

# **Lynton, Lower Dunton Road, CM13 3BP**

Representation regarding the impact of the  
proposed Norwich to Tilbury electricity transmission  
proposal on residential development

Prepared by iArch Consulting

on behalf of

Westlands Farm Developments

25th February 2026



# Introduction

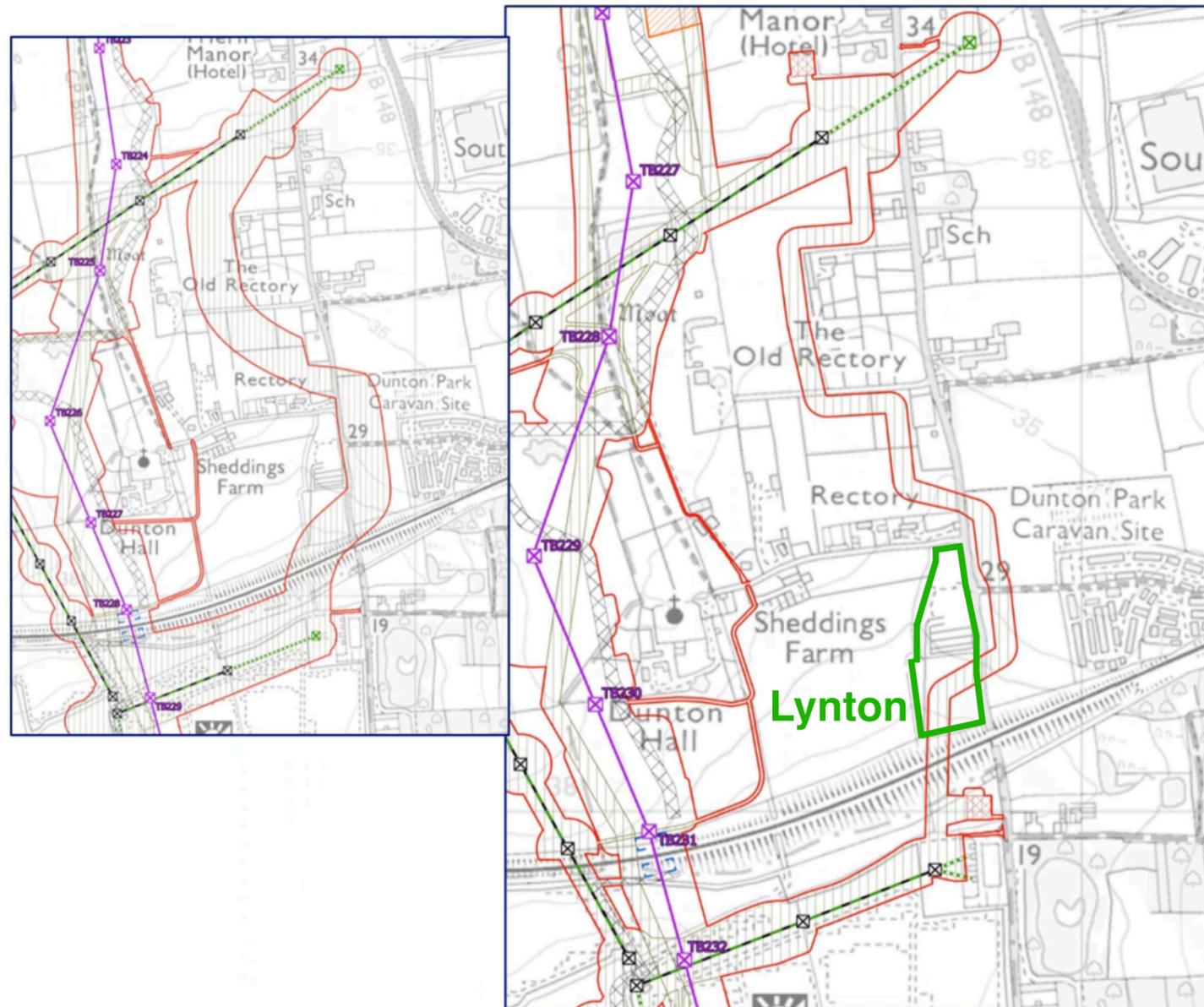
This document presents a preliminary appraisal of the impact of the proposed Norwich to Tilbury electrical connection project on the residential development planned at Lynton, Lower Dunton Road.

Westlands Farm Developments purchased Lynton in 2016, with the sole objective of developing the land for residential use. At that time the site was within the Green Belt but had been safeguarded for future residential development by the LPA. Since this time, Basildon Council have considered a range of options for the release of land from the Green Belt, but after a lengthy preparation and consultation process, the site has been included in the Basildon Borough Council's Housing and employment land availability assessment 2021 (The HELAA) (site SS0603). The site is very clearly located within the proposed H11 residential allocation within the latest revision of the Local Plan, which we presume that both National Grid and the Planning Inspectorate will be familiar with. Basildon Council has advised that the Local Plan including the H11 residential allocation will be adopted in the very near future.

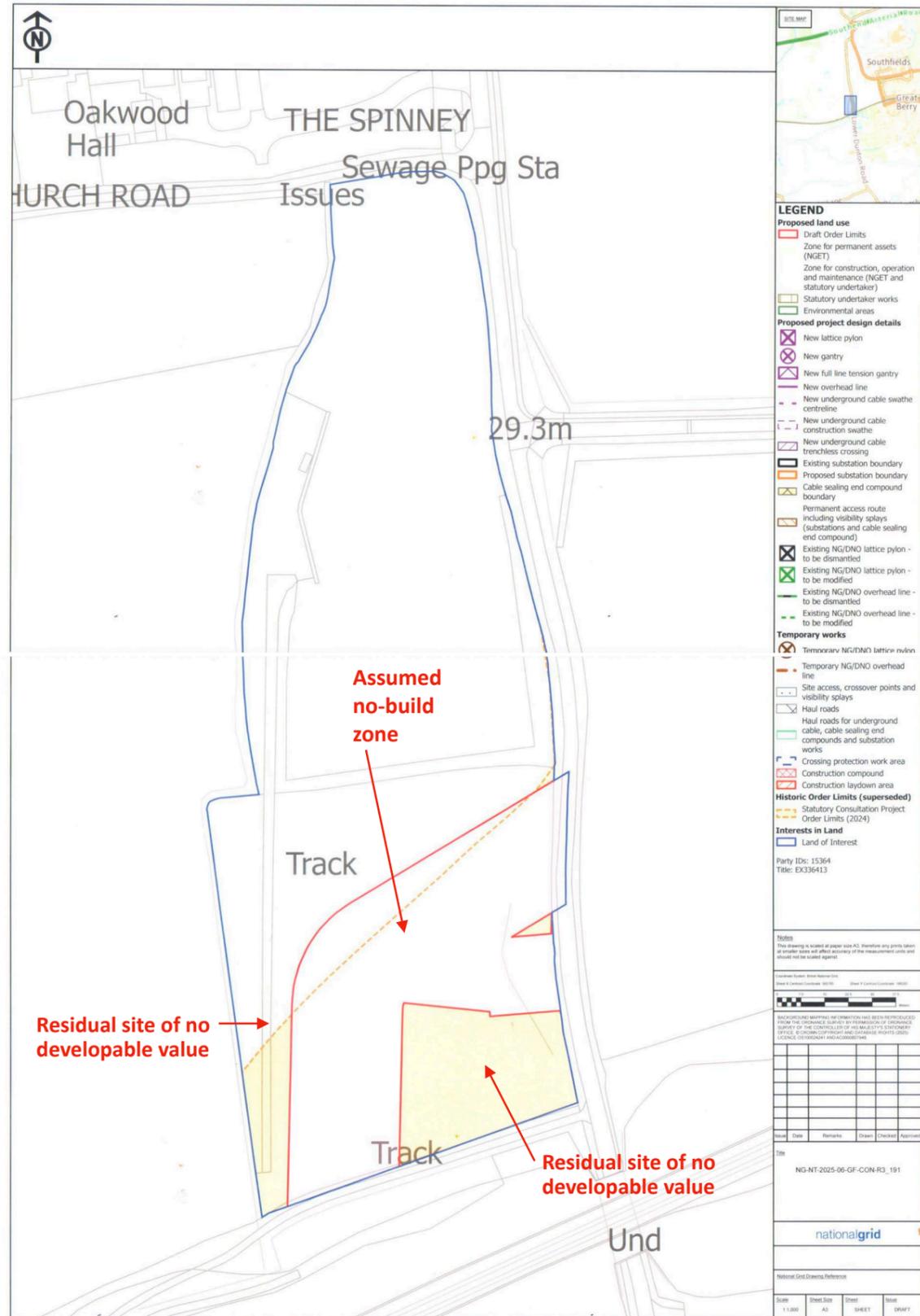
Information on the proposed development of Lynton has also previously been shared with National Grid and the Planning Inspectorate.

This document is not intended to reproduce the above, or any other previously presented information, but to concisely appraise the impact of the proposed electrical infrastructure on the residential development, and to propose some alternative design approaches which could be adopted by National Grid with a modest impact on their infrastructure, greatly mitigating the adverse impact on Lynton's residential development potential.

As is clear from the drawing shown on this page, the proposed electrical infrastructure has a very significant impact on the Lynton site. It is also clear that the routing of the underground cable, and its no-build zone, is quite flexible, as elsewhere on the same plan it is shown as incorporating turns in some cases exceeding 90 degrees, to align with plot boundaries and avoid impacting specific properties.



Map showing one of several versions of National Grid's proposals



# Impact

We are in possession of a number of drawings showing variants of the National Grid proposals.

As we shall explain below, we have attempted on numerous occasions to engage with National Grid, to verify the details of their design, and to understand the rationale behind it. Our hope has always been to establish a direct dialogue with individuals having both relevant technical knowledge and some decision-making authority. Unfortunately, this has not proved possible to date.

For the purposes of the present representations, we have assumed that the plan reproduced on this page (NG-NT-2025-06-GF-CON-R3\_191) represents the most complete and current version of National Grid's proposal.

As is immediately obvious from the drawing shown here:

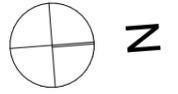
- The no-build zone reserved for National Grid's infrastructure occupies a very significant proportion of the site
- The route of the proposed (underground) cable does not align with any of the site boundaries
- The positioning and alignment of the no-build zone leaves small and irregularly shaped parcels of land to its west and south-east, effectively blighting all of the southern part of Lynton as a residential development site
- The proposed cable is to continue southwards under the railway embankment, confirming the technical viability of crossing the line of the railway viaduct in whatever alignment is determined by other considerations
- The proposed cable passes under Lower Dunton Road, to the east of the site, at an angle with no obvious alignment to any site boundaries or other topographical features

As was noted on the previous page, the routing of the underground cable, and its no-build zone, appears to be quite flexible, as nearby it is shown as incorporating turns in some cases exceeding 90 degrees, to align with plot boundaries and avoid impacting specific properties.

Our immediate conclusion is therefore that the impact of National Grid's infrastructure on the development potential of Lynton is extremely significant but substantially avoidable.

# Impact

This drawing shows National Grid's proposed no-build zone overlaid on Westland Farm Developments' proposed residential development



Residual site of no developable value

<b>Dwellings</b>		Existing trees Trees to be removed New trees Bushes / hedges	Parking places Pavements Roads	Private gardens Communal gardens / spaces
	18 Type 1 a) 3b5p / 50m <sup>2</sup> / 2s			
	22 Type 2 a) 4b6p / 55m <sup>2</sup> / 2s b) 4b7p / 60m <sup>2</sup> / 2s c) 4b7p / 55 / 2,5s			
	10 Type 3 a) 5b7p / 65m <sup>2</sup> / 2s b) 5b7p / 90m <sup>2</sup> / 1,5s			

## SITE PLAN

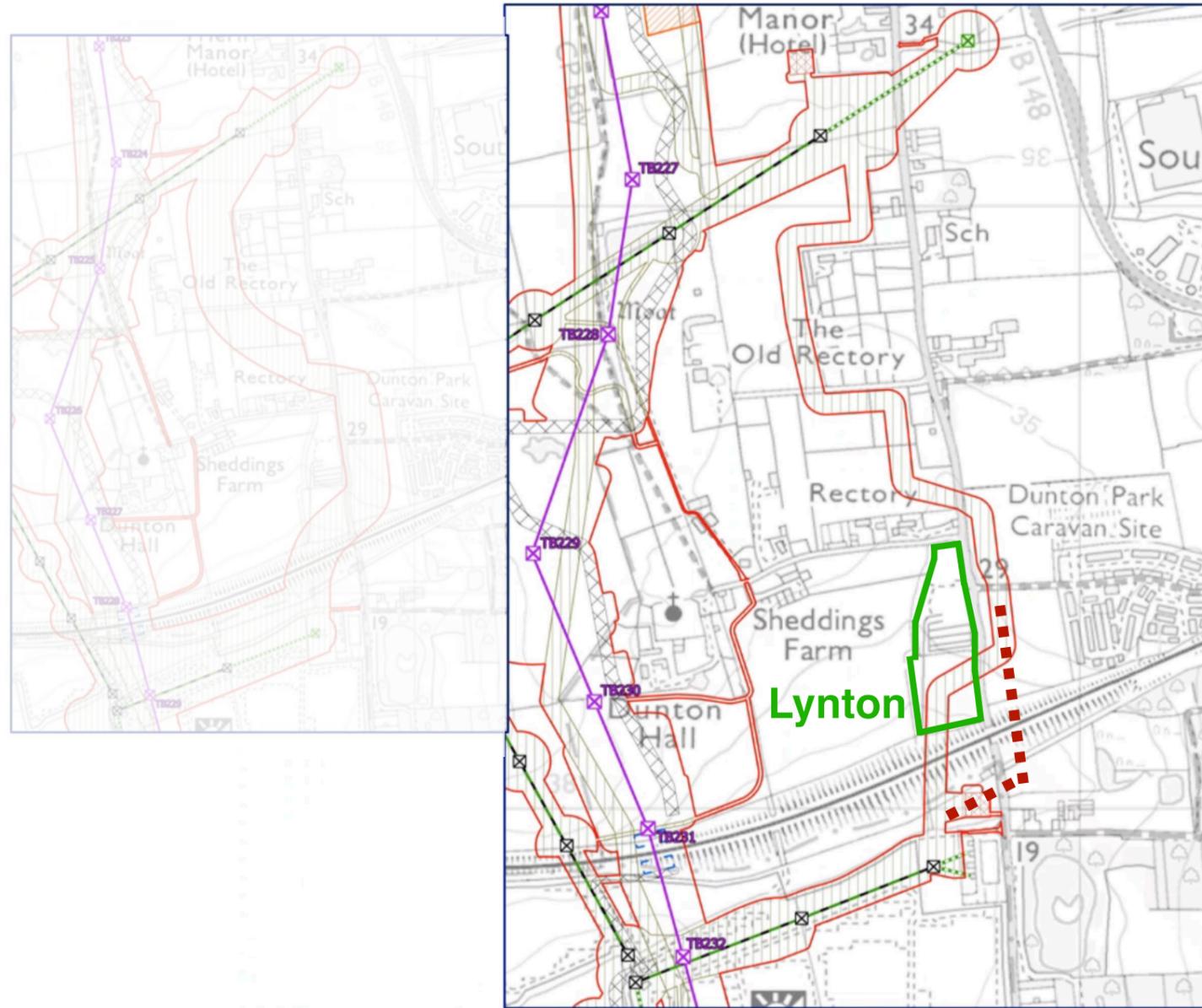
scale: 1:500 @ 700x420  
 drawing nr: 001  
 date: 28/08/2018

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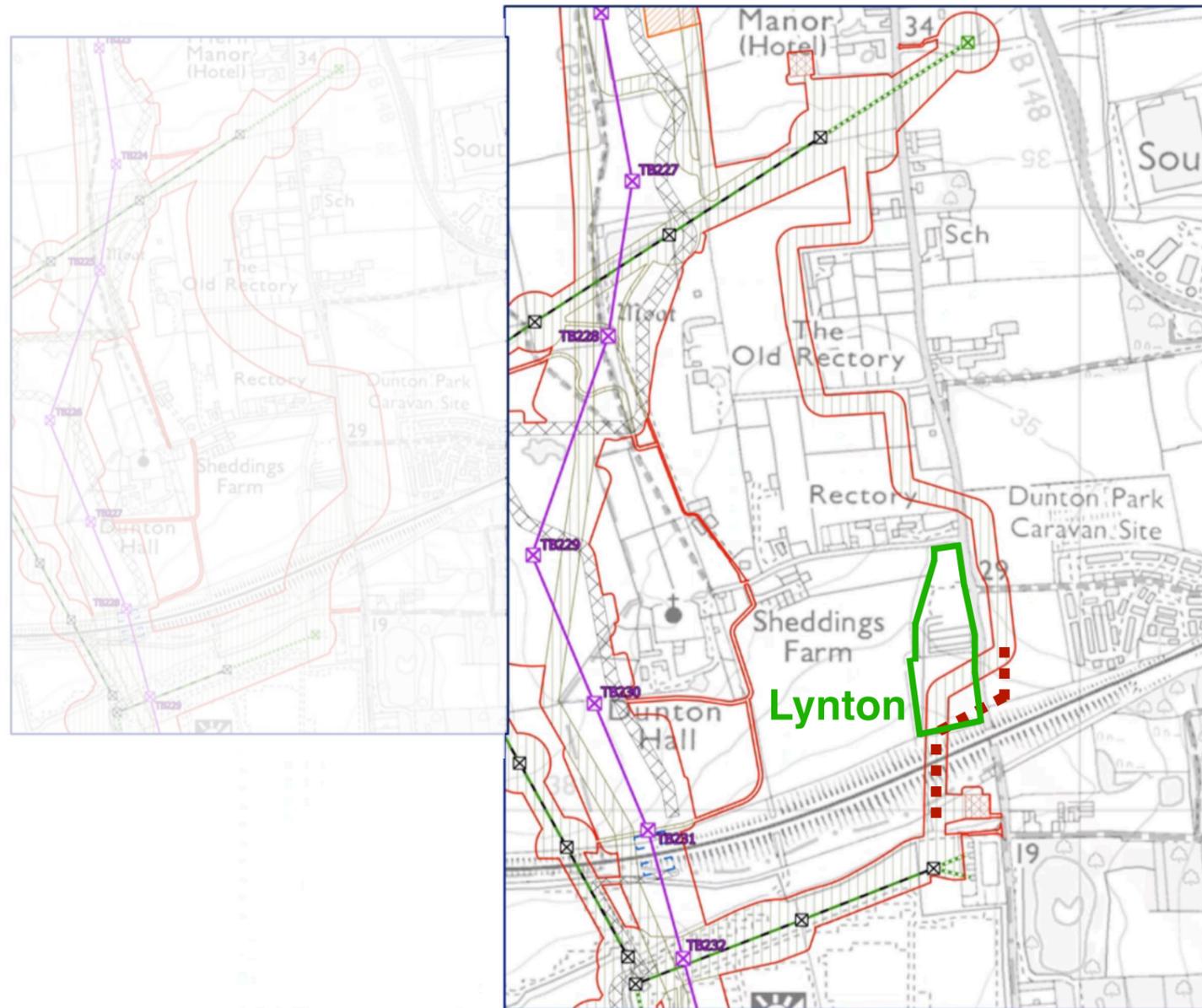
# Alternative A

We would request that National Grid consider an alternative routing of the underground cable, entirely by-passing Lynton to the east and south.



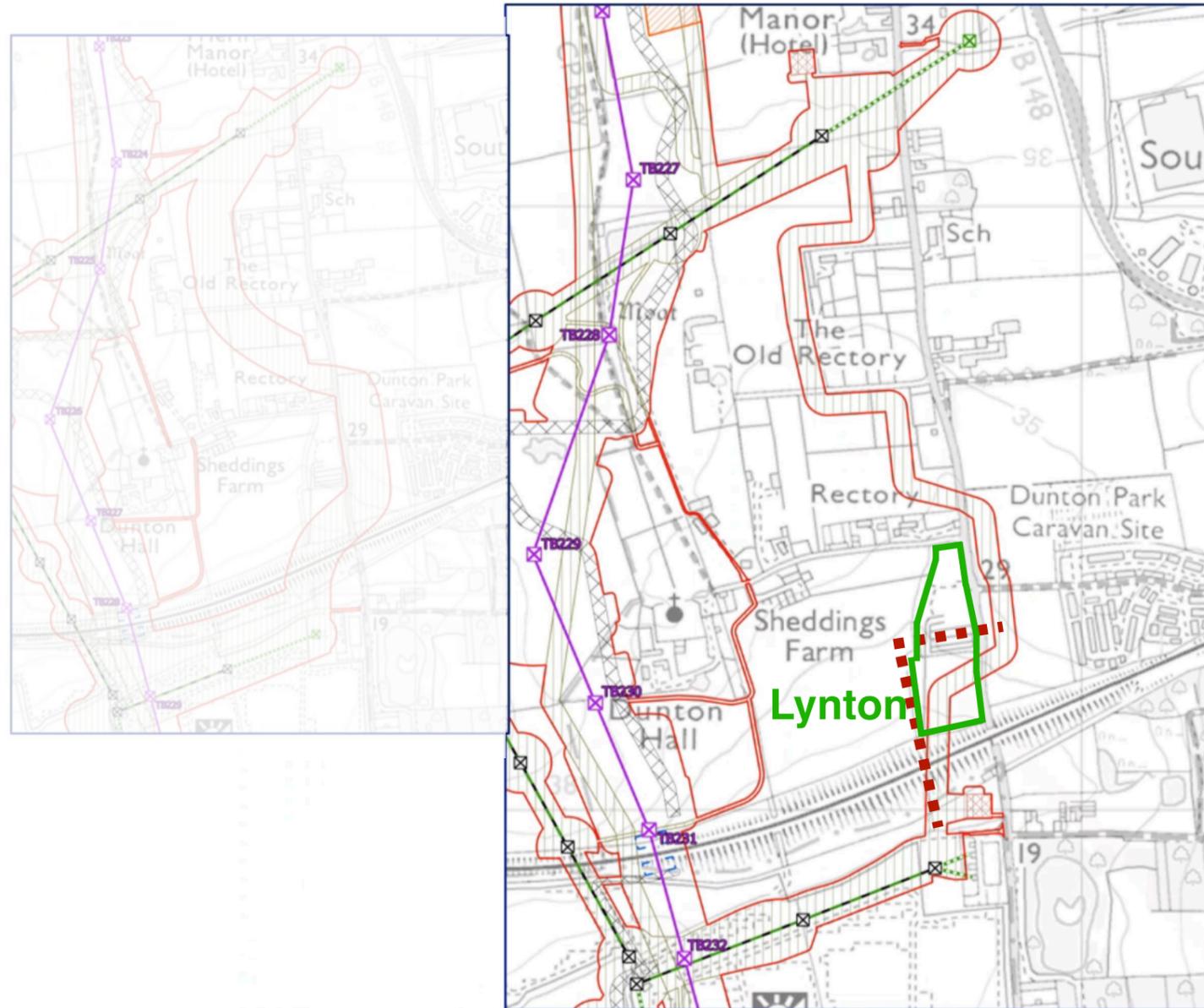
## Alternative B

If our Alternative A is unviable for whatever reason, we would request that National Grid consider an alternative routing of the underground cable, aligned with Lynton's southern boundary, substantially within the zone adjoining the railway embankment which has a higher flood risk and is therefore of limited development value.



# Alternative C

A further alternative which National Grid may consider would route the underground cable through the central part of Lynton, but align the no-build zone with an area dedicated to amenity uses, thus having very limited adverse impact on the residential development. This is shown in greater detail on the next page.



# Mitigated impact

This drawing shows how National Grid's no-build zone could be realigned with gardens within Lynton (Option C).



	18	Type 1 a) 3b5p / 50m2 / 2s		Existing trees		Parking places		Private gardens
	22	Type 2 a) 4b6p / 55m2 / 2s b) 4b7p / 60m2 / 2s c) 4b7p / 55 / 2.5s		Trees to be removed		Pavements		Communal gardens / spaces
	10	Type 3 a) 5b7p / 65m2 / 2s b) 5b7p / 90m2 / 1.5s		New trees		Roads		
				Bushes / hedges				

## SITE PLAN

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# Lack of engagement

As explained above, we do not oppose the Norwich to Tilbury proposal in principle, and recognise its importance to the UK's infrastructure, energy security and economy. We also understand that such a project will inevitably have some adverse impact on land in private ownership. We do believe, however, that National Grid have an obligation to mitigate such adverse impact wherever this is technically possible, and that there is considerable flexibility for National Grid to do so, as is clear from the routing of the proposed underground cable, weaving around various plots of land to the north of Lynton.

We have met on site with N-T Surveys / Fisher German, who have been instructed as National Grid's agents. In our face-to-face meetings with N-T Surveys and our exchanges of e-mails, we were given the impression that our arguments were logical and understood, and would be communicated to relevant decision-makers. Unfortunately, subsequent to our first meeting with N-T Surveys, we received a revision of National Grid's proposals which had a significantly greater adverse impact on Lynton than the previously consulted proposal. We can only therefore assume that N-T Surveys were unable or unwilling to communicate what we had explained to them to the relevant designers and decision-makers, or that our representations were deliberately ignored.

We are also frustrated by N-T Surveys' complete inability to explain the rationale for National Grid's design, or any of the technical constraints within which National Grids are working.

Our overwhelming impression is that N-T Surveys have been instructed as a PR exercise, and have no remit to engage in any meaningful technical discussions, nor to act as a reliable conduit between interested parties such as ourselves and those with the discretion and technical understanding to meaningfully consider our representations and offer a coherent response.

We trust that the Planning Inspector will agree with our sentiments and, at the very least, require National Grid to respond much more meaningfully to the representations contained in this document.



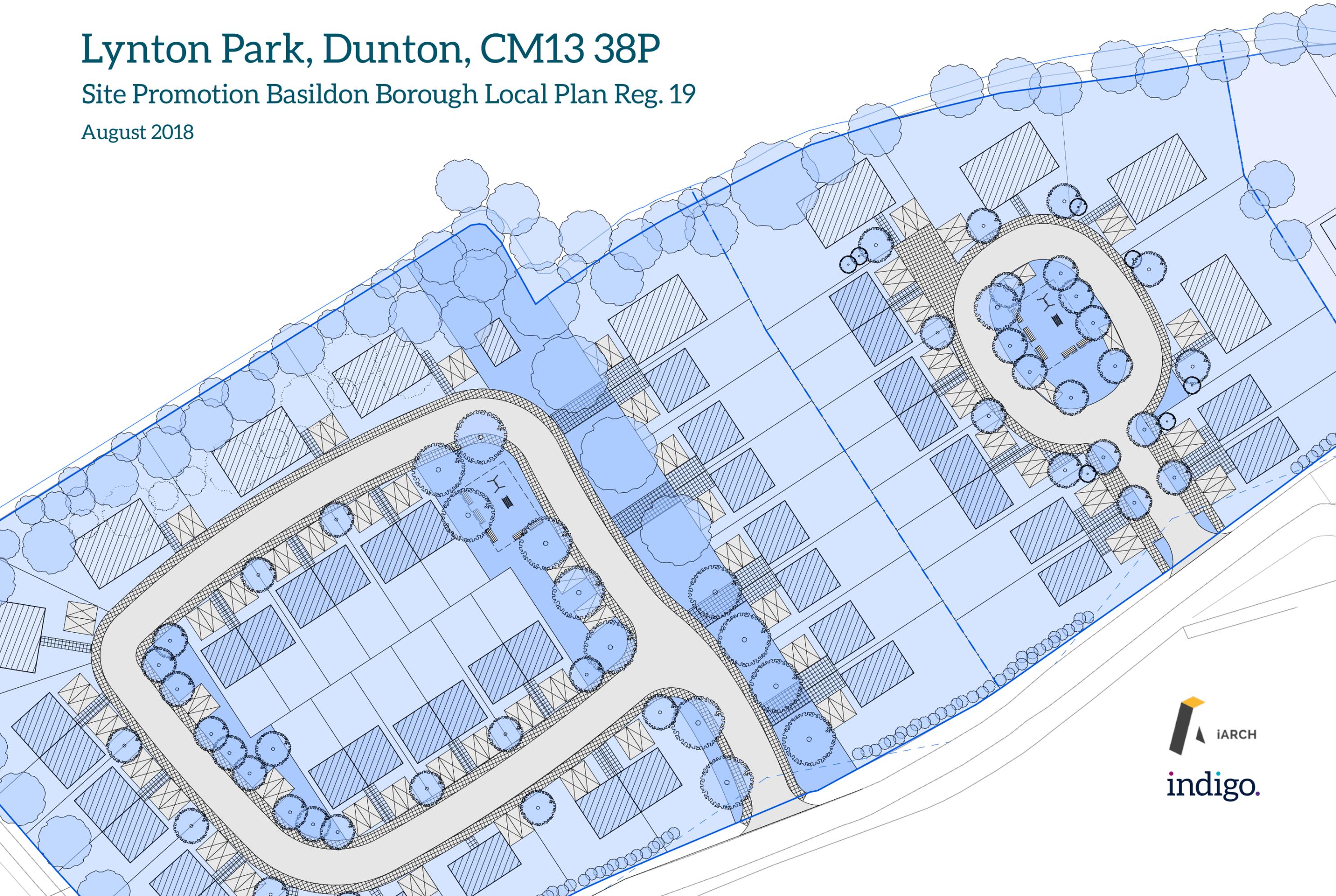
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# Lynton Park, Dunton, CM13 38P

Site Promotion Basildon Borough Local Plan Reg. 19

August 2018



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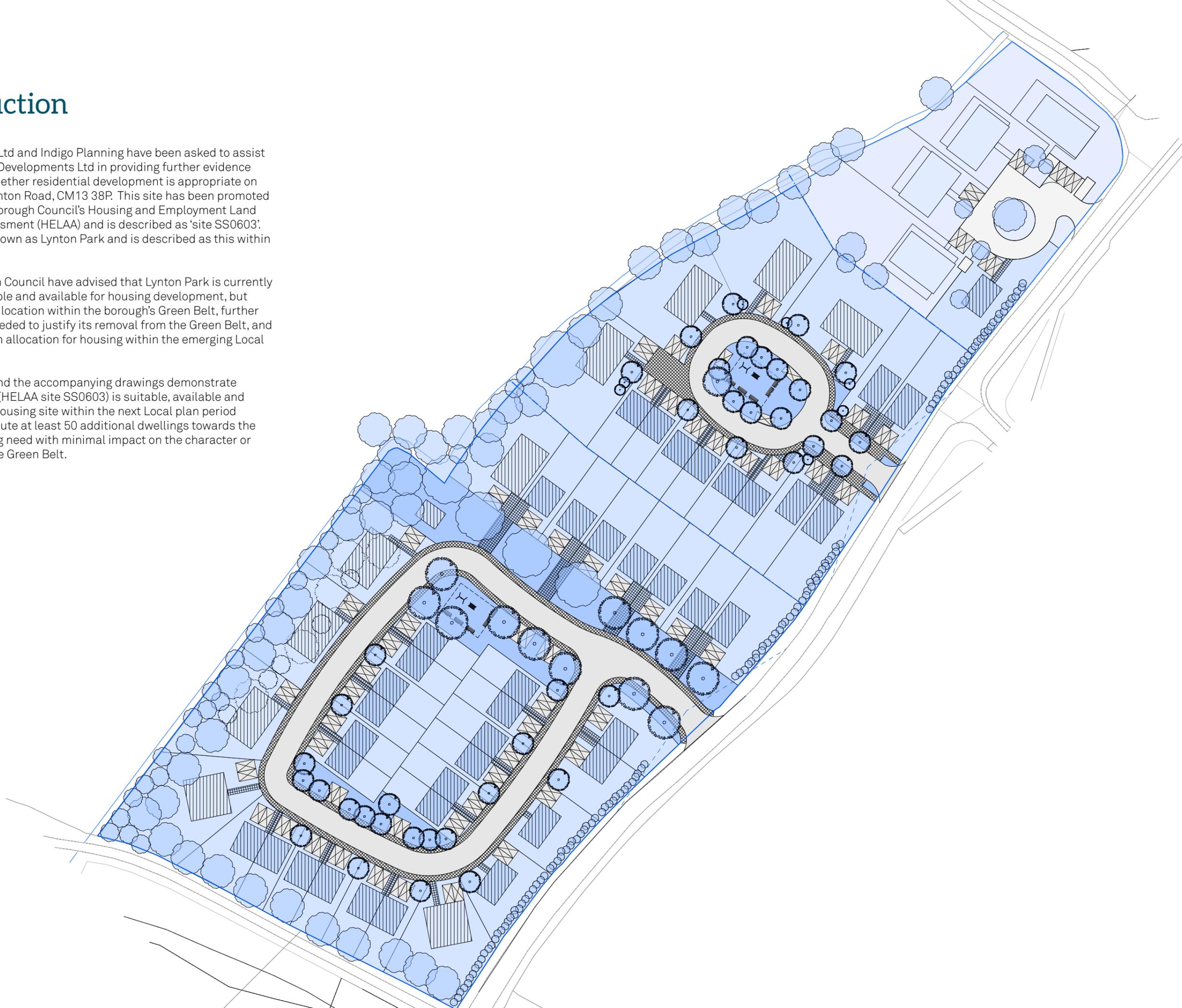
# Lynton Park, Dunton, CM13 38P

Site Promotion Basildon Borough Local Plan Reg. 19

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# 1. Introduction

- 1.1. iArch Consulting Ltd and Indigo Planning have been asked to assist Westlands Farm Developments Ltd in providing further evidence to understand whether residential development is appropriate on land at Lower Dunton Road, CM13 38P. This site has been promoted in the Basildon Borough Council's Housing and Employment Land Availability Assessment (HELAA) and is described as 'site SS0603'. Site SS0603 is known as Lynton Park and is described as this within this document.
- 1.2. Basildon Borough Council have advised that Lynton Park is currently considered suitable and available for housing development, but due to its current location within the borough's Green Belt, further justification is needed to justify its removal from the Green Belt, and its inclusion as an allocation for housing within the emerging Local Plan.
- 1.3. This statement and the accompanying drawings demonstrate that Lynton Park (HELAA site SS0603) is suitable, available and deliverable as a housing site within the next Local plan period and could contribute at least 50 additional dwellings towards the borough's housing need with minimal impact on the character or appearance of the Green Belt.



## 2. Site and surroundings

### The Site

- 2.1. Lynton Park (HELAA site SS0603) is situated close to the western boundary of the Basildon Borough. It lies to the west of Laindon and is currently within the Green Belt. The Northern part of the site benefits from planning consent for four houses (LPA ref: 17/01451/FULL).
- 2.2. Opposite the site, across Lower Dunton Road, is Dunton Park a residential static caravan park, country club and caravan storage facility. To the North, further dwellings and agricultural buildings are spread out along Lower Dunton Road and make up what is known as Dunton village.
- 2.3. Laindon, to the east of the site, is the closest large settlement. It is well served with shops, services and public transport links, including Laindon Train Station which provides four services an hour to London and Shoeburyness. Basildon is also 4km to the east. Basildon is a major town and provides all the key services and employment opportunities.
- 2.4. To the north east of the site is a large area of strategic employment land at Southfields Business Park and the Ford Dunton Technical Centre.
- 2.5. In short, the site is close to shops, services, employment opportunities and good transport links. It is a sustainable site. Furthermore, the character of this area is changing, and it will become more urbanised.

### Emerging Context

- 2.6. Basildon is a borough undergoing significant change. The borough has a significant housing need and must provide at least 18,000 new homes over the next plan period 2014 to 2034.
- 2.7. As part of the emerging Local Plan process, the council has recognised that the borough's Green Belt will need to be rationalised in order to meet the borough's social and economic needs and to allow the borough to expand sustainably. At present, 63% of the borough is Green Belt. Managed release of just 4% of this Green Belt will:
  - maintain the integrity of the Green Belt and its function;
  - safeguard the borough's character; and
  - meet the pressing social and economic needs.
- 2.8. The latest version of the emerging Local Plan, published in March 2018, allocates a number of sites for housing development. Subsequently, some of these housing allocations have been amended or removed from the draft Local Plan and there is now a need to find additional sites capable of accommodating the current shortfall.
- 2.9. Emerging allocation H8, directly opposite Lynton Park on Lower Dunton Road, remains an allocation in the emerging Local Plan. It is identified as being capable of accommodating 300 homes and 7.8ha of sports facilities. This site is greenfield and was previously in the Green Belt. This allocation is effectively an urban extension which significantly changes the context of this part of Lower Dunton Road.
- 2.10. Within this context of an expanding settlement, Lynton Park is an appropriate site for housing either as its own allocation or as an addition to allocation H8.

## 3. Planning Policy Context

- 3.1. It is widely accepted that the need to deliver more homes is the biggest challenge facing planning in the south of England. However, the protection of valued Green Belt land is a long-standing maxim of the planning system. In order to accommodate sustainable housing development, recent national policy allows the loss of Green Belt land that has a limited Green Belt purpose in order to deliver much needed new homes.

### Revised National Planning Policy Framework (NPPF)

- 3.2. An updated version of the NPPF was published in July 2018. One of the key aims of this revised document is to significantly increase the delivery of housing, the supply of housing land and to encourage the more efficient and sustainable use of land.
- 3.3. The revised NPPF maintains that Green Belt boundaries should only be altered in exceptional circumstances and that these exceptional circumstances must be justified.
- 3.4. Paragraph 137 of the revised NPPF confirms that before considering Green Belt release, LPAs should:
- Make as much use as possible of suitable brownfield sites and underutilised land;
  - Optimise the density of development in line with policies in Chapter 11 of the revised NPPF; and
  - Be informed by discussions with neighbouring authorities about whether they could accommodate some of the identified need for development.
- 3.5. If an LPA has done all three of these things, but still cannot meet its housing needs, exceptional circumstances will exist, and suitable sites within the Green Belt should be considered in order to meet housing needs.
- 3.6. Paragraph 136 of the revised NPPF states:
- Strategic policies should establish the need for any changes to Green Belt boundaries, having regard to their intended permanence in the long term, so that they can endure beyond the plan period.*
- 3.7. Therefore, Green Belt boundaries need to be reviewed, with an eye to meeting, not only existing need, but future needs.
- 3.8. Paragraph 139 goes on to confirm that when defining new Green Belt boundaries, plans should:
- a) ensure consistency with the development plan's strategy for meeting identified requirements for sustainable development;
  - b) not include land which it is unnecessary to keep permanently open;
  - c) where necessary, identify areas of safeguarded land between the urban area and the Green Belt, in order to meet longer-term development needs stretching well beyond the plan period;
  - d) make clear that the safeguarded land is not allocated for development at the present time. Planning permission for the permanent development of safeguarded land should only be granted following an update to a plan which proposes the development;
  - e) be able to demonstrate that Green Belt boundaries will not need to be altered at the end of the plan period; and
  - f) define boundaries clearly, using physical features that are readily recognisable and likely to be permanent.
- 3.9. The allocation of Lynton Park for housing in the emerging Local Plan would comply with the relevant criteria a), b), e) and f) and should, therefore, be considered as an appropriate site for release.

- 3.10. In this national context, therefore, the Council has identified locations where land has a limited Green Belt function and could be removed from the Green Belt. This analysis was undertaken in two Green Belt reviews in 2015 and 2017.

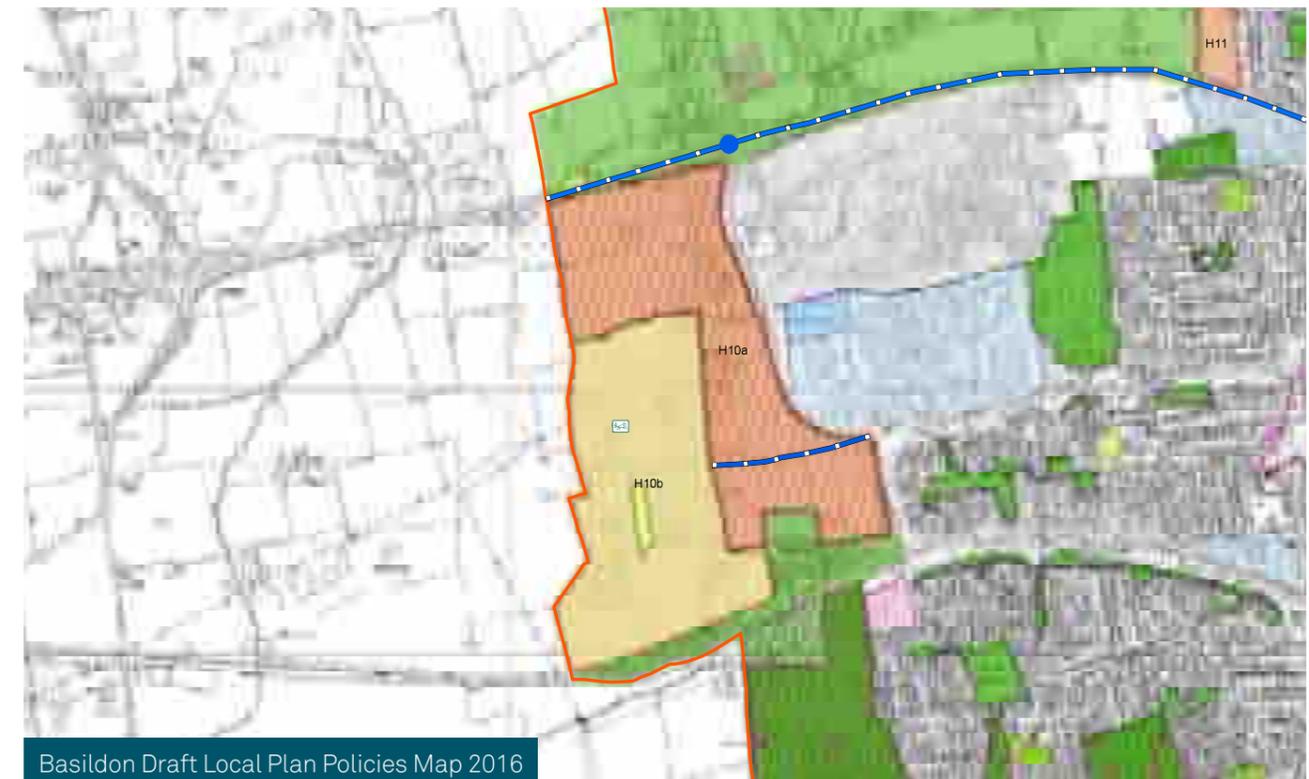
### Emerging Local Policy

#### The Green Belt Review (2015)

- 3.11. The 2015 Green Belt Review identified a number of areas for consideration for release from the Green Belt. Lynton Park was identified within sub area 67, immediately adjacent to sub area 66. The 2015 Green Belt Review (2015) concluded that sub areas 66 and 67 made: "no contribution to the role and function of the Green Belt". It went on to state that the land would "form an appropriate western extension to Basildon and presents the opportunity to create a stronger and more attractive edge to the Green Belt" outside of the borough.
- 3.12. In short, the Council has acknowledged that Lynton Park can be removed from the Green Belt and that removing the site and adjacent land will create a stronger more attractive Green Belt.

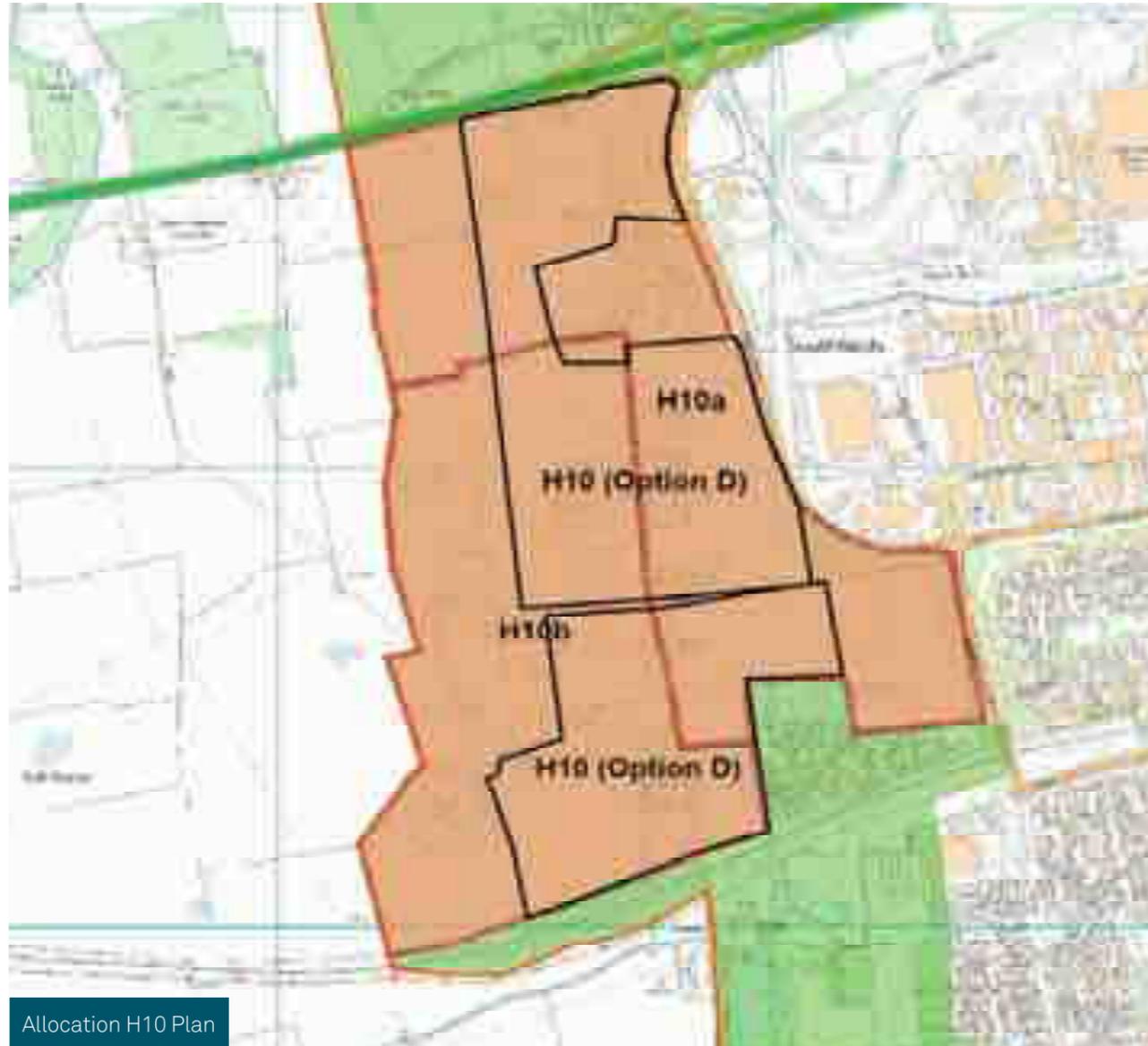
#### Draft Local Plan (2016)

- 3.13. Following the Green Belt Review, the Draft Local Plan was published in early 2016 and Lynton Park was included within a large housing allocation known as H10. Allocation H10 was split into distinct sub-areas, H10a and H10b. Lynton Park was within sub area H10b which was shown on the Policies Map as being "safeguarded for housing".



### 3. Planning Policy Context

3.14. Policy H10 of the draft Local Plan identified sub area H10a as being suitable for 1,000 homes during the plan period. Sub area H10b, including Lynton Park, was safeguarded to provide a further 1,350 homes in the long term.



#### The Green Belt Review (2017)

- 3.15. In 2017 an update to the Green Belt Review was undertaken to ensure consistency with the emerging Local Plan. Sub areas 66 and 67 remained as identified in the 2015 Review.
- 3.16. The 2017 Green Belt Review concluded that sub area 66 has little Green Belt purpose and its removal would “not cause harm to the strategic purpose of the Green Belt”.
- 3.17. However, contrary to the 2015 Review, sub area 67, within which Lynton Park lies, was considered to have Green Belt purpose and the review concluded that it may not be appropriate to allocate the full extent of the sub area for development in the short term.



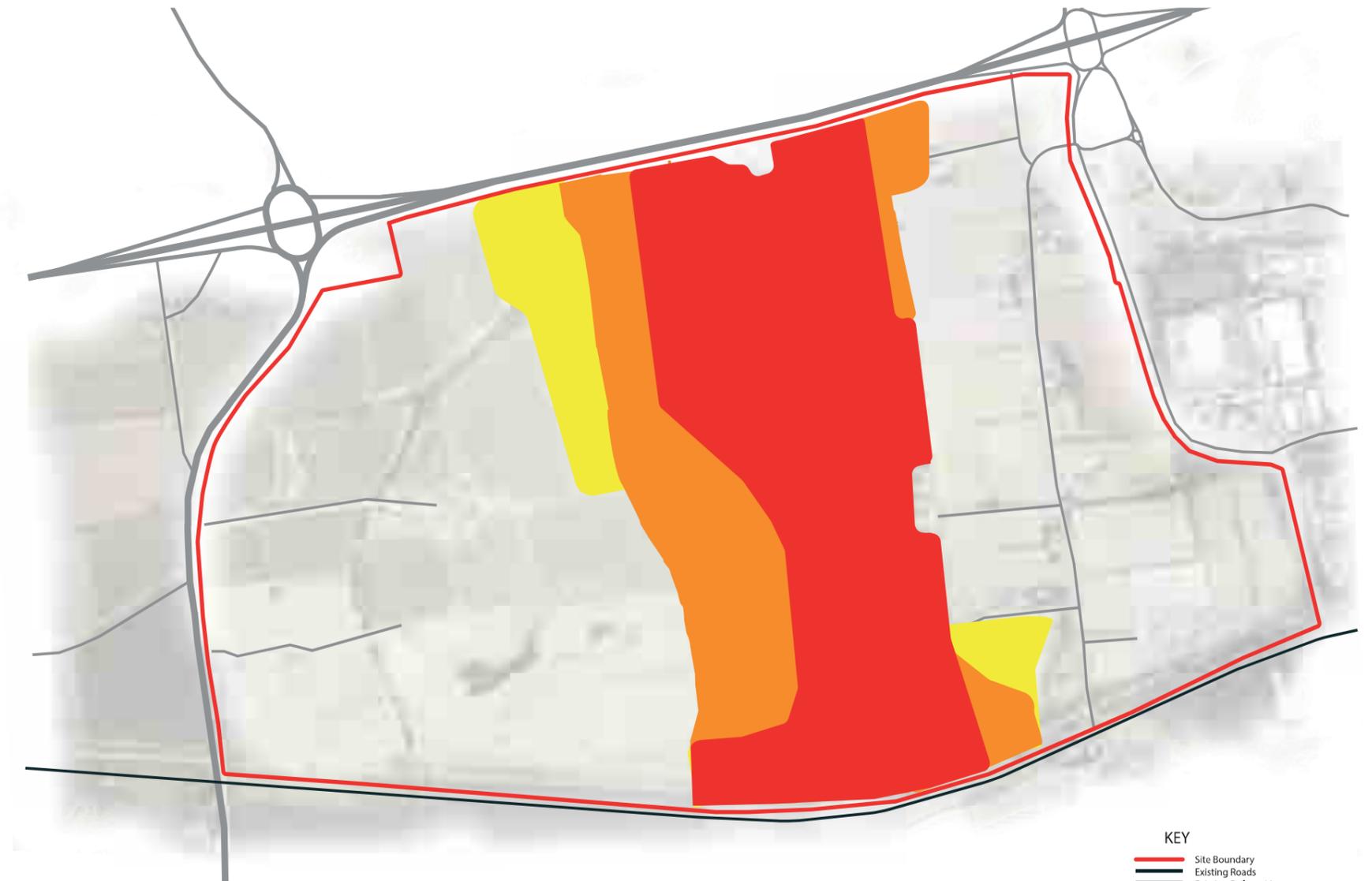
### 3. Planning Policy Context

#### Housing Options Topic Paper (November 2017)

- 3.18. At the same time as the 2017 Green Belt Review was being undertaken, the council produced a Housing Topic paper, which addressed housing opportunities and allocations.
- 3.19. The Housing Topic Paper considered emerging allocation H10 in the wider Dunton area. The Paper concludes that a revised allocation boundary (including Lynton Park) would be appropriate for development without having too much of an impact on coalescence with neighbouring areas.
- 3.20. The Paper recommends the inclusion of a 'landscape corridor', further to the west of Lynton Park in order to maintain the gap between Basildon and Brentwood boroughs in the long term. This address the concern in the 2017 Green Belt Review that the full extent of sub area 67 may not be suitable for Green Belt release.

#### Dunton Area Landscape Corridor Design Options Report (December 2017)

- 3.21. In this document Lynton Park is excluded from the proposed landscape buffer between the borough boundaries of Basildon and Brentwood demonstrating that it is of no particular landscape or ecological importance and that the hedgerows which form the western boundary represent a suitable defensible barrier to the wider Green Belt to the west.



Dunton Landscape Corridor Design Options Map

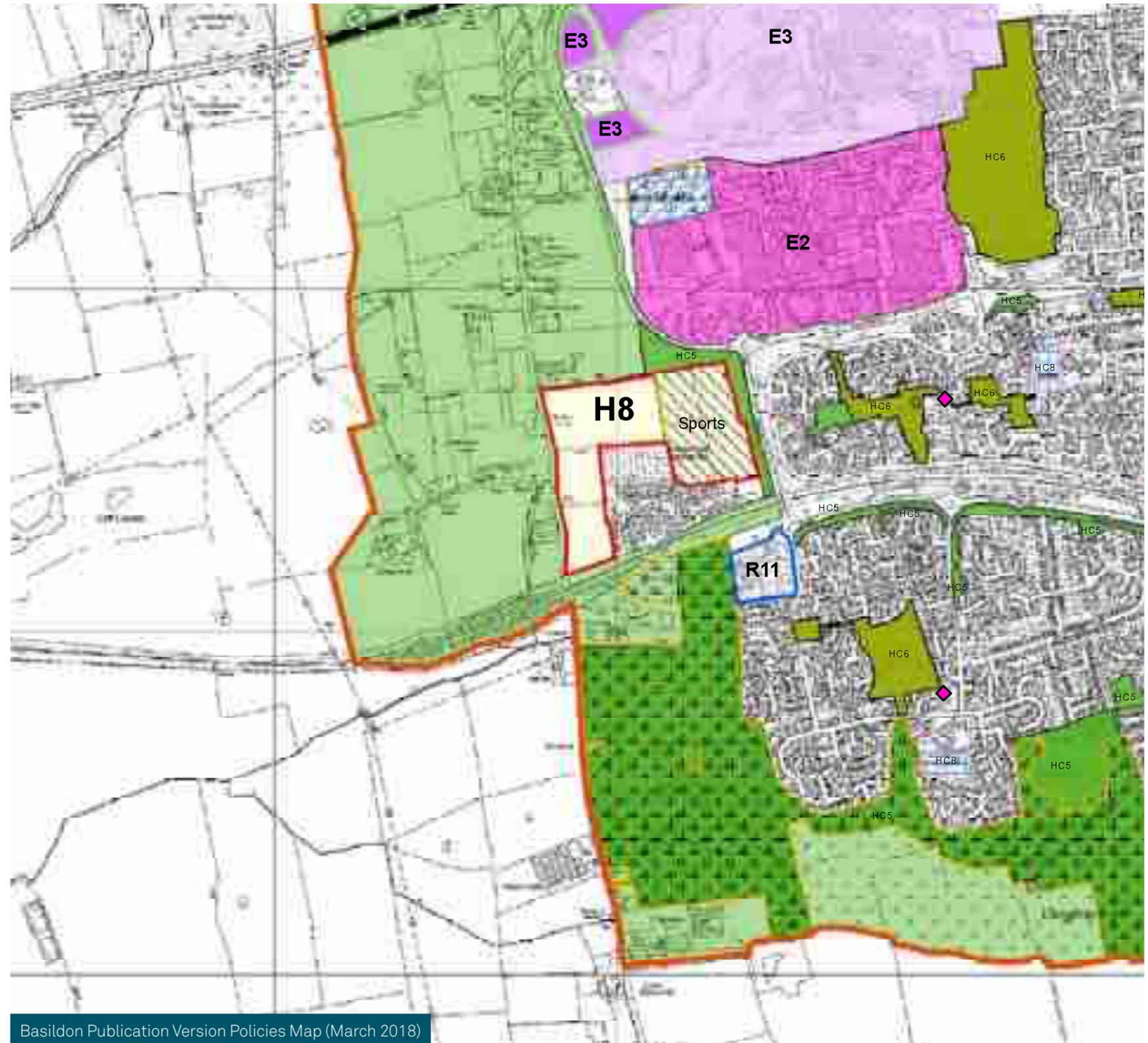
KEY

	Site Boundary
	Existing Roads
	Existing Railway Line
	Scheme 1 Minimal Recommendation
	Scheme 2 Intermediate Recommendation
	Scheme 3 Most Recommended

### 3. Planning Policy Context

#### Draft Publication Version of the Local Plan (March 2018)

- 3.22. In March 2018, the publication version of the emerging Local Plan was published, but not issued for public consultation.
- 3.23. In this draft of the emerging Local Plan, housing allocations were amended, and the land previously included in allocation H10 in the 2016 draft was removed and replaced by a smaller allocation known as H8, which is directly opposite Lynton Park.
- 3.24. Furthermore, Lynton Park and the adjoining land to the west of Lower Dunton Road was no longer safeguarded for future development. This is despite the 2017 Green Belt Review, Housing Topic Paper and Dunton Area Landscape Corridor Design Options Report indicating that some parts of this area, such as Lynton Park, would be suitable for development.



## 4. Suitability of Lynton Park for Housing Development

- 4.1. In order for Lynton Park to be considered suitable, available and deliverable for housing, it will need to be removed from the Green Belt because of exceptional circumstances. The Calverton Parish Council v Greater Nottingham Councils [2015] case sets out the tests required to demonstrate exceptional circumstances, these are:
- *The acuteness/intensity of the objectively assessed need (matters of degree may be important);*
  - *The inherent constraints on supply/availability of land prima facie suitable for sustainable development;*
  - *(on the facts of this case) the consequent difficulties in achieving sustainable development without impinging on the Green Belt;*
  - *The nature and extent of the harm to this Green Belt (or those parts of it which would be lost if the boundaries were reviewed): and*
  - *The extent to which the consequent impacts on the purposes of the Green Belt may be ameliorated or reduced to the lowest reasonably practicable extent.*
- 4.2. In this context, it is clear that there are exceptional circumstances for releasing Green Belt land within the borough. Lynton Park represents an appropriate site to release and allocate for housing as it would cause minimal harm to the Green Belt. Any impacts it would have could be satisfactorily mitigated through the retention of landscaped boundaries, appropriate densities and high-quality design.
- 4.3. The site is located within an area of Green Belt that has been previously considered appropriate for development during the emerging Local Plan process. Lynton Park was only retained as Green Belt in the most recent version of the emerging Local Plan. However, the evidence base clearly recognised that it is suitable and appropriate to remove the site from the Green Belt.

- 4.4. Given the findings of the 2015 and 2017 Green Belt Reviews, the Housing Topic Paper, and the Landscape Corridor Design options Report, the site should be released from the Green Belt because:
- It is not valuable Green Belt land that serves an important Green Belt function;
  - It is location immediately opposite emerging allocation H8;
  - There is a history of residential use on site; and
  - It has a strong defensible boundary on the western edge which screens the site from the remaining Green Belt to the west.
- 4.5. Emerging allocation H8 is subject to Policy H8 in the emerging Local Plan. Policy H8 states that the site is capable of delivering around 300 new homes at a density of 30dph and that it is well located with good access to employment areas, local services and amenities, including Laindon railway station and Laindon Town Centre. The same must be concluded in respect of Lynton Park. In short, Lynton Park is a sustainable site.
- 4.6. Furthermore, once allocation H8 is developed, it will significantly alter the character of this part of Lower Dunton Road. Lynton Park represents an opportunity to provide approximately 50 additional sustainable homes towards the borough's housing target as part of the wider H8 allocation.

### Summary

- 4.7. Lynton Park should be reinstated as a development site in the emerging Local Plan as it is a small slither of Green Belt on the boundary of emerging allocation H8, with minimal landscape value.
- 4.8. The site is sustainable as it has good access to employment areas, local services and amenities including Laindon railway station.

## 5. Lynton Park Masterplan

- 5.1. This layout demonstrates that the site can comfortably accommodate 50 new homes, at a density of circa 19dpha. If higher densities were supported, at 35dpha, the site could accommodate up to 90 new homes.
  - 5.2. The proposed masterplan includes the site of the former Lynton Dog Kennels on Lower Dunton Road. The site divided into distinct parts, each with a separate access, identity and means of way finding and orientation.
  - 5.3. **Area A** comprises four detached houses previously approved under Planning Reference 17/01451/FULL, with a fifth, more compact house completing the enclosure of the 'paddock' by occupying the vacant area immediately to the south of the existing vehicular and pedestrian access.
  - 5.4. **Area B**, constitutes the next substantial phase of the development, is also arranged around a central 'village green', located on the axis of its independent vehicular and pedestrian access.
  - 5.5. **Area C** is the final and largest phase of the development, occupying the southern half of the available land, towards the railway embankment. A generously landscaped 'avenue' provides the main access to this area, with buildings set well back from the carriageway and footpaths, behind substantial communal amenity areas.
  - 5.6. Whilst each of the three phases has a distinctive scale and identity, all follow similar design principles. For example:
    - Seen from Lower Dunton Road, to the east of the site, the development forms an integral extension of the settlement area. It follows that buildings closest to Lower Dunton Road are generally 2-storeys high, and of modest size, similar to the majority of new homes being developed in the wider neighbourhood, including those likely to be built in future to the east of Lower Dunton Road on allocation H8. Whilst the majority of the existing hedgerow along the Lower Dunton Road boundary may be retained, to provide occupiers with privacy and screen them from through traffic, there will be no attempt to block views of the development entirely, and no major additional planting is envisaged along this boundary.
    - Lynton Park will become the edge of the redefined Green Belt to the west of Basildon. It follows that buildings along the western boundary of the site are all substantial bungalows, similar to those previously permitted in the northern part of the Lynton and are substantially screened from the green belt to the west by dense, existing trees, shrubs and hedgerows, supplemented where necessary by additional planting.
  - The development becomes more typically urban furthest from its boundaries and closest to its well screened heart. The only semi-detached and/or 2.5-storey houses are therefore located well away from the eastern and western boundaries of the site.
  - Each part of the development incorporates at least three different house types, the intention being to achieve a balance of unit sizes and typologies.
  - All homes are provided with a minimum of two, private off-street parking spaces, arranged in a variety of configurations, to suit individual unit typologies and plot locations and sizes. Additional visitors' parking spaces are distributed around all parts of the development, broken up by contrasting hard and soft landscaping.
  - Throughout the masterplan, there is a clear, hierarchical progression from public to private territories, respecting the principle that front elevations should face each other, and rear elevations should back onto each other. Whilst the masterplan incorporates a wealth of retained, preserved and new landscaping, this is never allowed to compromise the security of individual properties or the surveillance of public areas.
  - 5.7. This master planning work demonstrates that the site can be attractively developed to deliver a minimum of 50 homes. The site will provide high quality living accommodation and a strong defeasible boundary created by the existing ditch and tree line to the West in a discrete area that has no detrimental impact (visual or otherwise) on the integrity of the Green Belt or country side.
- ### Technical issues
- 5.8. We have considered the following technical issues related to Lynton Park:
    - Highways;
    - Ecology;
    - Heritage;
    - Flooding; and
    - Contamination
  - 5.9. The site is in flood zone 1 and we are not aware of any other technical highways, heritage, ecology or contamination issues which would prevent the delivery of the site. Therefore, the site is unconstrained and development could come forward in the short term.

# 5. Lynton Park Masterplan

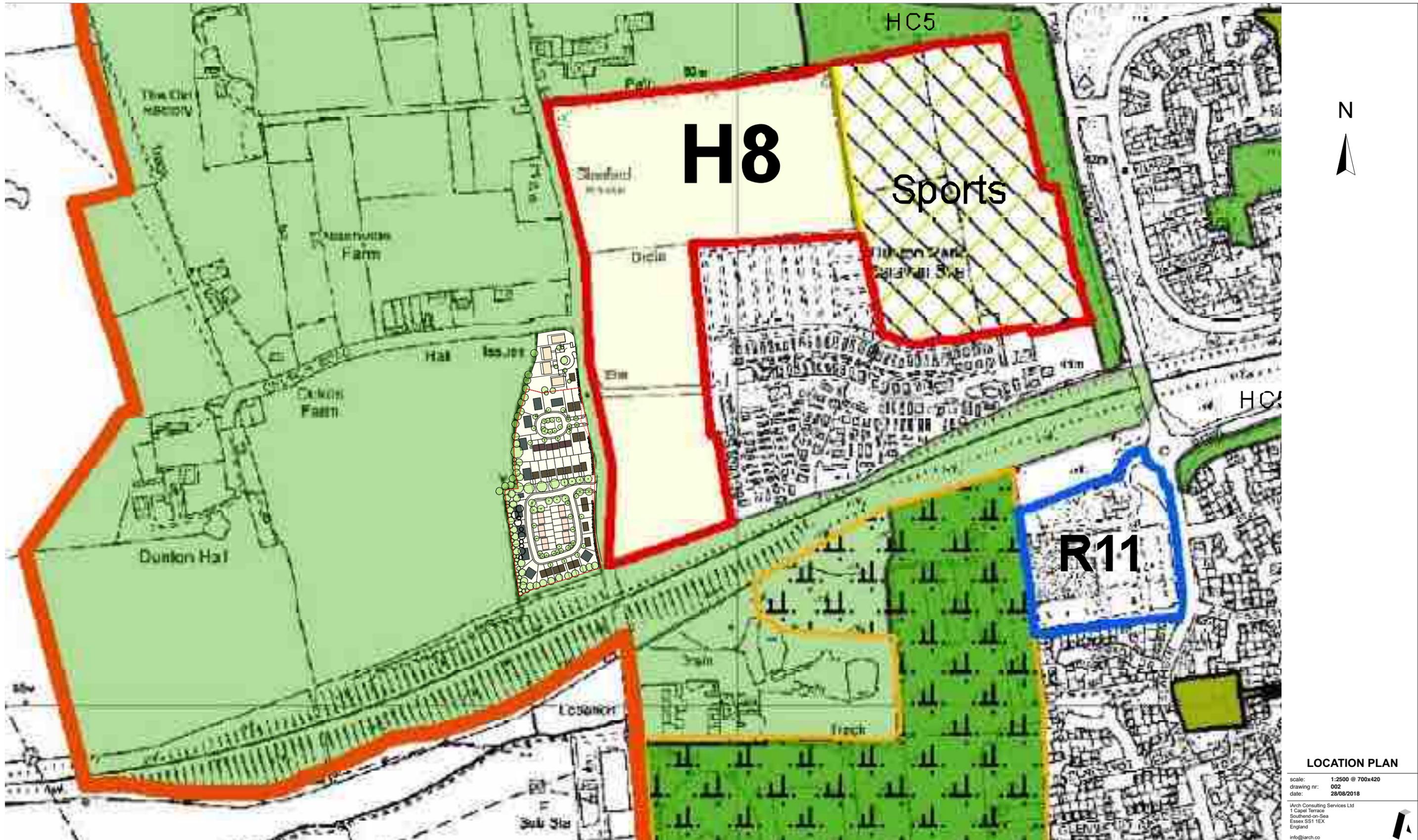


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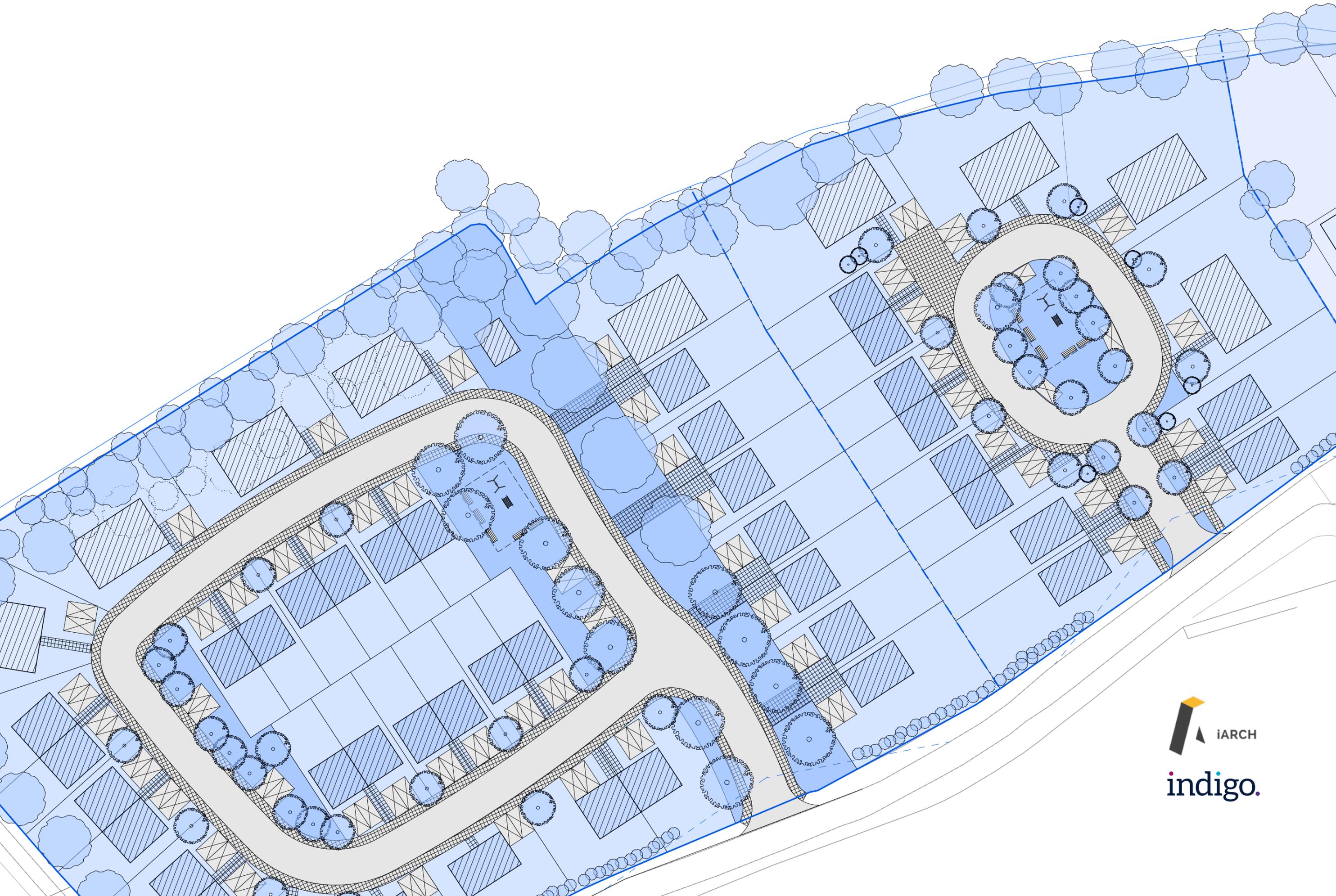
## 5. Lynton Park Masterplan



## 6. Conclusions

- 6.1. Lynton Park is a sustainable and appropriate site for housing and would meet the tests required for its release from the Green Belt.
- 6.2. The site's relationship with emerging allocation H8, the extant planning permission for four dwellings on the northern most part of the site and the strong defensible boundary created by the tree line and drainage ditch on its western edge make the site appropriate for development. Over a number of years, the Council has earmarked the site for release from the Green Belt. It has been acknowledged in various evidence base assessments and documents that the site's release from the Green Belt will have no harmful impact on the purpose and function of the Green Belt.
- 6.3. Therefore, Lynton Park is suitable and available in the short term to deliver at least 50 new homes towards Basildon's housing need. Therefore, Lynton Park should be allocated for development in the next version of the emerging Local Plan.





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