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Planning Policy Team  
Brentwood Borough Council  
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Brentwood  
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CM15 8AY

Our ref: SH006 – 6

10 February 2015

Dear Sir

**STRATEGIC GROWTH OPTIONS CONSULTATION  
EHS METALS AND LAND REAR OF 131 – 137 COXTIE GREEN ROAD, BRENTWOOD**

On behalf of Sunbury Homes, I am writing to respond to the current consultation exercise with regard to the Strategic Growth Options Consultation (January 2015), as part of the preparation of the new Brentwood Borough Local Plan. My client has an interest in land on Coxtie Green Road that is identified as a potential site for residential development and, as such, Sunbury Homes wishes to express their support for the creation of new homes in the north of the borough.

The document accepts that one growth option may not be able to address all of the borough's requirements for growth and that the growth options should not be considered in isolation: Sunbury Homes agrees that a pragmatic approach to accommodating growth is the only way that a balance between competing interests can be achieved. Sunbury Homes also supports the view that development in the Green Belt must be actively considered if the council is to meet its objectively assessed housing need. In this regard, it is appropriate for the northern part of the borough to play a role, using previously developed land in the Green Belt to deliver small scale schemes that can address local housing need.

Potential sites are identified in Figure 11 and the benefits of a dispersed form of development are clear, minimising the potential impact on the openness of the Green Belt by restricting development to brownfield sites or greenfield locations on the edge of the villages. With regard to brownfield sites, the preparation of a criteria based policy as part of the Local Plan to ensure that only appropriate sites are developed will ensure that a robust approach to housing sites in the Green Belt is created, but the new Local Plan also needs to allocate brownfield sites that are currently available for development – the two approaches need to run in parallel in order to ensure that the openness of the Green Belt is protected at the same time as the borough identifies sufficient sites to meet its housing need. Sunbury Homes would support a pro-active approach to accommodating development in the north of the borough and encourages the council to take a step further and consider, as part of the allocation of sites for residential use, the environmental and social benefits of redeveloping non-compliant and un-neighbourly industrial uses that cause harm to the Green Belt.

Sites 171 (Former EHS Metal Scrapyard, Coxtie Green Road) and 172 (Land rear of 131 – 137 Coxtie Green Road) comprise a scrapyards, industrial uses and hardstanding within the Metropolitan Green Belt. It has been determined from intrusive investigations that both sites have a degree of contamination and that this has the potential to impact on adjoining land and watercourses. As well as creating an opportunity to comprehensively deal with the historic contaminative uses, redevelopment of the EHS Metals Scrap Yard will remove a use which is incompatible with adjoining residential dwellings.

Sites 171 and 172 have already been promoted through the Strategic Housing Land Availability Assessment call for sites process and can be considered to be deliverable in the short term. The footnote to Paragraph 47 of the National Planning Policy Framework states that a site is considered deliverable if it meets the criteria of being (a) available now, (b) offers a suitable location for development now, (c) is achievable with a realistic prospect that housing will be delivered on the site within five years and (d) development of the site is viable. The proposed redevelopment of the site meets these four tests of deliverability.

Site 171 is currently in industrial use and the applicant has control over the whole site. As such, it is currently available for development because notice to terminate the tenancy can be served immediately and the remediation of the site and construction of new homes could commence as soon as the necessary permissions are in place.

The site is close to the northern edge of the existing Brentwood Urban Area and is part of the ribbon of development that extends westwards along Coxtie Green Road from Pilgrims Hatch. The site is not isolated in the countryside and reads as part of the transition between the built-up area of Brentwood and the rural area that surrounds it. The site would therefore be a logical and well-defined extension to the existing development on the north side of the road. The scrapyards is considered to be a nuisance and an un-neighbourly use, meaning that there is no significant harm caused by the land being changed to an alternative use. The designation of the land in agricultural use to the north as part of the Green Belt also means that there is no opportunity for the development of the site to begin a process of expansion into countryside to the north west of Brentwood. The proximity of the site to Pilgrims Hatch and northern Brentwood means that it is close to local services and facilities, including schools, shops and a health centre. Coxtie Green Road is served by a regular bus service (routes 71 and 72) and also has good access to employment areas, Brentwood's town centre, railway station and the M25/A12 junction. The mix, type and tenure of the new homes is an issue to be addressed through an application for planning permission but the site offers the opportunity to create a sustainable mixed community that builds on the existing social infrastructure and meets local housing needs. As such, the site can be considered to be a suitable location for development.

There is a realistic prospect that housing will be delivered on the site within five years: there are no physical, environmental, social or legal constraints upon the site that could prevent development, although it is accepted that extensive decontamination works will be required once the use as a scrapyards ceases. As such, upon the grant of planning permission for redevelopment for residential use, the site can be developed with new homes straight away, making it achievable in the short term.

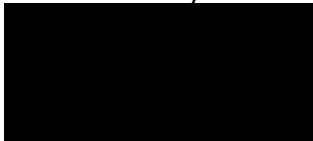
Site 171 is already controlled by a developer and pre-application discussions have taken place with a view to submitting an application for planning permission. Draft schemes for the site have been prepared and detailed options for the redevelopment of the site are currently being considered. Based on detailed financial appraisals undertaken by Sunbury Homes, subject to agreeing the appropriate contributions through the negotiation of a Section 106 Agreement, the site is a viable proposition.

In short, the site passes the tests of being available, suitable, achievable and viable and can therefore be considered to be a deliverable housing site. Moreover, the site is deliverable in the short term: it can be developed as soon as the necessary approvals are in place. As noted above, pre-application discussions are already underway and it is anticipated that an application for planning permission will be submitted later this year, emphasising that the site can be delivered for residential development in the near future.

As such, Sunbury Homes wishes to express its support for the proposed growth option in the north of the borough and, in particular, the identification of Site 171 and the adjacent Site 172 as locations suitable for residential development.

I trust that you will find these notes to be clear and straightforward, but if you have any queries, or should you wish to discuss the potential redevelopment of the two sites in greater detail, please do not hesitate to contact me at the above address.

Yours faithfully



**MICHAEL SMITH**  
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