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Head of Planning and Environmental Health Brentwood Borough Council Town Hall Ingrave Road Brentwood Essex CM15 8AY

Your reference: LPD/DraftPlan/1 - Mr Gordon Glenday

19th March 2016

Dear Sir

BRENTWOOD DRAFT LOCAL PLAN CONSULTATION Call for Sites Land at Coxtie Green Road, Brentwood, Essex

Thank you for your letter dated 10th February 2016.

In response to the invitation to put forward during the consultation period (10th February 2016 until 23rd March 2016) alternative sites for new homes, I am instructed by my clients, Mrs Johnson, Mrs Reynolds and others, the current joint owners of the site edged in RED on the required site map, to investigate the potential for the development of the site at this location for further housing. Such housing to be low cost and include, inter alia, an element of social housing.

The Site and Its Surroundings

The site at Coxtie Green is a site of about 3.40hectares (8.40acres) located on the northern side of Coxtie Green Road west of its junction with Mores Lane/Lincolns Lane and east of the more recently developed and now well-established Warwick Place (See below). This is designated Metropolitan

Green Belt.

It is the site of a former sports ground comprising football pitches and a large hardsurfaced area for carparking with in and out vehicular access onto Coxtie Green Road. There is perimeter planting screening the site from the road.

The site is well served by utilities with access to main electricity, gas and water supplies and telecommunications. There is access to a public soil sewer in Coxtie Green Road via a privately built pumping station facility, which has been designed with spare capacity, within Warwick Place.

Adjoining land to the west, the site of a former works for the production of animal feed, was redeveloped with planning permission granted in 1986 with a minor access road (Warwick Place) and 16 detached houses with double garages at a density of approximately 20dwellings per hectare (8dwellings per acre). Provision was made within that development for alternative access to the identified site at the rear of the older terraced block of properties, 253 – 265 Coxtie Green Road.

There is a small settlement, which has developed about the road junction and a public house, The White Horse PH, and the identified site is situated within tightly knit ribbon of frontage development extending westwards from it. The redevelopment of the former industrial site, Warwick Place, marks the western extent of the settlement. However, land further to the west is extensively used commercially as a nursery/garden centre with an associated dwelling-house.

Adjoining residential properties to the east have generous plot sizes, whereas the terraced houses and newer detached houses to the west have small to modest plot sizes.

The land adjoining the site to the north is publicly owned woodland with its associated public footpath system.

The settlement as a whole is served by an efficient public transport (bus) operation and within a short (walking) distance of the identified site there are primary and secondary schools, places of worship (Trinity and St Paul's Churches), shops, restaurants and a public house (The White Horse PH),

two privately owned golf courses, a country park, areas of public open space and woodland.

National Planning Policy Framework (NPPF)

There remains a general presumption against the construction of new buildings in the Green Belt but subject to certain exceptions including the following:-

- limited infilling or the partial or complete redevelopment of previously developed site (brownfield land) whether redundant or in continuing use, which would not have a greater impact on the openness of the Green Belt and the purpose of including land within it than the existing development. This was the justification for the development of Warwick Place with its sixteen family-sized dwelling houses.
- limited infilling in villages, and limited affordable housing for local community needs under policies set out in the Local Plan. It has long been established that a community's need for affordable housing is a material planning consideration which may properly be taken into account in formulating development policies.

We understand the term to mean housing, which by definition comprises a range of house types and sizes available primarily for people in the surrounding rural area(s) of the borough, at below market prices and controlled to ensure availability in perpetuity to meet the identified needs of those, who could not otherwise afford to purchase their homes on the open market.

Borough Local Plan Policy

We are aware that the adopted Green Belt policy of the local plan reflects national and regional planning policy guidance namely, that within the Green Belt permission will not be given, except in very special circumstances, for the construction of new buildings for purposes other than agriculture, mineral extraction or forestry, small-scale facilities for outdoor sport and recreation, institutions requiring large grounds, cemeteries or similar uses, which are open in character.

However, local planning policy states that in very special circumstances the development of small-scale low cost rural housing may be permitted in the

Green Belt subject to certain criteria being fully met.

Achieving an Appropriate Mix

It may be desirable in planning terms that new housing development on a substantial scale in both urban and rural areas should incorporate a reasonable mix and balance of house types to cater for a range of housing needs.

There is in the borough a need for a higher proportion of two bedroom units to create better housing offer and address the increasing need identified for smaller properties due to demographic and household formation change (Strategic Housing Market Assessment 2013). A 65% small and 35% large unit split is recommended and a dwelling unit size is suggested.

It further encourages authorities to consider releasing small sites, which development plans would not otherwise allocate for housing within or adjoining existing villages, and on which housing would not normally be permitted. Where sites are released for low cost housing as an exception to normal policies of restraint, it will be essential for the planning authority to satisfy itself as to the adequacy of arrangements to reserve the housing in question for local needs, both initially and on subsequent change of occupant.

Low Cost Market Housing

Low cost housing is likely to be smaller one and two bedroom units which are provided to meet the needs of households with income levels just adequate to access the housing market. Given that household growth in the borough will be mostly from smaller households, smaller units will play a key role in meeting future market housing requirements.

The delivery of these smaller units within the market sector will be important in addressing a more balanced type and size stock mix.

Affordable Housing Delivery

Land supply is crucial to the provision of housing and land available free or at a discount is often the key to making a social housing scheme viable. It is clear from the scale of affordable need identified by survey - the annual need level of 234units i.e 64.6% of the full potential annual housing delivery - that the Council will need to negotiate with private landowners and developers to be able to deliver the scale of housing required.

87% of the sites identified by the SHLAA 2011 with a total potential dwelling contribution of 4,167 units are on greenfield sites.

The Case For Developing This Particular Site for Further Housing Including an Element of Social Housing

Warwick Place with its low density large detached family homes made little contribution to the planning objective of achieving a reasonable mix and balance of house types to cater for a range of housing needs. No provision was made for the growing need for low cost (*starter homes* part of the general market), affordable and social housing units and perhaps sheltered housing for the elderly.

Were the development of Warwick Place viewed as the initial stage (Phase I) of a more comprehensive/balanced approach to meeting the need for a wide range of new rural housing, then the appropriate development of the now identified site immediately adjoining might be seen as Phase II etc. to meet current and future housing need and address the missed opportunity of past redevelopment.

There is an acknowledged presumption against inappropriate development in the form of new building in the Green Belt except in very special circumstances, which in this case relate to

- the land is not strictly a greenfield site, it is land not suited to its
 former use lacking essential facilities for a modern sports facility,
 such as changing rooms, clubroom, and secure covered storage
 accommodation, poor surface water drainage, accessibility from
 major centres of population
- the new development could provide much needed affordable housing
- the new development would represent minor infilling within a now established settlement and tightly knit ribbon of frontage development.
- the opportunity to promote informal countryside recreation, and

- the opportunity to increase public open space provision, including children's play area facilities, in the area with improved access provided to it and beyond for informal countryside recreation for the local community and visitors.

There is a substantial and continuing unmet need for low-cost housing in the Brentwood area due to the following factors:

- reduction in local authority stock of and provision of housing
- insufficient housing association provision
- increased ownership of the housing stock
- rising property prices beyond the reach of first time buyers
- type of housing unsuitable
- young people with family ties within the Borough look for housing outside the Borough

New development of the site for housing would include significant planting to enhance the landscape. Indigenous species would provide both screening to soften the impact of new buildings, to safeguard the character and appearance of the area, to protect existing residential amenity and to enhance the visual amenities of the area.

The content, layout and form that such development should take would be the subject of discussion and negotiation with the local authority with a view to meeting the Council's specific land use planning objectives and specific housing needs.

Finally, the identified site is immediately available with all the necessary infrastructure and essential services in place.

Many thanks.

Yours faithfully

Michael Warner Chartered Planner Land at COXTIE GREEN ROAD, BRENTWOOD, ESSEX



