From: Ben Thomas [

Sent: 17 February 2015 15:13

To: Planning Policy Cc: 'Mark Bedding'

Subject: Draft Brentwood Local Plan Strategic Growth Options Representations

Attachments: Brentwood Local Plan Representations Blackmore 17 02 finalcombined.pdf; Stategic

Growth Options Consultation Form Savills.pdf; Cover letter 17.02.15.pdf; ATT443786.txt

Dear Sir/Madam

Please find attached representations attached in relation to the Draft Brentwood Local Plan Strategic Growth Options on behalf of Crest Nicholson.

The representations are made generally in connection with the site 076 (SHLAA site G070A), Land South of Redrose Lane, Blackmore which is being promoted by Crest Nicholson.

Kind regards

Ben Thomas BA (Hons) MSC MRTPI Associate Director Planning





Before printing, think about the environment

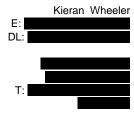


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17th February 2015



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



Dear Sirs,

DRAFT BRENTWOOD LOCAL PLAN STRATEGIC GROWTH OPTIONS CONSULTATION PLANNING RESPONSE SUBMITTED ON BEHALF OF CREST NICHOLSON EASTERN

Please find enclosed a planning response on behalf of Crest Nicholson Eastern, in response to the Draft Brentwood Local Plan Strategic Growth Options.

Representations are made generally in connection with the site 076 (SHLAA site G070A), Land South of Redrose Lane, Blackmore which is being promoted by Crest Nicholson.

These representations have been submitted via email to planning.policy@brentwood.gov.uk.

Savills request that we are notified of any future publication's of these documents.

In the meantime, should you require any additional information or have any further queries, please do not hesitate to me or my colleague Ben Thomas on

Yours sincerely,



Kieran Wheeler Director Savills Planning and Regeneration

cc Mark Bedding Crest Nicholson Eastern



Internal use only
Comment No.
Ack. date



Brentwood Borough Local Plan

Strategic Growth Options Consultation

January 2015

Consultation questionnaire

This consultation questionnaire relates to the Brentwood Local Plan Strategic Growth Options Consultation and is provided for you to make comments. Please take the opportunity to read the consultation document before filling in this form and returning to:

Planning Policy Team, Brentwood Borough Council Town Hall, Brentwood, Essex, CM15 8AY or by email to planning.policy@brentwood.gov.uk

Comments need to be received by 5pm on Tuesday 17 February 2015

If you need any help completing this form please contact the Planning Policy Team using the contact details given above or by telephoning 01277 312620.

Personal Details

Title: Mr	First Name: E	3en	Last Name: Thomas	
Organisation (if applicable): Savills Planning				
Job title (if applicable):Associate Director				
Address:				
Post Code:		Telephone Number:		
Email Address:				

Questions

The Council is seeking responses on key issues. Focused questions appear in bold boxes throughout the Strategic Growth Options document. These questions are summarised in this consultation questionnaire. More information can be found at www.brentwood.gov.uk/localplan.

Please use an additional sheet if necessary. Please note that all responses will be published online.

.	Q1: Do you agree with the broad areas, for the purpose of considering Y approaches to growth?	⁄es	No 🗆
	Please refer to supporting statement.		
?	Q2: Do you agree with the issues raised within each of these areas?	∕es □	No
	Please refer to supporting statement.		
		, _	
3	Q3: Do you have any comments on the appropriateness of particular sites? Y	∕es ⊔	No
	Please refer to supporting statement.		
?	Q4: Given the greater capacity for growth along the A127 corridor, which of the sites put forward do you think is the best location for growth?	Э	
	Please refer to supporting statement.		
Ş	Q5: Should the A12 corridor accommodate growth by releasing sites on	∕es □	No

			1
	Please refer to supporting statement.		
?	Q6: In order to provide for local need is it preferable for Greenfield sites on the edge of villages to be released, or to develop brownfield sites (both within the Green Belt)?		
]
	Please refer to supporting statement.		
?	Q7: To enable future employment need to be met do you agree that the most sustainable approach is to allocate new sites close to the strategic highway network?	Yes □	No □
	N/A		
?	Q8: In order to ensure that the Town Centre remains economically sustainable, do you agree that a "Town Centre First" approach should be taken to retail development?	Yes □	No 🗆
	N/A		

the edge of urban areas?

N/A	?	Q9: Are there opportunities for more open space provision in the area where you live?	Yes □	No 🗆
		N/A		

Q10: Please rate the level to which you value the landscape near where you live (on a scale of 1 to 5), as compared to other areas within Brentwood Borough, for the following aspects:

Aspect:	Very Low	Low	Average	High	Very High
Scenic Beauty / Attractivness	1	2	3	4	5
Outdoor Recreation / Leisure Use	1	2	3	4	5
Wildlife Interest	1	2	3	4	5
Historic Interest	1	2	3	4	5
Tranquility	1	2	3	4	5
Other – please specify: N/A	1	2	3	4	5

Q11: To what extent do you think the following are present in the landscape near where you live (on a scale of 1 to 4):

Aspect:	Absent	Occasional	Frequent	Predominant
Houses	1	2	3	4
Commercial / Industrial buildings	1	2	3	4
Nature Reserves / Wildlife	1	2	3	4
Farmland	1	2	3	4
Woodland	1	2	3	4
Degraded / Derelict / Waste land	1	2	3	4
Infastructure (Road / Rail / Pylons etc.)	1	2	3	4
Leisure / Recreation Facilities	1	2	3	4
Other – please specify: N/A	1	2	3	4

	Q12: Have we considered the main infrastructure issues? Are there other Yes Important issues to consider?	No □
	Please refer to supporting statement.	
?	Q13: What do you think the priorities for infrastructure spending should be?	
	Please refer to supporting statement.	

Thank you for taking the time to complete this questionnaire

Please ensure that you return comments to the Council by 5pm on Tuesday 17 February 2015 (see page 1 for details)

Brentwood Local Plan Strategic Growth Options Consultation

Planning Representations

Prepared by Savills UK on behalf of Crest Nicholson Eastern in respect of Land South of Redrose Lane, Blackmore





Representations

Introduction

- 1.1 These planning representations have been prepared by Savills UK on behalf of Crest Nicholson Eastern in response to Brentwood Borough Council's Strategic Growth Options Consultation. The representations specifically relate to site 076 (SHLAA site G070A), Land South of Redrose Lane, Blackmore.
- 1.2 A Vision Statement has been prepared which identifies the benefits and opportunities for the site which is enclosed as Appendix 1.
- 1.3 We set out below responses to the relevant questions as out in the Strategic Growth Options Consultation document.

Q1: Do you agree with the broad areas, for the purpose of considering approaches to growth?

- 2.1 No.
- 2.2 We acknowledge that 'Growth Option B' (A12 Corridor) warrants consideration, particularly around Brentwood, at the top of the Borough's settlement hierarchy. However, sites within this corridor need to be well contained by defensive, permanent boundaries and represent an appropriate scale in relation to the settlement they adjoin (supported by localised ONS data on household growth). The ability to mitigate development in transport impact terms will also need to be demonstrated.
- 2.3 'Growth Option A' which supports the growth of villages in the north of the Borough should be given priority. As the consultation document acknowledges, "it is important to consider allowing villages to grow in order to provide for local need". This approach not only seeks to meet local, settlement specific housing needs to address localised affordability issues but it is also necessary to retain the working age population in the village to ensure the viability and vitality of local shops and services. As such, support is given to the development of the most sustainable Green Belt site/sites on the edge of villages with the capacity to meet settlement-specific housing needs. We acknowledge that the villages have a rural setting so it is also imperative that these sites can be delivered in the short term by a housebuilder with a proven track record of delivering high quality, low density, well-landscaped schemes. Crest Nicholson is the current National Housebuilder of the Year and is a local company based in Brentwood.
- 2.4 We object to the quantum of 4-6,000 homes that has been proposed at the Dunton Garden Suburb (Growth Option C) on the periphery of the Borough, which would not assist in meeting the existing settlement specific housing and socio-economic needs within Brentwood and especially the villages throughout the Borough.
- 2.5 The principle of an urban extension to the settlement of Basildon is not objected to but the quantum of cross-boundary development suggested is not logical, nor justified by any meaningful evidence. The area within the administrative boundary of Brentwood has a number of environmental constraints and the quantum proposed will require a significant

upgrade to strategic infrastructure. The time frames for the delivery of such an extensive development will not address the acute local housing shortage within Brentwood that exists now. It is considered that reliance on a single site within a Local Plan is not a sustainable approach to meet housing need, and is one that has been heavily criticised by a number of Inspectors at recent Local Plan Examinations.

2.6 It is further considered that the only viable, appropriate and logical area for housing within the Dunton Garden Suburb area is immediately adjacent to the settlement boundary of Basildon Town.

Q2: Do you agree with the issues raised within each of these areas?

- 3.1 We agree with paragraph 2.15 of the Strategic Growth Options Consultation Document where it is stated that in order to provide for local need, villages should be allowed to grow, and the edge of villages could be released from the Green Belt to enable this.
- 3.2 We agree with the Council's consideration of Green Belt release because there is insufficient brownfield land to meet its objectively assessed need (OAN) (as indicated at paragraph 1.4 of the consultation document). We would reassure the Council that Hundal v South Buckinghamshire (DC 2012) demonstrates that housing need is capable of justifying a change in the Green Belt boundaries. Taking this point into practice, St Albans City and District Council (another Metropolitan Green Belt authority) is preparing its Local Plan to meet full OAN with Green Belt release on the basis that 'exceptional circumstances' do exist because there is insufficient brownfield capacity and no alternative locations beyond the Green Belt. This situation is materially the same as can be observed in Brentwood Borough and we subsequently support the consideration of Green Belt release. Therefore, where there are suitable, sustainably located Green Belt sites adjoining villages such as Blackmore, they should be released for residential development.
- 3.3 Whilst the document refers to meeting local housing need through the release of land within the Green Belt at each village, clarification is required on how this is defined. It is essential that the most appropriate site is allocated at each village which has the capacity to meet settlement specific needs over the next 10 years (for example site 076). As mentioned previously, this is crucial to maintain the viability/vitality of village services.

Q3: Do you have any comments on the appropriateness of particular sites?

- 4.1 This document specifically supports the site at Land South of Redrose Lane, Blackmore (076) which we consider should be released from the Green Belt, in order to meet the existing and future housing and socio-economic requirements within Blackmore.
- 4.2 A Local Housing Requirements Study for Blackmore, prepared by Barton Wilmore (August 2013) concludes that projected household growth at Blackmore will generate a need for between circa 81- 98 dwellings over the next 20 years (or approximately 60-75 though the proposed Plan Period 2015-2030). It is considered that the Land south of Redrose Lane is the only sustainable housing option within Blackmore to meet this need in the short-to medium term.
- 4.3 The Vision Statement at Appendix 1 demonstrates how the Site could be sensitively developed to provide a sustainable, high quality scheme in the region of 40 residential units. The site is suitable for a number of reasons:

- The site is well screened, with defensible boundaries on four sides, ensuring that visual impact from the proposals will be minimal, and considerably less than other promoted sites;
- The site does not result in any symptoms of coalescence and is located within an area
 of established residential character, that presents itself as a logical extension to the
 existing settlement boundary;
- The site does not perform the function of preserving the setting and special character of a historic town or any assets of historic value;
- No environmental or ecological constraints have been identified on the site that would prevent its development for residential use; and
- The proposals would result in a number of significant socio-economic community benefits.
- 4.4 Access to the site is achievable from Red Rose Lane which has been agreed in principle with Highway Officers. Pedestrian access is possible from the north-west corner of the site via a new footpath link connecting to a short section of new footway on the south side of Red Rose Lane. The new footway extends south to the existing footway that currently terminates opposite Orchard Piece, from which point existing footways facilitate walk trips to the village centre.
- 4.5 Within BBC's SHLAA (2011) and "Draft Site Assessment" (July 2013) which supports the Local Plan, "Land South of Redrose Lane, Blackmore (ref G070A)" is identified as appropriate for housing development for 89 units. It should be noted that a design-led approach has resulted in a lower-density scheme of approximately 40 residential units. The Vision Statement enclosed at Appendix 1 identifies the benefits and opportunities for the site.
- 4.6 BBC states in their SHLAA that the site is:
 - Suitable: The site is located adjacent to the settlement boundary and contained by Redrose Lane, Fingrith Hall Lane and Chelmsford Road. The site comprises land used for grazing. The site is bounded on one side by residential properties. Development in this location would help to support the viability and vitality of existing services and potentially provide new services
 - Available: The site is available for residential development; and
 - Achievable: Residential development on this site would be achievable due to its location within an attractive area. Due to its size this site would be brought forward by a medium sized developer.
- 4.7 A total of 7 sites (not including the subject site) are considered in the SHLAA. Two of the sites are on brownfield land and can only achieve approximately 1 dwelling (B140 and B141). The remaining 5 sites are located on greenfield land. Three of these sites are discounted due to the unacceptable intrusion into the countryside G041, G044 south and G044 west). One other site can only achieve one dwelling (G146).
- 4.8 The remaining Green Belt site G070 lies to the west of the subject site. This site has many similarities due to its close proximity to the subject site. However it is more open in nature,

does not have clear defensible boundaries on all sides and development would have a greater impact on existing residential properties. The site also lies to the north west of Blackmore which represents an important green gateway into the village, characterised by open space either side of Nine Ashes Road (including Blackmore Millenium Park). The north eastern part of Blackmore is distinctly different in character due to its more enclosed nature and the existing residential development along Chelmsford Road.

- 4.9 As such it is considered that the subject site is the only suitable site around Blackmore.
- 4.10 Land South of Redrose Lane (076) is being promoted by Crest Nicholson who are National Housebuilder of the Year and are fully committed to delivering a high quality, low density, well-landscaped scheme.
 - Q4: Given the greater capacity for growth along the A127 corridor, which of the sites put forward do you think is the best location for growth?
- 5.1 As above in queston Q3, none are appropriate in this area on the periphery of the Borough.
 - Q5: Should the A12 corridor accommodate growth by releasing sites on the edge of urban areas?
- 6.1 Yes, some growth is understandable given the supporting road infrastructure.
 - Q6: In order to provide for local need is it preferable for Greenfield sites on the edge of villages to be released, or to develop brownfield sites (both within the Green Belt)?
- 7.1 It is considered that the release of Greenfield sites on the edge of villages is the preferred approach. The development of Greenfield sites avoids village cramming in areas where urban capacity is already non-existent (for example in Blackmore). This would not be a sustainable solution to the delivery new homes as it is anticipated that only a small number of homes would be built and therefore would not meet objectively assessed needs. Furthermore, small scale urban development (under 10 units) would not deliver much needed affordable housing provision.
- 7.2 The delivery of Greenfield sites allows for higher quality, lower density, well landscaped housing development. The delivery of larger scale development will also provide planning benefits including financial contributions to local services.
 - Q12: Have we considered the main infrastructure issues? Are there other important issues to consider?
- 8.1 Greater reference is required to maintaining village services and social infrastructure.
 - Q13: What do you think the priorities for infrastructure spending should be?
- 9.1 We consider that education should be a priority.
- 9.2 Commissioning school places in Essex 2013/18 (2014) confirms that Blackmore Primary School currently has capacity to accommodate an additional 17 pupils. The provision of family housing on Land at Redrose Lane would be beneficial in terms of ensuring sufficient numbers on roll to meet this capacity. This would have a positive impact on the existing school and wider community with more children given access to extend learning opportunities. It will also ensure that the village has a wider age diversity which will enable

	the retention of a working age p shops and services.	opulation in future years a	and secure the long term viability of
Brer	ntwood Borough Council: Local Plan	Page 6 of 7	Savills UK on behalf of Crest Nicholson

Appendix 1: Land So	uth of Redrose La	ane Vision State	<u>ement</u>	



Land at Redrose Lane, Blackmore Vision Statement

February 2015









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1.0	Introduction
2.0	Site and Surroundings
3.0	Borough-wide Planning Context
4.0	Settlement Specific Planning Context
5.0	Growth Options around Blackmore
6.0	Opportunities and Constraints Plan
7.0	Concept Plan Development
8.0	Access and Design Principles
9.0	Indicative Layout
10.0	Indicative Illustration
11.0	Socio Economic Benefits
12.0	Conclusions

1.0 Introduction

This document is submitted as part of the supporting case for the residential development of Land at Redrose Lane, on behalf of our client Crest Nicholson.

Crest Nicholson is a leading housebuilder across the South of England and current National Housebuilder of the Year. Crest has a 50 year heritage of high quality, community focused development. For the Last three years Crest has been ranked in the top two developers under the independent sustainability audits sponsored by the Homes and Communities Agency.

Crest has assembled a team of leading advisors including Savills, LAP and Ardent Consulting Engineers, who will assist with developing proposals for the site. The aim is to make the very best of the unique opportunity to deliver a high quality and sustainable new residential development within Blackmore, which would contribute towards meeting the settlement and the Borough's housing and socio- economic needs.















2.0 Site and Surroundings

The 1.6 hectare site is located adjacent to the settlement boundary of the village of Blackmore, within the administrative area of Brentwood Borough Council (BBC). The site lies to the south of Redrose Lane, and adjoins the settlement boundary to the south which is characterised by two storey terraced and detached housing. The site's eastern boundary is characterised by established trees and the western boundary by Fingrith Hall Lane. To the north, across Redrose Lane lies Redrose Farm, which contains a two storey house and a collection of agricultural buildings and structures.

The existing access from the single track Redrose Lane (via a gated field access) is at the site's northern boundary.

In terms of public transport, local bus services operate from the centre of the village. Served destinations include Chelmsford City Centre, Ongar and Brentwood Railway Station.



Site within urban context

3.0 Borough-wide Planning Context

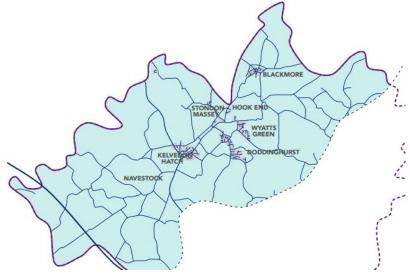
BBC is currently consulting on its Strategic Growth Options Consultation. The consultation period closes on 17 February 2015.

Within the Strategic Growth Options Document, BBC acknowledge that they are "required to meet local housing and employment needs, among other needs. For housing, evidence suggests that need is around 360 new homes per year, or 5,500 new homes over a 15 year period. The capacity of brownfield sites in urban areas over 15 years is 2,500, some 3,000 short of total need."

BBC's housing trajectory (opposite) demonstrates a significant housing supply shortfall over the next five years.

As acknowledged in the Strategic Growth Options document, "it is important to consider allowing villages to grow in order to provide for local need".





4.0 Settlement Specific Planning Context

A settlement specific Housing Needs Assessment has been prepared by Barton Wilmore (dated August 2013) which sets out the future local housing requirements within Blackmore. The document projects that household growth within Blackmore will generate a need for between 60 and 75 dwellings over the plan period (4 to 5 new dwellings per annum). This is considered the minimum level of growth necessary, being based on demographic change.

The proposed development site would provide in the region of 40 new homes which will meet the future needs of Blackmore for the next 10 years. Meeting settlement specific need is also critical in terms of addressing localised affordability issues and retaining the viability and vitality of local shops and services.

Commissioning school places in Essex 2013/18 (2014) confirms that Blackmore Primary School currently has capacity to accommodate an additional 17 pupils. The provision of family housing on Land at Redrose Lane would be beneficial in terms of ensuring sufficient numbers on roll to meet this capacity. This would have a positive impact on the existing school and wider community with more children given access to extend learning opportunities. It will also ensure that the village has a wider age diversity which will enable the retention of a working age population in future years and secure the long term viability of shops and services.







5.0 Growth options around Blackmore

The SHLAA identifies potential sites for future development within the Borough. The Brentwood SHLAA was published in October 2011 and is also contained as part of the draft Site Assessment published in 2013 which makes reference to the subject site. The site reference is G070A. BBC state in the Assessment that the site is:

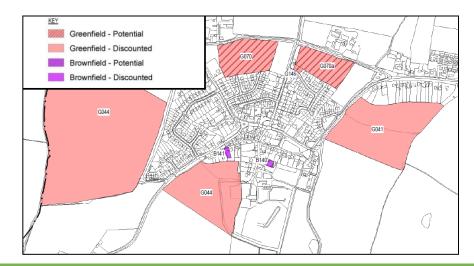
"Suitable: The site comprises land used for grazing. The site is bounded on one side by residential properties. Development in this location would help to support the viability and vitality of existing services and potentially provide new services;

Available: The site is available for residential development, and;

Achievable: Residential development on this site would be achievable due to its location within an attractive area. Due to its size this site would be brought forward by a medium sized developer".

A total of 7 sites (not including the subject site) are considered in the SHLAA. Two of the sites are on brownfield land and can only achieve approximately 1 dwelling (B140 and B141). The remaining 5 sites are located on greenfield land. Three of these sites are discounted due to the unacceptable intrusion into the countryside G041, G044 south and G044 west). One other site can only achieve one dwelling (G146).

The remaining Green Belt site G070 lies to the west of the subject site. It is much larger and more open in nature, and would have a greater impact in landscape terms. The site also lies to the north west of Blackmore which represents an important green gateway into the village, characterised by open space either side of Nine Ashes Road (including Blackmore Millenium Park). The north eastern part of Blackmore is distinctly different in character due to its more enclosed nature and the existing residential development along Chelmsford Road.

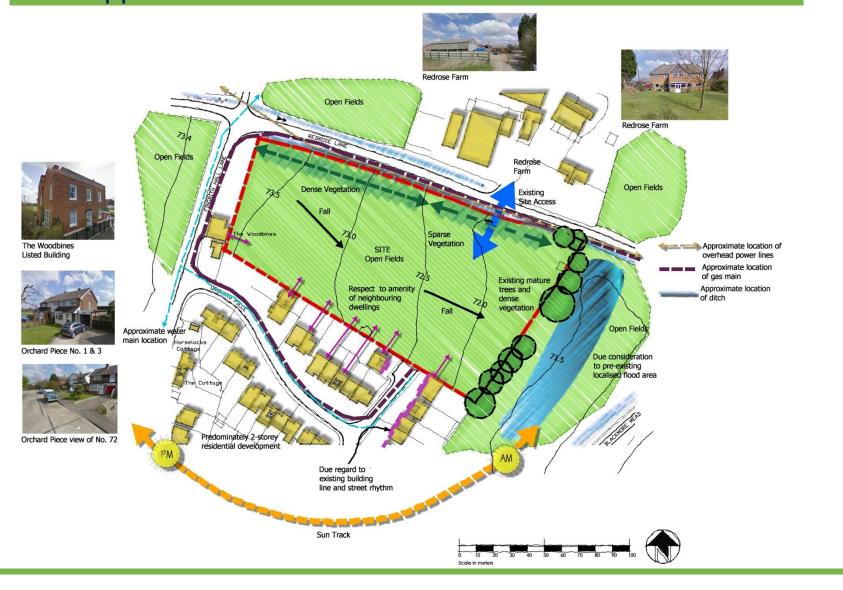


As such it is considered that the subject site is the most appropriate site in the SHLAA due to its enclosed nature (with defined boundaries on all sides) that would represent a natural extension to existing residential development.

It has the potential to deliver approximately 40 homes which would assist to meet the projected housing needs of Blackmore over the next ten years.

To note: The Strategic Growth Options consultation document now references the subject site as site 076 and the adjacent site as 076 although no further assessment of the sites has been undertaken.

6.0 Opportunities and Constraints Plan



7.0 Concept Plan Development

The proposals seek to complement the site's existing features and constraints.

Key Design Features

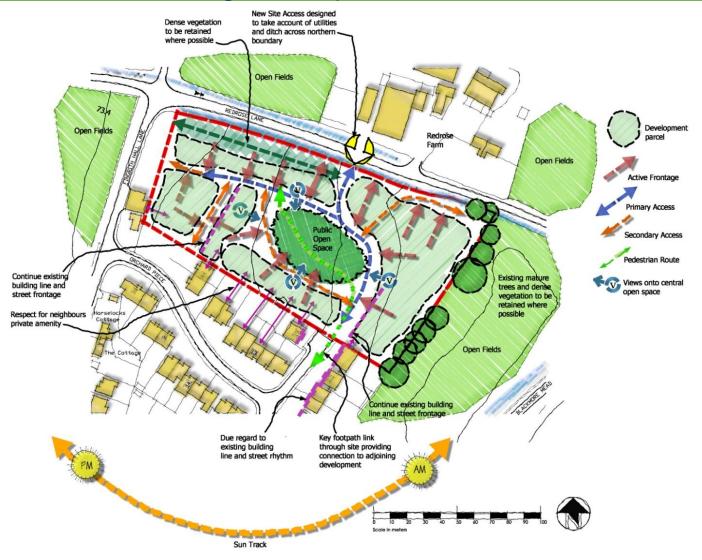
- · Achieve high quality new homes;
- •Develop a scheme that delivers an area of public open space as a key feature of the scheme;
- •A design that respects neighbouring properties;
- Design a layout which reflects the existing street pattern;
- Provide a new road junction from Redrose Lane comprising a shared surface;
- Comprehensive Landscaping Strategy to create an attractive location for residents to live;
- Respect services and utilities crossing the site both over and underground
- •We are aware of previous drainage issues on Redrose Lane. Ardent have been appointed to advise on the drainage strategy for the site. As part of the proposed development it is likely that the proposed floor levels will be raised slightly in the north east corner of the site to ensure that the proposed development will not be affected by drainage issues.



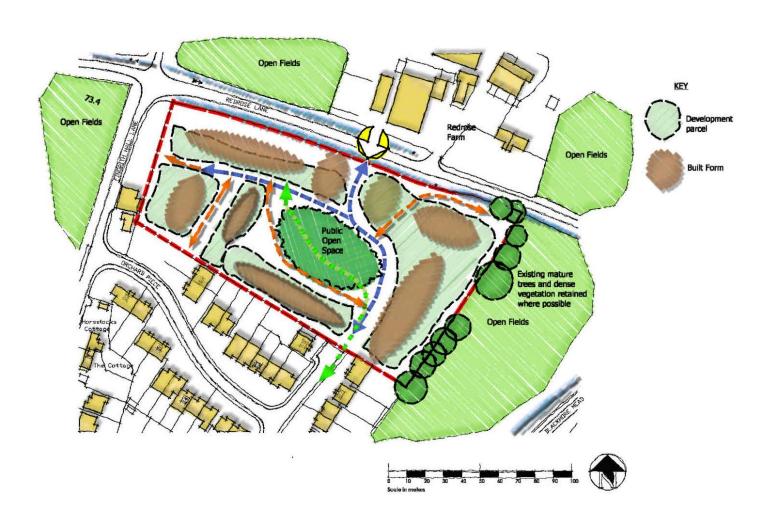




8.0 Access and Design Principles Plan



9.0 Indicative Layout



10.0 Indicative Illustration



11.0 Socio Economic Benefits

The infographic below prepared by Barton Wilmore provides a summary of the socio economic benefits of the scheme



APPROXIMATELY 40 DWELLINGS, LAND TO THE SOUTH OF REDROSE LANE, **BLACKMORE**

The NPPF sets out three dimensions to sustainable development, these being economic, social and environmental.

In its economic role, the planning system is required "to contribute to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation and by identifying and coordinating development requirements, including the provision of infrastructure" [para 7, NPPF].

The NPPF confirms that pursuing sustainable development involves seeking positive improvements to people's quality of life,

- · Making it easier for jobs to be created in cities, towns and villages; and
- · Improving the conditions in which people live, work, travel and take leisure; and widening the choice of high quality homes.

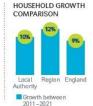


ECONOMIC PROFILE

Household Growth

HOUSEHOLD GROWTH IN THE LOCAL AUTHORITY BETWEEN 2011-2021 Source: CLG 2011 Interim Household Projections

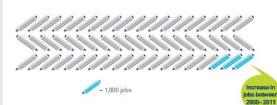
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2011-2021

Employment Profile

IOB GROWTH IN THE LOCAL AUTHORITY BETWEEN 2000-2011



JOB GROWTH COMPARISON



Authority

Increase in jobs

Average House Price Index HOUSE PRICE BETWEEN 2001-2010 COMPARISON

Source: CLG/Land Registry

LOCAL AUTHORITY



REGION



ENGLAND



ECONOMIC IMPACT OF PROPOSED SCHEME

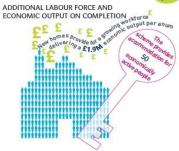
Paragraph 152 confirms that Local Planning Authorities should seek opportunities to achieve each of the economic, social, and environmental dimensions of sustainable development, and net gains across all three. The following summary highlights the substantial net positive impact that the proposed scheme will have on the local economy, which is entirely consistent with NPPF policy.



ADDITIONAL NEW HOMES BONUS







WWW.BARTONWILLMORE.CO.UK

12.0 Conclusions

The land at Redrose Lane should be considered for sustainable residential development for a number of key reasons, as outlined in this document, including the following:

- •There is an identified shortfall of housing at both borough and settlement specific level;
- •It has been identified that in order to meet the settlement specific needs of Blackmore, at least 4-5 units should be completed each year;
- The site could sustainably deliver around 40 much needed new homes meeting Blackmore's housing need for the next ten years;
- •The site is considered to be the most sustainable location within Blackmore compared to other competitor sites;
- •The site has good links to existing transport networks and infrastructure (as acknowledged by BBC);

- •The site is well screened, with defensible boundaries on four sides, ensuring that visual impact from the proposals will be minimal, and considerably less than other promoted sites;
- The site is located within an area of established residential character and represents a logical extension to the existing settlement boundary;
- No environmental or ecological constraints have been identified on the site that would prevent its development for residential use; and
- The proposals would result in a number of significant socioeconomic community benefits.







