

BASILDON BOROUGH COUNCIL

DRAFT LOCAL PLAN

SERVICED SETTLEMENTS REVIEW

AUGUST 2017

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1.0 INTRODUCTION

Objectives of the Review

1.1 The objectives of the review as set out in the brief are:

- a) To provide a detailed review of those sites in Ramsden Bellhouse promoted through the Housing and Economic Land Availability Assessment (the 'HELAA') in order to identify their suitability and capacity for accommodating housing development.
- b) To provide a detailed review of those sites in Crays Hill and the Crays Hill plotland promoted through the HELAA in order to identify their suitability and capacity for accommodating housing development.
- c) To provide a view on the existing cumulative impacts of gypsy and traveller sites in the Crays Hill plotland, and provide a potential assessment of the future cumulative impacts of gypsy and traveller sites taking into account the proposals in draft policies H 5 and H 6.
- d) Provide recommendations to policies H 28, and H 29, and also policies GB 3, H 5 and H 6 as they relate to the Crays Hill Plotland.

1.2 The approach taken to this review, in accordance with the objectives set in the brief, and the expected outputs, has been to:

- i) In relation to both settlements to undertake a review of all the HELAA assessments undertaken by the Planning Policy team.
- ii) Review all the representations made in relation to policies H 28 and H 29.
- ii) Make recommendations as to the most appropriate sites for development, and how they should be brought forward in terms of capacity and mitigation.
- iii) Specifically in relation to Crays Hill, the assessment has considered the impact of further development in the wider plotland area particularly in relation to Policy GB 3.

- iv) Set out recommendations as to how the cumulative impacts arising from a concentration of Gypsy and Traveller sites should be dealt with in a way that is consistent with the Gypsy & Traveller Equalities Act 2010.
 - v) Also where appropriate comment on the wording of the policies and highlight any inconsistencies or anomalies within the draft policies.
- 1.3 Appendices 1-13 include a series of indicative plans for both Ramsden Bellhouse and Crays Hill showing options for development within the two settlements.

2.0 BACKGROUND

- 2.1 The 2016 Draft Local Plan (DLP) includes specific policies in relation to the settlements of Crays Hill and Ramsden Bellhouse. The two settlements are described as serviced villages within the settlement hierarchy for the Borough. The settlement hierarchy was derived from the Basildon Borough Settlement Hierarchy Review (August 2015) which forms part of the evidence base for the preparation of the DLP.
- 2.2 The DLP includes two policies H 28 and H 29 that propose that 45 new dwellings are allocated to each of the serviced settlements of Ramsden Bellhouse and Crays Hill. The two policies are respectively:

Policy H 28 Housing Growth in Ramsden Bellhouse

1. Local amendments have been made to the Green Belt boundary in order to extend the village envelop of Ramsden Bellhouse. Within this expanded envelop, sites may be developed for residential or community use purposes only, to provide around 45 homes.
2. New homes should be designed in accordance with the Special Development Control Policy for Ramsden Bellhouse, and should contribute in a proportionate way to the provision of local infrastructure improvements, in particular the improvement of local public transport services. Proposals must also conform with all other relevant policies within this plan.

Policy H 29 Housing Growth in Crays Hill

1. Local amendments have been made to the Green Belt boundary in order to extend the village envelop of Crays Hill. Within this expanded envelop, sites may be developed for residential or community use purposes only, to provide around 45 homes.

2. New homes should be designed in accordance with the character of the local area and should contribute in a proportionate way to the provision of local infrastructure improvements, in particular the improvement of local public transport services. Proposals must also conform with all other relevant policies within this plan.

- 2.3 There are a number of other policies that also need to be considered when reviewing policies H 28 and H 29, as they relate to the implementation of the two policies. These are:

Policy GB 3 Plotland Infill

1. Limited residential development within the Plotland Infill Areas, as identified on the Policies Map, will be supported where they are compliant with all other relevant policies of this plan, and:
 - a. Where it can be demonstrated that the infill is intended to meet the need for housing arising from the plotland settlement itself; or the plot is being made available for self-build via the Council's Self-Build Register;
 - b. Where the intended infill is not the result of subdivision of a larger plot and is located between existing dwellings on an existing road frontage, or on a corner plot. The development should not however face onto the strategic road network;
 - c. Where the intended development is appropriate in scale and setting to preserve both the character of the plotland settlement and the openness of the Green Belt. In particular, development proposals within the plotland settlements should normally be:
 - i. Structures low in height, such as bungalows and chalets;
 - ii. Set within the site, with sufficient space between the dwelling and the boundary of the site to maintain an open appearance;and

- iii. Integrated into the wider landscape through the use of soft boundary treatments, such as hedges or tree lines, soft landscaping and the retention of trees.
2. Where development proposals are permitted within the Plotland Infill Areas, the Council will seek to remove the permitted development rights of the new development in order to ensure that extensions, alterations and ancillary buildings do not result in the development causing harm to the character of the plotland settlement or the openness of the Green Belt over time.
3. Non-residential development proposals will not normally be permitted within the plotland settlements.

Policy DES 2 Urban Character Areas

1. The Borough's Urban Character Areas are defined on the Policies Map. These will be managed and, where possible, enhanced through development proposals using character assessments as part of the planning application process.
2. Planning applications will be expected to respond effectively to local character and distinctiveness. Where there are local features or characteristics that are considered to undermine the overall character of the area, and/or it relates poorly to the surrounding development or lacks a coherent and integrated built form, new development will be expected to take reasonable steps to improve the area's character, enclosure, permeability, public realm and appearance and better integrate the area with its surroundings.
3. Where there are no significant or predominantly local design styles, innovative contemporary design is encouraged, however regard should be had to characteristic features of the wider Borough such as using local materials or adopting successful urban forms.

Policy DES 3 Areas of Special Development Control

1. Within Areas of Special Development Control as defined on the Policies Map, new development will be critically examined in strict accordance with the criteria set out in policy DES 1 to ensure the special character of the area is maintained. Extensions to dwellings should respect the symmetry of the original buildings.

2. Any proposals for residential development including new build, replacement dwelling, infilling and extensions should:
 - a. Be constructed on building plots of a similar average width as surrounding residential development;
 - b. Harmonise with the building heights predominant in the area;
 - c. Be constructed on a similar building line (formed by the front walls of existing houses) and be of similar scale, form and proportion as adjacent houses.
 - d. Reflect the materials, design features and architectural style predominant in the area, and
 - e. Achieve sufficient architectural variety in order to retain the area characteristics of large individually designed houses.

- 2.4 Ramsden Bellhouse is defined as an Area of Special Development Control, which therefore means that any proposals for development have to be in accordance with the requirements of DES 3. This is important when considering alternative options for Ramsden Bellhouse, such as reducing the plot width requirements which is discussed later in this report.

- 2.5 The objectives for the study also require recommendations to be made in relation to Policies H 5 and H 6 and how they relate to the Crays Hill Plotland. These policies are:

Policy H 5 Established Gypsy, Traveller and Travelling Showpeople Sites

Refusing planning permission for changes of use to uses other than for residential use by gypsy and travellers or as a travelling showpeople yard of the sites identified in Appendix 3 unless acceptable replacement accommodation can be provided, or it can be demonstrated that the site is no longer required to meet any identified needs.

Policy H 6 New Gypsy and Traveller Site Provision

To help meet the identified need for gypsy and traveller pitches within the Borough, 72 pitches for Gypsies and Travellers will be allocated in the following locations:

- a Outside of the Green Belt - 1 site accommodating 10 pitches at the Former Haslemere Allotments, off Haslemere Road, Wickford.
- b Within the Green Belt - A total of 40 sites accommodating 62 pitches are identified within the extent of the Green Belt in Appendix 4 and allocated for future gypsy and traveller needs. These sites will remain within the Green Belt, and be subject to the design criteria set out in Policy H 32.

2.6 Appendix 4 includes an allocation of an additional 7 pitches within Crays Hill in the following locations.

ADDITIONAL GYPSY AND TRAVELLER SITE PROVISION IN CRAYS HILL		
Site No.	Site Name	Additional Pitch Total
BAS 035	Five Oaks Farm, Oak Lane	2
BAS 036	Land North of 6a, Oak Lane	1
BAS 037	Plot 6a, Oak Lane	1
BAS 040	Oak Farm, Oak Lane	1
BAS042	Land at Oak Lane, Oak Lane	1
BAS 043	Oak Stables, Oak Lane	1

Table 1: Additional Gypsy and Traveller Site Provision in Crays Hill

2.7 It is also relevant to examine the strategic policies in the DLP which have determined the number of dwellings allocated to Ramsden Bellhouse and Crays Hill. The overall strategic approach is to meet the OAN of 15,260 homes within the plan period (reduced to 14,852 as 678 already delivered) and the way this will be achieved is set out in Policy SD 2 which allocates 45 dwellings each to Ramsden Bellhouse and Crays Hill. Point 6 of Policy SD 2 states that:

6. *Minor adjustments will be made to the Green Belt around the serviced settlements of Crays Hill and Ramsden Bellhouse to accommodate additional small-scale development consistent with the design and character of existing buildings within these villages. Large scale extensions to these settlements will not be permitted.*

2.8 The only justification for the allocations for Ramsden Bellhouse and Crays Hill is in paragraph 6.47 which states that:

Through the HELAA, sites within and adjacent to smaller settlements within the Borough have been submitted for consideration for development purposes. The serviced settlements of Ramsden Bellhouse and Crays Hill benefit from access to some services and public transport provision, the viability and retention of which would benefit from some additional development. However, these settlements sit within the Green Belt. Consequently, it has been necessary to amend the Green Belt boundary for these settlements to permit a limited amount of development to occur, whilst maintaining the overall scale of the settlements and the purpose of including land within the Green Belt. These settlements have the capacity to accommodate around 90 homes between them.

2.9 The 45 dwellings to be provided in each of the serviced settlements Crays Hill and Ramsden Bellhouse form part of the allocated new growth in the Borough required to meet the Council's Objectively Assessed Need (OAN) for new housing. Similarly the 50¹ dwellings estimated to come forward from the Crays Hill Plotland Infill Policy

¹ The figure of 50 is derived from the 2015 Plotlands Study

GB 3 are required to enable the Council to achieve the OAN. This is set out in Policy SD 2 (Settlement Hierarchy and the Distribution of Growth) on pages 29 and 30 of the DLP.

- 2.10 As the combined allocations of 90 new dwellings for the two settlements together with the 50 to be delivered through the Plotland Infill Policy are required to enable the Council to meet its OAN then there has to be certainty that the sites are deliverable, and could reasonably be expected to come forward in the plan period.
- 2.11 It is also worth considering whether the wording of policies H 28 and H 29 needs amendment. Both policies use the same wording, and there would appear to be some inconsistencies with other policies in the plan and the Policies Map. This will be considered further under objective (d) of the study.

3.0 RAMSDEN BELLHOUSE

3.1 In relation to Ramsden Bellhouse (RB) 16 sites were originally examined through the HELAA process and four were selected for inclusion on the Policies Map accompanying the DLP. The four sites selected are set out below.

ALLOCATED SITES IN RAMSDEN BELLHOUSE			
SS0221	Land adjacent to Copper Beeches, Orchard Avenue	0.55 H	Site is located in close proximity to the RB settlement, with residential properties adjacent to three sides. It is adjacent to Church Road with trees along the eastern & southern boundaries.
SS0481	Land adjacent to Cassetta, on east side of Orchard Avenue	0.45 H	L-shaped site located close to RB settlement, is open field with trees covering 50% of site, with other dwellings in close proximity.
SS0223	Land south of Ramsden Park Road.	3.1 H	Large agricultural field on south side of Ramsden Park Road. Residential dwellings to east and west with fields to the south.
SS0559	Land at Ramsden Park Farm, Ramsden Park Road	0.57 H	Plot of land to north of Ramsden Park Farm used for grazing. Access via Park Lane

Table 2: Allocated Sites in Ramsden Bellhouse

3.2 The 2016 public consultation generated 101 comments which are summarised in the table below.

SUMMARY OF RAMSDEN BELLHOUSE COMMENTS	
Opposed to any development in Ramsden Bellhouse	41
Recognise need for development/or object generally but specifically opposed to SS0223 & SS0559 allocations (Ramsden Park Road).	19
Recognise need for development/or object generally but specifically opposed to Orchard Road allocations	11
Generally object, but specifically that 45 is too high a figure and that any development should be in accordance with existing Special Development Control Policy.	6
Should be frontage only development in accordance with existing policy.	6
Target should be 24 not 45 and object to SS0223 & SS0559 allocations.	3
Target should be 24 not 45 and specifically objects to Orchard Avenue allocations.	3
Target should be 24 with no other comment.	1
Put forward alternative sites	5

SUMMARY OF RAMSDEN BELLHOUSE COMMENTS	
Supports own site allocations	3
Technical Comments	3

Table 3: Summary of Ramsden Bellhouse Comments

- 3.3 The particular objections regarding the SS0223 and SS0559 allocations can be summarised as concerns relating to capacity of drainage systems, narrow and unadopted nature of Ramsden Park Road, proposed field (SS0223) is considered as flood plain, too close to footpath and bridleway, contrary to established planning policies, unacceptable visual and landscape impacts, significant detriment to openness of Green Belt, regular power cuts and destruction of wildlife habitat. If SS0223 and SS0599 are allocated for development then comments from objectors are that it should be restricted to frontage only development on plot widths of 24.6 metres in accordance with Policy BAS BE13 of the 2007 Saved Policies from the Basildon District Local Plan.
- 3.4 In relation to Orchard Avenue the objections were mainly related to the highway network, in particular the junction with Church Road and also the narrowness of the road. Inadequate sewerage capacity was also mentioned as an issue and that if any development were to be allowed it should be in accordance with the existing Policy BE13.
- 3.5 Compliance with the existing Special Development Control Policy was referred to consistently in many of the representations and Draft Policy H 28 specifically refers to new homes having to be designed in accordance with the Special Development Control Policy (SDCP) for Ramsden Bellhouse. However there is not a specific policy in the DLP relating to a SDCP for Ramsden Bellhouse. It is however one of the three areas referred to in Policy DES 3 where all new development proposals will be required to comply with the criteria set out in Policy DES 1 and in part (2) of Policy DES 3. The wording of these policies and the preamble to Policy DES 3 at paragraph 12.25 suggest that continued adherence to the minimum plot widths required by Saved Policy BE 13 may not be possible, and that some relaxation will be necessary in the future.

3.6 Following the HELAA review of the potential sites for development in Ramsden Bellhouse four sites were selected in Ramsden Park Road and Orchard Avenue, and are shown on the Policies Map. As only these 4 have been allocated then it is assumed, for the purpose of this exercise, that all 45 additional dwellings are to be accommodated on these sites. However the HELAA Site Assessments do not give any indication of the capacity of each of the site, and there is no reference to their possible capacity in the DLP.

3.7 However if the existing Saved Policy BE13 criteria is applied to each of the sites, as shown in the table below the total capacity is just 14.

CAPACITY OF SELECTED SITES IN RAMSDEN BELLHOUSE			
Site	Address	Frontage/Capacity	Total
SS0221	Land adjacent to Copper Beeches, Orchard Avenue	54 metre frontage = 2 dwelling capacity applying minimum 24.6 plot width.	2
SS0223	Land south of Ramsden Park Road	216 metre frontage = 8 dwelling capacity applying 24.6 plot width. Landowner has submitted a layout plan proposing 7 dwellings fronting the road.	7
SS0481	Land adjacent to Cassetta, east of Orchard Avenue	45 metre frontage = 1 dwelling capacity applying 24.6 plot width. Could achieve 2 if slightly reduce plot width to 22.5 metre.	2
SS0599	Land at Ramsden Park Farm, Ramsden Bellhouse	74 metre frontage = 3 dwelling capacity applying 24.6 plot width.	3
Total			14

* Calculations based on minimum plot widths required by Saved Policy BE13

Table 4: Capacity of Selected Sites in Ramsden Bellhouse

3.8 This figure could be increased by reducing the minimum plot width requirements. However, whilst Draft Policy DES 3 suggests some relaxation of the currently sought minimum plot widths, they would have had to fall considerably to accommodate all 45 additional dwellings on the allocated plots. In fact, to use a not very scientific comparison, the four plots have a total combined frontage of 389 metres so to accommodate 45 dwellings each plot would be 8.6 metres. This is less than the general requirement for a 9 metre minimum plot width for new detached houses in the Borough set out in the 1997 Development Control Guidelines.

- 3.9 A consistent theme of the representations is that any new development should reflect the existing Saved Policy BE13 requirements; which since they were created have led to the creation of the present street character of Ramsden Bellhouse. It will however not be possible to achieve 45 dwellings on the 4 allocated sites by adhering to the existing plot widths policy. Therefore to achieve a target of 45 new dwellings a decision has to be made on whether the plot widths for new dwellings can be reduced and/or additional sites have to be allocated for development.
- 3.10 In accordance with the objectives of the study a review of the HELAA sites not allocated for development has also been undertaken and the results set out in the table below. However it is important to state that all HELAA sites in Ramsden Bellhouse are within the Green Belt; and no sites outside the Green Belt are presently known to exist which could be considered for development first. If the Council was to review the Green Belt boundary to accommodate development site options, the analysis set out in the following table should assist.
- 3.11 In addition Ramsden Bellhouse Parish Council have also submitted a Plan with their proposals for how 45 dwellings could be accommodated within the settlement. Their plan is included as Appendix 6 to this report and the proposed sites are included in the analysis below.

REVIEW OF HELAA SITES NOT ALLOCATED FOR DEVELOPMENT		
SITE	SUMMARY	CAPACITY
SS0052	<p>This site was considered to be suitable, on the basis that the land does not retain its full Green Belt ('GB') status, but not achievable or available due to change in land ownership. Development of this land would result in an extension of the settlement of RB into the green belt in a manner inconsistent with the existing pattern of development in RB and therefore contrary to the draft policy H 28. However it is a piece of land that is landlocked between the railway line to the north and the rear of properties in Glebe Road (all with long back gardens), and would not therefore close the gap between RB and the Castledon Road development or Wickford, if development was restricted to the western half of site. However an application for 6 dwellings on the land in 2015 was refused by the Council and also dismissed on appeal on 8th February 2016. The Inspector considered that the proposal was inappropriate development in the Green Belt, would result in a significant loss of openness and create encroachment into the countryside. (Ref: APP/V1505/W/15/3129671). In relation to this site and other sites in Church Road residents have concerns about the suitability of the road to accommodate extra traffic. Essex County Council as the Highway Authority have been asked to comment on this and have responded in the following manner. They have confirmed that further development on Orchard Avenue would be considered acceptable and that the geometry and layout of the carriageway are commensurate with the quantum of development along Orchard Avenue. The Highway Authority has not raised any objections to recent applications in this location.</p>	<p>If access issues could be overcome then this site has the potential for a number of dwellings. However appeal for 6 dwellings on part of this site dismissed in Dec. 2015 for current GB policy reasons but highway/access issues not a reason for refusal. Recent planning application for 12 dwellings on same site refused on 21 March 2017 for GB reasons but again no objection from the highway authority.</p>
SS0196	<p>This site was considered to be suitable, achievable and available but not allocated for development, presumably as does not conform to 'existing pattern of development' criteria. Site could however be developed with a new access road onto Church Road, but would mean the loss of a significant number of mature trees. Whilst these trees are not covered by a Tree Preservation Area their wholesale removal would have impact on overall appearance of RB, and would extend development further into the GB by 207m in a northerly direction and 85m in a westerly direction.</p>	<p>Nil, on basis that would be too intrusive for reasons given in summary.</p>
SS0205	<p>Found not suitable or achievable. Single plot with existing dwelling. Site not large enough to accommodate additional dwelling so no benefit in allowing re-development of this plot.</p>	<p>Nil</p>
SS0220	<p>HELAA assessment found the site to be technically adjacent to the RB settlement and therefore the site could be considered suitable. However the assessment then states that the site is located in a remote rural area opposite a ribbon of development and other sites may be more suitable for housing development. Found suitable and available but not allocated. The site is densely wooded and the subject of a Tree Preservation Order so should be excluded from development to maintain character of area.</p>	<p>Nil</p>
SS0222	<p>Found suitable and achievable but not allocated due to site not being able to deliver 5 dwellings. Could however provide one additional dwelling.</p>	<p>1</p>

REVIEW OF HELAA SITES NOT ALLOCATED FOR DEVELOPMENT		
SITE	SUMMARY	CAPACITY
SS0224	Found suitable and available but not achievable. Consideration would have to be given to proximity to local services. However this not raised as an issue with SS0599 which has been allocated for development. Also whilst raised as an issue with regard to nearby SS0223, SS0223 still allocated for development. Therefore there is some risk of an inconsistency in approach and the 'HELAA' should be reviewed for this consistency point. However there are already two cottages on the western side of the road so there would be no net gain if development allowed and the narrowness of the access road (between 3-4metres) to the site makes this an inappropriate site for development.	Nil
SS0246	Found not suitable or achievable due to accessibility and distance from settlement. Development of this plot would lead to coalescence with properties in Castledon Road which should be avoided on GB policy grounds.	Nil on basis that would be too intrusive for reasons given in summary.
SS0453	Small plot of land adjacent to railway line found neither available nor achievable. Location to north of railway creates distinct separation from main settlement.	Nil
SS0482	Considered suitable but not achievable due to no land ownership details. Parish Council ('PC') have submitted it in their plan and it could accommodate 3 dwellings. The fact that PC have submitted the land suggests they know that owner is willing to put the land forward, although this has not been confirmed by the PC. However 2 dwellings seems more appropriate if want to develop in accordance with existing plot widths and retain some of the many trees on the site.	2
SS0531	Found suitable and achievable but not included as an allocated site without adequate reason for not being given an allocation. Parish Council suggest 6 dwellings which seems reasonable. Site is closer to village shop than allocated sites and opposite existing development.	6
SS0588	Found not suitable or achievable due to inability to accommodate 5 dwellings. Could however accommodate 2-3 at the rear but would result in a form of backland development out of character and therefore contrary to the Special Development Control Policy.	Nil on basis that would be too intrusive for reasons given in summary.
SS0602	Found not suitable or achievable due to distance from settlement. This in itself is not a reason to not allocate the site but its position behind existing properties and awkward nature of site would mean introducing a form of development out of character with the existing pattern of development in RB.	Nil on basis that would be too intrusive for reasons given in summary.

Table 5: Review of HELAA Sites Not Allocated for Development

3.12 This analysis shows that there are some additional sites that could be considered for development to meet the 45 dwelling target.

3.13 Therefore if the DLP requirement of allocating sites for an additional 45 dwellings is to be achieved then the options are:

- i. Increase the number of allocated sites (including some with a capacity of less than 5 dwellings previously ruled out) by extending the settlement boundary.
- ii. Reduce the requirements for minimum plot widths.
- iii. Allow the settlement to expand further into the Green Belt by creating new roads off Church Road and introduce forms/patterns of development not previously allowed in the settlement.
- iv. A combination of i and ii.
- v. Alternatively reduce the number of dwellings to be allocated to Ramsden Bellhouse to avoid requiring a density and form of development out of keeping with that established by the Special Development Control Policy

3.14 Draft Policy H 28 seeks to allow some additional development in Ramsden Bellhouse but in a manner and form that respects the existing pattern of development and in conjunction with the Green Belt policies in the DLP seeks to prevent the settlement from expanding into the Green Belt to a significant degree. This is very much the opinion of local residents, who consider that if it is to be allowed it should respect the existing pattern of development.

3.15 Therefore to maintain this approach to development means that option (iii) above can be discounted and probably some combination of (i) and (ii) will need to be adopted to meet the required number of 45 dwellings. The alternative is to consider option (iii) and allow the settlement to expand further into the Green Belt at the same time as maintaining the existing plot width requirements. However there is a further consideration that needs to be factored into considerations about the future of Ramsden Bellhouse. Planning policies for the settlement have sought to perpetuate the existing pattern of development and by insisting on minimum plot widths have ensured that any new dwellings are large detached properties which will only be affordable to a relatively limited number of people. This is not consistent with paragraph 50 of the NPPF which requires local planning authorities to *'deliver a wide choice of high quality homes, widen opportunities for home ownership and create sustainable, inclusive and mixed communities.....'*

- 3.16 To be consistent with paragraph 50 of the NPPF and to achieve the required number of 45 dwellings then it may be helpful to consider allocating some sites where dwellings will only be allowed that are on smaller plot widths and/or have shallower rear gardens. This would also allow a greater density of development to reduce the amount of land taken out of the Green Belt, which is also an important consideration. This approach will be considered further when examining the development options for the settlement.
- 3.17 The HELAA site assessment found that two other sites were suitable and available for development, namely SS0220 and SS0531. However these were both excluded from the final selection of sites. In the case of SS0220 it was considered to be *located in a more remote rural area opposite a ribbon of development and other sites may be more suitable for future housing development*. In the case of SS0531 it was considered to be *“.....adjacent to the settlement boundary with potential access. As there are no physical constraints, the site is considered to be suitable”*.
- 3.18 As the two sites are adjacent to each other it is not clear why SS0220 was considered to be in a more remote rural area, particularly when it is opposite a line of existing dwellings. It is also not obvious why SS0531 was not allocated as a development option. In relation to SS0220 the comments from the owner’s representative are in my view well made and it is somewhat illogical for the HELAA to describe the site as being in a remote rural area and this inconsistency should be addressed at the next review. However SS220 is a wooded plot covered by a Tree Preservation Order and should be retained as a woodland area to help maintain the established character. However there is no reason why SS0531 cannot be considered for allocation. The Parish Council, in their more recent submission, include SS0531 as a potential development site (see Appendix 6). This is also a site where the plot widths could be reduced to encourage smaller dwellings to be built to help diversify the range and affordability of new homes available in Ramsden Bellhouse.
- 3.19 There have also been some additional sites submitted since the DLP was published and these also need to be assessed with regard to their suitability for development.

Some have been submitted individually and others have come forward on the map submitted by the Parish Council. They are shown in the table below:

ADDITIONAL SITES SUBMITTED IN RAMSDEN BELLHOUSE			
Site	Comment	Submitted by Parish Council	Capacity
Copper Beeches, Orchard Avenue	The site has a 67 metre frontage to Orchard Avenue and is immediately north of SS0221 and opposite SS0222. However it contains a substantial existing dwelling Copper Beeches and it is difficult to see how development can come forward on this site without demolishing the existing dwelling.		Nil
Ramsden Park Road (RPR)(SS0223)	The owner's agent has submitted two site layout options. One which proposes 7 detached dwellings fronting RPR and a second which proposes 38 dwellings in the open land to the south serviced off a new access road from Church Road.		7 fronting RPR, but this site already allocated for development. The 38 dwelling option would result in a major incursion into the Green Belt and have a detrimental impact on the openness of the GB and be harmful to the appearance of the countryside.
Site to West of Ramsden Park, RPR	Site included on Parish Council plan. However would extend the residential development to the west and result in a rather cramped appearance adjacent to the adjoining dwelling to the east.	Yes	Not suitable.
Site to north of recreation ground, Church Road.	Site included on Parish Council plan. Development of this site would reduce the openness of this part of RB, as there are currently just two dwellings on the eastern side of Church Road at this point.	Yes	3 fronting Church Road
Site at southern end of Church Road on east side of road. (Part of SS0531).	Site included on Parish Council plan, which shows 9, but 3 in flood risk area.	Yes	6 fronting Church Road, or up to 16 if higher density development, on reduced plot widths, is allowed.

ADDITIONAL SITES SUBMITTED IN RAMSDEN BELLHOUSE			
Site	Comment	Submitted by Parish Council	Capacity
SS0482 (part): Land on west side of Orchard Avenue below SS0221	Site included on Parish Council plan. Considered suitable in HELAA assessment, but not available.	Yes	2 fronting Orchard Avenue
SS0222: Land on east side of Orchard Avenue.	Site included on Parish Council plan. Deemed not suitable in HELAA assessment due to not being able to achieve 5 dwellings, but could accommodate 1 dwelling.	Yes	1 fronting Orchard Avenue

Table 6: Additional Sites Submitted in Ramsden Bellhouse

3.20 These sites together with the other sites already considered and referred to above are the only alternative options for additional ‘frontage style’ development in Ramsden Bellhouse. It is therefore necessary to examine the numbers that could be achieved by utilising these sites.

3.21 However before doing this exercise consideration has to be given to the concerns raised in the consultation responses with regard to the highway issues. These were expressed in some detail in the response from Inter-Modal Transportation on behalf of Orchard Avenue Residents. The concerns are in response to the suggestion that 14 dwellings would be built at the southern end of Orchard Avenue. The particular issues are that:

- i. The junction from Orchard Avenue onto Church Road is not suitable to accommodate the additional traffic. This is due to the poor visibility and the width of Orchard Avenue close to the junction. There are insufficient junction radii which can cause vehicles to wait in Church Road before being able to turn into Orchard Avenue.
- ii. The existing Orchard Avenue cul-de-sac is significantly narrower and longer than would be permitted under the current Essex Design Guide and the Essex Development Control Manual.
- iii. There is currently no turning area for vehicles using Orchard Avenue which causes refuse vehicles to reverse the entire length of the road and the Council has to use smaller vehicles to access the southern end of the road.

- iv. Also the road is in places narrower than the minimum 3.7m required for fire tender access.

- 3.22 These comments were made on the assumption that 14 additional dwellings would be constructed in Orchard Avenue. At the current time there are 27 dwellings that are served by Orchard Avenue (these include the two dwellings on the Church Road frontage, but who take access from Orchard Avenue). The two sites allocated in the DLP could accommodate between 4-6 dwellings depending on what plot width is allowed, and if the Parish Council's proposals were included the number could rise to a maximum of 10 dwellings. The Highway Authority have been asked for an opinion on the suitability of Orchard Avenue to accommodate additional development. Essex County Council have confirmed that further development on Orchard Avenue would be acceptable as the geometry and layout of the carriageway are commensurate with the quantum of development along Orchard Avenue. The Highway Authority have not raised any objections to recent applications at this location. One improvement that could be made is to require land to be made available, within one of the proposed development sites, to provide a turning circle at the southern end of the road to enable larger vehicles to turn. This would have to be within the SS0482 site and would reduce its development potential.
- 3.23 In relation to the highway concerns some of the objectors make reference to an appeal decision in December 2015 regarding a development of 6 dwellings to be served off Orchard Avenue. The application, under reference 15/00064/FULL was for 6 'life-time' homes to the rear of Cassetta, Orchard Road and whilst it was refused on green belt grounds there was no highway reason for refusal. The Highway Authority did not raise any objection to the proposal subject to the imposition of conditions.
- 3.24 In addition another recent application for 12 dwellings² on the land to the rear of Cassetta, was refused by the Council on mainly Green Belt grounds. However, again there was no objection from the Highway Authority.

² Application Ref: 16/01436/FULL

3.25 On this basis it would therefore seem to be possible to allow some additional development in Orchard Avenue, without raising objections from the Highway Authority. On the basis of the above information it is possible to draw up a revised schedule of potential development sites in addition to those allocated in the DLP. These are shown in the table below.

REVIEW OF ALL DEVELOPMENT OPTIONS (UTILISING EXISTING SETTLEMENT PATTERN)		
SITE	SUMMARY	CAPACITY
Ramsden Park Road		
SS0223	Allocated on Proposals Plan (applicant has submitted layout for frontage development)	7
SS0559	Allocated on Proposals Plan	3
Orchard Avenue		
SS0221	Allocated on Proposals Plan	2
SS0222	Found suitable and achievable but not allocated due to site not being able to deliver 5 dwellings. Could however provide one dwelling.	1
SS0481	Allocated on Proposals Plan	2
SS0482	Considered suitable but not achievable due to no land ownership details. Parish Council have submitted it in their plan and could accommodate 2 dwellings.	2
Church Road		
SS0531	Found suitable and achievable but not included as an allocated site with no reason for not being given an allocation. Parish Council suggest 6 dwellings which seems reasonable.	6
Site to north of recreation ground, Church Road	Site included on Parish Council plan.	3
Total		26

Table 7: Review of All Development Options (Utilising Existing Settlement Pattern)

3.26 This option only proposes development that is in keeping with Saved Development Control Policy BE13 for RB. It does however increase the number of sites put forward for development in Orchard Avenue, although reduces the overall total of dwellings in Ramsden Park Road and Orchard Avenue from 45 to 17 in these roads. The overall total of 26 is less than the 39 proposed by the Parish Council on their plan. Their plan suggests allocating 10 dwellings to SS0223 which is unrealistic, and includes 3 at the southern end of Church Road (part of SS0531)

which are in Flood Zone 3b and therefore at the greatest risk of flooding. The Parish Council's plan suggests allocating 9 dwellings to Orchard Avenue as opposed to 7 in the table above. The plot widths would have to be reduced to achieve 9 dwellings which would be inappropriate at the southern end of Orchard Avenue where the nature of the road becomes more rural in character. Indicative plans of how development could take place on these sites is included at Appendices 1 & 2.

- 3.27 An alternative option for increasing the numbers is to, as mentioned in 2.15 above, reduce the required plot widths from those required by Saved Policy BE13, and allow some alternative dwelling types to be built in the settlement on slightly smaller frontages. This would be in accordance with §50 of the NPPF.
- 3.28 The Council's 1997 Development Control Guidelines require a plot width of 9.5 metres for detached dwellings and 15 metres for a pair of semi-detached dwellings. On this basis the northern section of SS0531, between the Police Houses and the recreation ground (124 metre frontage) could be allocated for building 8 pairs of semi-detached dwellings and the land north of the recreation ground (56 metre frontage) could accommodate 3 pairs of semi-detached dwellings. This would increase the overall provision to 39 dwellings. The existing dwellings on the west side of Church Road in this area are built on plot widths that are less than those further north in Ramsden Bellhouse so it would be more compatible to introduce some smaller plot widths, thus enabling semi-detached dwellings in this location.
- 3.29 It is also the case that occupiers of new dwellings in these locations would at most be 390 metres from the village shop and post office. Whereas new dwellings in Orchard Avenue and Ramsden Park Road would be approximately 1000 metres and 1400 metres from the shop.
- 3.30 Indicative plans are included at Appendices 4 & 5 showing how 8 pairs of semi-detached could be sited on the frontage of SS0531 and 3 pairs of semi-detached dwellings on the land to the north of the recreation ground. This approach would clearly introduce a form of development that would be contrary to the existing patterns of development and may be considered to be introducing a form of development out of character with the traditional pattern of development in

Ramsden Bellhouse. However to achieve the target figure of 45 dwellings it will require a more radical approach to the delivery of new housing in the settlement.

- 3.31 However, a decision to allocate sites in this area for development would mean that this area of open land to the south of the centre of Ramsden Bellhouse would lose its openness and would this be detrimental to the character and setting of the village. This question will be considered further in the conclusions at paragraph 3.35.

Summary of Options for Ramsden Bellhouse

- 3.32 The options to be derived from the above analysis of the position for Ramsden Bellhouse is that:

- i) The strong feeling from the public consultation is that residents would prefer only limited or no growth in Ramsden Bellhouse.
- ii) Secondly if there is to be growth it should reflect the existing pattern of development in Ramsden Bellhouse.
- iii) There are particular objections to additional growth in both Orchard Avenue and Ramsden Park Road.
- iv) If the existing development control policy for development is applied to the sites allocated in the DLP only around 14 dwellings would be provided, on the allocated sites.
- v) Some sites found to be suitable and available at the southern end of Church Road have not been included in the DLP as they are considered to be further from the settlement. However they are closer to the village shop than the preferred sites in Orchard Avenue and Ramsden Park Road.
- vi) Consideration should be given to allowing some semi-detached dwellings to be built in accordance with paragraph 50 of the NPPF and to produce a more sustainable community. Although even this approach will not achieve the target of 45 dwellings.

- 3.33 Using the analysis employed above a revised strategy for delivering additional dwellings in Ramsden Bellhouse produces the following alternatives.

COMPARISON OF DELIVERY OPTIONS FOR RAMSDEN BELLHOUSE		
Location	Lower Density	Higher Density
Ramsden Park Road	10	10
Orchard Avenue	7	7
Church Road	9	22
Total	26	39

Table 8: Comparison of Delivery Options for Ramsden Bellhouse

3.34 This shows that even the high density option does not achieve the target figure of 45 dwellings. If 45 dwellings remains the target then it will be necessary to allow some further encroachment into the Green Belt to meet the target. This will mean exploring further options such as utilising more of SS0223 and SS0531 and re-visiting the option of land at the western edge of SS0052 despite the previous refusals of planning applications on this land on green belt grounds.

Conclusions on the Development Options for Ramsden Bellhouse

3.35 The analysis above has examined the development options available to achieve the target figure of 45 new dwellings in Ramsden Bellhouse over the plan period. The analysis shows that it will not be possible to achieve the target of 45 dwellings on the sites proposed in the DLP whilst at the same time adhering strictly to the Special Development Control Policy for Ramsden Bellhouse. There are some other sites that could be allocated for development and there is also the option of relaxing the minimum plot widths required by the policy. Reducing the plot width requirement would be consistent with the advice in the NPPF in relation to providing a greater range of types of housing within communities, but will not be supported by local residents who wish to retain the existing character of the village. There are opportunities to expand the village, particularly on the east side of Church Road, at the southern end of the settlement. This however would result in incursions into the Green Belt and a loss of openness at the southern end of the settlement.

3.36 The alternative option is to reduce the allocation of new dwellings for Ramsden Bellhouse and rely on the Strategic Housing Allocations in the DLP to make up the shortfall from not delivering 45 dwellings in Ramsden Bellhouse.

Additional Comments on the Wording of the Draft Local Plan Policies for Ramsden Bellhouse

- 3.37 Policy H 28 as drafted refers to amending the Green Belt boundary, and within the expanded envelope sites may be developed for residential or community use purposes. The preamble to the policy at §11.215 - 11.217 only refers to residential growth and there is no reference as to under what circumstances community uses might be permitted. If community uses were to be allowed what does that mean for the housing numbers as this would reduce the overall numbers of residential units which would have to be found elsewhere if the OAN is to be achieved. It is also questionable whether community uses would be appropriately sited on the allocated sites as they are on the periphery of the settlement, rather than more central which is where you would expect to allocate new community uses.
- 3.38 The reference to community uses would also seem to be in conflict with Policy SD 2 which sets out the settlement hierarchy and distribution of growth for the Borough. As already referred to in this report this clearly sets out that 45 dwellings should be provided in RB (and CH) with no mention of community uses. Again this raises the issue of under what circumstances might community uses be allowed and what would that mean for meeting the OAN.
- 3.39 Ramsden Bellhouse and Crays Hill are both included within the 12 Urban Character Areas. DES 2 seems to require the submission of a character assessment (or the use of character assessments to determine the applications). In either case this requirement is not referred to in policies H 28 and H 29.
- 3.40 These comments also apply to Crays Hill but will not be repeated in the Crays Hill section.

4.0 CRAYS HILL

- 4.1 In relation to Crays Hill it is helpful to start by reviewing the status of the settlement and the designations now being applied to the area, and how the HELAA review has been undertaken in relation to Crays Hill.
- 4.2 The 1998 Basildon District Local Plan Proposals Map delineates a large area between the A127 to the south, Hardings Elms Road to the west, Gardiners Lane North to the east and the southern edges of the Crays Hill settlement to the north as an area of Plotlands within which Policies GB1 to GB6 and GB8 would apply. The Proposals Map shows the settlement of Crays Hill to the north of the defined Plotlands straddling both sides of Southend/London Road as it passes through the settlement. All of the plotlands are in the Green Belt whilst the settlement itself is excluded from the Green Belt.
- 4.3 The DLP Policies Map removes the plotland designation shown on the 1998 Proposals Map and replaces it with four smaller areas where Plotland Infill Policy GB 3 will be applied and one area where new Gypsy and Traveller Site Provision Policy H 6 will apply. In addition Policy H 29 states that:
- “Local amendments have been made to the Green Belt boundary in order to extend the village envelope of Crays Hill. Within this expanded envelope, sites may be developed for residential or community uses only, to provide around 45 new homes.”*
- 4.4 The DLP Policies Map allocates three areas where development will be allowed to take place. To satisfy the policy these sites should be capable of delivering 45 new homes. This will be considered in more detail below. These three alterations are the only proposed changes to the settlement boundary shown on the 1998 Proposals Map.
- 4.5 The boundaries defining the remainder of the settlement of Crays Hill have not been amended in the DLP. The settlement is essentially a very linear development that straddles the north and south sides of the A129 as it passes through the village. As

the village has this linear form it is different from a traditional village which would typically have a central core or village green around which any facilities would be focused. Crays Hill has a very limited range of services including one village shop at the bottom of Crays Hill, one public house, a village school at the eastern boundary and a recreation ground at the western end of the settlement. The A129 is a very strong feature as it passes through the settlement which serves to undermine any sense of community within the settlement. The limited number of local services together with their dispersal along the length of the settlement has resulted in some anomalies in the HELAA assessments which are reviewed further below. In some cases some sites have been assessed as being too far from the settlement boundary to be deemed suitable for development, whilst other sites the same distance or even further away have been deemed to be suitable. These have been identified in the analysis below and it is important that there is consistency in the assessments and a robust justification for the selection of the sites allocated for development.

4.6 A total of 34 sites were assessed in the HELAA exercise, many of which are some distance from the defined settlement of Crays Hill. A further site has been added since the publication of the plan (SS0662) which has been assessed as suitable and available. This submission has also been accompanied by a site layout which proposes 47 dwellings. The three sites allocated for development in the DLP are set out below.

PROPOSED ALLOCATED SITES IN CRAYS HILL			
SS0505	Rear of Barnsfield, Crays Hill	1.04 H	Rectangular plot of land to south of Crays Hill and to the north of Barns Road with residential properties to the north, east and west. Site also includes Barnsfield to provide access. Site primarily open and used for agricultural purposes. Local services some distance from site.
SS0606	Land north of London Road (west of Beam End Cottage.	1.05 H	Rectangular plot of vacant land, access via London Road.
SS0608	Land north of London Road (east of Hughendon)	0.4 H	Rectangular plot of vacant land, on north side of London Road to east edge of settlement.

Table 9: Proposed Allocated Sites in Crays Hill

4.7 The consultation exercise generated 28 separate comments which are summarised in the table below. Whilst this is a relatively small number of comments overall the main concern is that the number of new dwellings planned for Crays Hill is too high when the 45 allocation is combined with the possible 50 from the plotland infill policy GB 3. Whether 50 new dwellings are derived from the plotland infill areas over the period of the plan is questionable. The 2015 Plotland Study concluded that 50 dwellings could be achieved, whereas the analysis in paragraph 3.22 below (page 37) concludes that a figure closer to 35 is more realistic.

SUMMARY OF CRAYS HILL COMMENTS	
Opposed to any development in Crays Hill	4
Proportionately high allocation taking account of 45 for Crays Hill and 50 for the plotland infill.	12
Confusion over 45 allocation and 50 plotland infill (criteria for infill is unclear and will lead to 'differential') development. Also wants maximum size limitation (180sqm). Also concerned about impact on transport and unacceptable levels of traffic flows through Crays Hill. A127 slip road position at Nevendon needs to be resolved.	1
Specific objection to allocation of SS0505	7
Landowner supports allocation of SS0606 & SS0608	1
Landowner puts forward additional site SS0662	1
Object to any infilling in Oak Road and the expansion of the Oak Lane gypsy and traveller site from 35 to 52 pitches.	1
Landowner supports allocation of SS0319 to provide 10 dwellings.	1
Remove SS0606 & SS0608 from allocated sites to protect views to the north.	2
There is also a letter from Smart Planning, on behalf of their client, in support of the allocation of site SS0505 for development.	1

Table 10: Summary of Crays Hill Comments

4.8 Following the HELAA review of potential sites for development in Crays Hill three sites were selected for development and are shown on the Policies Map. As only these 3 have been selected then it is assumed, for the purpose of this exercise, that all 45 additional dwellings are to be accommodated on these sites. However the HELAA Site Assessments do not give any indication of the capacity of each of the sites, and there is no reference to their possible capacity in the DLP.

4.9 However if an assessment of the capacity of each site is undertaken, applying the criteria set out in part 2 of Policy H 29 that '*new homes should be designed in*

accordance with the character of the local area', it is possible to arrive at an estimate of the number of dwellings that could be derived from the three sites.

CAPACITY OF SELECTED SITES IN CRAYS HILL		
Site	Frontage/Capacity	Total
SS0505	1.04h site to rear of properties on Crays Hill with proposed access direct onto Crays Hill via site of Barnsfield. Surrounded on three sides by existing residential properties. The need to have required separation distances from existing properties will reduce capacity of the site. If use the plot dimensions of properties in Oak Avenue to the west capacity of site is around 10-12. However also have to consider access to the site and whether the highway authority would object to another access onto Crays Hill at its steepest point.	10 -12 dwellings subject to highway authority consent for new access
SS0606	Existing agricultural field with road frontage of approximately 140 metres. If allowed frontage only development with similar plot widths to those of the adjacent properties to the east then could achieve 9 dwellings. Access will have to be considered given proximity to bend. Existing properties to west accessed by way of service road with single point of access to London Road and similar arrangement likely to be required for SS0606. Major issue with this site is its openness and the views it affords over the countryside to the north. This field together with the enclosed grassed area on south side of road contribute to forming a recognised open (kind of village green) feel approach into Crays Hill from the east. 2 objections to the loss of this view. Alternative viewpoint is that developing this land would increase sense of enclosure of the grassed area opposite so it would appear more as a village green. However Council has no control over this land and cannot control its appearance.	9 dwellings
SS0608	Similar to SS0606 above with plot width of 78 metres so could achieve 6 dwellings, again subject to highway authority consent for additional access points onto the A129 London Road.	6 dwellings
Total		25-27

Table 11: Capacity of Selected Sites in Crays Hill

4.10 Four other sites were also found to be suitable and available, but have not been allocated for development. For the sake of completeness consideration should be given to all these sites, together with the additional site (SS0662) found to be suitable and available. They are set out in the table below, together with the text taken from the original HELAA assessments.

OTHER SUITABLE AND AVAILABLE SITES NOT ALLOCATED IN CRAYS HILL			
SS0192	Land rear of, and including, Ravenscroft and Saremma, Gardiner's Lane North.	0.97 H	Irregular shaped plot of land to the east of Gardiner's Lane North. Site comprises dwellinghouse, Saremma and outbuildings. No physical constraints.
SS0302	Crown View, Crays Hill Road	0.92 H	Grassland site adjacent to Bromfelde Road, via a residential property. Trees in centre and along south, east and west boundaries. Access via 14 Bromfelde Road.
SS0319	Land between London Road and Corner Road.	0.69 H	Irregular shaped field on south side of London Road as it bends towards Crays Hill. Prominent position and forms established and well recognised entrance to CH from the east.
SS0456	Land at South Lodge, Southlands Road.	2.48 H	Irregular shaped parcel of land north of Southlands Road. Wooded boundaries to the north and east.
SS0662	Land on north side of London Road at western end of settlement adjacent to Whitesbridge Farm.		Rectangular plot of land, opposite recreation ground. In agricultural use. Layout submitted with submission showing 47 units.

Table 12: Other Suitable and Available Sites Not Allocated in Crays Hill

4.11 A review of the development potential of all of the sites found suitable and achievable and available produces the following outcomes.

DEVELOPMENT POTENTIAL OF PROPOSED ALLOCATED/DRAFT ALLOCATED SITES AND OTHER SITES FOUND SUITABLE		
SITE	SUMMARY	CAPACITY
SS0505	1.04h site to rear of properties on Crays Hill with proposed access direct onto Crays Hill via site of Barnsfield. Surrounded on three sides by existing residential properties. The need to have required separation distances from existing properties will reduce capacity of the site. If use the plot dimensions of properties in Oak Avenue to the west capacity of site is around 10-12. Highway Authority have confirmed that there would be no objection to access being taken direct onto Crays Hill.	10-12 dwellings.

DEVELOPMENT POTENTIAL OF PROPOSED ALLOCATED/DRAFT ALLOCATED SITES AND OTHER SITES FOUND SUITABLE		
SITE	SUMMARY	CAPACITY
SS0606	Existing agricultural field with road frontage of approximately 130 metres. If allowed frontage only development with similar plot widths to those of the adjacent properties to the west then could achieve 12 dwellings. Access will have to be considered given proximity to bend. Existing properties to west accessed by way of service road with single point of access to London Road and similar arrangement likely to be required for SS0606. Major issue with this site is its openness and the views it affords over the countryside to the north. This field together with the enclosed grassed area on south side of road contribute to forming a recognised open (kind of village green) feel approach into Crays Hill from the east. 2 objections to the loss of this view. Alternative viewpoint is that developing this land would increase sense of enclosure of the grassed area opposite so it would appear more as a village green. However Council has no control over this land and cannot control its appearance.	9 dwellings.
SS0608	Similar to SS0606 above with plot width of 78 metres so could achieve 6 dwellings, again subject to highway authority consent for additional access points onto the A129 London Road.	6 dwellings
SS0192	0.97 hectare site found S/Ac & A in HELAA but not allocated for development. Adjacent to SS0456 which also found to be A/Ac in HELAA but not allocated (although could come forward via GB 3 policy). Could do small residential infill which would have the advantage of not taking direct access onto A129 and not closing off views across open countryside. Somewhat awkward shaped site to develop and provide sufficient amenity space and manoeuvring space for vehicles. Maximum of 4 dwellings.	4 dwellings
SS0302	Site found to be A/Ac but is more distant from village and access would be via Bromfelde Road direct onto Crays Hill which will increase amount of traffic accessing onto the A129. To allow development on this site would mean extending the settlement boundary in a somewhat anomalous manner. Also just to north of GB3 area so not eligible via that route.	Nil
SS0319	Considered to be A/Ac, but not allocated, presumably because the open grassed area seen as an important local feature. Landowner has submitted scheme for 10 dwellings and a community hall. This land although privately owned creates an important open feature at the approach to Crays Hill from the east and has importance for local residents. To develop this site would create a more urban environment and should be resisted. Although in terms of consistency is it justifiable to not allow development on this land if sites such as SS0606 & SS0608 are being allocated together with possibly other nearby sites.	Resist development at this stage. Nil
SS0456	This is the land that surrounds South Lodge on Southlands Road, which is also within a GB 3 policy area, so development could come forward via that route subject to criteria being met. However if allocated for development, in a manner that respected existing plot widths in road, could provide around 5 dwellings. Is also opposite existing development, but further from the village services.	5 dwellings

DEVELOPMENT POTENTIAL OF PROPOSED ALLOCATED/DRAFT ALLOCATED SITES AND OTHER SITES FOUND SUITABLE		
SITE	SUMMARY	CAPACITY
SS0662	New site at western end of Crays Hill which has been found to be suitable. It would extend the linear development of CH and be located between existing housing to the east and the Whitesbridge Farm industrial estate to the west. Is opposite wooded area and recreation ground so only limited impact on existing residents. If developed with frontage only development would provide 10 dwellings. However is it appropriate to extend the settlement boundary so far to the west?	11 dwellings
Total		45-47

N/S = Not Suitable, N/Ac = Not Achievable, N/A = Not Available, S = Suitable, Ac = Achievable, A = Available

Table 13: Development Potential of Proposed Allocated/Draft Allocated Sites and Other Sites Found Suitable

4.12 In accordance with the objectives of the study a review of all the HELAA sites not allocated for development has also been undertaken and the results set out in the table below.

REVIEW OF CRAYS HILL HELAA SITES NOT ALLOCATED FOR DEVELOPMENT		
SITE	SUMMARY	CAPACITY
SS0086	Considered N/S & N/Ac, due primarily to distance to established settlement. To allocate this site would extend the settlement boundary in an anomalous southern direction. However is within GB 3 area and could come forward via that route.	2 dwellings via GB 3 route if criteria met.
SS0303	Considered N/S and N/Ac due to distance from settlement, however recent submission SS0662 found to be S & Ac although similar distance from settlement. However site would introduce backland development and result in loss of area of woodland. Considered not suitable for these reasons.	Nil
SS0317	Considered N/S and N/Ac due to distance from settlement. Also excluded from GB 3 area as no dwelling on plot.	Nil
SS0318	N/S & N/Ac due to distance from settlement. However is within GB 3 area and could come forward via that route.	2 dwellings via GB 3 route if criteria met.
SS0320	Found to be S but N/Ac due to no access available. HELAA assessment also refers to site being a fair distance from local services. However site no further from local services than two of the allocated sites, SS0606 and SS0608 and is close to local school. Access would also appear to be available from Approach Road and Corner Road.	2 dwellings

REVIEW OF CRAYS HILL HELAA SITES NOT ALLOCATED FOR DEVELOPMENT		
SITE	SUMMARY	CAPACITY
SS0321	Found to be N/S & N/Ac due to distance from settlement boundary and therefore unsuitable. However this is not consistent with approach taken to SS0606, SS0608 & SS0456 (and also SS0662). Access available from Corner Road and Approach Road.	1-2 dwellings
SS0322	Found to be next to settlement boundary but N/S & N/Ac due to not being able to accommodate 5 dwellings.	Nil
SS0336	Found to be N/S & N/Ac due to distance from settlement boundary. Site adjacent to A127 and some distance from settlement. Site should not be considered for development.	Nil
SS0436	Found to be N/S & N/Ac due to distance from settlement boundary. Site adjacent to A127 boundary and some distance from settlement. Should not be considered for development.	Nil
SS0452	Found to be N/S & N/Ac due to distance from settlement boundary. However immediately to east of SS0608 (an allocated site). Also SS0662 found S & Ac even though further from settlement. However no ownership details so considered to be N/A.	Nil
SS0462	Found to be N/S & N/Ac due to distance from settlement, and in Flood Zone 3b. Should not be considered for development.	Nil
SS0463	Found to be N/S & N/Ac due to distance from settlement, also noted that in Flood Zone 2 (however this can be overcome). The Belvedere part of this site was the subject of a pre-application enquiry in 2016, on basis of NPPF §89 compliant development. Formal pre-application response gave favourable response to development of 23 houses to replace Belvedere and introduce large areas of landscaping. Application recently submitted under reference 17/00227/FULL. As this site is some distance from settlement should not be allocated and if permission is granted should just be treated as a Local Plan departure and 'windfall' site.	Nil (for the purposes of this exercise)
SS0464	Found to be N/S & N/Ac as not directly adjacent to settlement boundary, and not appropriate development in the GB. Site however includes commercial activity with outside storage and vehicle parking. Could be considered to be NPPF §89 compliant development if an application came forward. However at this stage should not be considered for development.	Nil
SS0465	Found to be N/S and N/Ac due to distance from settlement boundary and development in this area would form sporadic and sprawling growth in the GB. Also unknown ownership and site not likely to provide 5 dwellings. Should not be considered for development.	Nil
SS0467	Found to be N/S and N/Ac due to distance from settlement boundary and development in this area would form sporadic and sprawling growth in the GB. Should not be considered for development.	Nil

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REVIEW OF CRAYS HILL HELAA SITES NOT ALLOCATED FOR DEVELOPMENT		
SITE	SUMMARY	CAPACITY
SS0468	Found to be N/S and N/Ac due to distance from settlement boundary and development in this area would form sporadic and sprawling growth in the GB. Also site not likely to provide 5 dwellings. Should not be considered for development.	Nil
SS0469	Found to be N/S & N/A due to distance from settlement boundary, and partially within flood zone 3b. Also access onto Hardings Elms Road not good at this point due to bend in road. Could however be considered to be §89 compliant development if an application submitted. However should not be allocated for this reason.	Nil
SS0478	Found to be N/S & N/Ac as not adjacent to settlement boundary, however inconsistent with SS0456 which found to be adjacent to settlement boundary. However site not large enough for 5 dwellings so does not meet HELAA criteria. Site within GB3 Policy area but unlikely to meet criteria.	Nil
SS0479	15.7H site covering a large swath of the CH plotlands area which if developed would have a major urbanising impact and change character of area. Access would also be difficult to achieve for such a large development, and multitude of ownerships would make it difficult to bring forward. Should not be considered for development.	Nil
SS0480	Found to be N/S and N/Ac due to distance from settlement, however SS0456 (opposite) found to be adjacent to settlement. Site is within Policy GB 3 area and could possibly meet the criteria for development.	1 dwelling via GB 3 route if criteria met.
SS0517	Found to be N/S and N/Ac due to distance from settlement, also not large enough for 5 dwellings so not HELAA compliant. In GB 3 area but would not meet criteria.	Nil
SS0518	Found to be N/S and N/Ac due to distance from settlement boundary, and distant from services. In GB 3 area but would not meet criteria.	Nil
SS0572	Found to be N/S & N/Ac due to not meeting HELAA criteria of capacity for 5 dwellings. In GB 3 area but would not meet criteria.	Nil
SS0584	Found to be N/S and N/Ac due to distance from settlement boundary. However within Policy GB 3 and could meet criteria.	2 dwellings via GB 3 route if criteria met.
SS0590	Found to be N/S and N/Ac due to distance from settlement boundary, also may not be able to achieve 5 dwellings in accordance with HELAA criteria. Is however within GB 3 Policy area and could meet criteria for 1 dwelling.	1 dwelling via GB 3 route if criteria met.
SS0605	Found to be S but N/Ac due to no access available. HELAA assessment also refers to site being a fair distance from local services. However site no further from local services than two of the allocated sites, SS0606 and SS0608 and is close to local school. Access would also appear to be available from Approach Road and Corner Road.	6-7 dwellings if apply similar plot widths to existing properties in Gardiners Lane North.

REVIEW OF CRAYS HILL HELAA SITES NOT ALLOCATED FOR DEVELOPMENT		
SITE	SUMMARY	CAPACITY
SS0607	Found to be adjacent to the settlement boundary but N/S & N/Ac due to not meeting HELAA criteria for 5 dwellings. However if SS0606 & SS0608 are allocated is it reasonable to omit SS0607.	2-3 dwellings

N/S = Not Suitable, N/Ac = Not Achievable, N/A = Not Available, S = Suitable, Ac = Achievable, A = Available

Table 14: Review of Crays Hill HELAA Sites Not Allocated For Development

4.13 This analysis shows that there are potentially another 4 sites that could be considered as development options (SS0320, SS0321, SS0605 & SS0607). They are all at the eastern end of London Road around the Corner Road and Approach Road area. These are included in a revised list shown in the table below, which includes all the potentially developable sites.

REVISED LIST OF ALL POTENTIALLY DEVELOPABLE SITES		
SITE	ADDRESS	CAPACITY
SS192	Land rear of, and including Ravenscroft and Saremma, Gardiner's Lane North (2)	4 dwellings
SS319	Land between London Road and Corner Road (2)	10 dwellings
SS320	Land opposite South Lodge, Approach Road. (3)	2 dwellings
SS321	Land east of South Lodge, Approach Road. (3)	6-7 dwellings
SS456	Land at South Lodge, Southlands Road (2)	5 dwellings
SS505	Rear of Barnsfield, Crays Hill (1)	10-12 dwellings
SS605	Land east of Corner Road. (3)	1-2 dwellings
SS606	Land north of London Road (west of Beam End Cottage) (1)	12 dwellings
SS607	Land north of London Road (east of Annawest). (3)	2-3 dwellings
SS608	Land north of London Road (east of Hughendon) (1)	8 dwellings
SS662	Land on north side of London Road at western end of settlement adjacent to Whitesbridge Farm. (4)	16 dwellings
TOTAL		65-70 dwellings

1 = Sites allocated in DLP, 2 = Sites found suitable and available but not allocated in DLP, 3 = Additional sites added following CDS review, 4= additional site submitted more recently.

Table 15: Revised List of All Potentially Developable Sites

- 4.14 This is a consolidated revised schedule of the potentially developable sites within and close to the settlement boundary which could all be considered for development. To ensure consistency all of these sites should be considered to be available for development.
- 4.15 For the purposes of this exercise any sites that might possibly come forward via the § 89 of the NPPF route should not be taken into account when allocating sites. They are all likely to be some distance from the settlement boundary and it is not possible to identify if and when applications may come forward. They should just be considered on their merits at the time, applying the §89 test, and be treated as ‘windfall’ sites.
- 4.16 In considering the development options for Crays Hill and the consistency between the proposed policies it is also necessary to take account of the impact of Policy GB 3 which allows for some infill development in specific circumstances. A number of sites subject to the HELAA assessments, and found not suitable, are however also within the proposed plotland infill areas as defined by GB 3. These are set out in the table below.

HELAA SITES ALSO WITHIN PLOTLAND INFILL SITES			
REF.	Location	Size	Capacity
SS0086	Treetops and Land Adjacent Treetops, North Road	0.33 H	2 dwellings
SS0318	Land west of Rookery Nook, Oak Lane	0.62 H	2 dwellings
SS0456	Land at South Lodge, Southlands Road. **	2.48 H	5 dwellings
SS0478	Abisca, Southlands Road.	0.41 H	Would not qualify under GB 3 Policy
SS0480	Land to south of South Lodge, Southlands Road	1.20 H	Essentially vacant plot with some buildings, number of applications refused over the years, but would probably qualify under GB3, for one dwelling.
SS0517	Crayside, Oak Road.	0.25 H	Would not qualify under GB 3 Policy
SS0518	Crayside Kennels, Oak Road.	0.53 H	Would not qualify under GB 3 Policy
SS0572	Land rear of Pickwick, Gardiner's Lane North	0.20 H	Would not qualify under GB 3 Policy
SS0584	Land adjacent to Prospect Cottage, Crays Hill Road	0.42 H	1-2 dwellings

HELAA SITES ALSO WITHIN PLOTLAND INFILL SITES			
REF.	Location	Size	Capacity
SS0590	Land at the Woodmans, Oak Road.	0.18 H	1 dwelling

** Also found to be suitable and available but not allocated for development.

Table 16: HELAA Sites Also Within Plotland Infill Sites

4.17 The issue of consistency is important when making decisions about which sites have been found to be suitable and available, but then not allocated for development. Firstly there has to be a robust justification for the site selection process as there may not be too much difference between the ‘in’ and the ‘out’ sites. This is further complicated by the fact that some of the sites not allocated may in due course be next to sites that are developed via the GB 3 route. The analysis above has indicated where that may occur. In particular SS0086 and SS0456 are close to the settlement boundary and also close to a number of HELAA sites that have not been included in the DLP allocations.

Impact of GB 3 Policy

4.18 The representations from local residents raise concerns about the impact of having the 45 extra dwellings plus the potential extra 50 dwellings as a result of the GB 3 policy. The 2015 Plotland Study estimated that the Crays Hill plotland has the potential to deliver up to 50 new homes. This seems to have been based on an assessment of the land available within the plotland *‘that have been promoted for development’*. However the criteria attached to Policy GB 3 refers to:

“Where it can be demonstrated that the infill is intended to meet the need for housing arising from the plotland settlement itself; or the plot is being made available for self build via the Council’s Self-Build Register”

4.19 There is however no clarification in the accompanying text to the policy as to how the need for *housing arising from the plotland settlement* will be assessed and what tests will be applied to the assessment. Will it relate to the need for housing for the children of families living in Crays Hill, or more distant relatives? This probably

needs some clarification within the wording of the policy. In any event it is difficult to predict how many new homes might arise via this route.

- 4.20 I produce as appendices 10-13 maps of the four plotland areas with an indication of how new development might come forward applying the criteria in Policy GB 3. This has been done with reference to *“where the intended infill is not the result of subdivision of a larger plot and is located between existing dwellings on an existing road frontage, or on a corner plot.”* However this is in itself somewhat ambiguous as it is not clear whether this means that where there is a vacant plot, it can only be developed with one dwelling whatever the size of the plot, or if the vacant plot is larger can it be developed with more than one dwelling so long as the spacing and positioning of the dwellings is consistent with the established pattern of development within the plotland.
- 4.21 For the purposes of the exercise of trying to estimate the number of dwellings that might come forward via the GB 3 policy route the following methodology has been used.
- (i) Only shown development on plots that are truly vacant and have no existing residential use.
 - (ii) Allowed for development that utilises the whole plot, but at a density that respects the existing pattern of development. This means that on some plots it is possible to achieve more than one dwelling.
- 4.22 This approach would appear to be consistent with the 2015 Plotland Study, on the basis that to arrive at a total of 50 there must have been provision for more than one new dwelling on some plots.
- 4.23 The outcome of this exercise is shown on the plans produced as Appendices 10-13 and gives an estimate of 35 new dwellings that could be derived from this route. A concern of local residents in their comments on the DLP was the proportionally high figure of additional dwellings for Crays Hill taking account of the allocations and the 50 estimated to come forward via the GB 3 route. Whilst the estimate for the Plotland Areas only predicts 35 this would still give a total of 80 for the settlement. The other important point about the number of dwellings that might come via the

GB 3 route is the uncertainty both in terms of whether new dwellings will come forward and also when they will come forward. In relation to this point very few sites within the GB 3 areas were submitted through the 'call for sites' process, and a number of those that were will clearly not meet the criteria required to qualify under GB 3.

- 4.24 As a Local Plan should be about certainty of delivery of the required new homes to meet the Borough's OAN, it is not helpful to have areas of uncertainty, not just in the Crays Hill plotlands, but all of the plotlands within the Borough. There is also the problem that some non-plotland sites that will not be selected for development will be close to sites that may come forward via the GB 3 route. This has the potential to create ill-feeling within the community and the Local Plan Inspector may well challenge the legitimacy of the GB 3 policy in terms of both its justification and the uncertainty of delivery of the required housing numbers.

Conclusions on the Development Options for Crays Hill.

- 4.25 The DLP allocates three sites for development, SS0505, SS0606 and SS0608. The review of the selection process undertaken above makes a number of conclusions. In summary these are:

- (i) The number of units likely to be delivered from these sites is approximately 25-27 dwellings.
- (ii) Sites SS0606 and SS0608 are close to other sites which have not been allocated for development, in some cases because they were considered to be too distant from the settlement boundary (although as close or closer than SS0606 and SS0608) and/or that there was no available access (when access does appear to be available).
- (iii) The selection of SS0606 and SS0608 will close off views across the agricultural land to the north. Whilst it can be argued that in the case of SS0606 there are no existing houses on the southern side of London Road at this point which have a direct view across this land, the views across the land to the north are valued by local people and contribute to the character of the settlement.

- (iv) In relation to point (ii) above the nearby sites that could also be considered for development are SS320, SS321 and SS605, which together would provide 10 dwellings. Indicative layouts are shown at Appendices 7 & 8. Site SS0319 has not been selected for development although found to be suitable, achievable and available. Whilst there are good reasons that this land is maintained as open area, is it reasonable when sites surrounding it could be allocated for development?
- (vi) Site SS0662 was a late HELAA submission and is at the western end of the settlement. However it is as close to the village shop as SS0606 and SS0608 and could provide a low density frontage development of approximately 11 dwellings or something more at a higher density. This would however significantly extend the settlement boundary on the northern side of the A129 Crays Hill in a westerly direction so that it abutted the Whitesbridge Farm industrial area. A view will need to be taken as to whether this would be acceptable and whether it should mean that Whitesbridge Farm gets removed too - which could have a bigger impact and in time, be redeveloped into residential itself, further extending the village boundary. Also submission shows 47 dwellings and would owner still be willing to put land forward if restricted to frontage development. An alternative approach is that all 45 dwellings could be provided on this single site, although it could be considered unreasonable to undertake all the required development on a single site at the western end of the settlement.
- (vii) If SS0662 was deemed suitable for development then it would be consistent to also consider SS0192 and SS0456 as they are as close to the settlement boundary and services as SS0662. SS0456 may well come forward via the GB 3 route in any event, so it could be allocated together with SS0192.

4.26 The DLP in effect allocates three of the HELAA sites to provide the 45 dwellings required to be achieved in Crays Hill. The report shows that it will not be possible to provide 45 dwellings on these sites. There are other sites that could be utilised to either make up the shortfall or be substituted for the originally selected sites. A number of options are shown on the plans at Appendices 7-9. There needs to be a further review of the options before finally determining the sites to achieve the 45 dwellings.

- 4.27 However as discussed in paragraph 3.35 above in relation to Ramsden Bellhouse a decision has to be made as to whether it is reasonable to expect Crays Hill to meet the target figure of 45 dwellings. Crays Hill differs from Ramsden Bellhouse in that potentially 50 new dwellings could come forward from Policy GB 3 relating to Plotland Infill, albeit that the plotland infill areas are physically separate from the settlement boundary defined on the Policies Map.
- 4.28 Whilst the analysis undertaken for this review suggests a figure closer to 35 rather than 50 for the number of dwellings that might come forward from the GB 3 policy route, it still means that the wider Crays Hill area could receive 80 new dwellings over the plan period. Given the limited number of local services and facilities and limited public transport options, the question has to be asked as to whether this level of growth constitutes sustainable development in the terms of the National Planning Policy Framework. The conclusion is that it is probably not sustainable and that the proposed allocation of 45 dwellings for Crays Hill is too high and should be reduced with the deficit being made up from the Strategic Housing Allocations.

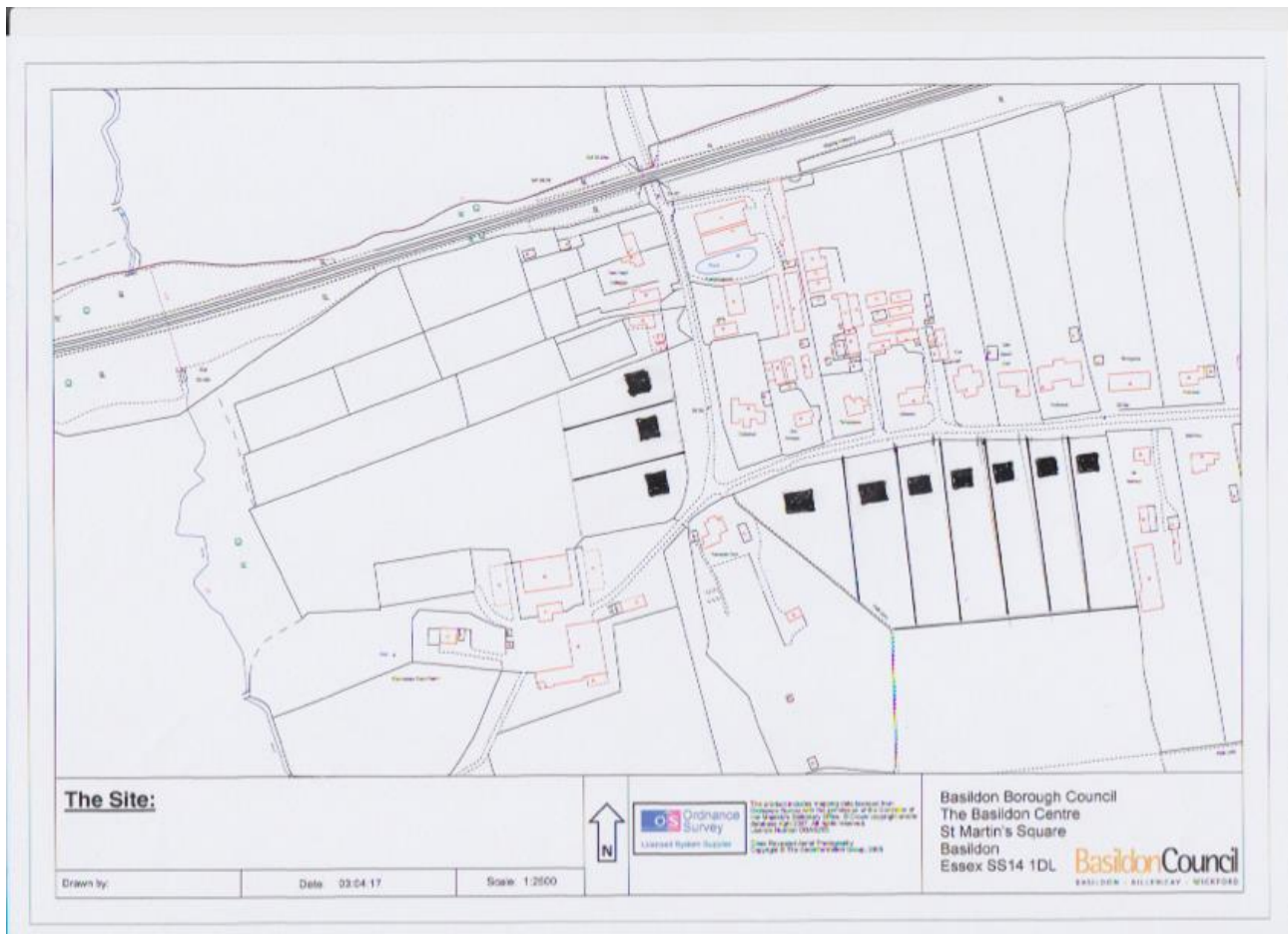
5.0 OBJECTIVE C: PROVIDE A VIEW ON THE CUMULATIVE IMPACTS OF GYPSY AND TRAVELLER SITES TAKING INTO ACCOUNT THE PROPOSALS IN DRAFT POLICIES H 5 AND H 6

- 5.1 Policy H 6 which is set out in full at page 6 above, includes an allocation of an additional 7 pitches on the west side of Oak Lane. These are all on established plots that have existed for some time, some of which have long planning histories and are authorised. The activity already generated by these plots is at a level where the addition of 7 new plots is probably not going to make a significant difference particularly when the activity from the Oak Lane authorised site immediately to the east is also taken into account.
- 5.2 The proposed plots are also in reasonable proximity to one of the four plotland areas where GB 3 will be applied and Appendix 13 indicates the additional dwellings that may come forward via that route. This shows that potentially five additional dwellings may be developed that would take access onto Oak Lane. So potentially the traffic generated by an additional seven traveller plots and 5 additional dwellings will use Oak Lane. This is not a significant amount of new traffic in relation to the current volume of traffic on the road.
- 5.3 As the 7 additional plots are proposed within an existing line of mainly traveller development on Oak Lane there will not be any further significant expansion of traveller plots into the Green Belt. The new development will be well contained within the existing traveller community so will not have an impact on the wider Crays Hill settlement.
- 5.4 Policy H 5 seeks to retain the existing number of traveller sites, unless alternative provision is made for the sites subsumed by other development. This means that the other traveller sites in the Crays Hill area are likely to remain. These are predominantly at Oak Lane and now well established within the settlement. The addition of a further 7 plots will not have a significant impact on the settlement.

APPENDICES

APPENDIX 1 RAMSDEN BELLHOUSE - HELAA SITES SS0223 & SS0599

Indicative layouts for HELAA sites SS0223 and SS0599 showing a total of 10 dwellings based on existing plot widths in Ramsden Bellhouse.



APPENDIX 2 RAMSDEN BELLHOUSE - HELAA SITES SS0221, SS0222, SS0481 & SS0482

Indicative layouts for HELAA sites SS0221, SS0222, SS0481 and SS0482 giving a total of 7 dwellings based on existing pattern of development.



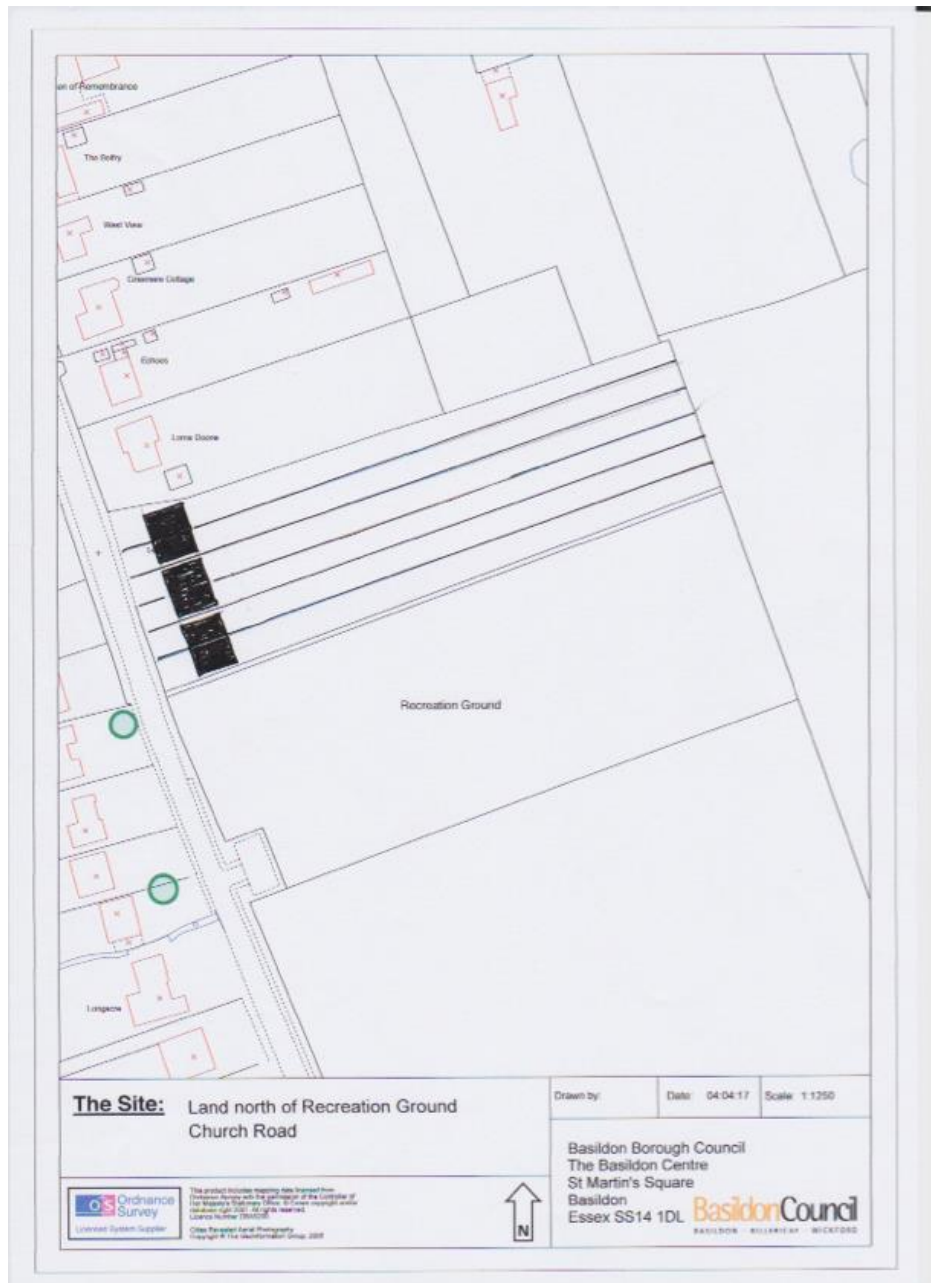
APPENDIX 3 RAMSDEN BELLHOUSE - HELAA SITE SS0531 & LAND NORTH OF THE RECREATION GROUND

Indicative layouts for frontage of HELAA site SS0531 and also land to north of recreation ground submitted by the Parish Council. Total number of units is 9 based on similar plot widths to existing development at southern end of Church Road.



APPENDIX 4 RAMSDEN BELLHOUSE – ALTERNATIVE FOR LAND NORTH OF THE RECREATION GROUND

This is an alternative higher density proposal of 6 semi-detached dwellings for the land north of the recreation ground based on the existing adopted Development Control guideline of a 15 metre plot width for a pair of semi-detached dwellings with a metre gap to the boundary. This approach would contribute to achieving a higher number of new dwellings in Ramsden Bellhouse but may be considered to be too high a density and too out of character with existing settlement.



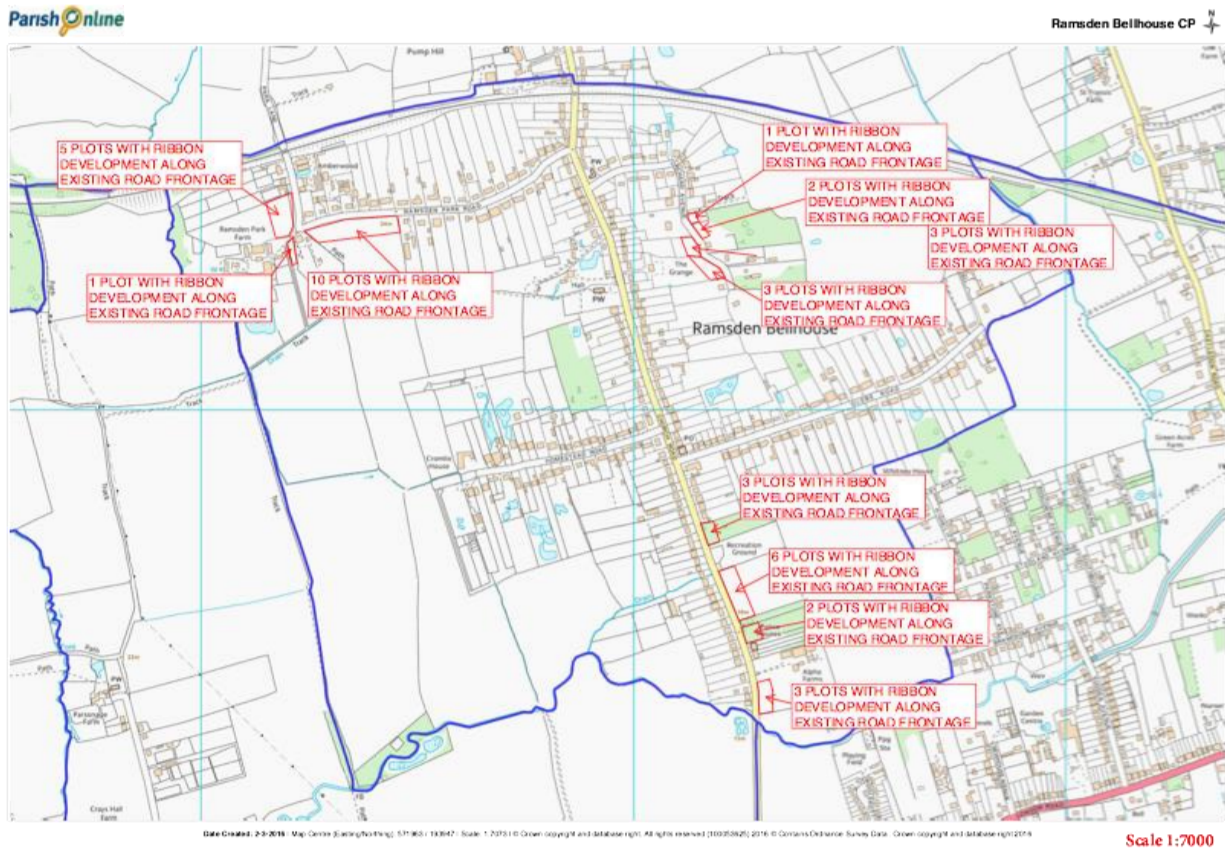
APPENDIX 5 RAMSDEN BELLHOUSE – ALTERNATIVE FOR HELAA SITE SS0531

This also proposes a higher density development of 16 semi-detached dwellings for the frontage of SS0531 based on the existing development control guidelines. This contributes to increasing the number of new dwellings in Ramsden Bellhouse to meet the target (although still only 39 achievable) but results in a very urban form of development which is probably too out of keeping with the existing settlement pattern and likely to generate objections from local residents. An alternative approach could be adopted of reducing the number of pairs of semi-detached units and arranging in a looser pattern of development.



APPENDIX 6 RAMSDEN BELLHOUSE – PARISH COUNCIL PROPOSAL

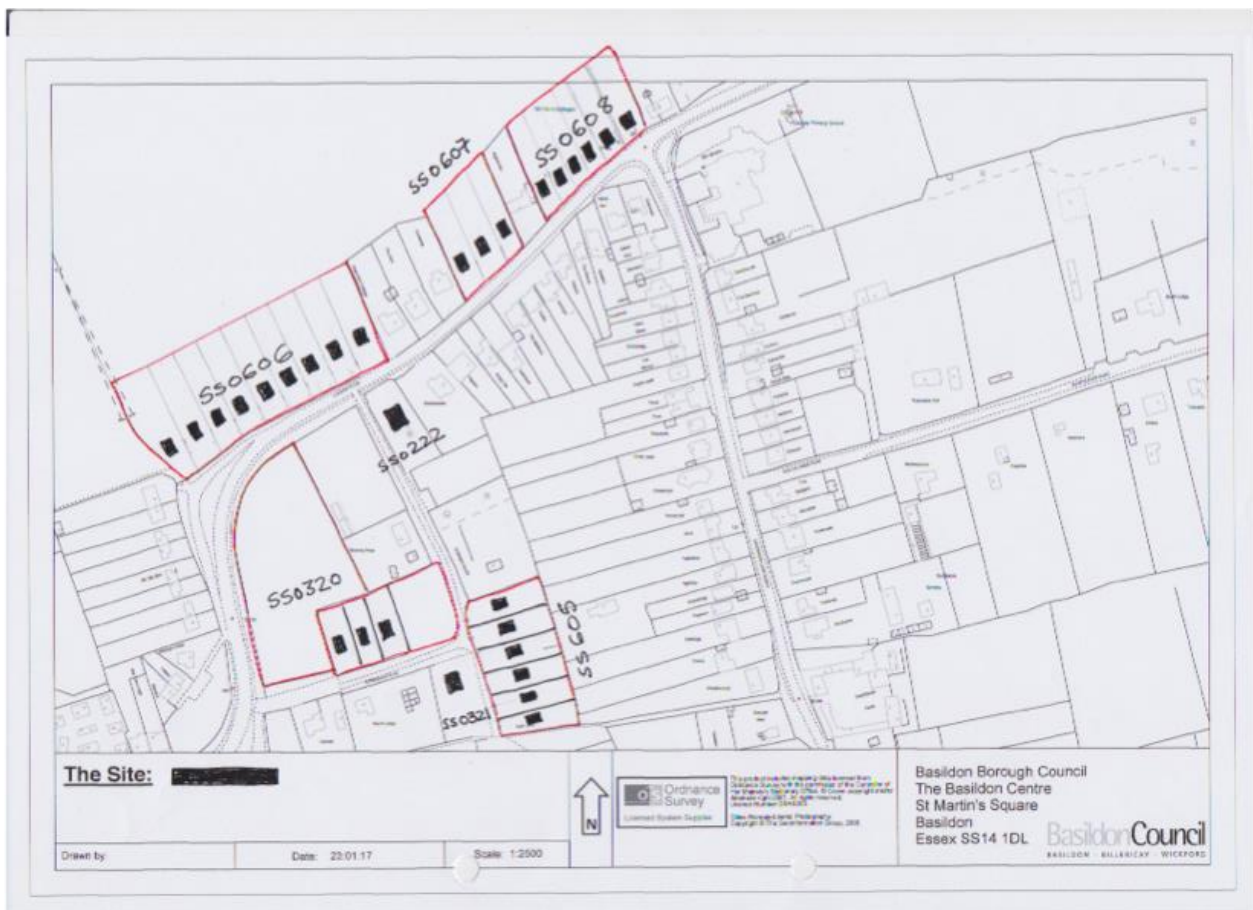
The Parish Council have submitted this plan which provides for 39 dwellings, although for reasons given in the report, 13 of their proposed dwellings are not achievable.



APPENDIX 7 CRAYS HILL – HELAA SITES SS0222, SS0320, SS0321, SS0606, SS0607 & SS0608

Indicative layouts for SS0222, SS0320 (retaining trees on eastern part of site), SS0321, SS0606, SS0607 and SS0608. This uses plot widths and densities in accordance with existing patterns of development in surrounding area. SS0319 not included as an option due to need to maintain open aspect on corner.

Also not shown are SS0192 and SS0456 to the east which merit consideration if new site SS0662 is considered to be suitable and available.



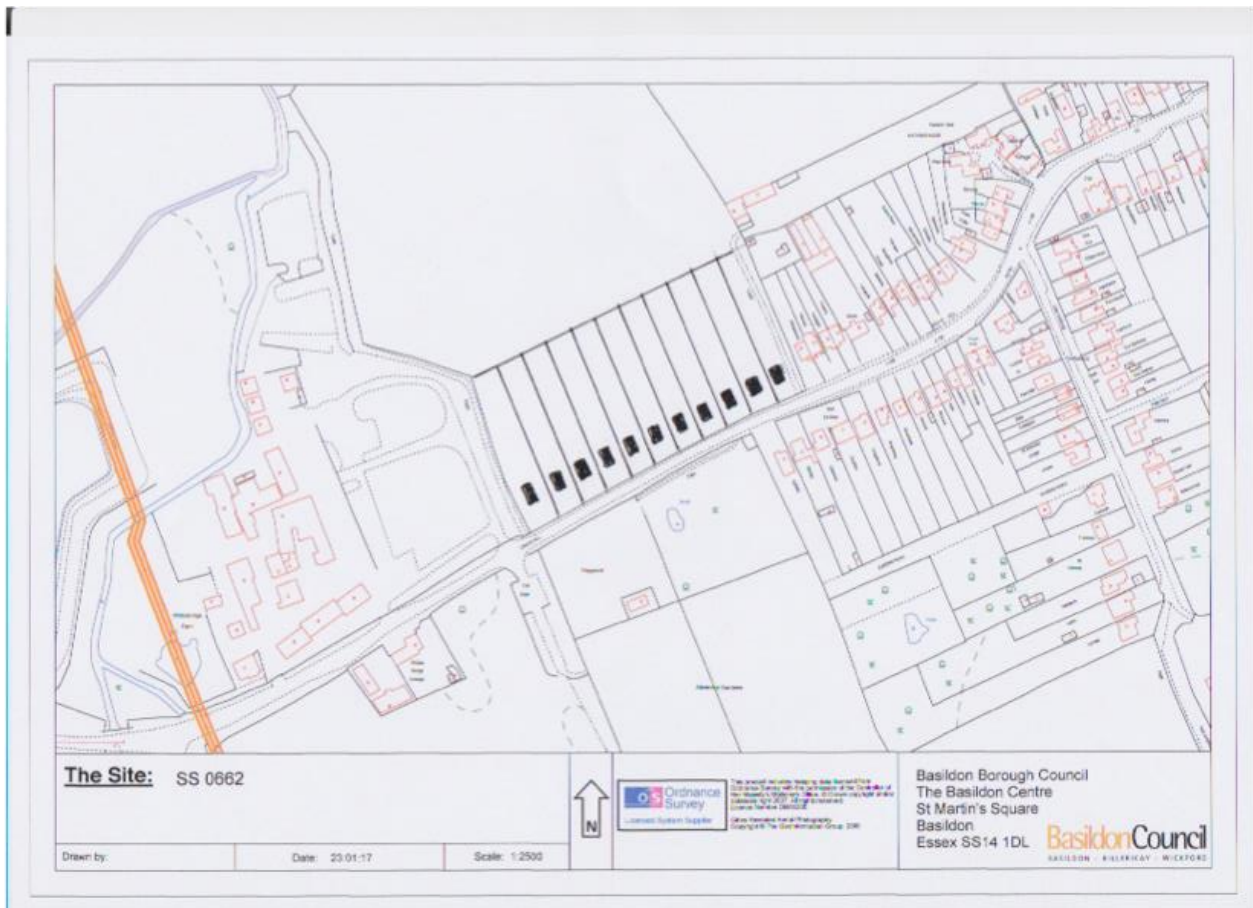
APPENDIX 8 CRAYS HILL – HELAA SITES SS0320, SS0321 & SS0605

This is larger scale plan of SS0320, SS0321 and SS0605. The HELAA assessments produced inconsistent assessments in relation to these sites when compared to other sites. They are no further from settlement boundary than the selected sites and access would appear to be available to each of the sites.



APPENDIX 9 CRAYS HILL – HELAA SITE SS0662

Site SS0662 is a more recently submitted site at the western end of the settlement. Submission showed plan of 47 dwellings but could do simple frontage development of 11 dwellings. However the issue of whether it ‘stretches’ the settlement boundary too far to the west has to be taken into account.



APPENDIX 10: PLOTLAND AREA 1

Potential number of dwellings (7) that could come forward within Plotland area 1 via the GB 3 policy.



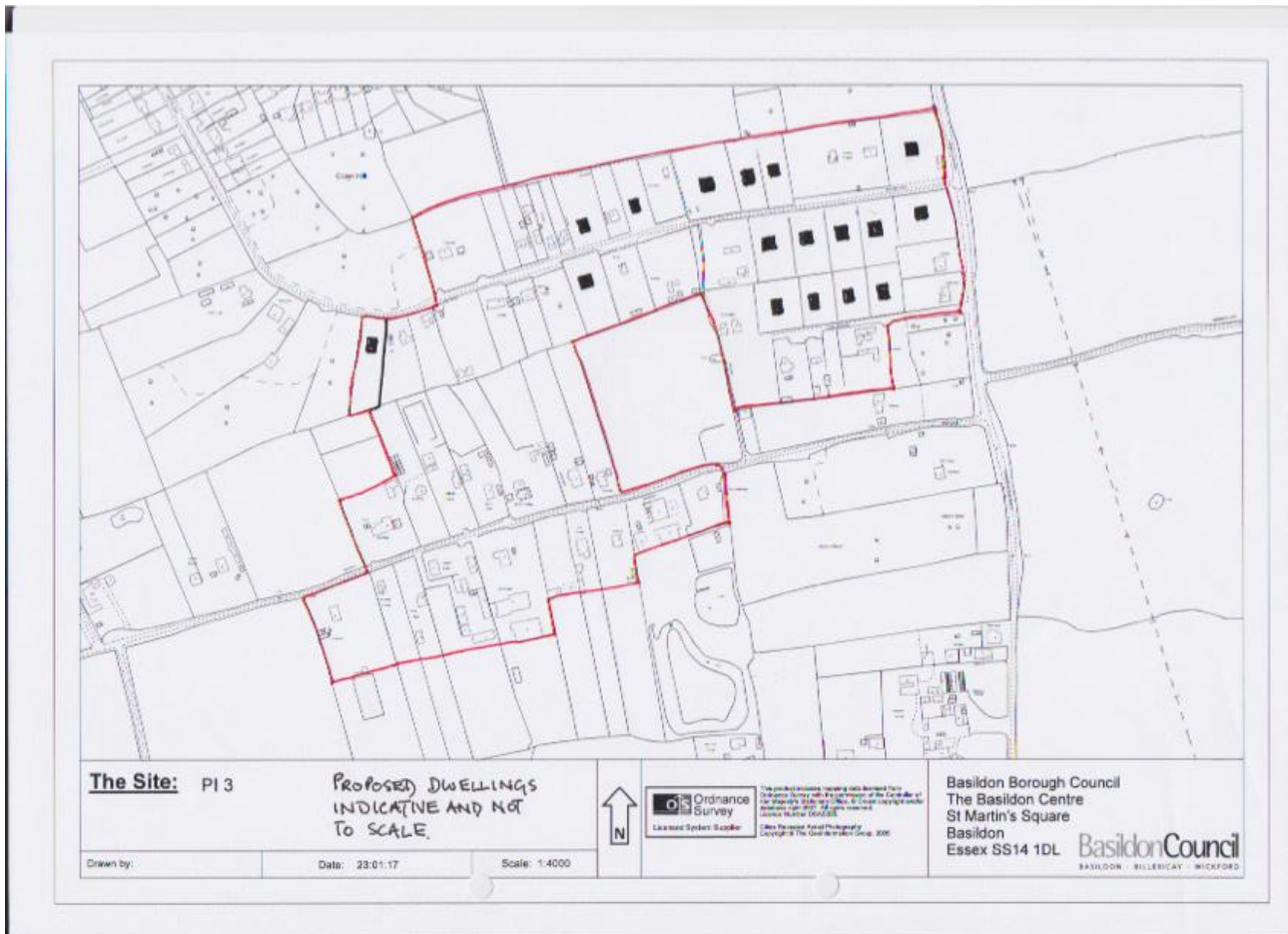
APPENDIX 11: PLOTLAND AREA 2

Potential number of dwellings (4) that could come forward within Plotland Area 2 via the GB 3 policy.



APPENDIX 12: PLOTLAND AREA 3

Potential number of dwellings (17) that could come forward within Plotland Area 3 via the GB 3 policy.



APPENDIX 13: PLOTLAND AREA 4

Potential number of dwellings (7) that could come forward within Plotland area 4 via the GB 3 policy.

