount of assessment work has been undertaken, all of which has enabled the promoters to provide further support evidence and suggest a possible form of draft allocation policy for the site.
- 1.3 The intention is for the suggested draft policy to contain sufficient detail to, in the words of Planning Practice Guidance (para 12- 010), "*provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the 'what, where, when and how' questions)*". The policy would provide sufficient detail against which to judge the suitability of an application for outline planning permission.
- 1.4 These representations refer, where appropriate, to the published local plan evidence base and comment on both Parts 1 and 2 of the consultation document.
- 1.5 In our view, the current Regulation 18 consultation plan and its supporting evidence demonstrate that the council is preparing a plan which meets its legal requirements and complies with the four tests of 'soundness' –positively prepared, justified, effective and consistent with national policy.
- 1.6 The council has published appropriate and proportionate evidence relevant to this stage of the local plan process. These representations identify some relatively small but pertinent areas where further evidence might be required to clarify some matters in relation to the preferred site allocation at DHGV. It is accepted that some of what we have described as "further evidence" may have already been considered by the council. The Promoters previously submitted a substantial body of proportionate evidence to earlier stages of the local plan process. Some of that earlier evidence is re-submitted here for ease of reference and, where appropriate, has been 'refreshed'.
- 1.7 The body of evidence submitted as part of these representations includes relevant and proportionate assessments of:
  - Ecology and bio-diversity (paragraph 3.4);
  - Landscape (paragraph 3.5);
  - Green Belt (paragraph 3.6);
  - Highways and transportation (paragraph 3.7);
  - Flood risk and drainage (paragraph 3.8);
  - Site capacity (paragraph 3.9).



## **2 PART 1 STRATEGY FOR GROWTH**

### **2.1 Vision**

- 2.1.1 The vision for Brentwood borough contains a clear understanding of the characteristics of the borough which are worthy of protection and enhancement while at the same time recognizing the need for new development designed to encourage future investment and meet the housing needs for current and future generations.
- 2.1.2 It is important to firstly recognize and secondly ensure that new development complements the borough's character as a 'borough of villages' set within a high-quality network of green infrastructure, parks and connected green corridors. A clear vision of this kind is enabling the local plan process to assess the development options and all reasonable alternatives against their ability to deliver the vision.
- 2.1.3 As illustrated in Part 2 of the plan the preferred site allocations represent a logical balance of sites including those within urban areas, well planned urban extensions on key transport corridors and a new garden village at Dunton Hills which will continue to reflect and enhance the 'borough of villages' characteristic.

### **2.2 Strategic Objectives**

- 2.2.1 The refreshed strategic objectives contained within the Regulation 18 plan have followed a logical path of development through the course of earlier local plan documents, consultation and evidence gathering.
- 2.2.2 The promoters of DHGV fully support all the strategic objectives and particularly those strategic objectives which aim to set the policy background to delivering and managing a sustainable (SO6-7), well connected (SO4), high quality designed (SO4) and creation of community (SO19-20) form of development, all set within and contributing to a rich connected network of green infrastructure (SO17). Assessments carried out so far by the promoters, with input from a variety of stakeholders including CABE the Design Council, BBC and ECC have confirmed confidence that DHGV can deliver against these strategic objectives. Further detail is contained in these representations in their commentary on Part 2 of the Plan.

### **2.3 Spatial Strategy**

- 2.3.1 Earlier stages of the local plan process involving consultation and accompanying assessments - contained most particularly in relevant Sustainability Appraisals have presented a logical narrative to the spatial strategy contained in the current Regulation 18 consultation document. As detailed in paragraph 6.3.2 of the Sustainability Appraisal Interim Report January 2018, the option of developing a new community between West Horndon and Basildon has featured in the appraisal of reasonable spatial strategy alternatives within the 2015 and 2016 Interim SA Reports. In our view, the draft spatial strategy is properly set to achieve the Vision and Strategic Objectives of the Plan and has properly





considered the various other options for growth. In the case of the contribution to be made by DHGV the promoters have confidence in being able to deliver the form, scale and timing of development required to make its contribution towards achieving the Spatial Strategy.

## 2.4 Housing Need

- 2.4.1 The Promoters welcome the council's acceptance to prepare a plan designed to meet the full Objectively Assessed Housing Need (OAHN). The work undertaken by PBA on behalf of the council and contained in the Strategic Housing Market Assessment Part 1 (January 2018) (SHMA) appears to be a robust and up to date assessment of OAHN. The council are, therefore, correct to rely upon this evidence in the current stage of the local plan process.
- 2.4.2 As stated in paragraph 7.18 of the SHMA though Objectively Assessed Need is not a science. Small changes in input data over time can have significant impacts on the levels of need. The NPPF (paragraph 158) urges councils in preparing their local plans to ensure they use the most up-to-date and relevant evidence. We would, therefore, urge the council to ensure that the OAHN is monitored closely and kept under review as the later stages of the local plan process progress. In the meantime, we are satisfied that the conclusion to seek to meet the full OAHN of 380 dwellings per annum is robust and a sound element of the current Regulation 18 consultation draft.
- 2.4.3 We also support the Regulation 18 consultation draft where it properly notes that the government's proposed standardized objectively assessed housing needs methodology indicates a need for Brentwood to deliver a capped figure of 454 dwellings per annum. The promoters fully support the council's approach to recognizing the implications of adopting the standardized methodology and are fully engaged in the council's appropriate investigation of how DHGV might contribute towards meeting this higher figure. Further comment is contained in paragraph 2.5.3-2.5.4 of these representations.
- 2.4.4 The promoters continue to assess and monitor the requirements for the types of housing to be provided in the borough and at DHGV. This work will continue throughout the various planning and development processes and will be subject to change. Given the changing requirements the Promoters will inform the council of their assessments and seek to link them with any assessments and monitoring undertaken by the council. With this in mind, the Promoters reserve their ability to comment further on residential typologies contained in the relevant IDP chapter.
- 2.4.5 The Regulation 18 Plan evidence base does require some further clarification though in respect of its assessment of specialist elderly persons accommodation referred to paragraphs 46 – 50. The SHMA Part 2 at paragraphs 6.3 – 6.14 attempts to assess the level of need for specialist elderly persons accommodation within the plan period by using the Strategic Housing for Older People tool developed by the Housing Learning and Improvement Network. In our view, this is a reasonable tool for assessing the likely level of specialist housing requirements for elderly persons in general but because it is, as confirmed in paragraph 6.8 of the SHMA, driven by demographic changes and does not take into account peoples' aspirations it is likely to be less accurate in assessing the level of need for care



homes in Use Class C2. Paragraph 6.14 of the SHMA Part 2 suggests a need for an additional 424 spaces over the next 20 years. The problem with this demographic only assessment approach is that it is likely to over-estimate the actual need because it fails to take into account the traditional desire of elderly people to avoid taking accommodation in an institutional care home and also fails to recognize the greater variety of specialist housing options now available which are designed to allow elderly people to maintain their independence for longer. The HAPPI Spectrum published by the Housing our Ageing Population: Panel for Innovation (HAPPI) identifies a range of options which are available as specialized housing where personal care and support can be arranged or provided within the development together with shared facilities and activities. These include sheltered retirement homes, very sheltered homes, extra care housing, retirement villages and close care facilities.

2.4.6 Paragraph 72 of the Regulation 18 Plan suggests the provision at DHGV of *“two large [care] homes - 204 beds in total”*. While the Promoters do not object to the principle of providing elderly persons accommodation on site – indeed it is welcomed as part of creating an inclusive community – before committing to policy a precise provision requirement for two large care homes it will be important to be clear about the level and type of need. Alternatively, our recommendation would be to maintain flexibility and include in policy a requirement to provide specialist accommodation for the ageing population. Such flexibility would allow the Promoters and the council to assess properly the level and type of requirements at the time of application submission and appropriately integrate that housing with the community. If, on the other hand, further detailed assessment or clarification of need and accommodation type is gathered then inclusion into the allocation policy would be entirely acceptable.

2.4.7 The promoters are currently assessing the ability of DHGV to accommodate specialist pitches for Gypsy and Traveller households. It is noted that in Fig 13 of the Regulation 18 Plan DHGV has been identified in Step 6 of a sequential testing exercise for consideration of a possible 30 (approx) pitches. We are not yet convinced by the available evidence that sufficient need has been identified to justify the accommodation of this number of pitches, or in the DHGV location. Firstly, the Gypsy and Traveller Accommodation Assessment (October 2017) identifies a need within the borough for only 12 additional pitches for Gypsy and Traveller households which meet the planning definition contained in the Planning Policy for Traveller Sites. There is no explanation of why the Plan seeks to identify accommodation of additional pitches for households which do not meet the planning definition. Secondly, the Promoters are not persuaded that DHGV is a suitable location for such a large concentration of pitches, particularly in view of the fact that the sequential test has identified other more suitable sites to meet the need.

## 2.5 **Housing Supply**

2.5.1 In our view, the council has undertaken a robust and sound assessment of housing land supply and have continued to ensure that the evidence base is as up to date as possible and proportionate to the relevant stage of Local Plan preparation.



- 2.5.2 The promoters were first appointed to partner the landowner at DHGV in 2015. Since then, the promoters have undertaken a substantial amount of assessment work designed to identify the suitability and capacity of the site. Together with the council's evidence base, the promoter's proportionate evidence supports the allocation of the site and its ability to deliver approximately 4,000 homes for a range of accommodation types in a new garden village form together with employment, local shops and supporting infrastructure. Relevant evidence accompanies these representations, refreshed and updated where appropriate. In addition, substantial further work is currently being undertaken to ensure that sufficient evidence is available to submit, at the appropriate time, an application for outline planning permission. One very clear conclusion of all this work is that the Local Plan allocation of DHGV as its principal strategic housing land supply site is reliable and able to deliver homes for first occupation from 2022. Evidence exists to confirm that the site is, in the words of paragraph 47 of the NPPF, "developable".
- 2.5.3 The council is sensibly also engaged with the promoters of DHGV in order to investigate whether or not DHGV could accommodate an increased delivery timetable in circumstances where the government's proposed standardized objectively assessed housing needs methodology were to be used. Paragraph 2.4.3 of these representations explains these circumstances. Paragraph 67 of the draft plan notes that, *"Should the council need to accommodate this significant increase in housing need, consideration is being given as to whether the delivery of DHGV could be accelerated to increase its dwelling yield within the plan period. Dunton Hills has capacity to deliver 2,500 dwellings within the plan period but has a possible total dwelling yield in excess of 3,500 dwellings."* Paragraph 67 continues to explain, *"This is at least another 1,000 dwellings beyond the end of the plan period to 2033. This work is linked to site masterplanning, consideration of various modern methods of construction, early upfront infrastructure delivery and a clear delivery plan with comprehensive site phasing."*
- 2.5.4 The promoters are fully engaged in this process and have made substantial progress in considering the options for delivering an increased number of dwellings within the plan period. Further investigation is required in order to confirm the ability of the site to action all the suggested elements of paragraph 67 but the promoters are confident that firstly the site can accommodate approximately 4,000 dwellings with delivery of up to 3,500 in the plan period. The promoters anticipate further comfort on this point as the Local Plan process progresses.
- 2.5.5 The availability of DHGV to accommodate the range of specialist accommodation is currently being investigated against the backdrop of outstanding queries concerning the precise nature and quantity of elderly persons accommodation (paragraphs 2.4.5- 2.4.6 of these representations) and of pitches for Gypsy and Traveller households (paragraph 2.4.7 of these representations). To avoid any doubt, the promoters are entirely confident, and indeed encouraging of a fully inclusive community providing an appropriate range of housing types and tenures.



## 2.6 Infrastructure Planning

2.6.1 As explained elsewhere in these representations, a substantial amount of assessment has already been undertaken by the promoters to assess the delivery opportunities for the DHGV. This has included assessments of the nature, scale and phasing of necessary infrastructure improvements. Further work is currently being undertaken in liaison with Brentwood Borough Council and other stakeholders. As a new settlement it is recognized that there are important infrastructure principles to be achieved. These include:

- ensuring the necessary infrastructure is planned from the start and delivered proportionate with the development;
- ensuring that all key facilities are planned in convenient and accessible locations;
- creating economies of scale sufficient to contribute to new and improved local and strategic infrastructure.

2.6.2 In addition to these general new settlement infrastructure related principles DHGV in particular affords the opportunities to deliver site specific infrastructure principles including:

- recreation and green space to complement an existing extensive network and making use of the existing green infrastructure, features and topography of the site;
- green infrastructure at the heart of development;
- non-car modes of travel;
- support for/enhancement of existing public transport provision;
- full range of community facilities including appropriate forms of education and health facilities.

2.6.3 In the promoters' view, all of the above principles should be included in a series of appropriate allocation and new settlement policies to ensure clarity to developers and stakeholders that what is promoted is delivered. These representations attempt to capture these principles for later inclusion in a single or series of policies specific to the delivery of a new garden village on the Dunton Hills site (paragraph 3.10 of these representations)

2.6.4 Clearly though additional assessments are required to be completed with relevant stakeholders and so these suggested policies will be clarified and developed as further assessments are completed. The promoters also note that the Infrastructure Delivery Plan (IDP) associated with the Regulation 18 plan is still emerging. As a consequence, the promoters reserve their position to enable further comments to be made and further assistance on site specific infrastructure planning to be offered.



## 2.7 Employment site allocations

- 2.7.1 The promoters support the economic aims and Strategic Priorities of the Plan. These contain an understanding of the contribution which Brentwood borough as a whole can make to the economic prosperity of the UK and the more immediate area in south Essex. The assessments, which include the evidence base contained in the final report of 'Brentwood Economic Futures 2013-2033 prepared by Lichfields and dated January 2018 confirms at Fig 4 and paragraph 4.12 that in all scenarios assessed for the borough as a whole the draft Local Plan will ensure a surplus of land for B1c/B2 and B8 uses but may see a shortage to meet future B1a/b requirements.
- 2.7.2 The Regulation 18 Plan identifies a number of potential preferred allocation sites for employment development, each with their own characteristics and ability to deliver space for a variety of B Class uses. Further assessment could usefully be undertaken to understand more precisely what each of these sites, particularly at East Horndon Hall and DHGV could most usefully deliver. The plan currently suggests the possibility of a 5.5ha site for dedicated employment uses at DHGV but correctly notes at paragraph 123 that, *"The exact range and type of employment development at Dunton Hills is still subject to detailed site master planning, but will need to be compatible with residential uses and of a human scale which is appropriate to a garden village"*. Preferred Allocation 187 on land south of East Horndon Hall is specifically allocated for employment purposes with the note, *"Self-contained employment site capable of being linked to DHGV proposals. This allows for increased development of new homes at Dunton Hills"*. Finally, on this point, the Employment Typology contained in the draft IDP identifies the 5.5ha of employment land at DHGV as potentially including land for B1a, B1b (Research and Development,), B1c, B2 and B8 uses.
- 2.7.3 In the promoters view the precise scale, type and location of any employment land allocation at DHGV, whether with or without the development on land south of East Horndon Hall requires further assessment. Paragraph 5.13 of the Lichfield document states that the provision of future employment land should consider carefully how businesses use premises. The report concludes on this point that, *"These factors mean that the Council will need to plan for a flexible employment land supply"*.
- 2.7.4 The changing requirements for employers and the changing nature of employment with improved technology raises genuine opportunities for new settlements such as DHGV to deliver a different and more flexible form of employment generation. Economies of scale and the potential to incorporate infrastructure including high speed broadband comprehensively and from the start of development affords the opportunity to consider efficient and sustainable home working, perhaps with shared meeting facilities within the village. The promoters continue to investigate the potential for this form of technological innovation and intend to include appropriate references within subsequent applications for planning permission. In the meantime, though it is important that opportunities of this kind are captured in any allocation policy (paragraph 3.10).



### 3 PART 2 PREFERRED SITE ALLOCATIONS

3.1 The preferred allocations have been identified through a sound and proportionate process in the preparation of the various stages of the Local Plan so far. Further clarification and assessment is required as the process progresses towards its Regulation 19 stage. These representations make no comment on the majority of the preferred allocations, instead concentrating on the DHGV preferred allocation on which the promoters represent the land owner, promotion and delivery strategy. As stated elsewhere in these representations, the promoters have appointed a full consultant team and since agreeing promotion terms in 2015 have undertaken a substantial amount of site specific assessment. This assessment has confirmed the suitability and capacity of the site and confirmed that the site is 'developable' and capable of delivering homes for occupation on site from 2022. Subject to further investigations concerning market signals, early delivery of infrastructure, housing typologies, employment land typologies, early submission of applications for planning permission and innovative construction techniques the promoters are confident that the development could deliver more homes within the plan period than the 2,500 originally considered by earlier stages of the process. The promoters anticipate further progress on this over the next few months. The following sections of these representations seek to outline the principal conclusions from some of the assessments already undertaken by the promoters in relation to the suitability of DHGV.

3.2 As part of a clear process of assessment sufficient to give confidence that the largest strategic housing led allocation in the plan is deliverable and is so in such a way that it would achieve the intended vision and strategic objectives of the Local Plan the promoters have made available and will continue to make available to the Local Plan process all appropriate assessments. In addition, the Promoters believe that in order to ensure that the policy framework for DHGV provides sufficient clarity to comply with Local Plan guidance, give confidence that the development will achieve garden village principles within the specific context of Brentwood and deliver homes early a dedicated new settlement chapter should be contained in the Regulation 19 Plan. These representations contain suggested chapter headings and envisage the incorporation of two separate but linked policies, one outlining Garden Village Principles and a second detailing some of the site-specific requirements for DHGV. Not only would such a chapter and policies 'anchor' subsequent applications for planning permission with a sound policy framework they would satisfy the aim of Planning Practice Guidance (PPG) paragraph 12-010.

*"Where sites are proposed for allocation, sufficient detail should be given to provide clarity to developers, local communities and other interests about the nature and scale of development (addressing the 'what, where, when and how' questions)."*

3.3 The promoters, together with stakeholders, continue to undertake further assessments. The intention is to feed these assessments into the suggested policies where appropriate. Revisions may include references to scale and size of community facilities to be provided, the scale and nature of the mix of housing tenures and types and detail of employment mix. In the meantime, the following summaries and references to earlier evidence prepared by the promoters may assist in the necessary understanding.





### 3.4 Ecology and bio-diversity

- 3.4.1 CEG Land Promotions Ltd commissioned SES to carry out an extended phase 1 habitat survey covering land at Dunton Hills Farm, Essex (attached with these representations). The habitat survey considers the site as follows:
- 3.4.2 The site is approximately 237ha in size and is dominated by arable farmland and amenity grassland used by Dunton Hills Golf Course. Due to this management much of the site is considered to be of low biodiversity value. Habitats of higher biodiversity value are restricted to field boundary habitats such as hedgerows and woodland blocks. These woodland blocks consist of two areas of deciduous woodland, with one small woodland block abutting the north-east boundary and a fragment of ancient woodland called Eastlands Spring which straddles the A127. The southern section of Eastlands Spring is located at the northern boundary of the site with the northern section on the distal side of the A127; this woodland is also designated as a Local Wildlife Site (LoWS). The proposed development will enable Eastlands Spring to be managed using recommendations from the Brentwood Borough Council Wildlife Review (ECCOS, 2012), in addition to complementary habitats buffering the woodland, which will also add to its biodiversity value. Other habitats of interest are the flowing stream believed to be a tributary of the 'Mardyke' which dissects Eastlands Spring flowing north to south and the site's ponds.
- 3.4.3 The proposed development offers a unique opportunity to provide residential development in combination with delivering no net loss to biodiversity. Indeed, there is ample scope for ecological enhancement given the dominance of habitats of low ecological value. A master planning process which retains and enhances the site's key green infrastructure, while creating high value interconnecting complementary habitats can deliver these aspirations. Wildlife should also be welcomed within the built environment targeting priority species of principal importance to UK biodiversity (Natural Environment and Rural Communities Act 2006).
- 3.4.4 As previously mentioned residential development could be delivered to not only achieve no net loss but could deliver real biodiversity gains. Key to this strategy is the delivery of a landscape-scale coherent ecological network by strengthening and interconnecting the site's green infrastructure to allow wildlife to move through the landscape. It is recommended that ecological connectivity is maintained through functional links with Essex Wildlife Trust 'Living Landscapes' Thorndon Woods (23), Bulphen Fen (27) as well Langdon Hills (30) to the south. In addition, green corridors can be established east to west linking to any West Basildon urban extension while also connecting to railway corridor to the south. These green corridors should include Eastlands Spring LoWS ancient woodland, as recommended with the GI Study (2015). These green corridors can provide a mosaic of multi-functional open spaces for the benefit of people and wildlife.
- 3.4.5 This opportunity will provide an invaluable building block to help realise the vision of an integrated landscape scale ecological network which is both coherent and resilient. Sir John Lawton within his



making space for nature review (2010) described in four words what is needed to establish coherent and resilient ecological networks that can deliver vital ecosystem services- these networks need to be: Better, Bigger, More and Joined. These four words describe the governments priorities stated within the '*Biodiversity 2020 strategy: A strategy for England's wildlife and ecosystem services*' (2011) in order to deliver ecosystem services for the benefit of people and nature.

- 3.4.6 DHGV can deliver this vision of eco-system services creating a vibrant, healthy environment that the local community can feel pride in their shared heritage, whilst enjoying the health benefits of outdoor recreation set amongst thriving wildlife. Following mitigation proposals, the redevelopment of the site can be achieved with no significant adverse effects upon any statutory or non-statutory sites.
- 3.4.7 In summary, DHGV can be delivered to not only achieve no net loss in biodiversity but can deliver real biodiversity gains. This draft allocation is considered to be compliant with ecological planning policies within the National Planning Policy Framework (DfCLG, 2012), draft local plan (BBC, 2016) and Brentwood Borough Council's Replacement Local Plan (adopted 2005).

### 3.5 **Landscape**

- 3.5.1 Tyler Grange, on behalf of the Promoters of DHGV have prepared a Green Belt and Landscape Technical Report (2394\_R06) that has reviewed the 2018 Interim Sustainability Assessment and the landscape and Green Belt evidence base that supports the Local Plan. A summary of the findings and consideration of the suitability of land at Dunton Hills for release from the green belt to accommodate DHGV is set out below in relation to landscape and green belt matters. A copy of the report is also submitted as part of these representations.
- 3.5.2 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 part 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 tranquility of the area. Tranquility is further eroded by electricity pylons crossing the site, a wind turbine and detracting development on the edge of Basildon, including the Ford buildings.
- 3.5.3 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, southwest and southeast;
  - 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;
- The field pattern across much of the area is degraded, with gappy hedgerows and a loss of hedgerow trees, distinctive copses and shelterbelts.

3.5.4 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 publicly 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.

3.5.5 In summary, DHGV can be delivered to respect the landscape and distinctive features, incorporating measures that would help to mitigate the negative impacts of existing transport infrastructure, whilst strengthening the degraded landscape structure through enhancement of boundaries. This accords with published management guidelines for the Horndon Fenland as set-out in the Mid Essex Landscape Character Assessment that forms part of the Local Plan evidence base.

3.5.6 As recognised by the council within the Sustainability Appraisal, development at DHGV has the potential to be delivered as a landscape-led scheme that responds to the topography of the site, provides substantial areas of green infrastructure incorporating accessible multifunctional green space and landscape planting that respects the local character.

### 3.6 **Green Belt**

3.6.1 The Green Belt Evidence Base is being updated to represent further research and analysis that responds to the consultation representations to date and the review and updating of policies in the Draft Local Plan. The Green Belt Evidence base comprises four parts.

3.6.2 Working Drafts of the Part 1 and Part 2 Green Belt studies have been published as part of the January 2018 Regulation 18 consultation on the Preferred Site Allocations.



- 3.6.3 The Part 3 and 4 Green Belt studies will continue to be progressively refined and updated to inform the site assessment process and final local plan policies. The council intend to publish both studies in full prior to or as part of the Regulation 19 Local Plan pre-submission consultation.
- 3.6.4 The Part 1 Study highlights the importance of sustainability criteria and infrastructure requirements being considered in the balance and that the context against which the emerging Local Plan is being developed with 10% of the borough being previously developed and 89% of the borough comprising green belt. There is, therefore, a small amount of land available to deliver the required housing and employment growth that remains outside the green belt.
- 3.6.5 As set out in the 2018 Interim SA, the development of DHGV would represent sustainable development within the A127 corridor that is well connected and in close proximity to employment areas and public transport. DHGV also offers potential for the provision of substantial recreational benefits including significant areas of green infrastructure incorporating multi-functional accessible green space as part of a landscape-led scheme that connects with adjoining areas of landscape and wildlife.
- 3.6.6 In addition to this, the containment of the site by existing roads and the railway, combined with the opportunity to provide a robust landscape buffer to the eastern boundary serve to limit any urban sprawl or coalescence whilst limiting impacts on the wider green belt.
- 3.6.7 In this manner, DHGV also offers the opportunity to provide enhanced recreational and wildlife benefits. This may serve to compensate for loss of green belt land.
- 3.6.8 The Part 2 Green Belt Study has been prepared to assess the level of contribution of general land areas (Green Belt Parcels) to fulfilling the purposes of the green belt at a strategic level. Within the technical report, Tyler Grange have undertaken a comparative exercise to consider the Dunton Hills site and the design principles of the DHGV scheme.
- 3.6.9 Having reviewed the methodology and findings of the Part 2 Green Belt Study, it is clear that it is necessary to reassess the Dunton Hills site in more detail to allow for the consideration of how the DHGV scheme can provide development that responds to the landscape and green belt context. It is expected that this work will be undertaken as part of the forthcoming Part 3 Study.
- 3.6.10 The Dunton Hills Site is also considered to make a lower contribution to the green belt by virtue of the following factors:
- the smaller scale of the site than the larger are assessed for Parcel 17;
  - the detracting influence of on-site development (buildings, car parking and roads), wind turbine, electricity pylons, roads and railway upon the landscape character and contribution to the countryside;
  - separation of Dunton Hills from the built edge and containment by the A127, A128 and railway line to prevent sprawl;



- opportunities for the reinforcement of the eastern site boundary to provide a soft transition with the adjacent landscape and provide a visual barrier with Basildon, as well as forming a robust and defensible new green belt boundary;
- opportunities for DHGV to be developed as part of a landscape led scheme that respects the topography and positive features on the site and provide substantial areas of green infrastructure and landscape enhancements.

3.6.11 The containment of the site by the A127, A128 and railway line provide existing robust green belt boundaries. Tying-in with the landscape proposals, the eastern boundary can be enhanced with woodland, trees, hedgerows and landscape buffers to provide a robust and defensible new green belt boundary that forms a soft transition with the countryside to the east and limits intervisibility with Basildon and West Horndon.

3.6.12 All of the above measures will serve to limit impacts on the function and openness of the wider green belt, containing the site and restricting urban sprawl. Combined with the location of the site within the A127 corridor and access to the transport network and infrastructure and employment areas these factors combine to make DHGV a suitable strategic allocation that fits with the spatial strategy of the emerging Local Plan.

### 3.7 Highways and transportation

3.7.1 Substantial work is currently being undertaken by BBC, ECC and highway consultants representing the promoters. We understand that further update evidence will be made available from current update modelling exercises. In the meantime, the PBA document 'Development Options – Highway Modelling' dated February 2016 follows a logical approach to assess numerous junctions, identifying four strategic land options, including Dunton. Each strategic option is assessed separately to identify the associated impacts. The report concludes that it appears that Options 1 (Dunton) and 4 have resulted in lower RFC/Degree of Saturation values in general when compared to the other two options. Several junctions are identified as needing further investigation to identify appropriate mitigation. These conclusions accord with the early assessment work undertaken, in liaison ECC, by Brookbanks Consulting on behalf of the promoters. Brookbanks Consulting have further identified two suitable access points to the site onto the A128 and will, as part of a more detailed assessment for the purposes of the Local Plan and application processes, continue to consider recommendations to reduce car usage. As a new settlement with opportunities afforded by economies of scale and timely provision of infrastructure designed into the core of the village DHGV could provide new and unique opportunities for modal shift and sustainable transport.

### 3.8 Flood risk and drainage

3.8.1 The current evidence base contained in the Surface Water Management Plan (January 2015), Strategic Flood Risk Assessment (Feb 2011) and Water Cycle Study (Feb 2011) provides a useful



foundation for the consideration of sites within the borough for possible development. While site conditions will be required, further specific assessments and a consideration of how development might 'fit' within the overall strategic water environment, the assessment undertaken so far by the promoters confirms the suitability of the site, identifies areas where built development should not take place and recommends an appropriate form of water management. On the later point, water management is likely to include both SuDS and water attenuation.

- 3.8.2 The majority of the Site lies within Flood Zone 1; being an area of Low probability of fluvial flooding outside both the 1 in 100 (1% AEP) and 1 in 1,000 (0.1% AEP) year flood events. All development is, therefore, deemed acceptable within this zone.
- 3.8.3 The extent of land directly adjacent to the watercourse that flows through the centre of the site, lies within Flood Zone 3. This area forms land having a 1 in 100 or greater annual probability of river flooding; or land having a 1 in 200 or greater annual probability of sea flooding. The capacity study and early concept master planning exercises identify these areas of the site as being part of the green and blue infrastructure network.

### 3.9 **Site capacity**

- 3.9.1 The early site capacity and master planning exercises undertaken on the site assume that as a garden village and making use of the site's natural contours, field boundaries, wetlands and wooded areas within a borough characterized by an extensive green network and villages developed around green facilities, the capacity and layout of the garden village will have green infrastructure at its heart. This is likely to require in the first instance an identification of areas of the site which will form the green infrastructure. Based on assessments carried out so far this is likely to ensure approximately 30% of the site will remain and be managed as green infrastructure.
- 3.9.2 Responding further to the anticipated full range of dwelling typologies referenced in the IDP, SHMA and NPPF and the aim of the garden village to provide an inclusive community for all, the remaining area of the site available for residential development could be developed in mix of densities and provide approximately 4,000 homes. The promoters would anticipate the inclusion of such considerations within Regulation 19 Plan DHGV policy framework.

### 3.10 **Suggested new settlement policy and explanatory text**

- 3.10.1 As explained elsewhere in these representations (paragraph 3.2), the promoters anticipate and would welcome the incorporation into the Regulation 19 Plan two separate but linked policies, one outlining garden village principles and a second detailing some of the site-specific requirements for DHGV. The promoters believe that such a policy framework, properly supported by evidence, would provide sufficient clarity to comply with Local Plan guidance, give confidence that the development will achieve garden village principles within the specific context of Brentwood and deliver homes sufficiently early to meet the Local Plan's OAHN.



3.10.2 The precise details of the policies will emerge from further assessment and engagement with stakeholders, all of which is currently progressing at pace. Below is a suggested format for such a policy framework with some explanatory text included here to demonstrate the very real and unique opportunities recognized to be provided in a new garden village as opposed to extensions to existing established communities. Much of the suggested text is based on publicly available and established good practice documents:

### **Suggested New Settlement Chapter and Policy Headings**

#### Garden village principles

- 1.1 *The Local Plan recognises the role that strategic development in the form of a new settlement can play in meeting the additional new homes required in the plan period and beyond and particularly in accordance with the Local Plan's Vision and Strategic Objectives.*
- 1.2 *A large scale new settlement provided as a new garden village can provide a number of opportunities such as:*
  - *ensuring the necessary infrastructure is planned from the start and delivered proportionate with the development;*
  - *creation of a community with access to a mix of uses including recreation and green space with a community cohesion strategy established by the Promoter with representation from the community and local planning authority;*
  - *ensuring that all key facilities are planned in convenient and accessible locations;*
  - *placing green infrastructure at the heart of the development;*
  - *creation of a strong sense of place that provides a new focus for growth within the plan period and beyond;*
  - *planning positively for walking and cycling;*
  - *providing support for/enhancement of existing public transport provision;*
  - *creating economies of scale sufficient to contribute to new and improved local and strategic infrastructure;*
  - *creating a place that is attractive to live (and work) benefitting from the provision of new and good access to existing employment opportunities;*
  - *implementation of a strong co-ordinated approach to design;*
  - *foster strong community engagement and a sustainable management structure.*
- 1.3 *Dunton Hills Garden Village (DHGV) will be a well-planned new settlement that responds directly to its regional, local and individual site context, provides the opportunity to create a new place underpinned by the inter-related principles set out in policy 1.*
- 1.4 *The Local Plan is committed to ensuring that the new garden village is as sustainable and high quality as possible and that the infrastructure needed to support it is delivered at the right time. This will require the local planning authority to work closely with the promoters within the proposed garden community location, identify and implement a robust delivery mechanism*



*that will ensure an appropriate and proportionate delivery of necessary infrastructure to achieve the policy ambitions.*

- 1.5 *Long-term and sustainable management arrangements for community assets including green space, public realm areas, community and other relevant facilities will be very important. Such arrangements are to be funded by the development and its new residents and as the community grows will include community representation to ensure residents have a stake in the long-term development and management of their community. However, such arrangements must be considered from the outset, the council will continue to explore with the site promoter the appropriate mechanisms for achieving this.*
- 1.6 *In order to establish a clear policy framework for the delivery of a new DHGV, the council have developed two separate but complementary policies. The role of policy 1 is to ensure that the garden village proposal delivers a high quality sustainable development, based upon a modern interpretation of garden city principles. Site specific policy relevant to the development of DHGV is addressed through policy 2 which details the specific policy approach and requirements for the site tailored to its context, issues and opportunities.*

**The promoters suggest that a Policy 1 should then be developed to capture the general principles to be included in the development of DHGV. This would be followed by a second more site-specific policy 2 to ensure clear guide/requirements for DHGV to provide. This would follow additional assessment of infrastructure requirements, design strategies and further engagement with stakeholders. We provide a suggested explanatory text, again based on established and publicly available documents in respect of garden village principles together with some suggested headings for the policy.**

#### ***Dunton Hills Garden Village strategic site allocation***

- 1.7 *DHGV is allocated as a new settlement, contributing to the delivery of the Brentwood Local Plan Spatial Growth Strategy. The development of DHGV will make a key contribution towards the additional homes required to be delivered across the borough by 2033, delivering approximately 4,000 new homes overall of which an estimated [2,500-3,500] will be within the current plan period.*
- 1.8 *The garden village site is located within the A127 corridor. The railway line runs along the southern site boundary with the northern and eastern boundaries contiguous with the A127 and A128 roads respectively. The development of a new village in this location would complement the unique character of Brentwood borough as a 'borough of villages' and in a location closely linked to the major regional and national transport network.*
- 1.9 *The assessment work undertaken as part of the Local Plan preparation process has identified a number of key opportunities and challenges for the development of a garden village at*



*Dunton Hills, which are addressed in the policy and will be further explored in an application for outline planning permission. These include:*

- o the opportunity to capitalise upon the location of West Horndon railway station and transport links to other strategic allocations in the A127 corridor;*
- o the need to address the development's impact on the transport network;*
- o proximity to and relationship with West Horndon village and the ability for DHGV to complement the network of individual villages set within an open landscape with green belt designation that is characteristic of Brentwood borough.*

1.10 *Policy 2 provides appropriate policy guidance to inform and shape the future submission of an application for outline planning permission. Any application for outline planning permission must be accompanied by a suite of documents which explain how the proposals will be designed to meet the requirements of policy 2 and the principles of a new garden village outlined in policy 1.*

#### **Possible headings for Policy2**

- **Place-making and design quality**, including reference to capitalising on local assets, established environments, maintaining and enhancing identified important views, provision of appropriate local centres which accommodate community facilities with high quality public realm and designed to become a focus of village activity and congregation.
- **Homes**, including reference to the need to provide a full range of house types and tenures to achieve a fully inclusive community. May make reference to the required density ranges and building heights across the site.
- **Employment**, including reference to any specific allocation or employment generation techniques. We would imagine that also at this point the policy would make reference to the importance of high speed broadband.
- **Transport and utility infrastructure**, including confirmation of access points, measures to encourage modal shift and internalisation of trips.
- **Green infrastructure**, including a description of the scale, location and type of green infrastructure to be provided on site.
- **Community infrastructure**, including a list of community infrastructure and contributions to be made by the development for facilities including education, health, community meeting places, public realm and sport.
- **Biodiversity assets**, including relevant detail of any on-site mitigation/enhancement and off-site contributions to assist in mitigation of the possible impacts on nearby SSI and Local Wildlife Sites.





- **Heritage assets**, including requirement for submission of Heritage Impact Assessment as part of application for planning permission and incorporation of appropriate mitigation.
- **Noise and air quality assessments**, including requirement to provide adequate mitigation particularly to A127, A128 and railway line.
- **Long-term community commitment**, including requirement for early community cohesion strategy designed to identify how the community assets will be managed for the long-term benefit of the community and maintenance of those assets.

#### 4 CONCLUSIONS

- 4.1 The above suggested text and policy framework can be further developed as progress is made on the design and planning of DHGV. For the moment though it represents the conclusion of these representations taking into account the evidence presented by the council and previously prepared by the promoters. There is no doubt in the minds of the promoters that the council have prepared a sound and robust set of preferred allocations supported by proportionate evidence.
- 4.2 The promoters are able to confirm that the largest strategic housing led preferred allocation at DHGV is developable in such a way as to meet established garden village principles and achieve the Regulation Plan's Vision and relevant Strategic Objectives. Additional assessments are currently being carried out which will assist in informing the detail to be provided in the Regulation 19 Plan.



DUNTONHILLS

BRENTWOOD

