



BNP PARIBAS GROUP 

Brentwood Regulation 19 Pre Submission Local Plan Review Consultation Response

Land to the west of Crossby Close, Mountnessing

Prepared on behalf of M. Scott Properties
March 2019

Site Name:	Land west of Crossby Close, Mountnessing
Client Name:	Scott Properties
Type of Report:	Brentwood Borough Council Regulation 19 Local Plan Representations
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Date:	March 2019

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Land to the west of Crosby Close, Mountnessing

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1.0 Introduction

1.1 These representations are submitted by Strutt & Parker on behalf of M. Scott Properties Ltd (Scott Properties) pursuant to Brentwood Borough Council's (BBC's) Regulation 19 Pre-Submission Local Plan (PSLP) consultation.

1.2 Scott Properties have an interest in land to the west of Crosby Close, Mountnessing (the Site), which has been actively promoted as part of BBC's plan-making process, site reference 073 (AECOM (January 2019) SA Report). Previous representations have been made at various stages of the Local Plan, including to call for sites exercises and consultations on iterations of the Local Plan.

1.3 Scott Properties, in their capacity as a provider of specialist accommodation, are promoting the site for specialist accommodation for those aged 55 and over, as well as those with, or supporting someone with a disability.

1.4 This representation raises specific concerns relating to:

- consideration of previous representations;
- the necessity of the proposed stepped trajectory;
- provision of specialist housing accommodation over the plan period to meet local and Borough needs; and
- the current failing of the PSLP to provide effective policies to support specialist housing delivery.

1.5 We are particularly concerned that the representations made during the previous Local Plan consultations have not been reflected in the PSLP. Specifically, the site was identified as being:

“Site 073 (1.2ha) site is not assessed by the Green Belt Study, but would appear to be well contained, with built development or mature tree belts on all sides. However, there are potential highway access issues, in that the site would be reliant on using an existing a small estate road and demolishing a bungalow (within the site promoters control).”

In conclusion, site 073 does stand-out as a site that potentially has some merit”

(SA Report p.118 (emphasis added)).

The highways issues referred to have been addressed in previous representations and confirmed by Essex County Council Highways as being resolved. This is shown in Appendix N.

1.6 A location plan for the site is provided as Appendix A.

2.0 Plan Period

- 2.1 The proposed PSLP period runs until 2033. Assuming, optimistically, adoption in 2019, this means that the Local Plan will address development needs for a maximum of 14 years. The NPPF (paragraph 22) is clear that strategic policies should look ahead over a minimum of 15 years from the date of adoption.
- 2.2 This deficiency in the PSLP is of particular relevance given that the Borough is predominantly Green Belt, and failure to ensure that development needs are planned for over a sufficient period of time would likely result in an early review of the Green Belt being required – contrary to the NPPF (paragraph 136); and undermining one of the two essential characteristics of the Green Belt: its permanence (NPPF, paragraph 133).

PROPOSED AMENDMENTS TO THE PSLP

- 2.3 Paragraphs 1.1 – 1.5 of the PSLP and all references throughout the PSLP including supporting text and Policies should be amended to refer to a period of at least 15yrs from date of adoption. It is suggested that this be at least 2016 – 2035;
- 2.4 Policies SP02; HP07; and PC02 should be amended to refer to a minimum of 15yrs from date of adoption with all housing and land requirements adjusted accordingly.

3.0 Commentary on the Total Housing Requirement

- 3.1. Without repeating much of the information in Section 4, the PSLP fails to demonstrate robustly the reasoning for adopting a stepped trajectory and not seeking to meet its full, annualised, housing need (including those with specialist needs) within the first five years of the plan being adopted. The current approach to housing delivery seems to heavily rely on strategic allocations (particularly in relation to specialist housing), without identifying smaller sites to boost housing delivery earlier in the plan period; such as the land west of Crosby Close, Mountnessing, which is confirmed to be deliverable by 2022 (Appendix O).
- 3.2. At paragraph 4.13 of the PSLP, it states that the Borough's housing requirement planned for is 350 dwellings per annum. At paragraph 4.12, it states that this figure has been calculated using the Standard Method (as per the NPPF and accompanying PPG).
- 3.3. However, this does not appear to be the case having regard to updated guidance. The PPG now confirms that 2014-based subnational household projections should be used to calculate the housing requirement using the Standard Method.¹
- 3.4. The relevant subnational population projections indicate an average annual increase of 293.2 households in the Borough between 2019 and 2029. The latest (2017) ratio of median house price to median gross annual workplace-based earnings for the Borough published by the ONS is 11.23. Once the Standard Method is applied using these figures this results in a requirement of 452 dwellings per annum.
- 3.5. The Local Plan is required to meet this need as a minimum (NPPF paragraph 35); and with sufficient flexibility to be able to respond to rapid change (NPPF paragraph 11). In addition, the Local Plan is required to ensure that the revised Green Belt can endure beyond the plan period (NPPF paragraph 136), i.e. in amending the Green Belt boundary, the Local Plan should account for development needs beyond 2033 (or, more appropriately, a revised later end to the plan period, which will ensure strategic policies will cover at least 15 years).
- 3.6. A further factor is the need to consider unmet needs of neighbouring authorities (NPPF paragraph 35). In this respect, we note in particular that Epping Forest District Council

¹ Paragraph: 004 Reference ID: 2a-004-20190220

is at an advanced stage in the preparation of a Local Plan (at the time of writing it is currently being examined) which proposes to deliver 11,400 dwellings between 2011 and 2033 (518 dwellings per annum), against a requirement (based on the Standard Method) of 944 dwellings per annum. We are not aware of BBC having objected to this approach, but neither is there any indication that the PSLP addresses any of this unmet need.

- 3.7. The PSLP considers it appropriate to apply a 20% uplift to the identified housing target of 350 dwellings per annum, resulting in a proposed target of 456 dwellings per annum.
- 3.8. The PSLP's rationale for this buffer is somewhat unclear: it states at Figure 4.1 that the buffer allows for an additional housing land supply to be maintained in the Borough throughout the plan period; but states at footnote 2 that the housing supply buffer serves to safeguard against any potential uplift to the standard methodology for calculating housing need, pending the outcome of the Government's 'Technical consultation on updates to national planning policy and guidance.'
- 3.9. In any case, the uplift means that the proposed annual housing target in the PSLP is only fractionally above the minimum housing requirement derived from the Standard Method, and does not provide any flexibility to ensure needs are met; does not ensure the Green Belt will endure beyond the plan period; and does not account for unmet need in neighbouring authorities.
- 3.10. Further to our comments in respect of the plan period, and the PSLP's failure to ensure strategic policies are in place to cover at least 15 years from adoption, as an absolute minimum the PSLP must be amended to ensure an additional year's worth of housing need can be accommodated. Given likely timescales for adoption of the Local Plan, we suggest a plan period to 2035 should be treated as a minimum, and an additional two years' worth of development needs to that which the PSLP currently seeks to address should be planned for.
- 3.11. Whilst we suggest 2035 should be treated as the earliest end to the plan period, it should also be recognised that the authority is predominantly Green Belt. The NPPF requires this Local Plan to ensure the Green Belt will endure beyond the plan period. As such, we suggest the PSLP that even if the plan period is extended until 2035, policies should account for potential development needs beyond this period.

4.0 Five-year housing land supply and housing trajectory

- 4.1. BBC is required to demonstrate a five-year housing land supply at any point in the plan period.²
- 4.2. In terms of the five-year housing requirement, the NPPF (paragraph 73) confirms a 20% buffer should be applied to the initial calculation in the event the results of the Housing Delivery Test show that delivery has fallen below 85% of the requirement. The PPG confirms the requirement to apply this buffer in such circumstances also applies where the Local Planning Authority are seeking to confirm their five-year housing land supply through a recently adopted Local Plan.³
- 4.3. The 2018 Housing Delivery Test measurement for Brentwood Borough shows that only 51% of the Borough's housing requirements were met over the last three years; well below the figure required to avoid a 20% buffer having to be applied.
- 4.4. The Borough's most recent reported five-year housing land supply, Five Year Housing Land Supply Statement as at 31 March 2018 (November 2018) ('HLSS'), is 4.1 years.
- 4.5. However, this is predicated on a requirement which, when considered in relation to the latest guidance, understates need; and a supply which, again when considered in relation to latest guidance, overstates supply. As such, the actual housing land supply is considerably less.
- 4.6. Looking at this in detail, the HLSS considers an annual need of 343 dwellings, resulting in a total requirement once the 20% has been applied of 2,058 dwellings. However, applying the latest guidance and the Standard Method, the Borough's housing requirement is 452 dwellings per annum. Applying the 20% buffer, this results in a five-year requirement of 2,712 dwellings.
- 4.7. In terms of supply, the HLSS includes sites without detailed planning permission and without evidence such sites will be delivered within five years. As per the NPPF, such sites cannot be considered deliverable for the purposes of the five-year housing land

² Paragraph: 038 Reference ID: 3-038-20180913

³ Paragraph: 037 Reference ID: 3-037-20180913

supply. Table 1 of the HLSS suggests that *at least* 1,042 dwellings in the reported supply did not have planning permission. Once these are removed from the supply calculation, the five-year supply comprises 653 dwellings. It is unclear if and how many of the dwellings categorised as having extant planning permission are on major sites which only benefit from outline permission. Such sites would also have to be discounted. As such, the figure of 653 dwellings may overstate housing supply.

- 4.8. A five-year supply of 653 dwellings compared to a requirement of 2,712 represents just a 1.2-year housing land supply.
- 4.9. The acute housing land supply shortage underlines the importance of allocating sites through the Local Plan which can deliver early in the plan period, and the need to avoid over reliance on large strategic sites which inevitably take a considerable time to bring forward.
- 4.10. The housing trajectory provided as Appendix 1 to the PSLP projects that it will enable completion of 2,305 dwellings between 2019/20 and 2023/24 (or, to be precise, it projects 2,305.1 dwellings).
- 4.11. Having regard to the Standard Method and the need to apply a 20% buffer to the housing requirement, the total five-year requirement for the Borough is 2,712 dwellings. Therefore, even before critical review of the supply, the PSLP will not provide a five-year supply of housing.
- 4.12. Furthermore, and in respect of the projected supply, we are concerned to note that Dunton Hills Garden Village is projected to deliver housing completions from 2022/23, i.e. falling within the first five years of the plan.

DUNTON HILLS GARDEN VILLAGE

- 4.13. Dunton Hills Garden Village is a proposed major strategic development, intended to provide 4,000 dwellings, 5.5 hectares of employment land, two new primary schools, secondary school, new village shopping centre, new transport infrastructure, and new community and health infrastructure. Delivery will require the coordination and input of multiple landowners, developers, infrastructure providers and other stakeholders. It is

noted that Basildon Borough Council objected at Regulation 18 stage to the allocation of land at Dunton Hills due to a lack of evidence and the potential impact on services in the Neighbouring Borough. It is not clear that these concerns have been satisfactorily addressed to ensure the prompt delivery of any development without further concerns from the neighbouring Council.

- 4.14. The site has yet to even be allocated. Once allocated, the PSLP requires a masterplan and design guidance to be prepared. Following this, an outline application will need to be prepared, submitted, and determined; followed by reserved matters. It will also be necessary to discharge all planning conditions and S106 obligations. All of this must be undertaken before development has even begun.
- 4.15. As such, it is totally unrealistic to project that 100 homes will be completed at Dunton Hills Garden Village as early as 2022/23. This does not in itself mean that Dunton Hills Garden Village proposals cannot form part of a sound Local Plan, but it does mean that additional smaller sites capable of providing homes in the early years of the plan period also need to be allocated in order to ensure the Local Plan is sound.
- 4.16. The ability of larger sites to come forward quickly has been the subject of recent assessments in the *Independent Review of Build Out* (the Letwin review; 2018) and issues with their complexity have been ably set out in the Nathaniel Litchfield Study *From Start to Finish* (2016). Both provide empirical evidence that the early delivery of such sites can be problematic due to a range of factors, including establishing the required infrastructure, and the timings of housing delivery associated with those requirements as well as the prolonged or protracted nature of the planning process. The Litchfield's report confirms that the planning process takes on average 2.5yrs for the planning application determination period for schemes of up to 500 units, but that this can double for sites over 1,000 units.
- 4.17. For the above reasons it is unrealistic to project that 100 homes will be completed at Dunton Hills Garden Village as early as 2022/23. This does not in itself mean that Dunton Hills Garden Village proposals cannot form part of a sound Local Plan, but it does mean that additional smaller sites capable of providing homes in the early years of the plan period also need to be allocated in order to ensure the Local Plan is sound.
- 4.18. The strategic sites are expected to deliver 1,555 dwellings within 5yrs of adoption. Given the matters set out above, this is unrealistic and it would not be justified to rely on these

sites to meet short term housing delivery. This emphasises the need to review sites such as ref. 073 to provide homes that have a far greater prospect for short term delivery, to ensure the plan is Sound.

RELIANCE ON WINDFALL SITES

- 4.19. At present the PSLP specifies that windfall sites will deliver 41 units per year in the last 10 years of the Plan period (giving a total 410 units to be delivered by Windfall sites). Given that the 'spatial challenges & opportunities' at paragraph 3.6 (b) recognises the constraints of the Green Belt and the limited availability of previously developed land, the reliance on windfall delivering in general would seem unjustified and undeliverable.
- 4.20. In addition to the above, there seems to be no robust reason why instead of allocating windfall sites to the last 10 years of the Plan, additional smaller sites could not be allocated in order to provide greater certainty of delivery and to improve the housing land supply position throughout the Plan period, but especially within the 5 years of the Plan being adopted, when the housing land position is at its weakest.

PROPOSED AMENDMENTS TO THE PSLP

- 4.21. The PSLP should be amended to identify a range of smaller sites to meet housing need throughout the Plan Period and particularly to address the inevitable shortfall in the early period of the Plan following adoption.
- 4.22. Policy SP02 should be amended to meet the annual housing need throughout the plan period, through the release of additional smaller scale sites in a variety of locations, without recourse to a stepped trajectory;
- 4.23. Appendix 1 of the PSLP should be amended to reflect the evidence provided by available evidence on the delivery of major developments;
- 4.24. The proposals map should be amended to release additional, suitable Green Belt sites in order to assist with the delivery of homes over the Plan period, including to meet the need for specialist housing.

5.0 Specialist accommodation for an ageing population

- 5.1 The *Government response to the Second Report of Session 2017-2019 of the Housing, Communities and Local Government Select Committee Inquiry into Housing for Older People*, at page 18 states that:

“... local authorities should be planning for the future housing needs of older people so that they are able to live safely, independently and comfortably in their homes for as long as possible, or move to more suitable accommodation if they so wish. That is why our planning guidance makes clear that local authorities should be planning for various general housing options, including bungalows, which are suitable for independent living for older people. Where bungalows have been identified as suitable solutions, we would encourage local authorities and developers to take an innovative approach that makes the most effective use of land.” Page 18

QUANTIFYING THE LEVEL OF NEED

- 5.1. Paragraph 6.25 of the PSLP states that the additional need for specialist housing for the elderly is 494 additional units over the Plan period. Outside of strategic allocations, this is intended to be met by Policy HP04 – Specialist Accommodation. Paragraph 6.24 highlights that this policy meets the needs of all persons needing specialist accommodation, not only elderly people. This definition of specialist accommodation is designed to be compatible with Paragraph 61 of the NPPF and the definition of older people⁴. However, the supporting text to Policy HP04 includes a broad definition (including Gypsies and Travellers who no longer exercise a nomadic lifestyle), which is potentially too broad to meet the needs for older people. The PSLP does not, therefore, give an accurate representation of the type of accommodation the Plan is seeking to deliver and for what specific group(s).
- 5.2. The following paragraphs and Tables 1-4 give a representation of the acute need for specialist accommodation to meet the broad needs of an ageing population and also provide recommendations as to how this can be addressed.

⁴ Glossary *Older People*; p.69

5.3. At paragraph 6.6, the PSLP rightly recognises that the Borough has an ageing population, with paragraph 6.25 setting out that the SHMA indicates that if occupation patterns for Specialist Residential Accommodation for older people remain at current levels, there will be a requirement for 494 additional specialist units over the plan period.

5.4. The 494-figure specified would assume, based on Table 1 and the 2035 figures, applying an occupancy rate of 1.75 per dwelling, that of the 4,005 new homes (ignoring existing need) required up to 2035, only 12% would be specialist. Again, because the current definition for specialist accommodation is broad, if you were to assume that 300 of the new specialist units were solely dedicated for those aged over 65, this would mean only 8% of the total need would be specialist for older people.

5.5. Table 1: ONS projections for those aged 65+ in the Borough of Brentwood.

Age bracket	2017	2020	2025	2030	2035
65-69	4,100	3,800	4,400	5,200	5,100
70-74	4,000	4,100	3,600	4,100	4,900
75-79	2,700	3,000	3,800	3,400	3,900
80-84	2,400	2,500	2,700	3,400	3,100
85-89	1,700	1,700	1,900	2,100	2,800
90+	1,000	1,100	1,400	1,700	2,100
Total	15,900	16,200	17,800	19,900	21,900
% increase	-	2%	12%	25%	38%

5.6. Given that the PSLP has only identified C2 and an unspecified type of specialist housing to be delivered through Dunton Hills Garden Village, it was viewed to be helpful to showcase the issues facing the Borough as a result of an ageing population. The tables below demonstrate that a more wholistic and supportive approach will be required to ensure that the diverse needs of those in later stages of life are addressed. In addition to the suggestion that specific housing sites are delivered to meet the needs of an ageing population and the modifications sought, recommended policy wording will follow in a subsequent email to BBC.

5.7. Table 2: ONS projections for those aged 65+ in the Borough of Brentwood **unable to manage at least one domestic task on their own.**

Age bracket	2017	2020	2025	2030	2035
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Total 65+	6,781	7,083	7,770	8,624	9,856
% increase	-	4%	13%	21%	31%

5.8. Table 3: ONS projections for those aged 65+ in the Borough of Brentwood **unable to manage at least one mobility issue on their own.**

Age bracket	2017	2020	2025	2030	2035
Total 65+	3,120	3,248	3,579	3,995	4,626
% increase	-	4%	13%	22%	33%

5.9. Table 4: ONS projections for those aged 65+ in the Borough of Brentwood **predicted to have a fall.**

Age bracket	2017	2020	2025	2030	2035
Total 65+	4,370	4,542	4,924	5,527	6,261
% increase	-	4%	11%	21%	30%

5.10. Paragraph 6.25 of the PSLP goes on to say:

“Essex County Council (ECC) is the provider of social services in Brentwood. ECC’s approach to Independent Living (Extra Care) encourages the provision of specialist accommodation in Essex as a means by which older people can continue to live healthy and active lives within existing communities. This approach to meeting the specialist accommodation needs of older people is intended to reduce the demand for residential/nursing home care across the County. Independent Living schemes are part of a wider accommodation pathway to enable older people to remain as independent as possible with the right housing and support to meet their needs. The Council will work with Essex County Council to secure provision of suitable sites.” (emphasis added)

5.11. The NPPF (paragraph 50) requires Local Planning Authorities to plan for a mix of housing having regard to the needs of different groups, including older people. It goes on to state that Local Planning Authorities should identify the range of housing required in particular locations.

- 5.12. The PPG⁵ describes the need to provide housing for older people as critical, given the increase in this part of the population. It stresses that older people will have diverse needs, ranging from active people approaching retirement to the very frail elderly. The PPG confirms that Local Planning Authorities will need to determine the needs of people who will be approaching or reaching retirement as well as older people now. It suggests that future need for specialist accommodation for older people be broken down by tenure and type (e.g. sheltered, enhanced sheltered, extra care, registered care).
- 5.13. Notwithstanding the requirements of the NPPF and PPG, and the acknowledgment within the PSLP that this issue of accommodation for an ageing population is pertinent to the Borough, we do not consider that the PSLP currently identifies the correct quantum of need, or provides for sufficient specialist accommodation to be delivered to meet the existing need.

PROPOSED METHOD OF SPECIALIST HOUSING DELIVERY WITHIN THE PSLP

- 5.14. The PSLP proposes to meet specialist accommodation needs through care homes on strategic allocations and Policy HP04. The proposed care homes on strategic allocations will provide in total 180 beds of C2 accommodation, falling significantly short of the identified requirement for 494 additional units.
- 5.15. Furthermore, we note that all of this provision is proposed on strategic allocations. As such, there will inevitably be relatively long lead-in times to their delivery and we therefore question whether the PSLP as currently drafted will ensure provision in the short-term. If not, this will cause people who are in need of specialist accommodation to continue to suffer in inappropriate accommodation.
- 5.16. The current alternative option for meeting specialist accommodation need is through Policy HP04, which states BBC will *'encourage and support proposals which contribute to the delivery of Specialist Accommodation'* subject to various criteria being met.
- 5.17. However, the policy is not clear as to how much specialist accommodation, where, or how it is expected to be delivered. Paragraph 6.25 states BBC will *'work with Essex County Council to secure provision of suitable sites'* for independent living schemes,

⁵ Paragraph: 017 Reference ID: 2a-017-20190220

strongly suggesting that BBC themselves are not clear where independent living or specialist housing will be located, despite there being a strong preference to ensure “older people can continue to live healthy and active lives within existing communities.”

- 5.18. Furthermore, as part of the PSLP a review of site capacity has been undertaken which identified that development needs in general cannot be met within the existing developed areas, with BBC considering exceptional circumstances exist to amend Green Belt boundaries in accordance with paragraph 136 of the NPPF.
- 5.19. With Policy HP04 still requiring proposals to comply with Green Belt policies, we question where additional sites can be identified within the Borough on non-Green Belt land. BBC have already identified that development needs cannot be met without amending Green Belt boundaries so it therefore logically follows that to provide additional specialist accommodation, Green Belt boundaries should similarly be reviewed. Under the current PSLP approach, it is difficult to see where a new site within the existing built up area will come forward for specialist accommodation, casting further doubts on the effectiveness of Policy HP04.
- 5.20. Without amendments, the PSLP is considered unsound in relation to its approach to meeting the accommodation needs of an ageing population. The approach is neither positively prepared, consistent with national policy, nor effective. In order to make the PSLP sound, we suggest BBC should allocate deliverable sites to meet this need and reflect the objectives set out in the PSLP in relation to accommodation for older people.
- 5.21. In addition to the above, the allocation of additional sites, specifically smaller sites, would ensure consistency with PSLP policy HP01-C, which states that “... *Specialist Residential Accommodation on smaller sites will also be encouraged.*”

PROPOSED AMENDMENTS TO THE PSLP

- 5.22. The PSLP will not be able to meet the needs of the elderly population without the release of additional sites to meet this need, and the PSLP has already (presumably) exhausted the available sites outside of the Green Belt. To meet the stated objective, the PSLP therefore needs to identify suitable sites in appropriate locations to meet the identified need explained at paragraph 6.25 for specialist accommodation, and within the existing communities. The PSLP is not sound without such amendments, as there are no suitable sites available that would be expected to meet this need in full, and consistently throughout the Plan Period.

6.0 Proposed Approach to Mountnessing

BACKGROUND – CONNECTIVITY & SETTLEMENT HIERARCHY

- 6.1 Mountnessing is small vibrant centre located to the north east of Brentwood’s main urban area. It is located adjacent to the A12 just north of junction 12, positioned strongly along the A12 corridor.
- 6.2 The village itself comprises a small mix of facilities and amenities including a primary school, village hall and a church hall, as well as a small selection of bars and restaurants, with further provision available in Heybridge, Ingatesone and the main Brentwood urban area.
- 6.3 Mountnessing is located less than two miles to the neighbouring village of Ingatestone which has a good train service running through Ingatestone Station into Central London and the wider eastern region.
- 6.4 Frequent buses run through Mountnessing into Brentwood via Hutton and Shenfield which all have a good variety of services, facilities and amenities. The village therefore benefits from good accessibility to infrastructure and surrounding settlements.
- 6.5 The PSLP sets out the Borough’s settlement hierarchy, with Mountnessing identified as Settlement Category 3 – Rural Village.
- 6.6 Mountnessing falls within the same classification as Blackmore and Kelvedon Hatch, both of which are the only villages that are receiving growth within the PSLP (123 units in total). This is despite there being identified constraints associated with each site allocated in these areas (four sites in total). The level of allocated growth and percentage increase based on existing number of residents has been shown below; the proposed level of growth in Mountnessing has also been shown in order to demonstrate it would not be out of character with the proposed extensions to Blackmore and Kelvedon Hatch.

Village Name	Population	Allocated level of growth within PSLP	% increase against population
Blackmore	829	70	8%

Kelvedon Hatch	2124	53	2%
Mountnessing	494	20	4%

TRANSIT-ORIENTATED GROWTH

- 6.7 Whilst Settlement 3 Rural Villages are defined in the PSLP settlement hierarchy as sparse rural setting with development intended to sustain the day to day needs of the local population, its location in relation to the A12 corridor should not be overlooked in terms of its sustainability as a potential growth location or existing needs within the community for housing for older people.
- 6.8 The PSLP’s Spatial Strategy sets out the driving forces and overarching aims for delivering development over the plan period. One of the key underlying foundations supporting the spatial strategy is ‘Transit-orientated Growth’ which focuses on Brentwood’s two key transit corridors: the ‘Central Brentwood Growth Corridor’ (CBGC) and the ‘Southern Brentwood Growth Corridor’ (SBGC).
- 6.9 The CBGC *inter alia* focuses growth around the A12 as a key channel for sustainable development and maximising opportunities around existing transport infrastructure and networks. The PSLP therefore promotes development steered towards sustainable locations along key transport nodes identified within the CBGC in accordance with ‘Transit-orientated Growth’ in the spatial strategy.
- 6.10 As such, sustainable development in settlements located in proximity to the A12 should be strongly supported by BBC and reflected in the PSLP, with more growth attributed to such locations. Additional growth targeted to locations that benefit from ‘Transit-orientated Growth’ should be reflected in the settlement hierarchy and the proportion of growth attributed as a result.

SUPPORTING THE PROSPERITY OF VILLAGES

- 6.11 Paragraph 2.8 of the PSLP details:

“To promote sustainable growth in rural areas, the NPPF (2018) paragraph 78 states that housing in rural areas should be located where it will enhance the vitality of rural communities, to ensure villages grow and thrive. To ensure the Local Plan responds to

this, a broad Settlement Hierarchy Assessment has been undertaken to understand the role, function and relationship of Brentwood's dispersed settlements (Figures 2.2 & 2.3)."

We support BBC's focus on this paragraph, however we question the application and response to it within the PSLP as it stands.

- 6.12 The current justification within the Sustainability Appraisal for Mountnessing not being allocated any growth is:

"In conclusion, site 073 [M Scott Properties Site] does stand-out as a site that potentially has some merit; however, the preferred allocation at 'Land south of Ingatestone' will in practice relate as closely to Mountnessing as it does to Ingatestone, and a higher growth strategy for this area could conflict with the vision for the District as a 'borough of villages'. The preferred strategy for Ingatestone/Mountnessing has been published for consultation, with all consultation response duly taken on-board."

- 6.13 The land south of Ingatestone is allocated for 161 units (Ref: R21 in the PSLP), this will serve as an urban extension to Heybridge with the A12 providing a hard boundary and should not be considered growth ancillary and directly beneficial to Mountnessing, given that people living within Ingatestone and Heybridge are likely to use services and facilities within these locations, and unlikely to travel to Mountnessing. For example, Mountnessing Primary School currently has a capacity of 105 pupils, and has a current pupil role of 90; given that Essex County Council seeks to promote sustainable transport methods, particularly walking to school, it would not be appropriate to direct pupils to Mountnessing Primary School.

- 6.14 In addition to the above, the land south of Ingatestone will not provide any housing specifically for older people. Therefore, there is a legitimate case to be made that the Land off Crosby Close, Mountnessing (073) could contribute towards meeting the needs of Ingatestone, Heybridge and Mountnessing (approximately 32% of the identified need), whilst also serving to benefit the settlement of Mountnessing directly by supporting economic growth.

- 6.15 Mountnessing should be considered a sustainable location to assist in the delivery of the spatial strategy. Failing to support the sustainable growth of Mountnessing will potentially undermine the spatial strategy as well as failing to manage the growth of the settlement

to ensure the vitality of the community is sustained or enhanced. This approach is unjustified and inconsistent with national policy.

6.16 The PSLP also prescribes Category 3 settlements as being able to accommodate urban extensions, with minimal amendments proposed to the Green Belt boundaries as a means of retaining the character of the Borough, as set out in the spatial strategy. We would therefore recommend that in assigning additional growth towards Mountnessing, in accordance with the spatial strategy, the PSLP should look to allocate well contained sites on the fringe of Category 3 settlements.

6.17 Given the foregoing, the conclusion reached within paragraph 6.12 is unjustified and we would strongly recommend BBC reviewing the case within these representations, and the direct benefits that could be realised and replicated on other potential suitable sites.

PROPOSED AMENDMENTS TO THE PSLP

6.18 To ensure the Local Plan is sound, land should be allocated in Mountnessing to ensure that the identified local need is addressed, consistency with the spatial strategy is maintained, and the settlement of Mountnessing is given the opportunity to thrive.

6.19 Chapter 9 should be amended to include land within Mountnessing to deliver specialist accommodation.

7.0 The Site

BACKGROUND & EXISTING PLANNING POLICY

- 7.1. The land to the west of Crossby Close (site reference 073) measures 1.25 hectares in area and comprises greenfield land, which is “*well contained, with built development or mature tree belts on all sides*” (page 118, *Sustainability Appraisal*). Specifically, the site is bordered by a thick tree belt along the western and southern boundary with fencing and intermittent trees and hedgerow along the northern and eastern boundaries. The site is well contained by residential development to the north west and east with a school and associated green space / trees to the south.
- 7.2. The site is located outside (but directly adjacent) to the village envelope of Mountnessing and is currently allocated as Green Belt land as per the adopted Brentwood Replacement Local Plan (2005).

SUPPORTING TECHNICAL STUDIES

- 7.3. A considerable amount of technical work has been undertaken in respect of the site which demonstrates the Site is sustainable, suitable, available and achievable to help meet the Borough’s specialist housing needs early in the Plan period. This work includes:

Appendix B	Mountnessing & Ingatestone Detailed Projections prepared by Experian
Appendix C	Mountnessing & Ingatestone Property Development Pack prepared by Experian
Appendix D	Mountnessing & Ingatestone Demographic Assessment prepared by Scott Properties using Experian Data
Appendix E	Agricultural land images and accompanying letter from the Landowner
Appendix F	Brentwood Green Belt Study 2 – Overall Contribution of Sites to Green Belt Purposes – Housing Assessment Plan
Appendix G	Site Assessment Methodology and Summary of Outcomes – Appendix 6 Green Belt land edge of larger villages
Appendix H	Highways Infrastructure Note prepared by Waterman Infrastructure & Environment

Appendix I	Proposed Site Access and Internal Turning Arrangements Plan prepared by Waterman Infrastructure & Environment
Appendix J	Mountnessing Primary School Establishment Data prepared by Scott Properties
Appendix K	Mountnessing C of E Primary School pupil premium strategy statements 17-18 / 18-19
Appendix L	Mountnessing Growth Distribution note prepared by Scott Properties
Appendix M	Sustainability Appraisal Site Analysis – Mountnessing
Appendix N	Email dialogue with Essex County Council – confirming there is no overriding issue with proposed access off Crosby Close
Appendix O	Delivery Statement
Appendix P	Landscape Summary Note for Land off Crosby Close by Lockhart Garratt

THE SITE'S SUITABILITY FOR SPECIALIST ACCOMMODATION

- 7.1 The Experian Reports provide detailed population projections analysing the study area of Mountnessing, Ingatestone and Heybridge (Appendix B) with a key statistics breakdown accompanying the submission (Appendix D). The data provides robust evidence that there is a shortfall of existing stock of specialist accommodation compared to both the current (2017) and projected (2022) population aged 55+ and the anticipated requirement for such housing.
- 7.2 Currently the over 55 age bracket accounts for 41% of the total study area population, with a percentage increase of 2% up to 43% in 2022 in Mountnessing and Ingatestone. This level of growth is in line with Table 1 and will account for just under half of the population of the study area by 2022. It can therefore be assumed that by the end of the Plan period, the population of those aged 55 and over will make up over 50% of the local population, and a significant proportion will require housing better suited to their needs.
- 7.3 The projections show that bungalows comprise only 14% of the overall stock in the study area. Given that bungalows offer an attractive housing option to people over the age 55, the low proportion of the overall bungalow stock in the study area, and considering that 95% of new local housing need will be for those aged over 55 in the study area, there is therefore an acute need for such accommodation that would be directly available for the 55 and over demographic.

- 7.4 The study shows that need for new homes for additional residents aged 55 and over by 2021 is 121. This figure, combined with a potential requirement for existing residents aged 55 and over equating to 84, creates a total potential new homes requirement for local residents aged 55+ by 2021 of 205 within the study area. Applying the presumption of 12.01 (Appendix D) of existing stock of bungalows capable of servicing this need (demonstrating the low percentage of existing stock to meet any current or future need), the new total potential requirement equates to 192.92.
- 7.5 Assuming 32% of these residents would consider moving into more appropriate accommodation (an accepted percentage – generated by L&Gs report into Older People), the number of specialist units required to meet the potential need of 193 up to 2021, is 62. Given there are no local committed developments providing such accommodation, and no allocations proposed in the PSLP to respond to this local need, there is a serious shortfall of existing and proposed stock across the study area to deliver specialist accommodation.
- 7.6 To support this, Scott Properties undertook a digital outreach campaign on Facebook to ascertain the level of demand for new build bungalows amongst those aged 55 and over living within a 7km radius of Mountnessing. All of the 92 people who responded to this consultation expressed an interest in a new build bungalow within the locality.
- 7.7 This demonstrates that there is a genuine and current demand for this type of property within the area, which is potentially in excess of the quantified need, further supporting the allocation of land to the west of Crosby Close for bungalows for those aged 55 and over. It also highlights that the PSLP is therefore failing to respond to local demographic housing need and serves to undermine the soundness of the plan as it is not positively prepared, justified or consistent with national policy.

PROPOSED AMENDMENTS TO THE PSLP

- 7.8 We propose that the site be allocated for specialist accommodation for older people to assist in the much-needed delivery of specialist older persons accommodation to address the shortfall of suitable stock across the study area, of which Mountnessing comprises. The delivery of 20 specialist dwellings at Land to the west of Crosby Close will account for 32% of the required 62 specialist dwellings.

- 7.9 It is considered that allocation of the site for the purposes of delivering specialist accommodation will assist in making the PSLP sound in meeting the full housing requirements, as well as supporting Mountnessing, Ingatestone and Heybridge's ability to grow and thrive. In effect, by delivering development in Mountnessing, it will support the other villages nearby.

8.0 STRATEGIC ENVIRONMENTAL ASSESSMENT / SUSTAINABILITY APPRAISAL (SEA/SA)

- 8.1 The Environmental Assessment of Plans and Programmes Regulations (2004) requires SA/SEAs to *inter alia* set out the reasons for the selection of preferred alternatives, and the rejection of others, be made set out.
- 8.2 In addition, the Planning Practice Guidance⁶ makes clear that the strategic environmental assessment should outline the reasons the alternatives were selected, the reasons the rejected options were not taken forward and the reasons for selecting the preferred approach in light of the alternatives.
- 8.3 A Sustainability Appraisal (SA) of the PSLP has been published alongside the current consultation, within which site 073 (land to the west of Crosby Close) has been discounted, failing to progress to ‘shortlisted omission sites’ nor the final shortlist for allocation.
- 8.4 Turning to the specifics of the SA assessment of the site, these are set out in Table C of the SA. This provides a ‘traffic light’ assessment of sites’ sustainability. Green indicates sites perform well; amber poorly; red particularly poorly, against specific criteria.
- 8.5 We would argue that the approach taken is very simplistic – the assessment of sites appears to be based purely on physical distance to various features / facilities / designations.
- 8.6 This is exemplified in respect of criteria 7 (proximity to GP surgeries), whereby a site is considered to automatically perform ‘particularly poorly’ if it exceeds 1.5km distance from a GP surgery. There is no evidence that any consideration has been given to whether development on a site, and the proposed site capacity / density sought to come forward on site, will be detrimentally impacted as a result of the distance exceeding 1.5km.
- 8.7 The same blanket approach can be seen with the scoring against criteria 16 (Green Belt), whereby it is considered to score ‘particularly poorly’ if it ‘intersects’ with the Green Belt. Again, it appears little consideration has been given to the sensitivity of the Green Belt and the contribution of the specific parcel to the purposes of the Green Belt in relation to

⁶ Paragraph: 038 Reference ID: 11-038-20150209

development coming forward in relation to the SA scoring. There may be instances where development of a site could have a limited impact to the purposes of the Green Belt and could provide other benefits which significantly outweigh any minor impact.

- 8.8 In respect of criteria 17 (Agricultural Land), the scoring system applied again scores a site on its classification of agricultural land. In the first instance we raise concerns with the approach applied. The SA provides the caveat that the 'agricultural land dataset is of a poor resolution' and that some of the sites 'flagged' as red or amber are in fact brownfield or non-agricultural. It is therefore unclear which sites these have been applied to and therefore the lack of accuracy in BBC's approach may affect the validity of which sites progress towards allocation and which do not.
- 8.9 In addition, where we have assumed the 'agricultural land dataset' the SA has used refers to the National England 2010 Agricultural Land Classification (ACL008) mapping, we raise caution in applying this on a site-specific basis, with Natural England stating it is to be used for strategic purposes rather than on a site by site basis.
- 8.10 Secondly, we consider the simplistic approach of scoring sites on the grade of land does not accurately represent the site-specific circumstances of a site's utility, history and agricultural operation.
- 8.11 A letter from the landowner and accompanying aerial photographs (Appendix E), confirm that the site has not been used for agricultural operation since its acquisition in 1995. The site provides no contribution to the agricultural output in Mountnessing and therefore to score it negatively for its potential grade of land quality in the context of agricultural operations where there clearly are none, is not justified.
- 8.12 BBC's decision-making process as a result of the SA scoring is therefore unclear, made less clear by the fact that Site 073 has been assessed within Table C as more positive than a number of sites that are proposed to be allocated. A lack of justification and clarity leads to ambiguity in the site allocation process resultant from the SA scoring.
- 8.13 Appendix 5 of the SA undertakes an analysis of 'Village Omission Sites' to see if any should be further analysed in Section 5 as HELAA sites that were not taken forward for allocation but are nonetheless deliverable. This analysis is applied with the understanding that it is carried out in the knowledge that there are limited strategic arguments for higher growth.

- 8.14 In the first instance we would raise the concern that this viewpoint is contradictory to the spatial strategy, as highlighted in earlier sections of this representation, as villages such as Mountnessing should be identified for higher growth given its credentials as a key settlement along the A12, supporting BBC's transit-orientated aspirations for sustainable development.
- 8.15 Whilst this analysis of village sites viewed in the context that the PSLP's vision is to create a 'borough of villages', consideration should be given to certain villages that demonstrate sustainability in accordance with the spatial strategy. In addition to this, by supporting villages through development and allowing them to thrive, it is difficult to understand how the stated vision is undermined, when well contained sites that integrate well with the existing fabric of the settlement and support the long-term sustainability are allocated for development.
- 8.16 This approach is reflected in respect of the two adjacent sites north of Blackmore; both policies contain a specific requirement for a minimum 25% of all proposed dwellings to provide for those over 50 or with a 'strong local connection', ensuring that the local community is given priority. The SA supports this approach subject to 'sufficient local needs' being demonstrated.
- 8.17 The Experian Demographic Data (Appendix B) shows that 'local needs' exist in Mountnessing and therefore allocation of the Site for specialist accommodation, in accordance with local needs and borough wide demographic housing requirement, would be supported as a sustainable approach to delivery as demonstrated by the policy requirements of the Blackmore sites.
- 8.18 Given that sites within the study area (appendix B and D) will not be providing specialist accommodation to meet the needs of those aged 55 and over, it is recommended that the allocation seeks to give preference to those within Mountnessing and Ingatestone first, and then a cascade provision could be adopted thereafter.
- 8.19 Looking specifically at the commentary on the Mountnessing sites, the SA does attach merit to the Land off Crosby Close (073) as a potential site allocation, recognising that the site is well contained visually in the absence of the site being reviewed within the Green Belt Study. The commentary does however raise concern around potential highways access issues through Crosby Close:

“Site 073 (1.2ha) site is not assessed by the Green Belt Study, but would appear to be well contained, with built development or mature tree belts on all sides. However, there are potential highway access issues, in that the site would be reliant on using an existing a small estate road and demolishing a bungalow (within the site promoters control).”

In conclusion, site 073 does stand-out as a site that potentially has some merit”.

(SA p.118 (emphasis added))

8.20 Scott Properties have sought to agree a deliverable access into the site with Essex County Council (ECC) Highways. Through these discussions it has been established and agreed that a safe, viable access can be provided via the turning head of Crosby Close. This access is demonstrated in plans enclosed at Appendix I, with an accompanying Highways Infrastructure Note by Waterman in Appendix H, which includes acknowledgement from ECC Highways on its acceptability.

8.21 The access arrangements have sought to reflect the recommendations which surfaced through dialogue with officers, including:

- *retain the existing layout of Crosby Close as is, rather than converting it to conform with the new parameters of the Essex Design Guide for a Minor Access (that being a 6m wide shared surface);*
- *provide the loop road being proposed within the site, as close to the end of the cul-de-sac as possible in order to aid the conformance with the guidance set out in the Essex Design Guide;*
- *provide development of a density that would keep the total number of dwellings served by Crosby Close below the 50 dwelling maximum for a Minor Access (existing Crosby Close has 23 of which 1 will be removed); and*
- *On street parking is not considered to be an issue along the length of Crosby Close as properties have off street parking facilities.*

8.22 The proposed access plan, as appended to the Waterman note, sought to demonstrate access into the site that complies with design guidance and the above officer recommendations. Whilst successful in demonstrating its deliverability, in order to ensure the site remains capable of delivering the maximum appropriate number of units, and therefore making the most effective use of the site (Chapter 11, NPPF 2019) ongoing

technical work provided that the latest proposed access plan (Appendix I) was the optimal arrangement in terms of land take.

PROPOSED AMENDMENTS TO THE PSLP

- 8.23 Highways officers at Essex County Council have confirmed there is no objection to the proposed access arrangements. The site therefore demonstrates deliverability in respect of access and to exclude the sites allocation from the PSLP on this basis is not justified.
- 8.24 We also consider it necessary to highlight the SA's commentary on the spatial strategy in relation to specialist accommodation.
- 8.25 The SA at paragraph 9.94 highlights the need for specialist accommodation across the Borough, identifying that there is an expectation that the Dunton Hill Garden Village (DHGV) will deliver specialist accommodation, stating however that *"the policy requirement for DHGV is less clear, with Policy R01i setting only a broad requirement for "specialist accommodation in line with ... Policy HP04"*.
- 8.26 This lack of explicit quantum for specialist accommodation within the policy highlights the issues with deliverability surrounding specialist accommodation and the flawed approach to allocating a large proportion of it to DHGV. The policy requirement left as is does not guarantee that an appropriate amount of specialist housing, in line with identified need, will come forward over the plan period, this statement is further supported by the viability issues identified with such accommodation:
- "Where an applicant considers that it is not feasible or viable to meet the requirements as set out in Policy HP01, the Council will expect this to be demonstrated with robust evidence and may negotiate a proportionate housing mix which is achievable, account will be taken of the nature, constraints, character and context of the site."* 6.14, page 127 PSLP.
- 8.27 It is recommended that site specific allocations with explicit, identified policy requirements for specialist accommodation for older people will assist in the delivery of this demographic housing need across the Borough.

9.0 SITE ASSESSMENT METHODOLOGY AND SUMMARY OF OUTCOMES (JAN 2018)

- 9.1 Accompanying this submission is Appendix 6 of the Site Assessment Methodology and Summary of Outcomes which forms part of BBC's evidence base (Appendix G).
- 9.2 Appendix 6 of the Methodology analyses Green Belt sites on the edge of larger villages. Site 073 (land to the west of Crosby Close, Mountnessing) is discounted on the basis of deliverability, rather than Green Belt impact (again, demonstrating its suitability for Green Belt release). The deliverability concern relates to highways access issues in terms of safe, viable access into and across the site.
- 9.3 As identified previously in this submission, any concerns relating to access have been resolved, as evidenced in the Waterman note (Appendix H) and subsequent dialogue with officers (Appendix N). The latest access plan (Appendix I) has been agreed by ECC officers as satisfactory in highways terms and no likely objection will follow.
- 9.4 The site is therefore considered deliverable and the assessment's failure to acknowledge this (through previous representations) has prevented the site's progression through the Local Plan towards allocation. The assessment, in its erroneous contribution to informing the Local Plan site allocations with regards to Green Belt release, has undermined the soundness of the Local Plan and its site selection process.

Green Belt

- 9.5 The BBC evidence base has assessed the Green Belt contribution of the site as low, and the 10th lowest contributor to the Green Belt out of the 203 sites assessed within the Borough. Such evidence can be found in the reports below, and also for ease at Appendix F:
- March 2016 – Appendix L5 – Overall Contribution of Sites to Green Belt Purposes Housing Assessment;
 - March 2016 – Appendix L4 – Detailed Site Housing Assessment Sheets;
 - Housing Sites Assessment - Results in Assessment Results Order
- 9.6 In addition to the above, an independent report was commissioned to assess 073 in greater detail (Appendix P). This report concludes:

“We support the Council’s assessment that the site represents an area of some merit, is well contained and its development is only likely to have a limited impact upon the Green Belt and the wider landscape setting. This aligns with the findings within the Assessment of Potential Housing, Employment and Mixed Use Sites in the Green Belt - Working Draft (Crestwood Environmental, March 2016), which identifies the site as having an overall Low Contribution to the 5 purposes of the Green Belt. It is our view that the built form and mature vegetation structure that bounds the site on all sides, coupled with the proposals to only input bungalows on site, will serve to limit the effect of development on site and will ensure that views from the wider landscape are, for the most part, imperceptible.”

...It is therefore our view, that the site’s omission within the Sustainability Appraisal is not justified on landscape, visual and Green Belt grounds, and that an amendment should be made to include the site among those allocated as a suitable location for development within the Brentwood Borough. ”.

9.7 The summary within the SA also seeks to confirm the above:

“Site 073 (1.2ha) site is not assessed by the [current] Green Belt Study, but would appear to be well contained, with built development or mature tree belts on all sides.”

“In conclusion, site 073 does stand-out as a site that potentially has some merit”

9.8 Despite the previous assessments, the Part 3 Green Belt Appraisal (dated 31st January 2019) was published by BBC. This considered specific sites, albeit in limited detail. Site 073 was discounted, with the assessment explaining:

‘based on the progressive findings of the HELAA and wider evidence base, a selective approach to the assessment of additional has been undertaken. Overall, Sites (located within the Green Belt) which have been discounted for other environmental or strategic reasons (i.e. too small to form a strategic allocation), were not considered for further assessment.’

9.9 Whilst the assessment has sought to justify Site 073 (and other sites) being omitted from the assessment, the study assesses the significance of each site’s contribution to four of

the five purposes of the Green Belt, with an understanding the fifth purpose is implemented as an integral part of the Brentwood Local Plan.

- 9.10 Irrespective of its omission from Part 3, the site scored extremely well in previous assessments carried out by BBC, and given the site's characteristics have not changed since these assessments, and is underpinned by a recent independent assessment, the Land west of Crosby Close is a prime site for Green Belt release.

PROPOSED AMENDMENTS TO THE PSLP

- 9.11 The current PSLP seeks to allocate sites that are more harmful to the Green Belt than the Land off Crosby Close, Mountnessing, therefore in order for the Plan to be found sound, we recommend the allocation of the Site for specialist housing for older people within the PSLP.

10.0 Conclusion

- 10.1 The PSLP recognises the need for housing over the plan period, including within the short term given the lack of five-year housing land supply and low past delivery rates. This is further reflected in BBC's approach to providing a stepped trajectory, recognising the lead in time for the delivery of large strategic sites.
- 10.2 Given this stepped approach, the PSLP does not therefore provide sufficient allocations to meet the full housing need in the initial part of the plan period. Whilst it seeks to rectify this over the longer term, the PSLP should allocate all suitable sites to provide housing in the short term to seek to meet as much of the housing need as possible in accordance with the NPPF, and also not place reliance on windfall sites that are highly likely to not materialise, due to identified constraints.
- 10.3 We consider the PSLP has not achieved this, failing to be positively prepared in this regard. As highlighted in these representations, Scott Properties have a site which can deliver housing in the first five years and it is not allocated due to unjustified highways conclusions in the SA, that have failed to consider previous representations.
- 10.4 Not only does the PSLP fail to meet as much of its housing need as possible in the early part of the plan period, the PSLP further fails to meet the housing needs of older people and also support existing communities so that they can thrive:
- “To promote sustainable development in rural areas, housing should be located where it will enhance or maintain the vitality of rural communities. Planning policies should identify opportunities for villages to grow and thrive, especially where this will support local services. Where there are groups of smaller settlements, development in one village may support services in a village nearby.”* Paragraph 78, NPPF (2018).
- 10.5 The PSLP proposes care homes on strategic sites and housing built to accessible standards (which would be available for the general market, not specifically for older people). This will not be sufficient to meet the existing or future demand for specialist accommodation. This approach also fails to provide housing suitable for older people within any existing communities within the Borough, which is inconsistent with the NPPF and the stated aim of the PSLP.

- 10.6 Policy HP04 recognises the need for specialist housing, but given the Green Belt constraints across the Borough it is difficult to understand where BBC expect sites to come forward if they are not allocated through the Local Plan. Whilst we support the principle of Policy HP04, it is not currently robust enough to provide sufficient housing to meet the need for specialist accommodation and would in fact be expected to hinder and constrain the delivery of suitable sites to meet the identified need.
- 10.7 The failure of the PSLP to suitably allocated sites for specialist accommodation results in the Plan being unsound.
- 10.8 The land to the west of Crossby Close in Mountnessing promoted by Scott Properties is considered suitable, available and achievable for the development of specialist accommodation in accordance with the PSLP's aspirations for sustainable growth. As well as an identified local need for such accommodation, it has also been demonstrated through the social media campaign undertaken by Scott Properties that there is a local demand for bungalows around Mountnessing, equating to at least 92 dwellings. In addition, the evidence supplied demonstrates that the Land off Crossby Close is significantly less valuable in Green Belt terms than many of the sites allocated with the PSLP.
- 10.9 In conclusion, the removal of the site from the Green Belt and its allocation for specialist accommodation will provide such housing within the first five years, reduce the need for a stepped approach to meeting housing needs, contribute to the five-year housing land supply, deliver much needed homes for older people within their local area, and support Mountnessing and its ability to thrive. Such an approach would assist the PSLP in being sound in accordance within paragraph 35 of the NPPF.