



Date: 14th March 2019

## Commercial Development

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Planning Policy Team  
Brentwood Borough Council  
Town Hall, Ingrave Road  
Brentwood Road  
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CM15 8AY

By email

Dear Sir/Madam,

### **RE: Brentwood Draft Local Plan Regulation 19 Consultation March 2019**

Thank you for consulting Transport for London (TfL) on the Brentwood Borough Council, Draft Local Plan (Regulation 19). The following comments represent the views of officers in TfL Commercial Development Planning Team (TfL CD) in its capacity as a significant landowner and are separate from any representations that may be made by TfL in its statutory role as the strategic transport authority for London.

TfL CD Property Development Team works to identify development opportunities throughout our landholdings. We work to unlock underutilised land through pursuing innovative solutions to enable development of our sites. We are committed to providing exemplary developments that will showcase the Mayors objectives of providing good growth. Within Brentwood, TfL CD has identified a site with the potential for residential development which could make a significant contribution towards meeting Brentwood and TfL housing targets.

### **Strategic Housing Allocation R10: Brentwood Railway Station Car Park**

TfL CD supports the principal of the allocating of Brentwood railway station car park as a strategic housing allocation. The site is a well contained underutilised brownfield site with excellent transport accessibility and should therefore be a focus for growth.

The draft site allocation boundary does not include a section of car park towards the east. An attached plan represents the parcel of land within of which TfL has an interest and for which we are exploring development feasibility, and which measures 1.39ha.

We note that the draft allocation includes the approximate capacity for 100 homes, which equates to an indicative net density of 104 dwellings per hectare. This is not in line with the content of the Draft Brentwood Town Centre Design Guide which identifies that up to "405 units per hectare is suitable around key transport nodes, such as Brentwood Station." We believe that the indicative density of the site should be revised upwards in line with the draft design guide.

Further to this, the site is brownfield, in a town centre location and adjacent to a significant transport interchange, therefore this is an opportunity to optimise residential development on this site in line with National Planning Policy Framework (NPPF). Optimising the residential density at Brentwood station car park would be consistent with paragraph 103 of the NPPF which states that "Significant development should be focused on locations which are or can be made sustainable, through limiting

*the need to travel and offering a genuine choice of transport modes” and Paragraph 118 (D) which states that planning policies and decisions should “promote and support the development of under-utilised land and buildings, especially if this would help to meet identified needs for housing where land supply is constrained and available sites could be used more effectively (for example converting space above shops, and building on or above service yards, car parks, lock-ups and railway infrastructure.”*

High level feasibility studies for this site indicate that a decked design could allow a greater density to be achieved on the site whilst still providing a compatible and neighbourly form of development. Taking into account the town centre location and prevailing form of development, we consider that the site could support a higher density form of development than that suggested.

We also note that Strategic Housing Allocation R14 the William Hunter Way car park includes the approximate capacity for up to 300 homes which equates to a net density of 245 dwellings per hectare. The background information sets out that viability analysis suggests that higher density residential development would be required to fund commercial and parking uses. If development at Brentwood railway station car park will need to re-provide existing commuter car parking, it is also highly likely that higher density residential development would be required to fund the additional infrastructure associated with parking uses. This would also be in line with the draft Brentwood Town Centre Design Guide which sets out that development should aspire to increase the density of the existing Brentwood Station area.

As such we would suggest that the same logic with regards to density assumptions are applied to both William Hunter Way car park and Brentwood railway station car park. Given the above, the central and accessible location of the site, we consider that an increased indicative density of up to 405 units per hectare would represent a more accurate representation of the sites likely housing capacity.

#### Concluding Remarks

We trust that the above and the enclosed is in order. In the meantime we would appreciate if you could confirm receipt of this letter. Should you have any queries, please do not hesitate to call me on 0207 054 7145.

Yours faithfully

**Luke Burroughs**  
Planning Advisor, Commercial Development

Cc:  
**Patricia Cazes-Potgieter**, Planning Development Manager, Commercial Development