



**Brentwood Draft Local Plan 2013 – 2033**

**Brentwood Enterprise Park**

**Representations on behalf of St Modwen Developments  
Ltd and S & J Padfield and Partners**

**March 2016**

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## 1.0 Introduction

- 1.1 These representations are prepared on behalf of St Modwen Developments Ltd (SMD) and S & J Padfield and Partners (SJP) to the Brentwood Draft Local Plan consultation March 2016.
- 1.2 The representation below sets out comments on the draft plan listed under policy or section number. In all cases the draft plan has been considered in the context of previous engagement and discussions with the Council.
- 1.3 Whilst the Local Development Plan has not yet reached formal submission or examination stage, in order to be considered 'sound' the Local Development Plan will be required to be:
  - **Positively prepared**  
*the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;*
  - **Justified**  
*the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;*
  - **Effective**  
*the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and*
  - **Consistent with national policy** –  
*the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.*
- 1.4 Where relevant our comments will therefore make reference to the above requirements and suggest changes to the plan to ensure it can be considered sound at public examination and that the site at Brentwood Enterprise Park can come forward in order to provide jobs and meet employment needs.
- 1.5 SMD and SJP look forward to continuing to work with the Council and other parties in taking forward the emerging local plan and supporting economic growth within the Borough.

## **2.0 Policy 5.1 – Spatial Strategy**

- 2.1 The focus of larger scale development on key transport corridors is supported. Sites in strategic locations such as the Brentwood Enterprise Park at Junction 29 of the M25 are particularly well suited to meeting needs of new development within the Borough during the plan period whilst minimising negative environmental or amenity impacts in line with the Council's policies and those set out within the National Planning Policy Framework (NPPF).

## **3.0 Policy 5.2 - Housing Growth**

- 3.1 The stated objective of the plan to meet full objectively assessed housing needs is strongly supported. In order to satisfy the duty to cooperate the Council will need to liaise closely with its neighbouring authorities in relation to all strategic matters (as defined in section 33A of the Planning and Compulsory Purchase Act 2004), but paying particular attention to the matter of housing growth. We would recommend that the Council submits a duty to cooperate statement in support the submission draft of plan. This statement should explain how the Council has satisfied the duty to cooperate throughout the preparation of the draft plan.
- 3.2 The provision of 362 dwellings per annum over the plan period is supported and the importance of strategic sites and jobs provision will of course be particularly important to support such growth in a sustainable manner. In this context, deliverable and available sites within single ownership such as the Brentwood Enterprise Park will be especially important in order to provide for phased delivery throughout the plan period.

## **4.0 Policy 5.3 - Job Growth and Employment Land**

- 4.1 The plan notes that provision is made for 5,000 jobs over the plan period at an annual average rate of 250. It is stated that "*Providing this many jobs will require a total of 32.8 hectares of new employment land*".
- 4.2 To provide further clarity on overall employment needs, we would suggest that the amount referenced in the policy should be increased in line with the figures on page 51 of the Plan to 36.7 ha.
- 4.3 Consideration should also be given to the findings of the Economic Futures Study (NLP, 2014) and in particular the scenario C options allowing for higher target taking into account the shortfall in housing delivery between 2012-2015 (adoption. i.e. before the plan is adopted). Taking this scenario into consideration it is clear that even higher levels of employment land would be required in order to for jobs to meet needs within the plan period.
- 4.4 We suggest that the final paragraph of Policy 5.3 is amended as follows:

*"Providing for this many jobs will require a total of 32.8 hectares of new employment land **as a minimum**".*

## **5.0 Policy 5.3 Supporting text**

- 5.1 The site at junction 29 is particularly important in terms of meeting employment needs.
- 5.2 The plan acknowledges that existing employment land amounting to 18.9 ha has been lost to preferred housing allocations and that this needs to be accounted for in the allocation of new employment land. Figure 5.13 and paragraph 5.61(3) account for existing employment land of 4.9 ha that is available for development. It is important to consider that, should this land not come forward, the amount of new employment land required will be higher than the stated 32.8 ha and this is why it is important to acknowledge this figure as a minimum.
- 5.3 With regards to paragraph 5.56, it is considered that the plan should provide for flexibility to meet the ambitious target for job growth through providing sufficient employment land. Providing a greater amount of land can therefore benefit flexibility and help ensure that employment needs can be met. In order to provide such flexibility the Council should adopt a range figure for new employment land allocation, with the figure of 32.8 ha being the bottom end of the range, i.e. the stated minimum.
- 5.4 The focus on M25 Junction 29 as an employment cluster is strongly supported. This part of the borough is a sustainable location because it is particularly well located in relation to strategic transport links, business needs, and is easily accessed from the key centres of population around the borough and adjacent areas. The Brentwood Enterprise Park located at J29 forms the key strategic employment-led allocation in this context.

## **6.0 Policy 6.6 – Strategic Sites**

- 6.1 The identification of the Brentwood Enterprise Park as a strategic site within Policy 6.6 is strongly supported which recognises the critical importance of the sites to delivering the Plan's overall objectives.
- 6.2 The inclusion of an individual policy within the plan for each of the sites is supported and will assist with providing further certainty as to delivery and clarification when bringing forward outline or detailed planning applications on the site.

## **7.0 Policy 7.1 Supporting text**

- 7.1 Within paragraph 7.8, we acknowledge the statement that *"It is recognised that the A127 highway is constrained and further work will need to be undertaken with*

*the Highways Authority and Highways England to determine opportunities to improve capacity and traffic flow.”*

- 7.2 We believe that rather than currently constrained, it is more accurate to identify that it's forecast to be under increased pressure in future years with the realisation of local plan development; for further examination with Highways England this should probably apply to the M25 Junction 29 as a key gateway for the borough, including direct access to the Brentwood Enterprise Park.

## **8.0 Policy 8.2 – Brentwood Enterprise Park**

- 8.1 The allocation of Brentwood Enterprise Park is strongly supported. In order to ensure the plan is fully effective and justified in line with national planning policy we would request that the following changes are made:

- 8.2 The policy wording should formally state that the site is allocated for employment development and removed from the Green Belt.

- 8.3 In line with the wording later in the policy with regards to site 101A it is considered that the start of the policy should state “Brentwood Enterprise Park will provide new floorspace for employment development (*principally* use classes B1, B2 and B8)...”. This will reflect the other wording in the plan and allow for ancillary and supporting uses.

### ***Criteria a)***

- 8.4 Criteria a) within the policy currently states that “Employment uses and jobs provided on site are consistent with the economic strategy set out within this Plan, and support the vitality and viability of Brentwood Town Centre and other Borough centres”.

- 8.5 Whilst we acknowledge the intention of this wording to reflect the overall plan's support for Brentwood Town Centre in particular it is considered that an assessment of this issue and in turn the suitability of employment allocations is properly made at plan making stage, thereby making criteria (a) superfluous. The NPPF makes clear that the planning system remains plan led and that “*they should provide a practical framework within which decisions on planning applications can be made with a high degree of predictability and efficiency*”. In this context it is considered the policy as currently worded could potentially lead to a degree of unnecessary uncertainty or potential delay when considering proposals at planning application stage that could negatively impact on the delivery of jobs and employment land on the Brentwood Enterprise Park site. The employment uses considered appropriate on the Enterprise Park site are already detailed within the policy and therefore it is considered that criteria (a). should be removed from the plan in order to produce a predictable and efficient planning policy in line with the NPPF.

**Criteria b)**

- 8.6 Criteria b) regarding high design standards is supported and SMD fully recognise the importance of high quality design.

**Criteria c)**

- 8.7 Criteria c) covers Landscape and Buffer planting. The importance of landscaping and planting has been fully recognised in developing the proposals for the Brentwood Enterprise Park including significant input from chartered landscape architects Liz Lake Associates. Supporting work undertaken has established the extent of areas required for structural landscaping, earthworks and planting as part of this strategy. This will extend to a significant area to the south and east of the site. As set out elsewhere in this representation it is therefore proposed that the allocation should include this area of land, as this will allow for structural landscaping and earthworks to be undertaken to most appropriately mitigate the proposals. This inclusion within the allocation will also be essential to ensure a developable employment area of 23.5 ha in line with plan policies and to ensure a fully viable and deliverable proposal as required by NPPF paragraphs 173 and 182. The proposed area for structural landscaping and earthworks which should thus be included in the allocation area are shown on the plan attached as appendix A .

**Criteria d)**

- 8.8 Criteria d) of Policy 8.2 states *“In accordance with Policy 10.3 Sustainable Transport, proposals should be accompanied by: i.e. Green Travel Plan linking this site with Brentwood, Shenfield, West Horndon and Dunton Hills Garden Village.”*
- 8.9 We have no issue with developments requiring a Green Travel Plan, however clarification is sought regarding how a Travel Plan is proposed to link the site with Brentwood, Shenfield, West Horndon and Dunton Hills Garden Village. If this means that the Travel Plan should consider green/sustainable links to these places, we would suggest that the policy should be reworded accordingly.
- 8.10 The following section of the policy sets out wording specific to the Former M25 Works Site (Site 101A) and Land at Codham Hall North (101B).
- 8.11 Whilst located in proximity to each other, the allocation at site the Former M25 Works Site (Site 101A) represents a new strategic employment allocation whereas the land at Codham Hall North (101B) consists of the allocation of existing employment uses. For this reason, as set out elsewhere in this representation, we consider it more appropriate to cover the requirements for site 101A within the Policy 8.2 and cover site 101B within the general employment allocations within the plan. Whilst the sites will have a complementary role this better reflects the role that these sites will play in meeting employment needs and the strategic employment provided at M25 Junction 29.

8.12 This section of the policy makes reference to further detail being provided through supporting masterplan work. As set out in our comments on the supporting text below, it is considered that clarification is required that this will be carried out through the normal pre-application process rather than requiring any further formal policy documents which it is considered may delay delivery. For this reason we would request that the wording regarding masterplanning within the policy is removed and further clarification is provided in the supporting text as set out below.

***Land at Former M25 Works Site, South of A127 (101A)***

8.13 The allocation is strongly supported subject to comments below regarding the proposed allocation area.

8.14 We would however raise concern with regards to the current wording on market led needs and also suggest amendments to clarify acceptable uses on site.

8.15 Whilst flexibility to respond to demand is supported we would suggest the policy is worded as follows: “...with business floorspace (***principally*** use class B1, B2 and B8) ***taking into account*** market needs along with ancillary uses...”

8.16 We would also suggest current policy wording regarding attractive site frontages is unclear in how this would apply to the site, which in practice will have different levels and relationships with the different surrounding areas around the site. For this reason we would request the wording is amended to state that “The proposals will ***give consideration to relationships between built form and key viewpoints from the surrounding highway network***”.

***Land at Codham Hall, North of A127 (101B)***

8.17 The formal allocation of existing employment uses at Codham Hall is strongly supported. It is considered that changes are necessary to fully reflect the existing uses on the site and this is the subject of separate more detailed representations submitted on behalf of the landowner S&J Padfield and Partners.

8.18 We consider strategic employment would be focused on the part of the site to the south of the A127 (101A). This provides the greatest opportunity for new employment development to meet strategic needs. The existing employment sites at Codham North, whilst important in contributing towards employment in the Borough, are anticipated to principally serve the existing businesses and employment uses on site and therefore do not represent new strategic employment land. For this reason we should suggest that the allocation at Codham North (101B) is set out elsewhere within the plan such as within Policy 8.4 and Figure 8.3. This would allow Strategic Policy 8.2 to focus exclusively on the larger new employment site to the south of the A127 (101A).



## 9.0 Policy 8.2 Supporting text

- 9.1 Paragraphs 8.19 to 8.24 of the draft Local Plan set out supporting text relevant to the Brentwood Enterprise Park.
- 9.2 Paragraphs 8.19 and 8.20 are generally supported. Within paragraph 8.19 we would suggest the use of “enterprise park” rather than “business park” given the intended nature of the uses. Within paragraph 8.20 we would request amendments are made to cover the strategic employment allocation and the allocation of the existing employment sites separately within the plan.
- 9.3 With regards to paragraph 8.21 it is requested that the following changes are made to the plan wording:
- 9.4 In order to provide further clarity and certainty in terms of delivery we would request that the first section of this paragraph should be amended to state that “The land at the M25 works site (101A) **is allocated for use as** a new **enterprise** park of mixed B-uses **alongside ancillary and supporting uses**”.
- 9.5 The statement regarding masterplanning work is also supported. We would request that amendments to this wording are considered to clarify that “*Separate masterplanning work will be undertaken **as part of the pre-application process** to inform floorspace, mix, density, design and **assist in bringing forward the site to meet employment needs**”.*
- 9.6 Whilst large scale retail use is not proposed the plan wording should acknowledge that smaller scale retail use to support employment activities on site would be appropriate and would further enhance the sustainability of the development.
- 9.7 We would suggest that paragraph 8.21 is worded as follows:

*It is proposed that land at the M25 works site (101A) will accommodate a new **enterprise** park of mixed B-uses (B1, B2 and B8). The entire site should provide for high quality building design to reflect this area as a key gateway to the Borough and into Essex. Separate masterplanning work will be undertaken **as part of the pre-application process** to inform floorspace, mix, density, design and **assist in bringing forward the site to meet employment needs. The site will provide for a range of business uses, including office floorspace, general employment uses and distribution. Accompanying uses will also be considered appropriate such as hotel and restaurants. Small scale retail uses that support employment activities on site will be considered appropriate however larger scale retail will be directed to the town centre in line with the retail strategy and sequential approach.***

## **10. Figure 8.2 – Brentwood Enterprise Park**

- 10.1 There is inconsistency between this figure shown within the plan document itself and the plans included within the supporting document “Site Allocation Maps”.
- 10.2 We would additionally highlight that the allocation area does not fully reflect the details discussed previously and submitted in previous representations. Further work has also been undertaken regarding delivery, constraints and landscape proposals. On this basis we therefore consider the following changes should be made to the allocation areas:
- There is presently inconsistency in the allocated areas when comparing those areas within Figure 8.2 and those areas set out in the site allocations maps. There is also inconsistency with the representations recently submitted to the Strategic Growth Options Consultation. To ensure a fully deliverable and developable site we consider it essential that the allocated areas are updated to reflect this work as well as including the additional changes set out below.
  - The allocated area currently includes some smaller areas of land outside of the client’s control and proposed to form part of the Enterprise Park site. Minor amendments to the boundary can ensure that all of the allocated area is deliverable and developable by retaining this within the site.
  - Some of the site is currently constrained by gas pipelines and associated easements. Other parts of the allocated area as shown in the consultation document also currently include highway embankments and other non-developable land. Amendments to the boundary to exclude these areas where possible and include adjoining land to ensure that a full 23.5 ha of deliverable and developable employment land can be provided.
  - As set out in the draft plan there will be a requirement for structural landscaping to the south and east of the site. This area will also need to include enabling earthworks and level changes. In order to provide certainty in terms of delivery of 23.5 ha of employment land it is therefore considered essential that the allocation area is extended to include land for these purposes to an area totalling 35.4 ha as indicated on GMTW architects drawing 2177-PL100 attached as an appendix to this representation. If required it is suggested that the wording of the plan should acknowledge that no more than 23.5 ha of the larger site is anticipated to be used for employment purposes with the additional area being included to facilitate enabling landscape and levels works. This will ensure the development can be appropriately mitigated in landscape terms as well as ensuring that the site can be practically delivered given engineering constraints.
- 10.3 Plans are attached to this representation which take the above into account and which should be used by the Council for the purposes of identifying the Brentwood Enterprise Park in the draft plan.

## **11.0 Figure 8.3 – Employment Land Allocations**

11.1 It is highlighted that the plan proposes 32.81 ha of new employment land allocation; 15.39 ha existing employment sites to be allocated; and 46.03 ha of existing allocated employment land. The total employment area allocated in the new plan is therefore stated to be 94.23 ha. This summary provides helpful clarity to the plan and highlights that new employment land provided is limited to 32.81 ha and therefore it is clear that delivery of sites such as the Brentwood Enterprise Park early within the plan period will be required in order to support jobs and employment within the borough.

## **12.0 Policy 8.3 – Employment Development Criteria**

12.1 The encouragement provided for new employment proposals that provide new jobs and boost the local economy is supported. We consider that clarity should be provided within the plan as to whether these policy criteria will also apply to strategic employment allocations. If this is the case the criteria should be carefully worded so as not to prejudice or delay the delivery of such strategic sites.

## **13.0 Policy 9.11 – Previously Developed Land in the Green Belt**

13.1 We support the redevelopment of previously developed sites (brownfield) within the Green Belt. Strategic brownfield sites such as the Brentwood Enterprise Park will of course also be removed from the Green Belt as part of the plan and therefore we consider the policy and/or supporting text should make clear that the more detailed criteria within this policy will not apply to such sites.

## **14.0 Policy 9.12 – Site Allocations in Green Belt**

14.1 This policy deals with site allocations in the Green Belt. Whilst the requirements of the policy may only apply to housing sites it is considered that the policy should also make reference to employment sites allocated such as Brentwood Enterprise Park that will also be released from the Green Belt and will play a crucial role in meeting employment needs and providing jobs throughout the plan period.

## **15.0 Policy 10.1 – Sustainable Transport**

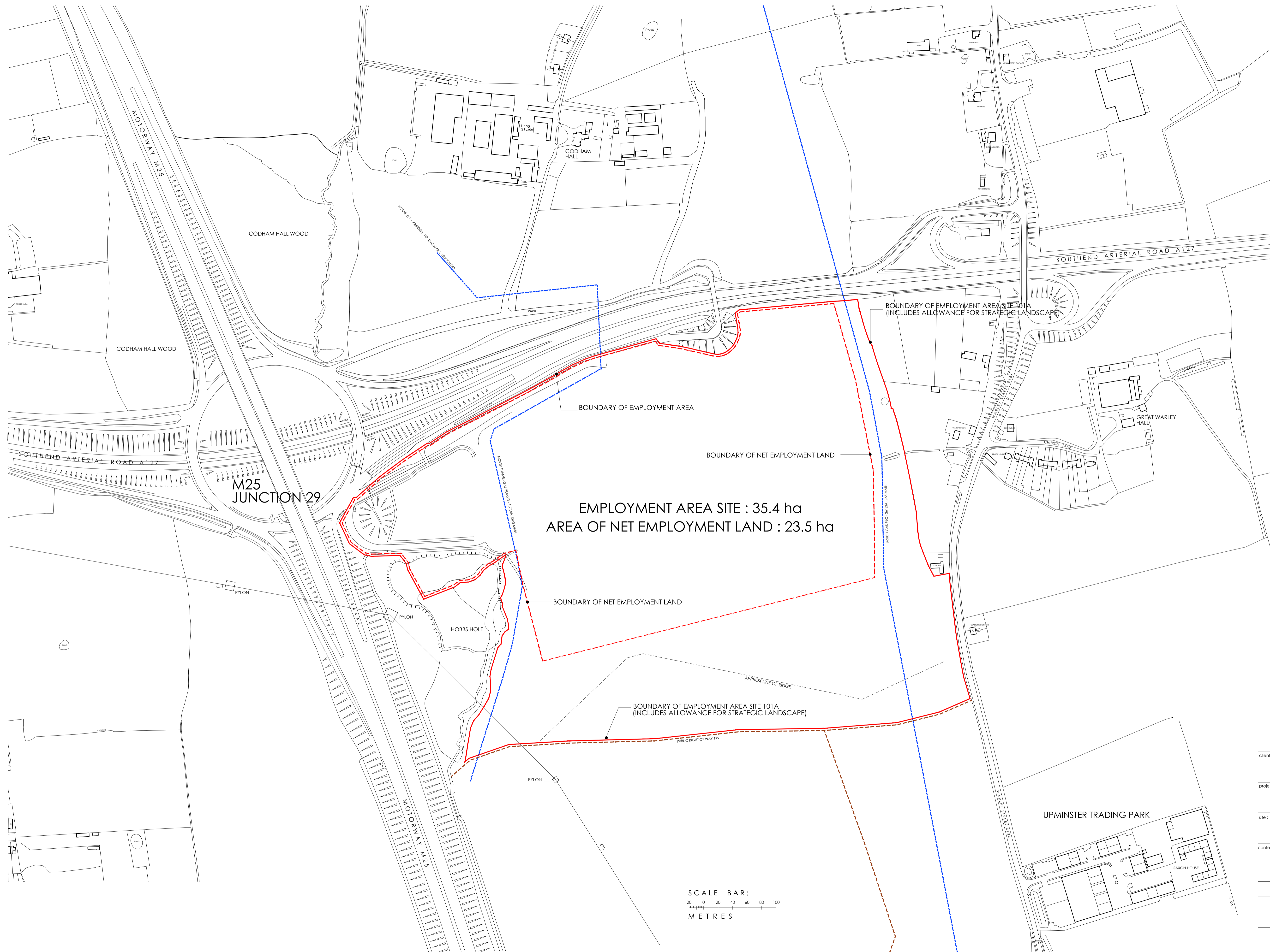
15.1 Proposals for a Green Travel Route linking Brentwood Town Centre with strategic allocations in the A127 corridor are supported. It is anticipated that this will form an important part of the transport strategy and travel plan for the Enterprise Park. The details of this proposal will of course be a matter for further work and it should be acknowledged that this may require input from Brentwood

Borough Council, Essex County Council and others in terms of delivering a co-ordinated strategy for this route.

- 15.2 The plan should acknowledge that strategic allocations such as Brentwood Enterprise Park will be located outside of Brentwood town centre. We therefore would request the wording of this policy is amended to make clear that *“Major generators of travel should be located in Brentwood town centre, in district centres, and within Strategic Allocations”*.

**Appendix A**

**Proposed revision to allocation boundary  
GTMW Architects Drawing 2177 – PL100**



EMPLOYMENT AREA SITE : 35.4 ha  
 AREA OF NET EMPLOYMENT LAND : 23.5 ha

SCALE BAR:  
 0 20 40 60 80 100  
 METRES

client : ST. MODWEN DEVELOPMENTS LTD.

project : PROPOSED DEVELOPMENT

site : BRENTWOOD ENTERPRISE PARK,  
 CODHAM HALL, ESSEX.

content : EMPLOYMENT AREA SITE BOUNDARY

MARCH 2016

1: 2500 @ A1

ALL DIMENSIONS TO BE CHECKED ON SITE

GMTW ARCHITECTS

RILEY HOUSE  
 RILEY ROAD  
 MARELOW  
 BUCKINGHAMSHIRE  
 SL7 2PH  
 T 01628 907000

dig.no : 2177 - PL100

revision :

## **Appendix B**

### **Proposed revisions to Draft Local Plan**

### **POLICY 5.3: JOB GROWTH AND EMPLOYMENT LAND**

Provision is made for 5,000 additional jobs to be provided in the Borough over the Plan period at an annual average rate of 250.

Job growth will be distributed primarily through new employment (B-use) allocations but supported by existing employment sites and appropriate redevelopment where appropriate. In addition, other business sectors will support job growth over the Plan period, such as retail, hotel and leisure uses.

Providing for this many jobs will require a total of 32.8 hectares of new employment land **as a minimum**. Areas allocated for employment purposes are set out in Policy 8.4 and identified on the Proposals Map.



### **Policy 7.1 Supporting text - Paragraph 7.8**

The A127 Corridor provides an opportunity for growth in the Borough that brings along new services, facilities and infrastructure. These same opportunities are not possible in the A12 Corridor considering the higher impact on existing services and lack of contained land to provide for similar development numbers. It is recognised that the A127 highway is constrained – ***forecast to be under increased pressure in future years*** and further work will need to be undertaken with the Highways Authority and Highways England to determine opportunities to improve capacity and traffic flow ***including direct access to the Brentwood Enterprise Park.***

## **POLICY 8.2: BRENTWOOD ENTERPRISE PARK**

~~Brentwood Enterprise Park will provide new floorspace for employment development (Use Classes B1, B2 and B8), made up of land at the former M25 works site (south of A127, site ref: 101A) and land at Godham Hall (north of A127, site ref: 101B), as set out on the Proposals Map.~~

***Brentwood Enterprise Park is allocated to provide 23.5 ha of developable employment land (Principally Use Classes B1, B2 and B8) taking to account market-led needs along with ancillary and supporting uses. Additional land is also allocated and removed from the green belt to provide for supporting landscaping and earthworks as set out on the Proposals Map. Proposals should give consideration to relationships between built form and key viewpoints from the surrounding highway network.***

Development proposals should meet the following criteria:

- ~~a. Employment uses and jobs provided on site are consistent with the economic strategy set out within this Plan, and support the vitality and viability of Brentwood Town Centre and other Borough centres;~~
- b. Development is of a high design standard, meeting aspirations to enhance this location as a key gateway into Brentwood;
- c. Landscaping and planting should be used to create a buffer and provide improved visual amenity between the site and surrounding land, minimising any amenity impacts; and
- d. In accordance with Policy 10.3 Sustainable Transport, proposals should be accompanied by:
  - i. Green Travel Plan linking this site with Brentwood, Shenfield, West Horndon and Dunton Hills Garden Village, and
  - ii. Transport Assessment.

~~Brentwood Enterprise Park will comprise the following while further detail is provided through supporting Masterplan work for the site:~~

### **~~Land at Former M25 Works Site, South of A127 (101A)~~**

~~Provision of 23.5 hectares of employment land is made at the former M25 Works Site with business floorspace (Use Classes B1, B2, and B8) to meet market-led needs along~~

~~with complimentary associated ancillary uses. The site will have a particular onus on high quality buildings and attractive site frontages to surrounding roads.~~

**~~Land at Codham Hall, North of A127~~**

**~~(101B)~~**

~~An opportunity will be taken to regulate existing employment uses on land at Codham Hall with provision of up to 6.6 hectares of employment development, specifically Use Classes B2 and B8 but with B1 office space where appropriate to support industrial uses and provide front office functions.~~

## Policy 8.2 Supporting text

### Paragraph 8.19

Previously developed land in this location provides an opportunity for new employment land in the form of an **business enterprise** park. The location is excellent in terms of transport links and is suitable for new floorspace of a scale that it would be extremely difficult to accommodate elsewhere in the Borough. It is consistent with the spatial strategy, creating an “employment village” within the context of other villages and links to Brentwood, and also utilises brownfield land.

### ~~Paragraph 8.20~~

~~Employment allocations for this site are proposed to be made up of two areas of land adjacent to the M25. Referred to collectively as Brentwood Enterprise Park (draft name), this includes the former M25 works site (101A) to the south of the A127 and land at Godham Hall (101B) to the north, as set out in Figure 8.2 and on the Proposals Map.~~

### Paragraph 8.21

*It is proposed that land at the M25 works site (101A) will accommodate a new **enterprise** park of mixed B-uses (B1, B2 and B8). The entire site should provide for high quality building design to reflect this area as a key gateway to the Borough and into Essex. Separate masterplanning work will be undertaken **as part of the pre-application process** to inform floorspace, mix, density, design and **assist in bringing forward the site to meet employment needs. The site will provide for a range of business uses, including office floorspace, general employment uses and distribution. Accompanying uses will also be considered appropriate such as hotel and restaurants. Small scale retail uses that support employment activities on site will be considered appropriate however larger scale retail will be directed to the town centre in line with the retail strategy and sequential approach.***

## **Policy 10.1 – Sustainable Transport**

...Future developments will be located in accessible locations to help reduce the need to Travel. Where travel is necessary public transport (rail, bus, taxi), walking, and cycling will be promoted as an alternative means of transport to the private car. Major generators of travel demand should be located in Brentwood Town Centre, in District Centres, **and within Strategic Allocations**. Applications for large scale development proposals will need to be accompanied by a Transport Assessment....