



Brentwood Regulation 19 Proposed Submission Local Plan Review

Consultation Response

Land at Rayleigh Road, Hutton

Prepared on behalf of Turn2Us
March 2019

Site Name:	Land at Rayleigh Road
Client Name:	Turn2Us
Type of Report:	Local Plan Representation
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Introduction and Background

1. These representations on the Brentwood Borough Proposed Submission Local Plan (February 2019) (PSLP) are submitted by Strutt and Parker on behalf of Turn2Us and in relation to land at Rayleigh Road, Hutton.
2. Land at Rayleigh Road, Hutton ('the Site') is also known as Land to the East of Hutton Village, Hutton as part of the Council's plan-making process, and is site reference 219.
3. The Site has been actively promoted by Turn2Us (including under their previous name of Elizabeth Finn Care Trust) throughout the plan-making process. Previous representations have been made at various stages of the Local Plan, including in relation to call for sites exercises and consultations on iterations of the Local Plan.
4. Turn2Us are the freeholder of the majority of the area of land between Hutton Village, Rayleigh Road and Church Lane. A small portion of this land, located immediately adjacent to the existing settlement and adjoining Rayleigh Road and Hutton village, measuring 2.4 ha is being actively promoted by Turn2Us for residential allocation in the Council's new Local Plan.
5. A location plan for this site is provided as **Appendix A**.
6. In addition, discussions with the Council through the plan-making process established that there is a need for the Local Plan to identify suitable sites to accommodate extra care accommodation (Use Class C2) to meet local needs. Consequently, a larger site within the location of Rayleigh Road, Hutton – suitable to accommodate both extra care accommodation (Use Class C2) and residential development (Use Class C3) was also put forward for consideration. This site was also submitted to the Council for consideration and was appended to our representations at the Regulation 18 stage. For completeness, a copy of this site plan is provided here again as **Appendix B**.
7. Neither the Site nor the wider land including potential for Use Class C2 accommodation are identified for allocation in the PSLP. Their rejection is considered unjustified, and to result in a PSLP which does not promote sustainable development.
8. By way of background, Turn2Us is a national, registered charity with a mission to fight poverty in the UK and Ireland, helping individuals who are struggling financially to gain

access to financial help. Each year the charity assists several million people in a range of different ways. It has seen a steady increase in the number of people turning to the charity for help in recent years.

9. The charity receives no Government funding. It is through donations and legacies that it raises funds, and the charity is committed to ensuring long-term financial sustainability. Following careful implementation of its financial sustainability plan, in 2016/17 Turn2Us delivered its first deficit-free result in a decade. Turn2Us is a not-for-profit organisation, and net income is directed to providing assistance to those in need.
10. As part of efforts to ensure the financial sustainability of the charity, Turn2Us has been reviewing its assets and their potential to assist the charity. Such assets include land at Rayleigh Road, Hutton. The potential for this Site to sustainably help meet housing needs is considered mutually beneficial to the Council, Turn2Us, and the wider community.
11. The Charity's holdings have been promoted for residential development and an extra care scheme to complement the care home opposite the site. The extra-care facility would provide employment at a range of skill levels, benefiting the immediate area and the district. Further, the holdings are not proposed for allocation in full and a majority of the promoted site could be made available to a public body to safeguard the land as public space. This would be a significant benefit to Hutton but such possibilities have not been fully considered in the preparation of the PSLP and in regards to achieving its objectives.

Plan Period

12. The proposed 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.

13. 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).

Total housing requirement

14. At paragraph 4.13 of the PSLP, it states that the Borough's housing requirement it plans 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).
15. 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
16. 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 result in a requirement of 452 dwellings per annum.
17. 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).
18. 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 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 Brentwood Borough Council having objected to this approach, but neither is there any indication that the PSLP addresses any of this unmet need.
19. 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.

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

20. 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'.
21. 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.
22. 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.
23. 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.

Five-year housing land supply and housing trajectory

24. The Council is required to demonstrate a five-year housing land supply at any point in the plan period².
25. 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 such a 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
26. 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.
27. 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.
28. 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.
29. 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.
30. 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 considerable deliverable for the purposes of the five-year housing land supply. Table 1 of the HLSS suggests that at *least* 1,042 dwellings in the reported supply

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

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

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.

31. A five-year supply of 653 dwellings compared to a requirement of 2,712 represents a 1.2-year housing land supply.
32. 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.
33. 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).
34. 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.
35. Furthermore, and in respect of the projected supply, we are concerned to note that Dunton Hills Garden Village is projected to delivery housing completions from 2022/23, i.e. falling within the first five years of the plan.
36. 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.
37. The site has yet to even be allocated. Once allocated, the PSLP proposes a masterplan and design guidance will be required 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 before development has even begun.

38. 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.

Specialist accommodation for an ageing population

39. At paragraph 6.6, the PSLP rightly recognises that the Borough has an ageing population. At paragraph 6.7 it states that the Government position is that older persons should remain at home rather than enter residential facilities (Use Class C2) where appropriate.
40. However, what the PSLP fails to appropriately recognise and address is that for some people specialist accommodation or Use Class C2 accommodation will be more appropriate or necessary. It must be recognised that 'older people' is not a homogenous group, but a term that encompasses people with greatly varying accommodation requirements.
41. 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.
42. The PPG⁴ 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) may need to be assessed.
43. Notwithstanding the requirement 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 have not been able to identify any evidence of how the accommodation needs for older people have been assessed as part of the plan-making process.
44. The PSLP proposes care homes through residential development within strategic housing allocations at Land at West Horndon Industrial Estate (Policy R02); Land north of Shenfield (Policy R03); Ford Headquarters and Council Depot (Policies R04 and

⁴ Paragraph: 017 Reference ID: 2a-017-20190220

R05). These are proposed to provide, in total, 180 beds of Use Class C2 accommodation.

45. In the absence of an assessment of need, it is unclear if this will meet need in quantitative terms.
46. 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. As such, we question whether the PSLP as currently drafted will ensure provision in the short-term.
47. The PSLP also suggests that there is “potential” for provision of a care home of around 40 beds as part of the proposed residential allocation at Policy R19 for 75 dwellings. However, the policy provides no certainty this will be delivered.
48. In respect of the allocations proposed to incorporate Use Class C2 development, it is unclear if the land is available for this type of development.
49. Policy HP04 of the PSLP states that the Council will “encourage” provision of specialist accommodation, subject to a number of criteria. However, it is not clear how much specialist accommodation, where, or how this will be delivered.
50. 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 the Council should identify the need for specialist accommodation, and allocation deliverable site to meet this.

Proposed Approach to Hutton

51. Hutton is the second largest settlement in the Borough.
52. In 2011, the town had a population of 15,578 and a total of 6,564 dwellings (Census 2011). It is a large, established community and a local centre which benefits from a range of services, facilities, access to public transport, and employment opportunities.
53. Hutton is situated approximately 30 kilometres from Central London, 12 kilometres from Chelmsford and in a position well related to regional and national infrastructure. Hutton lies in close proximity to Brentwood and Shenfield on the A12 corridor.
54. Hutton has strong service and education provision. The settlement benefits from excellent access to Shenfield High Street on the Hutton Road which adjoins Rayleigh Road and runs centrally through the settlement on an east-west axis. The High Street provides a variety of services, shops and businesses.
55. The PSLP sets out the Borough's settlement hierarchy. Hutton is identified as Category 1 – Main Town.
56. It is clearly a sustainable location to which a proportion of the Borough's housing need should be directed. In addition, as an established community, it is important that the Local Plan manages the growth of the settlement to ensure the vitality of the community is sustained or enhanced.
57. However, notwithstanding the above, the PSLP proposes to direct no housing growth to Hutton. This contrasts sharply with the proposed approach to the other settlements identified as Category 1 – Main Towns. It is also notable that a considerable amount of growth is being directed to settlements below Hutton within the settlement hierarchy.
58. The PSLP fails to support the sustainable growth of Hutton. The proposal to direct none of the Borough's housing need to Hutton is unjustified, and inconsistent with national policy.
59. To ensure the Local Plan is sound, land should be allocated to ensure the sustainable growth of Hutton.

The Site

60. The Site measures 2.4 ha in area and is low quality grazing land used as paddocks. As such it principally comprises open pastoral grassland of low landscape value. It is located in the north-western corner of the Hutton Conservation Area, to which it could not be said that the site makes a positive contribution.
61. The Site is roughly triangular in shape, and constrained to the west, south-west, and east by existing development, and to the north by the A129 Rayleigh Road.
62. The Site is on land currently allocated as Green Belt in the Brentwood Replacement Local Plan (2005), but is situated immediately adjacent to the settlement boundary of Hutton.
63. A considerable amount of technical work has been undertaken in respect of land at Rayleigh Road, Hutton and previously submitted to the Council through previous stage of the plan-making process. This technical work demonstrates the Site is sustainable, suitable, available and achievable site to help meet the Borough's housing need. Work undertaken, and previously provided by included here again for completeness, includes:
 - Green Belt Appraisal prepared by Lockhart Garratt (**Appendix C**)
 - Heritage Assessment prepared by Terence O'Rourke Ltd (**Appendix D**)
 - Site Opportunities and Constraints plan prepared by Go Planning Ltd. (**Appendix E**)
 - Site Master planning prepared by Go Planning Ltd. (**Appendix F**)
 - Landscape Assessment prepared by Lockhart Garratt (**Appendix G**)
 - Tree Constraints and Opportunities Report prepared by Lockhart Garratt (**Appendix H**)
 - Ecological Constraints and Opportunities Report prepared by Lockhart Garratt (**Appendix I**)
 - Access Appraisal prepared by Journey Transport Planning (Appendix XX)
 - Delivery Statement (**Appendix J**)
64. Within previous submissions to the Council, we have set out the sustainability of land adjacent to Rayleigh Road, Hutton for residential development, and an overview of these is provided again here, as follows.

65. There are three dimensions to sustainable development: economic; social and environmental.
66. In terms of economic impact, there is an inherent link between providing homes and the creation of jobs. Benefits of the site's development include additional local expenditure in and around Hutton from the additional residents. The intention for the land adjacent to Rayleigh Road, Hutton is to provide homes for people working in and around the Hutton area, assisting in local economic development.
67. The body of environmental consultancy work including detailed landscape appraisal, arboricultural investigations, ecological surveying and site master planning previously submitted to the Council have confirmed that the site can be brought forward for development without undue harm to the environment. Development of the site will reduce pressure to accommodate development on potentially more environmentally sensitive sites.
68. In respect of social impacts, the land adjacent to Rayleigh Road, Hutton is very well connected to local service provision with the majority of Hutton and Shenfield's services within a 2km radius of the site. In addition, the site benefits from excellent public transport links. The provision of homes to meet housing needs will have very significant social sustainability benefits.
69. Notably, the Council's evidence base supports the view that the Site is suitable, available and achievable for development, as confirmed by through by the assessment of the Site within the Brentwood Borough Council Housing and Economic Land Availability Assessment (October 2018) (HELAA). The HELAA projects the site can be delivered in years 1-5, and we concur with this view given the relatively small scale of the proposed development and the lack of constraints to delivery.

Strategic Environmental Assessment / Sustainability Appraisal (SEA/SA)

70. 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.

71. In addition, the Planning Practice Guidance⁵ 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.
72. Sustainability appraisal of the PSLP has been published: the Sustainability Appraisal of the Brentwood Local Plan January 2019 (the SA).
73. Site 219 is one of the 'shortlisted omission sites' in the SA, but did not progress to the final shortlist.
74. The SA explains that a number of sites were identified through the HELAA that were considered developable or deliverable, but are nevertheless not proposed to be allocated in the PSLP.
75. Table A of the SA provides commentary on these shortlisted omission sites. Of relevance to Site 219 it states:

“Hutton Village Conservation Area (CA) comprises the land to the south of the A129, stretching as far south as Hutton Hall and All Saints Church. Two shortlisted omission sites (HELAA 219, 317) comprise the areas of open land; however, both are heavily constrained in heritage terms. Maintaining the landscape gap between Hutton (Brentwood/Shenfield) and Billericay is a further consideration”.
76. No details are provided to explain in what way Site 219 is heavily constrained in heritage terms.
77. In contrast, at the Regulation 18 stage consultation, a detailed Heritage Assessment was undertaken by Terence O'Rourke Ltd in respect of this site, and submitted as part of the plan-making process. It is provided again here for completeness (Appendix D).
78. As the Heritage Assessment notes, the site is located within the Hutton Conservation Area. The Heritage Assessment considers the character of the Conservation Area in detail, heritage assets within the locality, and the potential for development to be accommodated on the site without harming the character or significance of these.

⁵ Paragraph: 038 Reference ID: 11-038-20150209

79. The Heritage Assessment identified the following key characteristics of the Conservation Area, which would need to be taken into account in the consideration of the development of the site:
80. The survival and legibility of the historically dispersed pattern and the separate development areas.
81. The contrast with the modern development to the west of Hutton Village, which creates a very clear distinction between the conservation area and its setting, with no blurred boundaries.
82. The distinctive road layout allows extensive views within and across the parkland at the centre of the Conservation Area.
83. Trees within house plots and along boundaries are effective in screening the existing development including the large buildings of the care home in views across the parkland from the south.
84. The band of trees and stables to the rear of Hutton Court creates a division and gives the northern triangle of land a weaker parkland character.
85. The estate cottages and the linear group at Hutton Village are a possible model for new development.
86. The Heritage Statement suggests detailed appraisal of any future proposals for development within the Conservation Area by design and heritage advisors be used to inform the details of the future development of the site.
87. The Heritage Statement concludes that the site is capable of accommodating varying forms of development that in themselves would not result in harmful change to the significance of the Conservation Area. The acceptability and degree of change would have to be subject to careful consideration of layout and design, but it is clear that heritage issues are not a reason to reject outright the development of the site or its allocation in the Local Plan.
88. This detailed evidence from the Heritage Assessment has been provided to the Council, and we are not aware of any assessment of equivalent detail which contradicts its findings.

89. Having regard to all of the above, heritage concerns do not justify the rejection of the Site.
90. The SA also makes reference to maintaining a landscape gap between Hutton (Brentwood / Shenfield) and Billericay, though this is not expressed as a reason for rejection, nor does it appear to have been a determinant factor in the decision not to allocate the site.
91. However, for completeness, it should be recognised that the Green Belt Assessment Part 3 produced in respect of the Local Plan confirms that development of the site does not give rise to concerns in respect of coalescence of settlements. Green Belt issues are discussed further, later within this representation.
92. In short, the SA does not provide a justified reason for the rejection of the Site.
93. 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.
94. Our first point in relation to the approach taken is that it is very simplistic – the assessment of sites appears to be based purely on physical distance to various features / facilities / designations.
95. For example, in relation to criteria 10 (Conservation Area) a site is considered to automatically score 'particularly poorly' if it intersects with a Conservation Area. There is no evidence that any consideration has been given as to whether a particular Conservation Areas is particularly sensitive to development (in many instances (e.g. town centres) Conservation Areas will be very much sustainable locations for development, provided development is implemented sensitively); or how development may impact on a Conservation Area. There may be cases where development could enhance a Conservation Area. Indeed, and somewhat confusingly, the SA acknowledges itself within Table A and in relation to cultural heritage, that it will also sometimes be the case that development can enhance heritage assets.

96. In respect of Site 219, it is deemed to perform particularly poorly in relation to criteria 10 (Conservation Area) due to it being located within a Conservation Area. As noted earlier, in the case of the Site, a detailed Heritage Assessment has been undertaken which confirms that heritage issues do not render the Site unsuitable for development.
97. We would also comment that it is unclear how the SA scoring has been used in decision-making, given that Site 219 has been assessed within Table C as more positive than a number of sites which are proposed to be allocated. It is not clear what weight has been applied to the different criteria.
98. The only other criteria against which the SA assesses the site as performing poorly is criteria 7 (GP surgery). Again, as with other criteria, assessment is based purely on physical distance. It is clear that this alone is a determinant factor, as there are other sites which are also measured as being over 1.5km from a GP surgery, but which are proposed to be allocated.

Green Belt

99. A detailed Green Belt Appraisal was prepared in respect of the Site by Lockhart Garratt and submitted at the Regulation 18 stage consultation. A copy is provided again here, for completeness (Appendix C).
100. The Green Belt Appraisal considers the contribution of the site in relation to the five purposes of including land in the Green Belt, as per paragraph 134 of the NPPF:
101. 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.
102. The Green Belt Appraisal provides a thorough review of the site in relation to these purposes, and concludes that the site does not perform as Green Belt land as defined by national policy. It is therefore, the Appraisal finds, “not suited to being included within the geographical extent of the Metropolitan Green Belt” (paragraph 5.3.2).

103. The Green Belt Appraisal further concludes that the removal of the site from the Green Belt and its subsequent residential development would not:
- Cause undue harm to the setting of Hutton;
 - Lead to settlement coalescence; or
 - Diminish the wider character of the Metropolitan Green Belt.
104. A Part 3 Green Belt Appraisal (dated 31 January 2019) has been published by the Council. This considers specific sites, albeit in limited detail. Site 219 has been assessed through the Part 3 Green Belt Appraisal.
105. There is no evidence that the findings of the Green Belt Appraisal that was produced in respect of the Site by Lockhart Garratt, and which considered the Site in far greater detail than the Council's Part 3 Green Belt Appraisal, have been taken into account.
106. We are concerned with the simplistic approach that appears to have been taken in considering the contribution sites make to the purposes of the Green Belt. For example, in relation to Purpose 3 (to assist in safeguarding the countryside from encroachment) the methodology states that where the majority of the existing land use is considered an appropriate land use with regard to Green Belt policy, and which contribute strongly to the functional countryside, such land will automatically be regarded as functional countryside. Such a finding then appears to contribute to a site being found to a high overall contribution to the purposes of the Green Belt. This approach to Green Belt assessment contrasts to that undertaken by Lockhart Garratt in respect of the Site, which – taking the consideration of Purpose 3 again by way of example – examines the relationship between the Site and the existing settlement in far greater detail, resulting in the provision of information which is of far greater use for the purposes of plan-making.
107. The Lockhart Garratt Green Belt Assessment provides a far more detailed and robust review of the Site's contribution to the purposes of Green Belt than that published by the Council, and should be considered as part of the plan-making process.
108. In addition, we note that despite the Council's Part 3 Green Belt Appraisal stating that Site 219 has "little or no relationship to historic town" on the first page of the Site's assessment. However, on the second and final page of the assessment it concludes

that the Site has a “Strong Relationship with Historic Town (SHRT)”, which appears to have contributed to the Site being found to have a moderate / high overall contribution to the purposes of the Green Belt. This is clearly an error.

Overview

109. The Council's own evidence base states that Site 219 is suitable, available and achievable for development. Development of the site is supported by a wealth of technical evidence that confirms its suitability, including in relation to the lack of harm to its development to the purposes of the Green Belt.
110. The reasons given for the rejection of the Site are spurious and based on erroneous conclusions.
111. The rejection of Site 219 is unjustified, and overlooks an opportunity to correct other soundness deficiencies in respect of the Local Plan, including in relation to the overall quantum of housing proposed and the lack of support for any growth of Hutton.
112. The allocation of Site 219 for development will assist in curing defects in respect of the Local Plan, enabling it to be a sound plan.