
F5B Dunton Hills Garden Village Topic Paper August 2020

Introduction

1. This Topic Paper addresses a range of questions raised in the letter provided by the Inspector on 01 June 2020. It should be read in conjunction with other topic papers that will support the Council's case at the Brentwood Local Plan examination, including: Spatial Strategy, Green Belt and Housing.
2. This information does not present new evidence but outlines the steps, processes and evidence that have led to the Council making its decision in respect of the strategic site selection of Dunton Hills Garden Village. It also looks at national policy and guidance, the supporting evidence base and consultation feedback. The paper also provides an up to date position and summary of the work that has been, and continues to be undertaken, with the promoters.
3. The Topic Paper also considers the proposed additional changes to the pre-submission Brentwood Local Plan as a result of a focussed consultation that was undertaken in November 2019. These changes do not affect the soundness of the plan and were made in response to representations received during the Regulation 19 consultation.
4. Reference is made in this Topic Paper to a Statement of Common Ground (SofCG) between the Council and CEG as the Master Developer for the Dunton Hills Garden Village allocation. This SofCG is being drafted and will be available prior to the examination hearings.

INSPECTORS' QUESTION 30

The Plan proposes to allocate DHGV as the largest strategic site allocation for residential-led development. Can the Council provide an update on the planning status of the site and the progress made on bringing the site forward? What is the position regarding land assembly of the site?

Land Assembly

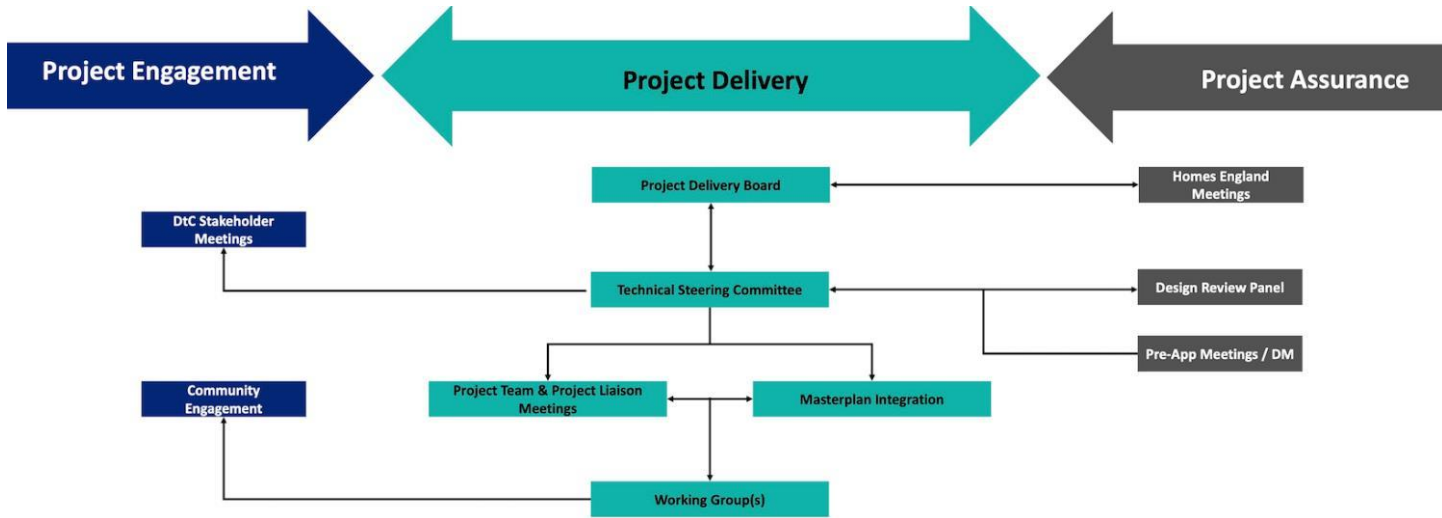
5. The land required for Dunton Hills Garden Village is already assembled and available for development. There are no major constraints to development.
6. The site is owned and controlled by six parties who, together, produced a Memorandum of Understanding (MoU) with respect to the delivery of the proposed allocation. The MoU is to be adduced with the SofCG
7. The vast majority (87%) of the allocation site is within the control of CEG, an experienced land promotor and master developer which is party to the MoU, working in conjunction with Homes England, the Council and other stakeholders to ensure the scheme will be delivered.
8. Land that is not within CEG's control is controlled by two private landowners (Messrs Low and Smith), that have two option agreements with Crest Nicholson and Bellway Homes, being four separate parcels of land. A further parcel is the building comprising Dunton Hills Farmstead (located at the centre of the site) that is in the same ownership as the land in which CEG has an interest via a Promotion Agreement.
9. All landowners have been regularly engaged through the governance arrangements for Dunton Hills Garden Village via the community forum and landowner integration meetings as set out in Examination Note F3E (Question 11 response).

Planning status

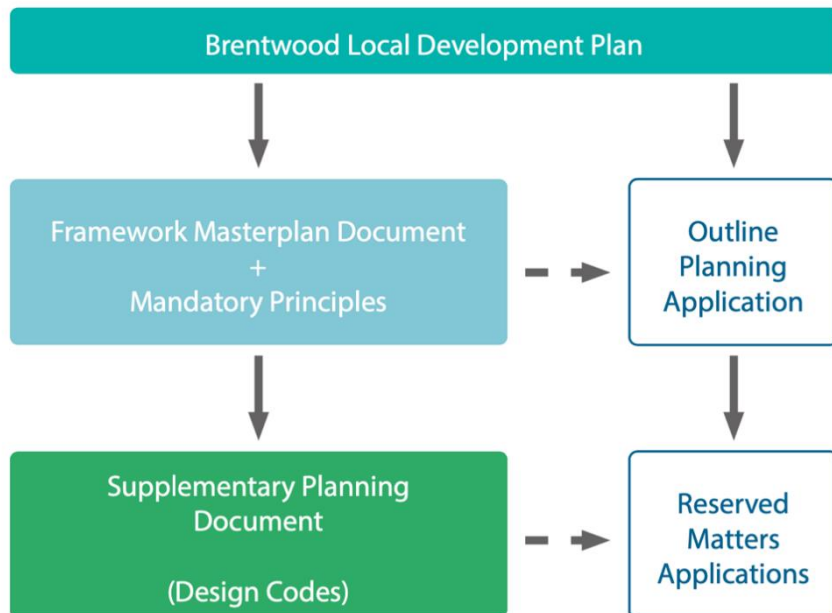
DUNTON HILLS GARDEN VILLAGE GOVERNANCE FRAMEWORK

10. The Dunton Hills Garden Village Examination Note F3E (Q11 response) sets out the governance arrangements for Dunton Hills Garden Village which has been treated as a strategic matter by the Council, engaging relevant stakeholders, including County and District planning authorities, and dedicating resources and necessary governance arrangements to meet Garden Community requirements of Government.
11. The governance arrangements have enabled issues to be addressed early in the evolution of the Garden Village plans progressing towards a masterplan.

12. The governance arrangements are illustrated in the diagram below. This arrangement is explained in more detail in the “DHGV Governance Framework” document as approved by the Council.



13. Under the umbrella of the governance arrangements, the relevant stakeholders have had, and continue to have, an opportunity to inform the evolution of the Garden Village masterplan. The Governance Framework has provided the context for the preparation of the draft Masterplan Framework Document and detailed design matters to be included in the Design Code Supplementary Planning Document (SPD). The policy context and hierarchy of the masterplanning and design documents, and how they interact with the development management process, is illustrated below.



14. The draft Masterplan Framework Document is publicly available and is included in the examination library (ref: **F5b1**) will be the subject of public consultation in Autumn 2020, alongside the Supplementary Planning Document. Following feedback and updates to both documents based on submissions received, the documents will be combined and adopted by the Council, subject to outcomes of the Brentwood Local Plan examination.

PRE-APPLICATION PROCESS

15. CEG is in the process of finalising documentation to support an Outline Planning Application. This has involved extensive pre-application discussions with Brentwood Borough Council and Essex County Council (through Planning Performance Agreements), Basildon Borough Council and other stakeholders such as Historic England, Sports England and statutory undertakers. The application is being prepared in accordance with the policy framework of the Local Plan and the principles established by the draft Framework Masterplan. The proposals have been the subject of extensive consultation with stakeholders. Further details on the consultation will be set out in the SofCG.
16. Presently, CEG and Brentwood Borough Council have agreed a list of application documentation. Some technical reports submitted as part of a draft Environmental Statement have been considered by the Council and Essex County Council (where relevant), as well as other statutory consultees.
17. A formal Scoping Opinion for an Environmental Impact Assessment was issued by Brentwood Borough Council on 28 February 2019. CEG submitted a review of the Scoping Opinion on 22 August 2019 with an updated development description, parameters plans, and additional information which incorporated the principles established by the draft Framework Masterplan Document. Further information was submitted in September 2019. An updated Scoping Opinion was issued by the Council on 11 November 2019. The Scoping Report and Options for the Environmental Impact Assessment are included in the examination library. It is expected that some amendments will be required dependent upon the outcome of the examination and consultation on the draft Framework Masterplan Document and Supplementary Planning Document. An amendment to the intended description of development will be needed to reflect the recent changes to the Use Classes Order.
18. It is expected that running the pre-application process concurrently with policy preparation will reduce lead in times for the consideration and determination of the application and hence the delivery of the site (a matter dealt with in response to Question 35 below).
19. The Outline Planning Application proposes:
 - Up to 3,700 residential units (Class C3) plus five Gypsy and Traveller pitches plus three up to 80-bed care homes (Class C2)
 - One Village Centre and two Neighbourhood Hubs comprising 14,750 m² of non-residential uses in use classes A, B1, D1 and D2
 - Either: 3 x co-located primary school and 1 x secondary school plus an additional early years' facility; or 1 x all-through school and 2 x primary schools plus an additional nursery (or equivalent).
 - Employment hub (Class B1) also acting as noise screen of up to 43,500sqm (gross) and 9m in height in the north west of the site.
 - Green and blue infrastructure comprising approximately 50% of the site including retained woodland, play areas and open space and Sustainable Drainage Systems (SuDS).

- Apart from vehicle access, bus, cycle and pedestrian only routes will be provided on site, and offsite a pedestrian/cycle route will connect with West Horndon. Three access points proposed from A128.
- Utility services will be required throughout the development.
- Demolition of existing golf course structures, the wind turbine and associated sub-station. It has been confirmed that additionally, overhead lines will be undergrounded.

20. It is expected that the Outline Planning Application will be submitted following the consideration of Dunton Hills Garden Village policy in the Brentwood Local Plan.

INSPECTORS' QUESTION 31

The ethos of Garden Communities is that they are sustainable. How will the development be 'self-sustaining'? Where is the evidence to demonstrate that this can be achieved?

A Self-Sustaining Garden Village

21. The Ministry of Housing Communities and Local Government set out key principles for planning garden communities in their Garden Communities Prospectus. In addition, the TCPA Garden Village Guidance sets out further principles and qualities of a Garden Village. The draft Brentwood Local Plan uses these principles (R01). The principles have been set out in three categories: Key qualities of the development (design); the delivery process (function); and the sustainable management of the Garden Village (management). Under each of these principles, sub-objectives that provide the link between the vision and development strategy are also set out.
22. These are illustrated below and form the fundamental development principles to help shape and inform the development of a comprehensive masterplan, and guide decision-making.

<p>DESIGN</p>	<p>Strategic Aim DH01</p>	<p>To create a distinctive and well-designed new settlement at Dunton Hills that responds to its spatial context and incorporates all the necessary components to achieve a healthy, liveable and self-sustaining Garden Village.</p>	<p>DH01a: DISTINCTIVE CHARACTER & HARMONIC DESIGN DH01b: LANDSCAPE-LED DH01c: EMBEDDING HERITAGE ASSETS DH01d: SOCIAL PLACE DH01g: HOMES THAT PROVIDE DESIRABLE DESIGN, CHOICE, AFFORDABILITY DH01e: SMART INFRASTRUTURE DH01f: SUSTAINABLE TRAVEL</p>
<p>FUNCTION</p>	<p>Strategic Aim DH02</p>	<p>To deliver a place of prosperity that promotes enterprise, innovation and learning as part of the delivery process, but also as an embedded culture for the future village.</p>	<p>DH02a: HEALTHY & PRODUCTIVE WORK PLACES DH02b: ALL THROUGH LEARNING DH02c: INNOVATION & ENTERPRISE</p>
<p>MANAGEMENT</p>	<p>Strategic Aim DH03</p>	<p>To create a process and legacy of co-design, co-delivery and eventual vibrant and cohesive community spirit and stewardship.</p>	<p>DH03a: GOOD GOVERNANCE DH03b: PHASING PLAN</p>

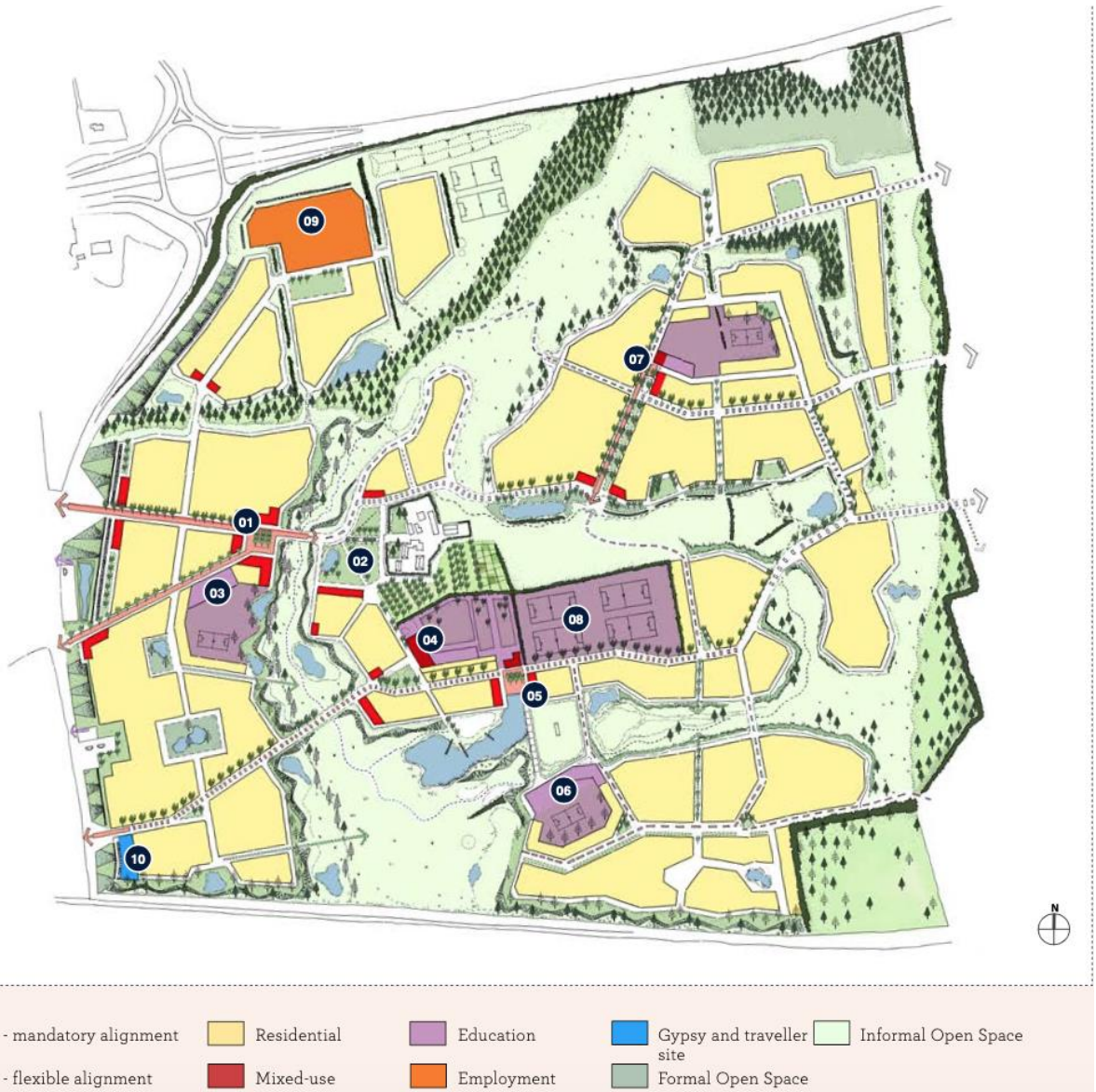
23. The draft Framework Masterplan sets out how the day to day needs, services, facilities and infrastructure are to be provided to create a self-sustaining community with continuing stewardship through a Community Management Trust. Careful consideration has been given to transport, the employment and retail offer, education and community infrastructure as well as landscape and heritage matters as set out in response to questions 32-37 below. Through the masterplanning process outlined in Examination Note F3E (Question 11), the draft Framework Masterplan has been prepared in collaboration with stakeholders to ensure that the necessary infrastructure is provided and provided in a timely way. Question 30 sets out the specific infrastructure provision on site, which accords with policy R01.

INSPECTORS' QUESTION 32

Of the 259.2 ha site proposed to be allocated, a minimum of 50% of the land area is proposed to be available for green and blue infrastructure. Is this feasible and can the level of development, including that to be delivered beyond the plan period, and all other necessary infrastructure be delivered within the remaining developable site area?

Deliverable Infrastructure

24. The draft Framework Masterplan demonstrates how Dunton Hills Garden Village will provide 50% of the allocation for green and blue infrastructure, which forms an integral part of the Garden Village. This includes retained ponds and woodland/hedges, sustainable drainage, children’s play spaces, formal and informal recreation/sports facilities, community growing space, Village Green, orchard, footway/cycleway routes, landscaping including along the eastern boundary and biodiversity areas. Thus, confirming the ability for 50% of the allocation to deliver Green and Blue Infrastructure alongside other necessary infrastructure. This will be a principal subject to be covered in the CEG and Brentwood Borough Council SofCG.
25. The draft Framework Masterplan also sets out how other self-sustaining infrastructure and the proposed number of homes required to develop a sustainable new Garden Village, can be delivered in the allocated area. The draft land use plan below is from the draft Framework Masterplan and illustrates the spatial requirements of the proposed development.



26. To ensure this comes forward in the plan period and beyond the plan period, the MoU explained in response to Question 30, sets out that all landowners will come forward to deliver the site positively and in accordance with the policy framework.

INSPECTORS' QUESTION 33

A total of 5.5 ha is proposed to accommodate 'a creative range of employment uses'. What type of employment uses are proposed and how and when is this to be delivered? Have locations and timescales for delivery been determined? How has the amount of employment land been determined and is this sufficient to ensure the site limits the need to travel and is self-sustaining?

Employment Type and Timing

27. The employment uses at Dunton Hills Garden Village are envisaged to include B1 Use Class (now Class E), commercial/retail uses (was Classes A and D but now Classes E and F and sui generis) and community infrastructure (e.g. schools and nurseries). Even before the implications of the Covid-19 lockdown, the masterplanning process identified that provision should, with high speed internet, be made to enable working from home (whether remotely or start-up businesses) with support facilities in the Village Centre (e.g. meeting rooms or other types of flexible space) . Section 7.0 - Sustainability Strategy of the draft Framework Masterplan Document sets out further detail relating to the spatial employment approach and type.
28. The formal 5.5 hectares of employment land envisaged for the site would be delivered over the plan period at the Employment Hub, the Village Centre and the Neighbourhood Hubs. Their delivery would be the responsibility of the developers.
29. The locations for employment land was subject to review through the design review process and took into consideration the need to create mixed-use communities and technical considerations such as noise, relationship to adjoining land uses, visibility and accessibility. The Employment Hub will complement East Horndon Hall (adjacent) offering larger spaces for companies looking to expand their businesses (light industrial and innovation hub).
30. Through reviewing the draft Environmental Statement, the Council has been provided with estimates of the number of employees at Dunton Hills by CEG. The employment areas will in total provide an estimated 2,067 jobs in accordance with the Economic Futures 2013-2033 report submitted as part of the Brentwood Local Plan evidence base, and an additional 823 jobs through retail services, education facilities, healthcare providers and other on-site facilities. The number of jobs has been tested through the masterplanning and planning pre-application process.
31. In addition to land within the Garden Village, the emerging Brentwood Local Plan allocates the following employment sites in the south of the borough:
- Brentwood Enterprise Park

- Land at Codham Hall Farm
 - Childerditch Industrial Estate
 - East Horndon Hall
 - Retention at West Horndon
32. Future residents of Dunton Hills will also have the opportunity to work at these sites, each of which would be accessible on foot, cycle and shared transport, whether buses or Demand Responsive Travel.

INSPECTORS QUESTION 34

The Transport Infrastructure section of the Infrastructure Delivery Plan (IDP) identifies four key items of sustainable infrastructure (T20-T23) which are required to support DHGV. Can the Council provide an update on these infrastructure projects? What are the highway mitigation measures that are required to support the development? Are these transport and highways requirements costed, funded and within approved delivery programmes? Is the Plan clear on what other infrastructure is necessary to support the development? Are all these infrastructure requirements justified, deliverable and viable?

Infrastructure Delivery Plan

33. Items T20-T23 set out in the Infrastructure Delivery Plan relating to Dunton Hills Garden Village include:
- T20: DHGV - Widening Connectivity (A128 and Tilbury Road) (short term)
 - T21: DHGV - Walkways / Cycleways (Medium / Long Term)
 - T22: DHGV - Sustainable Transport Hub (Medium / Long Term)
34. T23: DHGV - Public Realm and Village Square (Medium / Long Term)
35. All these infrastructure projects will be brought forward by the developers of Dunton Hills Garden Village. T21-23 have been set out in further detail in the draft Framework Masterplan.
36. The draft Framework Masterplan sets out a sustainable travel approach for travel within and beyond the local area in an order of priority including virtual travel, active travel, shared travel and single occupancy car travel, ensuring sustainable transport modes sit at the highest priority. Pedestrian and cycle movement is prioritised to encourage active transport, with new routes linking with the existing PROW network, providing connections to the surrounding countryside. It seeks to ensure there is an accessible transport system with walking, cycling and public transport designed to be the most attractive form of transport with a target of 60-70% local trips to be by sustainable transport modes (T21).

37. Outside of the site, Demand Responsive Travel (DRT) and traditional bus services are proposed to link Dunton Hills with key destinations including Brentwood, Shenfield, Basildon, Thurrock and employment allocations such as Brentwood Enterprise Park. Other improvements include an improved footway/cycleway link to West Horndon Railway Station, cycle and bus access along the A128, a foot/cycle/emergency access from the site towards Basildon subject to consent by Basildon Borough Council, and improvements to be made as part of the South Brentwood Growth Corridor Vision.
38. It is expected that there will be a high level of internalisation within the Garden Village. Other non-traditional and innovative transport modes have also been designated within the draft Framework Masterplan, including a mobility hub (T22) in the town centre which promotes sustainable travel modes and other initiatives such as: micro consolidation of deliveries to homes, hire of bikes, providing communal fast charging for electric vehicles to supplement home charging, operating car sharing schemes, and operating an electric vehicle hire scheme.
39. Discussions continue with Essex County Council and Highways England to address those junctions that will require improvements based upon the Transport Assessment for the Local Plan. A Statement of Common Ground between the Council and the Highway Authorities is in the process being prepared and is to be submitted ahead of the Examination in Public.
40. Public Realm and Village Square in the Village Centre (T23) are set out spatially in the draft Framework Masterplan. The Village Square is at the heart of the Village Centre adjoining the Farmhouse area and opens out onto the public green and adjoins the proposed primary school location. Mandatory principles set out how the plans come forward.
41. Item T20 is discussed as part of highway mitigation measures below.

Highway Mitigation Measures

42. The highway mitigation measure required to support Dunton Hills Garden Village include:
- Two new roundabouts, a new crossroad junction and improved pedestrian and cycling facilities on the A128 to access DHGV (costed in IDP and being paid for by the developers of DHGV)
 - Widening of the raised A127/A128 junction bridge to incorporate improved pedestrian cycling facilities and widening of the west bound entry from the A128 to the A127 (costed in the IDP and paid for by the developers of DHGV)
 - Reconfiguration of Station road to better facilitate pedestrian and cycling movements including a new roundabout at West Horndon station to improve traffic safety (costed in IDP and paid for by the developers of DGHV and West Horndon Industrial site)
 - Upgrade to J29 of the M25 which has a provisional cost in the IDP as detailed discussions are still ongoing with Highways England (the developers of all the Local Plan sites)
43. The Local Plan is clear in its ambition to ensure sustainable transport is the primary choice of movement in the South Brentwood Growth Corridor for residents and workers. It has therefore identified the highway mitigation listed above and the phased upgrading of West Horndon Station to a new interchange as necessary to support the developments in line with its sustainable transport Principle ([South Brentwood Growth Corridor Vision](#)). The Station provides opportunities to support sustainable connections to Dunton Hills through upgrades to the station, bus and non-motorised user infrastructure, providing benefits to the wider community. Ongoing

discussions are occurring with the rail provider C2C to prepare a Memorandum of Understanding for agreement of upgrade works to the station to better support Dunton Hills Garden Village and development along the A127 corridor and south of the station be accessed sustainably.

44. All items are costed within the IDP and a draft programme of delivery per item has been set out by the site promoters in line with delivery ambitions within the plan period. The process of apportionment has concluded and consultation of how those costs not directly related to Local Plan development sites is due to commence shortly. Contingency plans are in place if there is a gap between what sites consider viable to contribute and defined costs.
45. Apart from the optional cost to upgrade the A127, which is included in the IDP but isn't critical due to the route having existing NMU provision; the remaining infrastructure upgrades are justified either for additional flow capacity or sustainable transport reasons. All the infrastructure upgrades are planned to be delivered in the land ownership of either the Highway Authority or the site promoter to ensure they are cost effective and therefore viable and deliverable.

Infrastructure Requirements

46. Policy R01 sets out other required infrastructure required to delivery Dunton Hills Garden Village which links to the Infrastructure Delivery Plan and as such accords to the draft Framework Masterplan. As set out in response to Question 30 and 31, Dunton Hills Garden Village will provide a range of infrastructure to support a self-sustaining community. Required infrastructure has been tested through the governance framework arrangements that are discussed in detail at Examination Note F3E (Question 11).

INSPECTORS' QUESTION 35

The housing trajectory in Appendix 1 of the Plan shows that 100 houses will be delivered in 2022/23 with variable increased completions in subsequent years. This means that some houses are proposed to be delivered as part of the five-year housing land supply. Having regard to the definition of deliverable sites in Annex 2 of the Framework, is this realistic and justified? On what basis has the lead-in time and the proposed annual delivery rates been determined? What evidence supports the on-going delivery rates, as set out in the housing trajectory, throughout the remainder of the plan period.

Five-Year Supply

47. The Local Plan sets out a stepped trajectory rate for delivery of Dunton Hills Garden Village, with an average delivery rate of around 250 per year, increasing from 100 in the first year to 300 in the fifth year. The updated housing trajectory as set out in response to Question 43-49 provides 200 dwellings in year 2023/2024 followed by 300 in the following year and 310 each year after that for the rest of the plan period. As such, the average rate of delivery for DHGV is 270 dwellings per annum. Based on the delayed adoption of the plan approximated in 2021/2022,

the five-year period would go from 2021/22 to 2025/26. As such, 600 dwellings from DHGV would form part of the 5 year supply at the time of adoption.

48. The following timetable and lead-in times is expected delivery of the first dwelling for occupation on the CEG land interest, subject to the outcome of the Local Plan Examination:
- Q4 2020 – Submission of outline planning application
 - Q3 2021 – Determination of the outline planning application
 - Q1 2022 – Issuing of the planning permission
 - Q3 2022 – Discharge any conditions precedent for infrastructure works
 - Q4 2022 – First residential reserved matters approved
 - Q1 2023 – Start infrastructure works on-site
 - Q4 2023/Q1 2024 – anticipated first occupation
49. In accordance with the above, it is anticipated that 100 homes will be delivered during the five-year housing land supply period 2019-2024. This information has been prepared by the Council in consultation with CEG allowing for the delay in the Local Plan submission and examination which has occurred since the original housing trajectory for the site was prepared.

Delivery Rates

50. The site allocations identified in the Local Plan have been considered both available and deliverable. In accordance with the PPG, a site is considered to be available for development when there is confidence that there are no legal or ownership problems such as unresolved multiple ownerships, ransom strip tenancies and operational requirements. Availability of a site is key to whether development of the site will take place within the plan period. Where the availability of a site is in doubt, or other constraints exist to prevent it becoming available then, it is realistic to not include as an option.
51. Information used to assess the availability of a site was gathered from a variety of sources to establish 'availability'. This process was undertaken through the 'Call for Sites' exercise during the Brentwood Local Plan consultations which also included other fact checking activities. These were assessed as part of the Housing and Economic Land Availability Assessment (HELAA) undertaken in 2018 and further appraisal as part of the 2019 Sustainability Appraisal.
52. Dunton Hills Garden Village will deliver 2,770 homes within the plan period and is considered to be deliverable. It will be delivered at a staggered way with key infrastructure and fewer homes provided early on, and delivery to increase at pace towards the end of the plan period as set out in the Brentwood Local Plan updated trajectory in 2019.
53. The Council and CEG are committed to confirming agreement on the delivery statement of Dunton Hills Garden Village as part of the Statement of Common Ground ahead of the Examination in Public.

INSPECTORS' QUESTION 36

How have Green Belt, heritage and landscape matters been considered as part of the DHGV site allocation?

54. Green Belt, Landscape and heritage matters have been key considerations in the allocation assessment and masterplanning processes.
55. The assessment work included consideration of establishing firm defensible Green Belt boundaries; the potential impact on designated heritage assets within and adjacent to the allocation and how built development could be assimilated alongside the Green and Blue Infrastructure with minimal impact.

Spatial Strategy & Green Belt

56. The Green Belt and Spatial Strategy Topic Papers set out considerations that have been made as part of the consideration of the Dunton Hills Garden Village allocation. A summary is provided below, however both topic papers should be referred to in order to gain a detailed understanding.

SPATIAL STRATEGY

57. The Local Plan spatial strategy for Brentwood Borough Council involves:
 - Making optimal use of land falling outside of the Green Belt;
 - Allocating land in the Green Belt sufficient to meet LHN, recognising that providing for 'below LHN' (and thereby relying on neighbouring authorities to provide for the unmet needs) is not a realistic possibility; and
 - Selecting Green Belt sites in order to minimise harm to the Green Belt as a foremost consideration, whilst also giving weight to "the need to promote sustainable patterns of development" (NPPF paragraph 138).
58. The Spatial Strategy Topic Paper concludes that working within this framework, seven spatial strategy reasonable alternatives were established, appraised and published for consultation in 2019. The detailed appraisal findings, alongside the consultation responses received, demonstrated that the Local Plan spatial strategy does represent sustainable development and is sound.

GREEN BELT

59. The Council has concluded that the most appropriate approach to achieving sustainable housing growth whilst still maintaining the unique character of the borough is through a new Garden Village at Dunton Hills. It is deliverable within the plan period to help meet housing needs in the

Borough. A detailed summary of the spatial strategy and Green Belt decision making process can be found in the Spatial Strategy Topic Paper and Green Belt Topic Paper.

60. In addition, a new village fits within the existing urban form which Brentwood is characterised by, being a borough of many villages. This village character gives Brentwood its unique sense of identity and an important reason why people choose to live and work in the borough, especially given its good connections to London, to strategic employment areas.
61. Dunton Hills Garden Village provides a unique opportunity to create a new village community with a lasting legacy. The site allocation is large enough to provide the supporting community infrastructure and compact enough to fit with the village character; it is self-contained and positioned along key transport corridor (both public and vehicular) with good access to London but also to the wider South Essex employment opportunities.
62. Benefits for bringing forward Dunton Hills Garden Village include:
- **Deliverable Infrastructure** - the development will be large enough to make investment in new services and infrastructure to be self-sustaining rather than adding pressure to existing areas, thus avoiding a piecemeal infrastructure-light development in the north of the Borough that will have little impact over the longer-term;
 - **Planned growth in line with Borough's character** - this will avoid the unplanned, continual and ad-hoc expansion of urban areas, which risks eroding the local character and adding to cumulative pressure on local infrastructure and services in areas already at capacity.
 - **Enhancement of Landscape setting** - the site's setting provides an opportunity to embed green infrastructure, which responds to the fundamental principles of a garden village setting. Green infrastructure will connect to the surrounding countryside and country parks. The concept of a 'living landscape' will be at the heart of the image for the new settlement.
 - **Accessible and Sustainable** - its location allows it to be self-sustaining, rather than a dormitory suburb, or disconnected new settlement, strategically positioned near employment centres. It is located within existing sustainable transport connectivity: A127; and West Horndon station.
 - **Deliverability and Availability** – the site is available. Throughout the process the Council has maintained dialogue with the site promoters and both parties have been pro-active in providing key site assessments to help understand the deliverability of the site.
 - **Suitability** – the site comprises lower grade agricultural land and a golf course (the use of which use has declined in recent years), the land is suitable for redevelopment, ensuring areas with greater environmental constraints elsewhere are protected. It also provides a excellent recreational opportunities for the general public.
63. Brentwood's Part 2 Green Belt Study evidence base is a borough-wide strategic review of Green Belt land to understand the pre-existing function of large areas of land in relation to Green Belt purposes and planning policy. The analysis concluded that no or very few parcels are considered as having a low contribution to the Green Belt purposes. 38 of the parcels assessed showed they contributed highly to at least two purposes of Green Belt, whereas 13 contributed to 3 purposes of Green Belt. As a result, it cannot be concluded that one site is better suited for release from a green belt perspective, compared to another. Removal of land at Dunton Hills Garden Village from the Green Belt reduces the total amount of Green Belt within Brentwood Borough by 1%. In percentage terms this is not significant. The allocation accords with

Paragraph 83 and 84 of the NPPF and the allocation will assist in ensuring the longer-term permanence of the Green Belt elsewhere.

Heritage

64. As set out in the Council's response to Q85 – Heritage, the consideration of heritage matters in the Local Plan has been approached in a number of ways:

- An internal review of significant heritage assets by the Council's Conservation Officer
- Through the Sustainability Appraisal (SA), which defined heritage as one of the key objectives in the methodological assessment framework
- Through further considerations during the development of the Housing and Economic Land Availability Assessment (HELAA)
- Through policy, ensuring that development sites which may have an impact, are assessed as part of any development proposals.

65. The SA found that a Dunton Hills Garden Village scheme might impact on the setting of Dunton Hills farmhouse (grade II listed) but that significant negative effects are not predicted, noting good potential to suitably avoid/mitigate effects at the planning application stage. Further assessment work undertaken as part of the draft Framework Masterplan Document demonstrates that the listed building provides an opportunity to become a focal point of the development and key part of placemaking in the new Garden Village. Its inclusion will ensure that the significance of the contribution which its setting makes to its significance will be respected and any negative impacts kept to a minimum with appropriate mitigation.

66. The assessment work undertaken as part of the draft Framework Masterplan Document also demonstrated that:

- A comprehensive green infrastructure scheme will enhance the existing historic landscape features (such as the ancient woodland along Nightingale Lane, planting along Eastlands Spring and important hedgerows) and mitigate potential harm (such as structural planting in order to protect views of All Saints Church from Thorndon Park and the church itself).
- The provision of generous 'buffer zones' around historic buildings would provide new publicly-accessible green spaces from which to appreciate historic buildings but also respect their setting. This includes the provision of a new village green to the west of Dunton Hills farmhouse and grassland meadows in the vicinity of St Mary's Church and Dunton Hall.
- Key views across the site would be retained, including those towards and between the Dunton Hills farmhouse, Church of All Saints and Church of St Mary.
- The proposals would retain and reinstate historic routes through the site (e.g. the farmstead driveway).

67. It is noted that while Historic England have been a key consultee through preparation of masterplan drafting, a representation was made in March 2018 and November 2019. Historic England wish to see a more detailed Heritage Impact Assessment and potentially additional characterisation and archaeological investigations to be undertaken for the proposed development. This outcome of this work will be summarised in the Statement of Common Ground with Historic England.

Landscape

68. Landscape has been a fundamental consideration of the Dunton Hills Garden Village allocation and subsequent masterplanning work.
69. The Landscape Sensitivity and Capacity Study (Examination Document C32) sets out that, in the context of developing Dunton Hills Garden Village, unacceptable effects on landscape character could be avoided through good design.
70. In addition to the Landscape Sensitivity and Capacity Study (Examination Document C32), an independent study was undertaken between Basildon Borough Council and Brentwood Borough Council. While this work was never formally adopted by Brentwood Borough Council, it was considered as part of the Masterplanning work. The report found that a significant buffer would be needed to separate development at Basildon and Brentwood. While the extent of the buffer recommended in the report was larger than that provided in the draft Masterplan, it is considered that the treatment of the buffer is of more importance in terms of visual and physical separation. Well landscaped treatments along the eastern boundary will have permanence and provide a stronger setting than the current open fields. Structural planting will be focused along the eastern boundary of the site, creating a soft boundary between the proposed development and adjacent land while also screening views into the development from the east. There is also a minimum buffer proposed of 78m to ensure development is not located along the gas pipeline. This will contribute to the permanent landscape edge.
71. The existing ancient woodland, hedgerows, spring and ponds on site provide the basis for an extensive green and blue network as set out in the images below. These features are to be enhanced and integrated into key spaces which correspond to their setting, offering a variety of spaces for relaxation, active recreation and interaction with nature. SuDS are also to be situated in open spaces to ensure flood mitigation.



Integrated Blue Infrastructure



Integrated Green Infrastructure

72. Further detailed work is being undertaken as part of the detailed design work (SPD) which further embeds landscape character and green and blue infrastructure into the built and natural environment at Dunton Hills Garden Village at a fine grain.

INSPECTORS' QUESTION 37

Has a specific viability assessment of DHGV been undertaken?

Viability

73. A borough wide viability assessment was undertaken by Brentwood Borough Council for the Local Plan which involved some detailed considerations for Dunton Hills Garden Village. This is set out in detail in the Housing Topic Paper.

74. An updated viability appraisal is being prepared to reflect the circumstances as at the date of the submission of the Local Plan and the updated Infrastructure Delivery Plan. The outcome of this viability will be included in the SofCG.