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Planning Policy Team
Brentwood Borough Council
Town Hall
Brentwood
Essex
CM15 8AY

Oliver Milne



33 Margaret Street
London W1G 0JD
T: + 44 (0) 20 7499 8644
F: + 44 (0) 20 7495 3773
savills.com

Dear Sir / Madam

**Brentwood Pre-Submission Local Plan (Regulation 19)
Brentwood Railway Station Car Park**

Thank you for providing us with the opportunity to engage with the consultation on the Council's Pre-Submission version of its new Local Plan. We write on behalf of our client, Solum, who has an interest in the above site.

As part of the new Local Plan the Council is proposing to allocate the site for residential development which we fully support. Below, I set out a brief background and a summary of the site, before turning to specific comments on the draft allocation.

Background

Established in July 2008, Solum is a joint venture between Network Rail and Keir Property formed to attract private investment into the rail network and build much needed new homes close to railway stations. The joint venture specialises in developing underutilised sites near to train stations which in turn generates funding to enable station related and environmental improvements for the travelling public.

To date, Solum has completed schemes in Epsom, Christchurch, Haywards Health and Walthamstow, and has schemes in Redhill, Kingswood, Twickenham, Guildford and Bishops Stortford which are under construction.

The Site

The site is located to the west of Brentwood Railway Station, on the other side of Warley Hill. The site measures approximately 1.36 hectares in area and is broadly rectangular in shape. The site comprises surface level car parking, a light industrial unit that is currently occupied by a tyre repair service and a car wash service. Network Rail own the freehold of the site.

The site is bound to the north by a number of residential apartment blocks rising to 4-5 storeys in height, as well as light industrial units. To the east of the site is James Street which provides access onto the site and links the site to the local highways network. The site is bound to the south by railway tracks.

With regards to heritage, the site is not located within a conservation area and does not contain any statutory or locally listed buildings or structures. There are also no statutory or locally listed buildings or structures in the immediate vicinity of the site.

With reference to the Environment Agency's online Flood Map for Planning, the site is located within Flood Zone 1 (indicating the lowest probability of river and / or sea flooding).

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Draft Site Allocation

As part of the new Local Plan the Council is proposing to allocate the site for residential development. Draft Policy R10 currently states that:

“Brentwood Railway Station car park, as shown in Appendix 2, is allocated for housing development. Development proposals should consider the following:

A. Amount and Type of Development

- a. *provision for around 100 new homes of mixed size and type, including affordable housing.*

B. Development Principles

- a. *vehicular access via St. James Road;*
- b. *provision for pedestrian and cycle connections*
- c. *provision for public open space;*
- d. *development proposals should consider wider Town Centre parking needs in collaboration with other development sites where there is existing parking on site, in order to ensure that the current level of Town Centre public parking spaces is maintained.*

C. Infrastructure Requirements

- a. *a. the site is located within a Critical Drainage Area. This development may have the potential to impact on the Critical Drainage Area in respect of surface water flooding. As a result of this, the site is likely to require an individually designed mitigation scheme to address this issue.”*

Comments on Draft Site Allocation

In the first instance we note that the site allocation plan at Appendix 2 of the draft Local Plan (page 327) doesn't include the full extent of the Station Car Park (i.e. Network Rail's ownership). Please find enclosed a red line plan showing the area that Solum is looking to bring forward for comprehensive redevelopment. Such an approach, rather than a piecemeal approach, will ensure that a well-designed development is delivered in this part of the town that maximises the ability of the site to deliver new homes, key pieces of station infrastructure as well as public benefits. As such, it is respectfully requested that the site allocation plan at Appendix 2 be amended to reflect the enclosed.

Notwithstanding the above, we strongly support the proposed allocation of the site for residential development. The site is a key brownfield site in highly accessible and sustainable town centre location. Best of use of such a site should be made to relieve pressure on less suitable sites within the Borough to meet its needs.

In the context of making effective use of land, the allocation accords with the guiding principles of the NPPF which states that planning policies and decisions should give substantial weight to the value of using suitable brownfield land within settlements for homes and other identified needs, as well promoting and supporting 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.

In light of the above, the identified amount of development (i.e. 'around 100 new homes') represents an ineffective use of land which is contrary to the NPPF. Given the site's highly accessible and sustainable location, and given the context of the residential blocks to the immediate north of the site, it is considered that the site can accommodate a far greater density of residential dwellings. It is therefore respectfully requested that the wording of Policy R10 be amended to read 'provide for a minimum of 150 new homes...'.

In terms of delivery, we note that the supporting text to Policy R10 states that the new homes are anticipated to be delivered between 2029/30 and 2032/33. As mentioned above, Network Rail owns the freehold of the site



and Solum has been tasked with pursuing proposals for its development. It is anticipated that new homes could come be delivered from 2024. It is therefore respectfully requested that the supporting text be amended to reflect this.

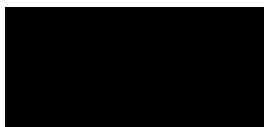
In terms of development principles, whilst we fully support the wider aspiration to increase public open space within the town, we question whether such provision is appropriate on this site. The site is relatively long and thin. As such, the provision of public open space has the potential to significantly limit the quantum of development which, as discussed above, would be contrary to making effective use of land in accordance with the NPPF. We therefore respectfully request that this development principle be removed from Policy R10.

Future Participation

I trust that the above is of assistance in the preparation of the new Local Plan. We would like to be kept up-to-date with progress and looking forward to further opportunities to engage.

I look forward to confirmation of receipt of these representations. Please feel free to contact me if you have any queries or if you would like to discuss.

Yours faithfully



Oliver Milne
Associate

Enc. As above