



Brentwood Local Plan Regulation 18 Consultation 2018

Land at Hillcrest Nurseries, Ingrave

Prepared on behalf of Clearbrook Group PLC

March 2018

COPYRIGHT © STRUTT & PARKER. This publication is the sole property of Strutt & Parker and must not be copied, reproduced or transmitted in any form or by any means, either in whole or in part, without the prior written consent of Strutt & Parker. The information contained in this publication has been obtained from sources generally regarded to be reliable. However, no representation is made, or warranty given, in respect of the accuracy of this information. We would like to be informed of any inaccuracies so that we may correct them. Strutt & Parker does not accept any liability in negligence or otherwise for any loss or damage suffered by any party resulting from reliance on this publication.

Contents

1.0 Introduction..... 4

2.0 Need for Retirement Accommodation 5

3.0 Proposed Approach to Meeting Development Needs..... 7

4.0 Land at Hillcrest Nurseries, Ingrave 9

5.0 Summary 13

Appendix 1 – Location Plan

1.0 Introduction

- 1.1 These representations on the Brentwood Local Plan Preferred Site Allocations Regulation 18 Consultation (2018) (PSA 2018) are submitted by Strutt and Parker on behalf of Clearbrook Group PLC, and in relation to land at Hillcrest Nurseries, Ingrave.
- 1.2 The site which is the subject of these representation is site reference 146 in the Council's Site Assessment Methodology and Summary of Outcomes (January 2018), and referred to as Land adjacent Hillcrest Nursery, Herongate / Ingrave within this process.
- 1.3 A location plan for this site is provided as **Appendix 1**.
- 1.4 The site is considered sustainable and deliverable to provide retirement flats to help meet an identified need within the Borough.
- 1.5 Allocation and subsequent development of the site also gives rise to the potential for improvements to the adjoining Ingrave Johnstone Church of England Primary School.
- 1.6 This representation explains how allocation of land at land at Hillcrest Nurseries, Ingrave for retirement housing would be justified, effective, consistent with national policy and would help ensure the Local Plan is positively prepared.

2.0 Need for Retirement Accommodation

- 2.1 The National Planning Policy Framework (NPPF) places great importance on Local Plans seeking to meet development needs, identifying this as a fundamental element of the presumption in favour of sustainable development (paragraph 14); and a requirement of a sound Local Plan (paragraph 182).
- 2.2 The NPPF also requires Local Planning Authorities to plan for a mix of housing based on current and future demographic trends and the needs of different groups in the community, and expressly references the need to plan for older people (paragraph 50). The NPPF defines 'older people' as people over retirement age, noting that this includes the active, newly-retired through to the very frail elderly, whose housing needs can encompass accessible, adaptable general needs housing for those looking to downsize from family housing and the full range of retirement and specialised housing for those with support or care needs.
- 2.3 At a national level, the population is ageing. The Office for National Statistics (ONS) reports that by 2039, the number of people age 75 and over is expected to double from 5 million to nearly 10 million.
- 2.4 The demographic change does not simply mean that additional C2 (extra-care) accommodation will be required. McCarthy & Stone's in-depth study *Retirement Housing: Integral to an ageing Britain* (2017) found that of those aged over 65, approximately 5.7 million people in the UK were potentially looking to downsize. This figure is projected to rise to 11 million by 2036.
- 2.5 Enabling people to downsize through the provision of appropriate accommodation would of course have a positive impact on the housing market, as larger homes become available to those who require them.
- 2.6 At the local level, the population of Brentwood Borough aged over 65 as a percentage of the total population is projected by ONS to increase from 20% in 2014, to 26% in 2037. In absolute terms, the total population aged over 65 is projected to increase from 15,000 in 2014 to 23,000 by 2037.
- 2.7 Clearbrook Group PLC, as part of a previous planning application¹, commissioned their own research in respect of need for retirement housing in the Borough. This confirmed the need for retirement housing in Brentwood Borough, and that there was a particular need for private sector retirement housing. The planning application was refused and appealed. The appeal² was dismissed, but the Inspector noted (paragraph 31) that a significant amount of evidence had been provided to demonstrate a need for sheltered

¹ Application reference 14/01024/FUL | Construction of 27 residential retirement flats with communal facilities; separate staff, visitor and coach parking for Ingrave Johnstone Church of England Primary School and an extended school playground; construction of a new access to serve both developments; associated landscaping, and a new greensward to Brentwood Road. | Hillcrest Nurseries Brentwood Road Herongate Essex CM13 3NZ

² Appeal Decision APP/H1515/W/15/3132571 11 February 2016

accommodation of the type proposed; that the need was not disputed by the Council; and concluded that the proposed development would clearly make a contribution to meeting local need.

3.0 Proposed Approach to Meeting Development Needs

The proposed approach to retirement housing / accommodation for older people

- 3.1 As noted earlier within this representation, there is evidently a need for retirement accommodation within the Borough; and the NPPF requires that the Local Plan seek to meet this need.
- 3.2 The PSA is silent on retirement housing.
- 3.3 The PSA does seek to address specialist accommodation needs, including residential care / nursing care (C2). However, as the NPPF recognises, older people's housing needs are not restricted to residential care / nursing care, and there is also a need for retirement accommodation.
- 3.4 It is suggested that the Local Plan should look to address retirement accommodation. Not only is it a requirement of the NPPF, but provision of retirement accommodation has potential significant benefits to the Borough's housing stock, as older people will be able to downsize.
- 3.5 Looking at the proposed approach to C2 development, we suggest that, whilst a need is recognised, the effectiveness of the policies to meet this need is questionable. The PSA states (paragraph 71) that the Council will "expect" the "majority" of future provision to be located within larger sites; and that Brentwood Town Centre and main urban areas "may" also provide opportunities. It is not clear if such sites are available, and how they will be delivered.
- 3.6 The PSA identifies five larger sites within which it is suggested that C2 facilities may be integrated. It is not clear if C2 development is deliverable within these locations.
- 3.7 Dunton Hills Garden Village is intended to be a new settlement (PSA, paragraph 34). As such, focussing C2 development there – and failing to provide a greater amount within existing settlements – will potentially deprive existing residents of the Borough an opportunity to continue living within their home town and community, in the event they require extra care accommodation. The Local Plan should seek to ensure a proportionate provision of C2 facilities and retirement accommodation for the Borough's various settlements.

Spatial Distribution of Growth

- 3.8 Ingrave is identified within the Borough's settlement hierarchy as a 'Large Village' (Category 3). Whilst the PSA does not define such settlements, previous iterations of the Local Plan notes that these are served by a local shopping parade and a primary school. They generally have some community and health facilities, some local jobs and a variable bus service. In short, they are established communities with some facilities and services which should be considered suitable for a proportionate level of growth.

- 3.9 Indeed, it should be noted that the NPPF recognises the important role planning has in sustaining smaller communities. At paragraph 55 it states planning policies should ensure retention and development of local services and facilities in villages, such as local shops, meeting places, sports venues, cultural buildings, public houses and places of worship. Clearer, ensuring a proportionate level of growth is directed to such settlements will assist in this regard.
- 3.10 However, the PSA currently proposes no growth be directed to Ingrave over the entirety of the plan period. The current proposed spatial strategy fails to ensure the sustainable growth of Ingrave. The proposal to direct none of the Borough's housing need to Ingrave is inconsistent with national policy, and the approach is not justified.
- 3.11 It should be noted that Ingrave has a strong functional relationship with Herongate, with the settlements adjacent to one another. Indeed, the PSA notes (Figure 14) that the settlements are linked. Herongate is also identified by the Council as a Category 3 – Large Village in the settlement hierarchy. However, again no growth is proposed to be directed to Herongate.
- 3.12 The failure of the PSA to ensure the sustainable growth of either Herongate or Ingrave is considered to be a substantial flaw, rendering the current strategy contrary to national policy. If the Local Plan were to persist with such an approach, it is considered that it would not be sound.

4.0 Land at Hillcrest Nurseries, Ingrave

- 4.1 The site (reference 146 in the Council's plan-making process) is located outside of, but immediately adjacent to the existing settlement boundary of Ingrave in the current Development Plan.
- 4.2 The site assessed by the Council measures 0.74 ha and forms the northern part of Hillcrest Nurseries, which in total measures approximately 1.6 ha.
- 4.3 It is rectangular in shape and was previously a paddock with the main stables sited on the northern edge of the nursery.
- 4.4 The site contains a number of trees (generally in poor condition, as identified through previous planning application work) and is characterised by scrub. In terms of topography, the site is relatively flat.
- 4.5 The site is on land which is currently allocated as Green Belt in the now out-of-date Development Plan (the Brentwood Replacement Local Plan (2005), which will be superseded by the new Local Plan currently being prepared. Land to the north, south, and east is outside of the Green Belt and forms part of the designated residential area.
- 4.6 Ingrave Johnstone Church of England Primary School is located immediately to the north of the site, beyond which are existing residential properties. The existing school access is via a narrow track adjoining the northern boundary of the site, which is understood to date back from the early 20th century, when the village school was considerably smaller.
- 4.7 To the west of the of the site is the existing school playing field; to the south-west residential dwellings.
- 4.8 To the east is Brentwood Road – the main road running through the village on a north-south axis. On the eastern side of this are, again, residential dwellings.
- 4.9 The locality is very much residential in character.
- 4.10 The site has a planning history which includes an application for 27 retirement flats with communal facilities; separate staff, visitor and coach parking for Ingrave Johnstone Church of England Primary School and an extended school playground (application reference 14/01024/FUL). The application was refused and was subject to an appeal, which was subsequently dismissed.
- 4.11 The reasons for the dismissal of the appeal can be summarised as follows:
- Inappropriate development in the Green Belt, which would harm openness.
 - Harm to the character and appearance of the area.
 - Failure to provide sufficient affordable housing.

- 4.12 In respect of the concerns relating to harm to the character of area and lack of affordable housing, these are functions of the details of the specific proposal that was subject to appeal; as opposed to potential fundamental concerns as to whether the site could be suitable for development.
- 4.13 In respect of the development being inappropriate development in the Green Belt, it is very much relevant to note that whilst this is of course very much relevant to a Section 78 appeal; in respect of plan-making, and given that the Council acknowledges the new Local Plan must release some Green Belt in order to meet development needs, it is necessary to consider the site's contribution to the purposes of the Green Belt.
- 4.14 As per the NPPF, the Green Belt serves five purposes:
- to check the unrestricted sprawl of large built-up areas;
 - to prevent neighbouring towns merging into one another;
 - to assist in safeguarding the countryside from encroachment;
 - to preserve the setting and special character of historic towns; and
 - to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.
- 4.15 The Council has undertaken a Green Belt assessment at the Borough level. This entailed dividing the Borough into a number of parcels of varying size, and appraising their contribution to the Green Belt. Land at Hillcrest Nurseries is within Assessment Parcel 19 on the eastern edge of this parcel. Assessment Parcel 19 'West of Ingrave' was assessed, in the draft document, as making a high overall contribution to the Green Belt. However, it should be noted that Assessment Parcel 19 is 682.28 ha. Land at Hillcrest Nurseries is 0.74 ha and as such makes up a very small proportion (0.1%) of the Assessment Parcel. Evidently, impact of the development of Assessment Parcel 14 would have a very different impact on the Green Belt than development of the land at Hillcrest Nurseries. In addition, impact of development within Assessment Parcel 14 would have varying impacts on the Green Belt depending on its location and scale. As such, in terms of examining the specific impact of land at Hillcrest Nurseries' removal from the Green Belt, the Council's Green Belt assessment provides little evidence to support or reject its removal from the Green Belt. Certainly, alone, the Green Belt assessment does not provide robust justification for the rejection of the site.
- 4.16 Looking at this specific site's contribution to the purposes of the Green Belt, its relationship with the existing residential envelope is considered particularly relevant. To the north is existing residential development and a school. To the east, south and south-west is also existing residential development. As such, the site is surrounded by existing residential development. The site does not represent open countryside, and as such its development would not entail encroachment into the countryside. Furthermore, given the site's relationship with existing development, its development could not constitute unrestricted sprawl. The site is very much contained by surrounding features.

- 4.17 In terms of impact on historic setting of a settlement, the scale of the proposed development is considered to result in nominal impact in this sense, as it would appear a proportionate and unobtrusive addition to the existing settlement. Herongate Conservation Area is the nearest Conservation Area, but is located some distance to the south of the site and is very much functionally separate from it.
- 4.18 In respect of the potential for development of the site to engender coalescence between Ingrave and Herongate, it should be recognised that there is existing residential and retail development along the eastern side of Brentwood Road which runs south, past the southern boundary of the site being promoted for allocation and closer to Herongate than the proposed allocation. A gap between Ingrave and Herongate would be maintained by the school playing field, the southern part of the nursery site, and Ingrave Common (cricket pitch). It is not considered that the development of the site proposed would materially alter the separation between the two settlements insofar as it currently exists.

Sustainability Appraisal

- 4.19 The Sustainability Appraisal (SA) of the Brentwood Local Plan (Interim SA Report) (January 2018) takes a very simplistic approach to assessing the sustainability of potential development sites. The NPPF confirms there are three dimensions to sustainable development: economic, social and environmental. The NPPF calls for gains in respect of each of these elements to be sought jointly and simultaneously in order to achieve sustainable development. However, the Interim SA Report focuses on physical distance between sites and various designations / facilities. Whilst it is acknowledged that such factors can assist in considering sustainability, alone they do not represent a robust assessment of the social, economic and environmental impacts of potential options.
- 4.20 For example, Site 146 is assessed as performing well in relation to criteria 8 (Primary school) by virtue of it being located less than 800m from the nearest primary school. However, this overlooks the site's potential to contribute to enhancements to the school, as described elsewhere in this representation. Essex County Council's Commissioning School Places in Essex 2017-2022 projects the School will be close to capacity by 2021/22, even before additional growth is accounted for, and the potential for land to be made available (which could include improvements to access) should be considered a significant positive.
- 4.21 The Interim SA Report also fails to acknowledge the social and economic benefits of providing additional homes for the village, in terms of the helping to sustain local facilities and services, and its vitality.
- 4.22 It is also noted that the site is assessed as performing poorly in relation to criteria 10 (Conservation A). However, the site is functionally separated from the Herongate Conservation Area. In any case, it cannot be said that any development within a certain distance of any Conservation Area would be intrinsically harmful to that Conservation Area. There may even be cases where development within a Conservation Area itself can have a positive impact.

4.23 The allocation and development of land at Hillcrest Nurseries will have a number of positive economic, social and environmental impacts that relate to matters other than simply proximity to designations / facilities. The Interim SA Report should be updated to ensure these are given due consideration.

5.0 Summary

- 5.1 There is evidently a need to provide additional homes within Brentwood Borough, and it is necessary to amend the existing Green Belt boundary to accommodate development needs. Indeed, it is likely that more homes will need to be provided in the Borough over the plan period than the PSA currently proposes.
- 5.2 The PSA is silent on the issue of retirement accommodation, but the provision of such development has the potential to have a significant positive impact on the local housing market, and freeing up existing dwellings for those who need them.
- 5.3 The PSA fails to direct a proportionate level of growth to settlements such as Ingrave, failing to ensuring the growth of such village is sustainably managed, and failing to seek to assist in retaining or enhancing the vitality of such communities. The Local Plan should direct a greater number of homes to villages such as Ingrave than proposed through the PSA.
- 5.4 Land at Hillcrest Nurseries is available and achievable to meet an identified development need (retirement housing), about which the most recent iteration of the Local Plan is silent. Furthermore, it is considered to be suitable for such development.
- 5.5 Land at Hillcrest Nurseries is not subject to any constraints that would prohibit its development. Furthermore, its development would have a number of social, economic and environmental benefits. These include those unique to this site, such as the making of land available for Ingrave Johnstone Church of England Primary School.
- 5.6 Land at Hillcrest Nurseries, Ingrave represents a deliverable and sustainable site to help meet an identified development need. Its allocation through the Local Plan would be justified, effective, consistent with national policy and would help ensure the Local Plan was positively prepared, i.e. its allocation would be sound.

Appendix 1 – Location Plan