



Brentwood Borough Local Plan

Strategic Growth Options Consultation
and

Sustainability Appraisal – Interim
Report (URS)

January 2015

Representations on behalf of
Countryside Properties (UK) Ltd

Land to the East of West Horndon

January 2015

AM-P 13035



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1.0 INTRODUCTION AND BACKGROUND TO REPRESENTATIONS

- 1.1 Land to the east and west of Thorndon Avenue in West Horndon has been promoted for development via the Local Development Framework for Brentwood, since 2009. It was first put forward in response to a ‘Call for Sites’ by Brentwood Borough Council (BBC), upon commencing a Strategic Housing Land Availability Assessment (SHLAA). This Assessment commenced in October 2009 and was concluded in May 2010. It was based on a housing target established by the East of England Regional Plan, adopted in 2008. The regional plan required Brentwood Borough to provide 3500 dwellings 2001-2021, i.e. 175 dwellings per annum.
- 1.2 The East of England Plan was revoked in January 2013 and the National Planning Policy Framework now requires local planning authorities to “boost significantly the supply of housing” and in doing so should “use their evidence base to ensure that their local plan meets the full, objectively assessed needs for market and affordable housing, including identifying key sites which are critical to the delivery of the housing strategy over the plan period” (paragraph 47).
- 1.3 The base assumptions of the SHLAA, final report dated October 2011, are now considerably out-of-date. The supply of land identified may have shown sufficient potential to meet the regional plan target but is grossly inadequate in terms of meeting the current objectively assessed needs (OAN) of the Borough based on the latest demographic statistics.
- 1.4 Since then the emerging plan has continued to advance a strategy for growth that centres upon Brentwood, Shenfield and West Horndon, together with developed sites in the Green Belt and brownfield development in other villages. In June 2014 BNP Paribas Real Estate were appointed by BBC to consider the viability and delivery of all sites identified in the Council’s Preferred Options Plan. Details were requested in respect of land to the east of West Horndon being promoted by Countryside Properties (see plan at Appendix 1). The outcome of this work is still awaited.
- 1.5 In a Borough that is so tightly constrained by Green Belt and other environmental designations, land at West Horndon remains an important site for growth because of its overall sustainability credentials. There is the scope to maximize the potential of this location and increase the quantum of development as previously proposed by the Council. These representations will demonstrate that there is the potential to develop land to the east and west of the existing settlement of West Horndon and provide a balanced expanded community that builds upon and strengthens the existing village centre by adding to its existing facilities and services. The land is readily accessible to public transport services and facilities. Transport benefits for the existing community can further be maximized by economies of scale.
- 1.6 The Council last consulted on its emerging plan for the Borough in 2013 (Preferred Options Plan). The Council readily acknowledges that much has changed since then with several key issues being identified for further assessment before it can progress to the next stages of Local Plan preparation. As explained in Section 2, key changes that will influence the level and location of growth in the Borough include:
 - the need to consider full objectively assessed housing needs. For the Plan to be found ‘sound’ at Examination this needs to be based on published technical data that is robust and up to date, including demographic data and forecasts, a Strategic Housing Market Assessment (SHMA) of both market and affordable housing and other relevant information;

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- new economic evidence including the likely impact of Crossrail; and
 - the duty to cooperate with neighbouring authorities on cross boundary issues – specifically a new strategic development allocation that has emerged on the border of Brentwood and Basildon.
- 1.7 The current consultation document focusing on Strategic Growth Options steps back from the ‘preferred options’ put forward in 2013 and re-opens the debate on spatial options for growth in the Borough, within which all sites put forward by landowners and others are treated on an equal basis in terms of their consideration as potential housing sites.
- 1.8 These representations seek to examine the evidence base to the emerging plan and comment upon the alternative growth strategies being proposed by the Council. They support the case for large-scale growth at West Horndon demonstrating, that land to the east of the settlement - the subject of these representations - is available for development and represents a viable site on which to deliver the Borough’s housing and employment needs in a sustainable way.
- 1.9 A key concern regarding the emerging plan is that it is not supported by a robust, up to date evidence base as national planning guidance requires. The consultation document refers to a number of technical studies that are predominantly described as ‘forthcoming’. These include evidence on the following key matters: economic, housing, environmental, transport, leisure and facilities, and renewable energy. In the absence of these it cannot be possible in the first instance to establish the overall targets for growth.
- 1.10 Towards the end of the consultation period into this Strategic Growth Options document the Council has posted on its web site a technical study by Peter Brett Associates LLP entitled “Objectively Assessed Housing Needs for Brentwood – Moving towards a Housing Target”. This is dated December 2014. An initial review of this document is that it does not propose change to the housing target as currently promoted in the emerging plan. Indeed it continues to refer to a number of issues and awaited housing statistics that will influence the final figures. We similarly address these in section 2 below. Due to the late availability of this document we reserve the right to further consider its contents and comment on these beyond the latest consultation period ending 17 February 2015.



2.0 PLANNING POLICY CONTEXT

Housing

- 2.1 The Draft Local Plan for Brentwood – 2015 – 2030 (Preferred Options) was published for consultation in July 2013. This identified preferred allocations for the provision of 3500 new homes over the fifteen-year plan period. This was below the level identified as necessary to meet the then full OAN for the Borough i.e. 5400 new homes. This led to objections from the adjoining authorities of Basildon, Chelmsford and Thurrock, confirming that they would not accept any shortfall from Brentwood Borough within their own boundaries. The consequences of failure to meet full need became increasingly evident in decisions made in response to various Local Plan Examinations, with those that failed to meet full need being increasingly found unsound, on the basis that they did not conform with the National Planning Policy Framework (NPPF).
- 2.2 Brentwood Borough Council (BBC) is now reconsidering issues such as its OAN together with new employment land and job provision and the need to consider economic impacts arising from the arrival of Crossrail. In the context of this, proposals for a strategic development allocation at Dunton, through duty to cooperate with Basildon BC, are being considered.
- 2.3 It is important to note that technical studies on OAN and the impact of Crossrail to support this latest consultation document on strategic growth options are not yet available. The consultation document states that they are “forthcoming”. This is contrary to National Policy and Guidance as set out in the NPPF and Planning Practice Guidance that requires a Local Plan to be informed by robust and up to date evidence.
- 2.4 To date the emerging plan has relied upon a Strategic Housing Market Assessment (SHMA) carried out by David Coultie Associates, dated and presented to the Local Authority in 2013, although published more widely and re-dated in 2014. This work was carried out jointly with reviews for Braintree, Chelmsford, Colchester and Maldon, although the five Councils do not regard themselves as a defined sub region. The SHMA claims compliance with work by Edge Analytics for the Essex Planning Officers Association. It does however not take account of the very latest figures as set out in Phase 6, published in September 2014. In addition the Government is shortly to publish 2012 – based Household Projections that will provide a more reliable set of figures, from the 2011 census, upon which to base an assessment of housing need.
- 2.5 The Council relied upon the above-mentioned SHMA in producing its Preferred Options Plan back in July 2013. Based on a stock flow analysis, this suggests that a range of 288-384 dwellings are required per annum over a 5 year and 15 year period. This in turn refers to work by Edge Analytics in identifying a need for 360 new homes per annum or 5500 over a fifteen-year period, as set out in the latest Growth Options consultation document. Some 23 hectares of new employment land is also proposed in the latest consultation paper.
- 2.6 There are a number of weaknesses in the base evidence to the emerging plan that are being identified at several other Local Plan Examinations taking place in the region. These point towards the need for a higher housing target and are examined in turn below:



i. Housing Market Area

The SHMA prepared by DCA claims that Brentwood is a single Housing Market Area. We consider that the data shows that Brentwood shares a housing market area with Chelmsford, Basildon and to a lesser extent Epping. Brentwood Borough has a considerable inflow from Greater London and the current pattern of household moves and travel to work areas that typically define an HMA look set to change significantly with the onset of Crossrail.

The NPPF states that LPAs are required to clearly understand housing needs in their area, and that to do this they need to prepare a SHMA in conjunction with neighbouring authorities where HMAs cross administrative boundaries. The PPG also highlights the requirement to assess need across LA boundaries and not just within an individual authority. Basildon, Chelmsford and Thurrock all objected to the Preferred Options consultation undertaken by Brentwood in July 2013, on the basis that they could not accommodate Brentwood's needs when they face some of the same environmental and Green Belt constraints.

In line with surrounding Local Authorities, Brentwood should commission an up to date SHMA that considers more carefully an appropriate HMA in the context of revised Household Formation figures due to be published in February 2015. This was the view taken by the Local Plan Inspector in finding the Uttlesford plan 'unsound' and has been the subject of similar debate at the extant examination into the local plan for Maldon.

ii. Consideration of the Latest Demographic and Economic Evidence and the Impact of Crossrail

The proposed housing target for Brentwood is based purely on demographic evidence and fails to properly accommodate economic and employment forecast needs of the Borough. The forecasts are based upon the SNPP 2010 demographic scenario - set out in the work by Edge Analytics - in proposing 362 dwellings per annum over the plan period 2015 – 2030. This ignores the jobs scenario that proposes a range of 270 – 426 dwellings. This is considered to be a significant failing in the forecasts and identification of a housing target especially in the light of Crossrail on which work is due to start early this year. This will bring a step change in public transport for people in the Borough that requires careful consideration and assessment. The improvements to existing rail lines and increased frequency of services are likely to make Brentwood an ever more favourable location to live and work and stimulate economic growth.

The NPPF states that in preparing their plans Local Authorities should support opportunities for growth. From the various factors addressed in this assessment it is submitted that the proposed delivery of 360 new homes per annum, or 5500 over a fifteen year period would not provide a level of homes to support inevitable growth in the local economy. The plan should be informed by an assessment of the social and economic opportunities of the Crossrail scheme, and other factors. Work on the assessment of Crossrail has been commissioned by the Council but is not yet available.

iii. The Need to Address Unmet Need in Greater London

Given the proximity of Brentwood to Greater London, it seems very likely that it will be called upon by the Greater London Authority (GLA) to help address the capital's anticipated housing shortfall, which is estimated to be in the region of 7,000 to 20,000 dwellings per annum. Brentwood already has a strong relationship with the north-east London Boroughs from which



in-migration levels are significant. Work by Edge Analytics shows that the implications for growth will be more significant for those local authorities that are immediately contiguous with the Greater London boundary.

Paragraph 57 of the comments made by the Inspector examining the Further Alterations to the London Plan (FALP) conceded that:

“In my view, the Mayor needs to explore options beyond the existing philosophy of the London Plan. That may, in the absence of a wider regional strategy to assess the options for growth and to plan and coordinate that growth, include engaging local planning authorities beyond the GLA’s boundaries in discussions regarding the evolution of our capital city”.

iv. *Need to meet Affordable Housing Requirement in full*

The 2013 Affordable Housing Assessment identifies a shortfall of 234 units per annum. The SHMA claims that an affordable housing target of 35% is justified. On the basis of a housing target of 360 per annum this would not be achievable.

In addition government guidance from CLG is that current unmet need (backlog) and projected future need should be added together. The PPG (ID:2a_029) states “An increase in the total housing figures included in the local plan should be considered where it could help to deliver the required number of affordable homes”.

The Inspector considering the Uttlesford Plan called for an uplift of at least 10% to deal with this. It could be argued that in the absence of evidence to the contrary that such an uplift would be appropriate in Brentwood Borough.

v. *Need to Respond to Market Signals*

Brentwood Borough has considerable ‘affordability’ issues. It is one of the most expensive authorities in the region. Its average house price is higher than all the surrounding authorities, the County and England. The cheapest entry level property requires an income of £34,700 whereas 81% of concealed households forming, earn below this amount. The ability of concealed households to access the market within the Borough is therefore very limited. This raises the question of whether housing needs to be boosted to reduce house price inflation relative to earnings and widen access to the private market.

- 2.7 BBC are proceeding with a consultation document on strategic options for growth that is not informed by an up to date assessment of OAHN. It uses an assessment prepared in early 2013 to advise the now abandoned Preferred Options Local Plan. That assessment does not contain the latest demographic or economic evidence. In the light of other Local Plan Examination findings in Essex the figures proposed are not compliant with National Policy and therefore highly susceptible to challenge.
- 2.8 The Councils Five year housing land supply assessment is based on these outdated target figures. In addition the Council assumes a 4.29 year supply of land on the assumption that proposed allocations in the now abandoned Preferred Options plan could be delivered.
- 2.9 It is essential that the emerging Local Plan is informed by robust and up to date evidence. We submit that a detailed assessment of housing need is required to take into account a number of adjustments



that need to be made including recognition of the likely economic impact of Crossrail. This will result in a housing target considerably in excess of the 360 new homes per annum currently proposed to be met in the consultation paper.

Green Belt

- 2.10 The latest consultation document shows a shift in the Council's position in recognising in principle the importance of meeting its full need for market and affordable housing. Previously it had stated that local constraints such as capacity of roads, and schools and local planning policies such as Green Belt have constrained its ability to meet its full need for housing. The Growth Options consultation document now explores whether it is possible to meet its full need, albeit set against a lower overall housing target for the Borough than we consider to be required in this Housing Market Area.
- 2.11 Some 89% of the Borough is within the Green Belt. In addition there are other important environmental features such as Sites of Special Scientific Interest, open spaces and flood zones. In this context the Council accepts that any housing provision over 2500 units will need to consider the use of the Green belt. It is accepted by the Council that a Green Belt boundary review is necessary to enable it to identify sufficient land to meet its future housing requirement and other development needs.
- 2.12 Whilst to date the emerging Plan has sought to protect the Green Belt and local character and focus new development on land accessible within existing settlements, it has consistently supported a strategic development site in the Green Belt at West Horndon. There have been no other significant Green Belt boundary changes proposed. These representations support the release of Green Belt land at this location in the south of the Borough on the basis that it will not undermine the overall purpose and integrity of the Green Belt.
- 2.13 The government's position on protection for the Green Belt is set out in section 9 of the NPPF. This acknowledges that it is for local authorities to define and maintain Green Belt land in their local areas. The government expects LPAs with Green Belts to establish boundaries in their Local Plans, which can be altered as part of the plan review process. At that time authorities should consider Green Belt boundaries having regard to their intended permanence in the long term, so that they are capable of enduring beyond the plan period (NPPF, paragraph 83).
- 2.14 A Parliamentary note issued in December 2014 on Green Belt matters alluded to a case for arguing for a review of Green Belts in certain circumstances. Applied in this Borough there is a case for saying that to a degree the centres of Brentwood and Shenfield are being strangled by the Green Belt. Furthermore that the Green Belt is adding stress to the transport network by inadvertently placing pressure for development on valuable areas of green space within the urban areas. A selective review of the Green Belt is required to alleviate this. In this context a case can be made for the release of land such as that to the east of West Horndon which is privately owned Green Belt without any real environmental or amenity treasures. The land has been intensively farmed and has limited access and relatively little amenity value. Years of intensive farming could even be said to have had a negative environmental value by removal, for example, of key features such as hedgerows and hedgerow trees, and the increase in field sizes, with a consequential reduction in habitat and landscape value.
- 2.15 The remaining sections of these representations will demonstrate that there is a strong case for building on the least attractive and lowest amenity parts of the Green Belt at West Horndon in order to solve the problems of housing supply and affordability in the Borough. It will be demonstrated that



a landscape led approach to the development of land to the east of West Horndon would not give rise to any significant landscape and visual effects. Indeed it will enhance the landscape character and restore lost landscape features typical of the area.

Infrastructure

- 2.16 The government is placing increasing emphasis on the importance of infrastructure planning. National planning policy formally requires local authorities to demonstrate that sufficient infrastructure exists, or will be provided, to support their strategies for new development, as set out in local plans. BBC is preparing an Infrastructure Delivery Plan to understand better current facilities that are in the Borough and to identify where new ones will be needed. This is not yet available to inform the selection of a spatial strategy for growth in the Borough. In the absence of this these representations will consider the growth options proposed from an infrastructure point of view. They will also demonstrate the potential that exists at West Horndon to develop land adjacent to the existing settlement that builds upon the strengths of the village and adds to its existing services and facilities. The land is already readily accessible to public transport services and facilities. It will be demonstrated how transport benefits for the existing community can further be maximized by economies of scale.



3.0 THE SUSTAINABILITY APPRAISAL

- 3.1 A Sustainability Appraisal of the Strategic Growth Options undertaken by URS was published for consultation in January 2015. This confirms that following a review of the consultation responses to the Preferred Options Plan in 2013, it became apparent that the policy approach to addressing a number of key issues needed to be reconsidered. These included issues such as the need to increase the number of new homes to be built, employment land requirements and job provision and the impact of Crossrail, renewable energy considerations and so on. In the context of these issues the SA looks at alternative locations for a strategic scale development scheme.
- 3.2 The SA finds some merit in the following four alternatives for large scale growth:
- 1) Dunton (west of Laindon) to provide a Garden Suburb of 4,000 to 6,000 new homes on 337 hectares of land.
 - 2) West Horndon. This is seen as having merit as a location for strategic growth given its location along the A127 corridor with good access to the M25 as well as the railway network. The SA states that this is reflected in the fact that it formed part of the Council's Preferred Options consulted upon in 2013. The SA adds that "Whilst there is a large area of land around West Horndon that might potentially be developed, work undertaken over the years has established that a preferred scheme might involve c4,500 new homes on a 196 hectare site extending east and west of the existing village and that this would be a mixed use scheme."
 - 3) South East of Brentwood and Shenfield. A 448 hectare parcel of land bounding the existing urban area is described at the outset of the SA as having "very little merit from a planning/sustainable development perspective."
 - 4) Pilgrims Hatch. This is described as an area of up to 52 hectares around the existing village. It is considered to have the potential to provide up to 2300 homes and a new junction to the A12.
- 3.3 In addition the SA looks at a fifth option (Urban Extensions) that involves the dispersal of growth between a number of smaller sites. Potential sites have been identified in Brentwood, Hutton, Pilgrims Hatch, Shenfield and Warley that together comprise 151 hectares of land that might accommodate c 4,500 new dwellings. Consideration is also given to some 42 sites in the rural area.
- 3.4 No explanation is given as to how the above potential capacities were derived.
- 3.5 In establishing a Sustainability 'Context' (chapter 6) the SA comments at paragraph 6.9.1 that "local planning authorities should significantly boost the supply of housing and seek to ensure that 'full, objectively assessed needs for market and affordable housing' are met. They should seek to create 'sustainable, inclusive and mixed communities'. Finally, "Larger developments are suggested as sometimes being the best means of achieving a supply of new homes".
- 3.6 The SA undertakes a specific assessment of each option and compares them in a single table to highlight 'significant effects' and 'relative merits'. Scores of 1 -5 are given to rank the performance of the options against twelve key topics. Score 1 rates the best option with 5 indicating the poorest performing. Additionally the use of a colour coded system of red and green indicates likely significant adverse and beneficial effects, respectively.



- 3.7 The option for strategic growth based upon West Horndon, scores the lowest and therefore represents the ‘best’ option for strategic growth overall. It is also important to note that the option for growth at West Horndon has a significant positive effect in terms of housing and the economy/employment and no significant adverse affects. This sets it apart from all other five options that show significant adverse effects against at least two topics. In addition we would argue that the assessment is flawed in its judgement of some of the topics and how individual options score relative to each other. The most notable examples are those of Air Quality and Community and Well-being, as well as Biodiversity. These are dealt with in turn below.
- 3.8 In assessing the topics of Air Quality, Climate Change and Community and Well-being the issue of accessibility and limiting the need for vehicular travel is a key consideration. The SA shows the greatest potential for development to occur where it is possible to limit the need for additional vehicular travel. We find the assessment flawed where it places the greatest development potential at Dunton (Option1) compared to West Horndon that has a railway station. In contrast the Dunton site lies midway between stations at West Horndon and Laindon, that are both approximately 2 miles or at least 30 minutes walk time away. Furthermore, although the initial proposals for Dunton Garden Suburb allude to the provision of a new station, we would argue that this is not capable of delivery because of the proximity of the existing stations and Network Rail’s technical requirements, as well as viability issues. This is explained further in these representations at page 11, under ‘Railways’.
- 3.9 Land at West Horndon also has established bus links to Brentwood. It is only a few minutes walking distance from key services such as a post office and health centre whereas the Dunton site is a 30 minute walk away from such services. Whilst large scale developments at these locations would be required to provide services and facilities to serve new homes and jobs, in the case of West Horndon an early phase of growth on land to the east could utilise existing provision which could then be added to and enhanced as the later phases of growth are added. Dunton scores more positively in terms of spare primary school capacity, however we maintain that development of the scale proposed in both options would generate a need for additional schools to meet the demand of new homes. In general terms we agree with the SA that options providing larger, more highly concentrated development offer greater potential to provide new community infrastructure for residents to be funded through developer contributions. Countryside Properties, as the promoters of land east of West Horndon, have a wealth of experience in delivering large-scale growth in the form of sustainable new communities and urban extensions in which the economies of scale can fund the improvement of existing facilities and justify additional provision. It is relevant to note the comments in the SA that confirm “At this stage it is not possible to make any conclusions regarding significant effects for Community and Well-being”.
- 3.10 In considering matters of biodiversity we confirm that our individual assessment of land east of West Horndon shows that there are sufficient opportunities to enhance the landscape and increase local ecological biodiversity by providing woodland buffer and links to ancient woodland. The broad brush SA is not capable of considering this level of detail.
- 3.11 Landscape and soil objectives present key concerns relating to Dunton and Pilgrims Hatch with both being assessed as having ‘low’ capacity to accommodate growth without adverse landscape effects. In contrast West Horndon is found to have a ‘medium to high’ landscape capacity and would make a ‘moderate’ contribution to Green Belt purposes in the Borough.
- 3.12 An initial review of the SA comparison of sites would appear to rule out options 4 and 5.



4.0 FURTHER COMMENT ON THE STRATEGIC GROWTH OPTIONS

- 4.1 The Strategic Growth Options consultation and accompanying SA present the various options for growth as alternatives. We contend that in the light of work that has yet to be done on establishing the OAHN and an appropriate Housing Market Area, that the target figures for growth will need to be raised if the Local Plan is to meet national policy guidance as set out in the NPPF and be found 'sound' at Examination.
- 4.2 There are a number of factors set out in section 2.0 above that may lead to an increase in the current figures. The importance of the need to adjust demographic and household formation figures to deal with issues such as economic and jobs forecasts and the impact of Crossrail, the impact of London's unmet need, and issues of affordability etc. is becoming increasingly apparent at other Local Plan examinations in the region. Technical assessments to inform the plan on these issues are still being undertaken.
- 4.3 A review of the OAHN for Basildon District similarly points towards a significant increase in growth that is only now beginning to be explored. The Local Plan for Basildon is now delayed and work on technical assessments to provide an evidence base is only just beginning. Proposed development at Dunton if found to be sustainable and achievable could not be delivered for some eight years from planning approval. It is therefore anticipated that first occupations would be unlikely before 2024.
- 4.4 We contend that West Horndon remains the only realistic location in the Borough for a strategic development to cater for jobs and homes that is deliverable in the first part of the Plan period. This is demonstrated in the emerging Consultation document and the Sustainability Appraisal to accompany it. Furthermore, land to the east of the settlement can be delivered early in the plan period.
- 4.5 We set out below further detailed assessment on the various growth options focusing on the issues of transportation and landscape. This is followed in section 5.0 with a full justification for West Horndon as the preferred location for strategic development in the Borough.

1) DUNTON

Transport and Access

This proposal has been assessed by Odyssey Markides LLP, transport consultants on behalf of Countryside Properties (Appendix 2). OM's assessment demonstrates that the proposals for a mixed use development of up to 6000 new homes would face a number of transport related challenges. A separate response is submitted to the joint consultation on the proposed Garden Suburb, currently being undertaken by the two Councils. Key findings in relation to transport and access are as follows:

- o Access

The site access strategy presented in the consultation document is deemed unsuitable for a development of the size proposed, due to the amount of traffic loaded onto the Dunton roundabout and the A148 link. Junctions on the A127 used to access the Dunton proposals are currently over capacity. Improvements/mitigation measures to these are not possible to meet the 3000 additional cars produced from the Dunton proposals.



Two options for alternative access have been explored; onto the A128 to the west and via a new junction onto the A127. These are not considered to be achievable in safety design terms. Whilst it may be possible to provide an access junction onto the A128, the construction of the access road would be costly due to it being partly located in Flood Zone 3. Furthermore it would likely be a long straight road through open or green space without direct access, leading to safety concerns due to potential speeding.

- *Traffic Impact*

A development of c 6,000 dwellings, employment and associated infrastructure would result in a trip generation of at least 3,000 vehicle movements in the peak periods, leading to significant congestion on the local highway network. In particular, the Dunton roundabout and the A127 slip roads would be materially adversely affected, as well as local roads in Basildon, such as the A1235 corridor.

- *Buses*

The development of Dunton Garden Suburb would require the provision of a bus service through the site, either through the extension of an existing bus route or the introduction of a new route in order to encourage sustainable travel behaviour. The bus service would cater for residents travel by bus only or by bus and rail, therefore the service would be required to serve one of the existing nearby railway stations.

- *Railways*

The consultation document suggest the construction of a new railway station within the site boundary, however a feasibility study carried out by OM concluded that this would be very difficult to deliver due to unsuitable embankments, steep gradients and lack of slack in the timetable. Instead, the residents of Dunton Garden Suburb would be expected to use the existing station of West Horndon or Laindon, adding around 400 additional cars to the already congested highway network. Furthermore, both stations have very limited parking available and the addition of 400 cars would result in the requirement for the doubling of the current combined provision. As demonstrated in section 5 below the development proposals for West Horndon are capable of addressing the need for additional car and cycle parking at the station to cater for increased demand generated by new growth at this settlement but could not address the demands from growth at Dunton.

There are many uncertainties about the proposal relating to matters of transportation and access. If they are capable of being resolved this will come at significant cost and could raise serious doubts over viability.

Landscape and Visual Impact – Comments on the Strategic Growth Options

A full assessment of the Dunton proposals from a landscape and visual impact, urban design and Green Belt perspective has been undertaken by Rummey Design on behalf of Countryside Properties. This is attached in full at Appendix 3. Its key conclusions are set out below.

Currently there is a lack of detail regarding the Dunton proposals that limits the ability to undertake a full landscape and visual impact assessment. From the information available it is clear that there are many potentially adverse outcomes that would result from large scale



development in this location. The central issue is the scale and scope of the proposal, which, while intending to resolve pressing needs to supply new housing for a growing population, has a considerable number of obstacles to overcome before it could be considered to be ready for further consideration as a viable option. Amongst these are: a potential conflict with national and good practice advice on promoting good urban design; assessment and mitigation of potential landscape and visual impacts; and an apparent lack of measures to address the objectives of the Green Belt, all of which result in significant adverse impacts and effects.

- *Urban and Landscape Design*

The scale and scope of the Dunton site would result in a number of issues that would need independent re-evaluation, particularly in regard to the scale and form of the layout, transport and access links, and visual/pedestrian links to existing communities and the surrounding landscape. The 'fit' of the proposal in its landscape context has not been demonstrated, and on close evaluation the SA undertaken by the joint Boroughs appears to considerably underestimate potential environmental issues and impacts. Part of the site that lies within Basildon Borough is designated as a Historic Environment Zone and considered to be 'Sensitive to Change'.

- *Landscape and Visual Impact Assessment*

Various landscape capacity studies commissioned by the two Councils indicate that Dunton has a 'low' landscape capacity to accommodate development without adverse landscape impacts. As much of the Dunton Garden Suburb development would be sited on raised ground, it would be exposed to views from the surrounding level landscape to the south and west, as well as to the higher ground to the north. It would be visible from the extensive transport network surrounding the site. Due to its sensitivity, changes to landscape character and views would be a challenge to integrate into the existing landscape and mitigate successfully due to the scale and scope of the proposed development.

- *Green Belt*

Because of its unfocussed and dispersed layout the Dunton site could give rise to concerns that it would continue to extend westwards and eventually join up with West Horndon. It would contribute to a perception of urban sprawl because the site occupies a significant area of the land between two built up areas, and the expanse of land delineated by the current site boundary is large in comparison to the developed area.

The Dunton site would appear to contribute to the merger of Basildon towards West Horndon, because the site occupies a significant area of the land between these two built up areas, the westward alignment of existing the A127 and the c2c railway. This would be exacerbated by the undefined western edge of the development proposal. The full extent of development would be visible following mitigation and could not be readily integrated with the existing landscape structure due to the scale of the development.

The large scale and spread of the proposed area of development would form a clear perception of encroachment within the uncontained countryside. The lack of a well-defined edge to the west again would further a perception that the development appears to be



poised to extend further west between the railway and the A127, to meet with West Horndon.

Flood Risk

The Dunton site contains areas of land classed as Flood Zone 3 and therefore susceptible to flooding. It would therefore be contrary to the NPPF that does not permit development within flood risk areas, nor where the effect would be to increase flood risk elsewhere. In addition the site is also susceptible to some surface water flooding.

Land Use and Soils

The Dunton site is entirely greenfield. Its development would involve the loss of a significant amount of good to moderate quality agricultural land, with an ALC of Grade 3. Within this grading it is not known what proportion of the land is Grade 3a (classed as ‘best and most versatile’). The development of this land would be contrary to national and local policy to make the best use of brownfield land and protect the Borough’s resource of highly productive agricultural land.

2) WEST HORNDON

A more detailed assessment of the option for growth at West Horndon and justification for this as the preferred Strategic Growth option, is set out in section 5 of these representations and in Appendices 3 and 4, deal with matters of landscape/design/Green Belt, and transport, respectively.

3) SOUTH EAST OF BRENTWOOD AND SHENFIELD

Transport and Access/Services

Development in this location would be car dependent and contrary to the Local Plan’s objective to promote sustainable patterns of development that limit adverse impact on air quality. It is an area of open countryside that is relatively remote from the existing urban area. Access to the Strategic Road Network (A12) from the site would be via the A128 or the A129 and Brentwood town centre, which are already congested at peak times. This is highlighted in the Essex County Council (ECC) Local Transport Plan 3 (LTP3, page 36). The LTP3 also suggests that the A12 as well as the A128 and A129, all experience significant reliability issues which would only be exacerbated by a large housing development to the south east of Brentwood. Furthermore the LTP3 highlights that bus and cycle networks are limited in centres such as Brentwood , making access by sustainable modes difficult.

Access to this site by train would be via Brentwood or Shenfield stations on the Shenfield to London Liverpool Street Line. The section of rail line between London and Shenfield currently experiences capacity issues as shown in figure 3.5 of the LTP3, although it is understood that as part of the Crossrail project improvements will be made to the line. It is questionable whether



these capacity improvements will be sufficient to support a residential growth of the scale proposed in this growth option.

The site would have potential connection issues in respect of sewerage and waste water treatment works. It has poor gas connections and no electricity supply.

Landscape and visual impact and Green Belt implications

This option relates to a large area of agricultural land in the Green Belt. It lies to the east of Brentwood and if developed would lead to coalescence of the settlements of Hutton and Shenfield with Ingrave and Herongate. Assessments commissioned by the Council on matters of Landscape and Green Belt confirm that development of this land would have ‘significant negative effects’ on the Green Belt, rural character of the area and the open countryside. In environmental and policy terms it is not seen as an area with capacity to absorb strategic level growth. It is poorly contained and highly visible. It lies adjacent to a Special Landscape Area. These issues have led to the site being discounted in the 2011 SHLAA.

Flood Risk

This land contains areas classed as flood zone 3. Its development would therefore be contrary to the NPPF that does not permit development within flood risk areas.

Land Use and Soils

This land is entirely Green Belt and would result in the loss of significant reserves of good quality agricultural land, contrary to national and local policy.

4) PILGRIMS HATCH

Transport and Access

Pilgrims Hatch is a predominantly residential area located approximately 2.5km to the north of Brentwood town centre. It is effectively severed from Brentwood by the A12 and there are limited opportunities to cross this principal route, making access to Brentwood town centre by sustainable modes (walking and cycling) difficult. The nearest railway station, Brentwood is located 1.4 miles (2.2km) from the potential development land, equating to a 30 minute walk. This is beyond the preferred maximum acceptable walking distance of 2km as stated in the Institution for highways and Transportation (IHT) “Guidelines for providing for Journeys on Foot”. It is therefore anticipated that the majority of residents at a new development at Pilgrims Hatch would drive to the railway station, adding to the already congested town centre road network.

This option relates to land either side of the A12 principal route. It would require a new junction on to the A12 that would lead to negative issues in relation to air quality. A new A12 junction has been the subject of only limited investigation but raised concerns over feasibility relating to visibility and capacity. Growth at this location would be vehicle orientated leading to significant adverse effects in terms of air quality. The size of the site available for development (currently proposed to be some 52 hectares) could be compromised due to the need for a buffer/screening



along the A12. There are implications for new homes in terms of noise and pollution from the A12.

Any new junction onto the existing dual carriageway A12 near Brentwood would have to be a large grade-separated junction in order to provide access to a new residential development as well as the wider area. Such a new junction would completely alter the traffic flows around Brentwood. Traffic flows along the A12 would increase, adding to the already high levels of flow. This is contrary to the “Strategic Growth Options Consultation” document that suggests at paragraph 2.19 that there is limited scope for improvements to the A12 compared to the A127 corridor. It is therefore concluded that an area-wide traffic model would need to be employed to determine the likely changes in traffic patterns in and around Brentwood before the potential for new development at Pilgrims Hatch and associated access onto the A12 is explored further.

Landscape and Visual Impact/Green Belt

We understand that this option predominantly comprises scrublands and open fields. Its use for development would however represent the loss of Green Belt land. Some of the land may encroach on the natural environment at the SSSI near Kelvedon Hatch. This general location has previously been rejected in the SHLAA to advise the emerging Local Plan.

5) URBAN EXTENSIONS - DISPERSED GROWTH OVER A NUMBER OF SMALLER SITES IN BRENTWOOD, HUTTON, PILGRIMS HATCH, SHENFIELD AND WARLEY.

Transport and Access/ General Infrastructure

By dispersing development on sites on the periphery of existing urban areas, many of which have poor public transport accessibility, will increase the need to travel and dependency on the car and therefore result in significant negative effects in terms of air quality. Growth on a number of smaller sites would be less likely to stimulate investment in services and facilities in the way that can be achieved on larger strategic sites and through economies of scale.

In the SA carried out by URS this option for growth scores the lowest out of the 5 options considered.

The NPPF requires the Council to maintain a five year supply of specific deliverable housing sites on a rolling basis. The Strategic Growth Options document seeks a site for large scale growth however it will also be important to ensure that a sufficient range of smaller sites are allocated in addition to larger development sites. The reason for this is that larger sites can take longer to come forward and once started can only support the delivery of a limited number of dwellings per year. The allocations of a range of smaller sites will help to ensure that this does not pose a threat to the Council's rolling five year land supply.

Soils and Land Use

It is understood from an assessment carried out on behalf of the Council that 5 of the 30 sites that comprise this growth option are currently designated as mineral safeguarding areas (MSAs). This would impact upon the likely delivery and timing of the sites being brought forward.



5.0 LAND EAST OF THORNDON AVENUE, WEST HORNDON – A JUSTIFICATION FOR GROWTH

5.1 Representations submitted to the Preferred Options Plan in July 2013 included a sustainability appraisal of land east of Thorndon Avenue in West Horndon, as currently being promoted by Countryside Properties. This forms part of the area for growth being considered at West Horndon settlement and referred to as Option 2 in the Strategic Growth Options Consultation document. Since the last representations were submitted to the Council further assessment work has been undertaken to demonstrate that this land at West Horndon represents a sustainable option for growth that is available for development now. The assessment examines the following key issues to ensure that there are no overriding obstacles to development:

- 1) Landscape and Visual Impact, Design and Green Belt Assessment – Rummey Design
- 2) Transportation and Access – Odyssey Markides
- 3) Archaeology – RPS
- 4) Ecology – Richard Graves Associates

1) Landscape and Visual Impact, Design and Green Belt Assessment

5.2 Appendix 3 comprises a report by Rummey Design. This highlights deliverability of the land at West Horndon and the benefits of developing this in the context of the various Strategic Options for Growth being considered for the Borough. In particular this report compares West Horndon with the nearby option for growth at Dunton. It builds upon and updates a report submitted to previous consultation on the emerging Local Plan (Preferred Options) for Brentwood in 2013. It promotes an enhanced landscape-led urban extension to land east of West Horndon and focuses upon the issues of landscape and visual impact, urban and landscape design principles and compliance with Green Belt principles.

Landscape Character

5.3 The landscape character around West Horndon is designated by BBC as G1 Horndon Fenland. The characteristics include:

- large, arable pasture fields
- predominantly flat topography
- mature hedgerow field boundaries
- relatively sparse settlement pattern
- views to surrounding wooded hills to the north
- long distance views to pylons and Tilbury Power Station

5.4 Assessment by the Council notes the disturbed tranquillity of the area, largely as a result of road noise. It also notes a general sense of enclosure to the north and east due to low wooded hills, but the more open views southwards to power lines and Tilbury. Landmarks include Little Warley and East Horndon churches to the north. The historic character is one of a distinctive grid-like grain of fields, thought to be of ancient origin. Settlements tend to be nucleated. There are smaller ponds scattered in the area and some medieval moated sites.

5.5 The area is assessed as having moderate sensitivity to change due to its open, flat nature, the fact that it is overlooked from the wooded hills to the north and east, and the sense of historic integrity. Landscape Planning Guidelines identified in the Rummey Design report suggest that any new



development should respond to the existing settlement pattern and use materials that are appropriate to the local landscape character. The assessment also suggests that the setting of West Horndon needs to be conserved through careful consideration of the existing landscape structure. It identifies the need to screen visual detractors such as the industrial estate in West Horndon and recommends that the existing hedgerow network is conserved and enhanced and new woodland planting introduced.

Visibility

- 5.6 The combination of a well-established network of hedgerows and hedgerow trees with the low level topography of the land causes a significant limitation to views of land to the east of West Thorndon, from the surrounding land to the south, east and west. Land to the west is more visible because the network of hedgerows is less established and there is little definition of the northern edge. Open views of the land are possible from the footpaths and public access land associated with the Thorndon Country Park South. These views are sensitive and frequented by many visitors. Nonetheless a mix of both rural and urban elements defines the expansive views experienced from the Country Park. Industrial elements such as chimneys and factories and infrastructure elements such as bridges and large roads define the character of the views from the park. Existing vegetation within the site at West Horndon and the Country Park limits visibility.

Urban Design

- 5.7 The planning of the site has evolved from an understanding of the needs of the existing village of West Horndon, both by assessing its physical form, testing proposals in terms of needs and reviewing responses to past public consultation. It is proposed that its function as a local urban centre would be strengthened whilst the core area of activity would be shifted slightly westwards to focus on the station area. In line with the initial recommendations of the SHLAA, by providing an equal quantum of development to either side of the village, a balanced extension would be created, thereby justifying enhancements to the commercial and civic core ensuring measured accessibility to the village centre from east and west by pedestrian traffic, as well as access by rail from the south and vehicles from all directions. Proposals for land to the east of the village by Countryside Properties would therefore represent an initial step towards enabling development to take place to the west once access and land availability issues have been resolved. Development to the east of West Horndon will also enable the entrance to the village to be properly addressed as well as the ‘capturing’ of traffic before it passes through the centre causing undue congestion to reach land to the west. The proximity of land to the east to the primary school and local park would enable easy and logical expansion of each as well as providing further, more varied facilities within the same location. Further detail on the design elements of the proposals for land to the east of West Horndon are set out in Appendix 2.

Landscape and Visual Effects

- 5.8 A strong network of landscape structure planting would integrate development of land to the east of West Horndon into the wider landscape in time. The existing hedgerow network should be retained and bolstered with new tree planting. New hedgerows and tree planting would help to integrate the development into the landscape and reduce its visibility from the Thorndon Country Park South. Visual impact resulting from the development of land to the east could be limited through mitigation planting. Residential development on the east side of the village will not give rise to any significant landscape and visual effects and will enhance landscape character and restore lost landscape features typical of the area.



Green Belt Assessment

- 5.9 Only three of the five statutory purposes of the Green Belt would be affected by development proposals at this location. It would not bring about harm to the ‘setting or special character of any nearby historic towns’ and would not offset any other ‘recycling of urban land’. There would be some adverse impacts on the remaining three purposes of the Green Belt in the vicinity of the proposed development, but relative to other Strategic Growth locations being considered these would be low.
- 5.10 In regards to ‘*unrestricted sprawl of large built-up areas*’ land to the east of West Horndon would extend the village to a limit that is logical and contained, occupying a small extent of land between West Horndon and Basildon. It would appear as a balanced and well-planned layout, of aesthetically high quality; this would not constitute sprawl.
- 5.11 Development to the east of the village would not effect the extent of conurbations of Brentwood or Basildon, nor give rise to a sense that it contributes to their spread across the landscape. The proposal would be perceived as an integral part of the village of West Horndon, not a new town or extension of an existing one. It would therefore not appear to cause ‘*merging of nearby towns into one another*’.
- 5.12 The development of land east of the village might perhaps appear as an *encroachment on the countryside*, but because it will not be highly visible this effect will be to a lesser degree than other growth options sites such as Dunton for example. Development would be screened to views from outside West Horndon.
- 5.13 The development proposed on land to the east of the village has many features and aspects to commend it, even in this early stage in the design development. Although it would adversely affect the objectives of the Green Belt by taking land into development, it provides the opportunity to enhance its landscape setting and to resolve access, social and design issues of the existing urban environment. It is inevitable that to meet BBC’s full OAN Green Belt land will have to be identified for release for housing and employment. In a Borough where 89% of land is within the Green Belt this privately owned land that has been subject to years of intensive farming represents one of the least attractive and lower quality parts of the landscape that could be released to meet growth needs. It could provide benefits that could offset the relatively minor harm it would cause the Green Belt.

2) Transport and Access

- 5.14 A report has been prepared by transport consultants – Odyssey Markides LLP to consider the Strategic Growth Options. This is attached in full at Appendix 4. Its key conclusions in respect of proposals for land to the east of West Horndon, are summarised below.
- 5.15 The assessment finds that the A127 corridor has a greater capacity for growth than the A12 where other growth options are proposed in the Borough of Brentwood. Although it suffers from congestion it has more scope for improvement than the A12, to the north. Furthermore, development along the corridor could provide funding for improvements to its capacity.
- 5.16 Land to the east of West Horndon is within walking distance of numerous services and facilities within the village, including a railway station, and is suitably located to connect to the good quality existing pedestrian network in the village. The site represents a sustainable location for new housing in terms of its accessibility via non car modes and is therefore in accordance with the NPPF (paragraph 34). Furthermore the development could help realise the Parish Council’s wish for



pedestrian related improvements in the centre of the village. Although there is little in the way of cycle facilities throughout the settlement, proposed development could fund additional cycle parking at the railway station and in the centre of the village. Further cycle routes could be facilitated.

- 5.17 The centre of the site is within a c. 1.4km walk of West Horndon railway station and there is a good existing footway network between the site and the station. Due to the frequency of trains to and from London and Southend there is no option to increase the number of trains. However there is an option to increase the number of train carriages from eight up to twelve. It is understood that the Parish Council would like to see improvements to the footway linking the railway station with that adjacent to station road. It would be possible to provide disabled access that is currently lacking, and additional car/cycle parking at the railway station to cater for increased demand in the future.
- 5.18 West Horndon benefits from a good bus network that future growth could significantly improve via increased revenue from future residents and from developer funding.
- 5.19 The key strategic road in the vicinity of the site is the A127 Southern Arterial Road, which connects the M25 (junction 29) to Southend. The A127 is a dual carriageway subject to the national speed limit. There are a number of left-in left-out junctions connecting to the A127 in the vicinity of the site that are substandard, such as Thorndon Avenue and Childerditch Lane. The A127/A128 Halfway House junction is an all movements grade separated junction to the north east of the site. The “A127 – Corridor for Growth: An Economic plan” is a joint strategy between Essex County Council and Southend-on-Sea Borough Council to assess the current issues and potential future improvements to the A127 corridor. The study confirms the corridor’s economic importance and suggests improvement works to provide greater journey time reliability to facilitate future growth in the region. The introduction of variable speed limits and realignment of junction entries would assist in improving visibility, reducing collisions and increasing reliability. This may however increase journey times.
- 5.20 It is understood that there is local concern regarding the movement of heavy goods vehicles through the village. There is the potential for a traffic calming scheme to be implemented on Station Road to slow HGV movements.
- 5.21 Suitable access to the site can be achieved for all modes of transport. The site has frontage in excess of 500m onto both sides of Station Road between West Horndon and the A128 Tilbury Road. The highway alignment along the site frontage to Station Road is relatively straight and therefore providing a site access junction with suitable visibility splays onto Station Road is comfortably achievable. There is an existing gap in the hedge/tree line along Station Road that currently provides access to the field. It is this gap in the hedge that could be used to enable a site access to be achieved with Station Road.

3) Archaeology

- 5.22 A review of a range of archaeological and historical sources has confirmed that there are no known prehistoric, Roman or medieval sites or finds on the Historic Environment Records for the site (Appendix 5). This is likely to reflect a lack of formal archaeological investigation. However, settlement of these periods is most likely to have been focussed, although not exclusively, on the adjacent higher ground. The current landscape form is likely to incorporate aspects of medieval as well as post-medieval date and buried evidence for landscapes of several periods is likely to survive in at least fragmentary form archaeologically. Archaeological fieldwork such as geophysics may be required to assist in the identification of any sites present, subject to further consultation with the Historic Environment Management (HEM). This may lead to further stage of evaluation and/or mitigation in the event of planning consent.



- 5.23 The most significant heritage asset within the vicinity of the Site is the Thorndon Hall/St Nicholas' Church Scheduled Monuments located to the north of the A128. The visual effects on the SM's will require further assessment as the masterplanning process is developed and in consultation with English Heritage. Although some effects on the immediately adjacent Registered Park and Garden and Conservation Area are likely these may be largely possible to mitigate via woodland planting. The setting effects on these assets and to Listed Buildings (in particular the Church of All Saints which has inter-visibility with the Site) will also be subject to design led mitigation.

4) Ecology

- 5.24 An ecological survey of land to the east of West Horndon was undertaken by Richard Graves Associates in October 2014. This is attached at Appendix 6. This survey included a Phase 1 Habitat Survey, a Protected Species Walkover, a Water Vole Assessment and a Desktop Study.

Key conclusions are that the site, which comprises four/five large fields, does not include, nor is it near to any protected or ecologically sensitive habitats and it does not have any previous protected species records. The majority of the site (cultivated land, improved grassland and ruderal habitats) is of low ecological value. One protected species, barn owl was recorded during the survey together with some suitable habitats for bats. The report concludes that if some recommendations are followed the site can be successfully developed without significant harm to wildlife and that there are opportunities for enhancement.



6.0 CONCLUSIONS

- 6.1 West Horndon as a settlement to absorb significant growth has been strongly supported in the emerging Local Plan for Brentwood from the early SHLAA back in 2009 through to the Preferred Options Plan in 2013 and now in the Consultation document to find sites for large scale strategic growth.
- 6.2 A significant amount of growth can be focused on West Horndon because the settlement is relatively unconstrained by landscape and visual effects, and offers opportunities to mitigate the impacts of development by integrating them into the existing landscape. Green Belt releases are inevitable in the Borough to meet its OAN. In a Borough where 89% lies within the Green Belt this privately owned land at West Horndon, that has been subject to years of intensive farming, represents one of the least attractive and lowest amenity parts of the Green Belt that could be released to meet housing and employment needs.
- 6.3 A landscape-led approach to development at this location proposed by Rummey Design, shows that it is possible to create an urban extension rooted in its context which also offers opportunities for biodiversity enhancement and restructuring of green infrastructure.
- 6.4 The settlement lies in the A127 transport corridor that is found in a recent transport assessment by Essex County Council and Southend on Sea Borough Council, to have the greatest capacity for growth in the Borough. It is viewed as a vital artery to economic competitiveness. A greater scale of new development at this location than previously considered, will assist in the funding and delivery of a number of transport related benefits that have historically been sought.
- 6.5 Since the settlement of West Horndon was first assessed as a potential growth location, the need for new homes both nationally and in the Borough has substantially increased. As we have demonstrated in Section 2 above a final target for growth has yet to be established. This needs to be influenced by an up to date SHMA that takes into consideration the latest population and demographic figures, which in turn need to be adjusted to respond to market signals.
- 6.6 These representations together with those submitted to the Preferred Options Plan demonstrate that there is potential to develop land to the east and west of the existing settlement and provide a balanced urban extension that builds upon and strengthens the existing village centre by adding to its services and facilities. These representations are supported by a detailed landscape and Green Belt analysis together with a transportation assessment.
- 6.7 Sufficient land is available at this location to justify a major strategic allocation to meet an urgent demand for sites. This can be phased to ensure early delivery of the unconstrained land to the east of the settlement and thereby contribute towards the five year housing land requirement. Growth at this location can also address a number of key concerns and requirements of the Parish Council that relate to transport and access and the provision of services and facilities.
- 6.8 It is not in dispute that the Borough of Brentwood and the adjoining local authority areas such as Basildon will need to find sites to accommodate significant growth over the next fifteen years and beyond. A Sustainability Appraisal by URS to support the Strategic Growth Options Consultation report finds that land at West Horndon represents the preferred location for growth when all options are considered against some 12 key sustainability issues/ objectives.

Strategic Growth Options Consultation and Sustainability Appraisal – Interim Report (URS)



- 6.9 In overall conclusion it is clear that the land being promoted by Countryside Properties has no overriding environmental, technical or land ownership constraints to prevent development. Its merits are reflected in the Sustainability Appraisal by URS that finds it to be a most sustainable location for growth. Moreover, the land to the east of the settlement, in the control of Countryside Properties is not reliant on major and disproportionate costly requirements of infrastructure. It could form the first phase of the sustainable expansion of West Horndon and provide a new attractive landscape-led gateway into the larger community. The site is, available, suitable and viable with a realistic prospect that housing could be delivered within the first five years of the Plan. Consequently the site should be selected as a preferred allocation in the subsequent stages of the emerging Local Plan.