

LLR/bjg/0201542

02 October 2013

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

By Post & By Email,
planning.policy@brentwood.gov.uk

Dear Sir/Madam

**RE: REPRESENTATION TO BRENTWOOD LOCAL PLAN 2015-2030 PREFERRED
OPTIONS CONSULTATION RE ACADEMY PLACE, BRENTWOOD, CM14 5NQ**

I write on behalf of my client Highcross following an instruction to review and submit representations to the current consultation on the Brentwood Local Plan, Preferred Options consultation.

My client owns the property Academy Place, located on the corner of Brooke Street and Spital Lane, with access taken from Spital Lane. A copy of a site location plan is attached which confirms the boundaries of the site within my client's ownership. The property is a three storey modern Grade A office building with associated parking, located in an area of mixed use, which includes the Jaguar Car Showroom and Wickes opposite and adjacent a public bar and restaurant, beyond which to the west is a further showroom, Wickes, a garden centre and Holiday Inn Hotel. The site is identified within the consultation as forming part of the Brentwood Urban Area and is a key gateway location to the town from the west.

The property was consented under planning reference 95/00300/FUL on the former Grange Motors site. The building was built and available for occupation from 1990 and HSBC previously occupied the ground floor and half of the first floor, however they vacated the property in November 2011 and despite the site being marketed, including a dedicated website (www.academy-place.com) which is still live, there has been no interest shown with regard to securing the future occupation of this substantial part of the building.

We wish to support the S1 'Spatial Strategy' which seeks to protect Green Belt land by focusing the majority of new development on land within accessible settlements. Our client's site would be a suitable location for alternative uses, or potentially, redevelopment, and qualifies under the requirements of this Policy, in that it is: accessible to public transport, services and facilities; would have no impact on the Green Belt, visual amenity, heritage, transport and environmental quality, and would be capable of coming forward over the plan period.



Policy S3 'Job Growth and Employment Land' advises of the future requirement for additional employment land and that research has shown that there is currently on-going demand for business premises. As discussed above, the premises at Academy Place has not experienced that demand and therefore we consider that the strategy should recognise that not all sites continue to be attractive to the market. Where sites are no longer suitable for employment, as in this case, as evidenced by long periods of vacancy and on-going marketing, then the policy should recognise that alternative uses, either through re-use or redevelopment should be acceptable to help meet other requirements of the plan.

With regard to Policy S4 'Provision for Retail and Commercial Leisure' we understand that the sequential requirements for the location of retail and other town centre uses need to be directed towards the Town Centre, in a 'Town Centre's First' approach required by NPPF. However, we consider that in addition to the Town Centre and the potential at West Hordon as a mixed use development, that there are neighbourhood/local centres which help provide local services and these too, must be supported. We consider that the location of the site is within such a neighbourhood and should be protected through the definition of the area by a local shopping boundary. This would help consolidate and maintain the existing uses, in a sustainable manner, by enabling the area to provide for the local catchment and provide top-up-shopping as well as other local facilities such as public houses and restaurants. On this basis we respectfully request that the site and surrounding area, which has numerous existing town centre uses, is identified as a local/neighbourhood centre.

Support is also given to Policy CP1 'Sustainable Development' and Policy CP2 'Managing Growth'. We agree that policy should confirm the presumption in favour of sustainable development, as per the requirements of NPPF. Furthermore, we recognise the support given, in principle, to the flexible use of land and the priority in favour of the re-use of previously developed land. We consider our client's site, represents a suitable brownfield site which has been unable to attract suitable re-use and therefore the Council should afford greater flexibility to its re-use.

Policy CP11 'Strong and Competitive Economy' seeks to capitalise on the employment potential of existing underused and vacant employment sites, however, it fails to recognise that there will be instances where floorspace cannot be re-let for continuing employment use. We object that the policy, by its omission of wording to confirm there may be instances where the re-use of existing employment sites which are not able to attract new users is acceptable. This appears to be contrary to Policy DM6 'Areas Allocated for General Employment and Office Development'. We support the rules of exception for the retention of employment sites outlined by policy DM6, but object that the existing employment land allocations have been carried over from the previous plan without consideration of how existing employment sites contribute to the employment supply or how they may be more suitable for other uses and could help achieve other aims of the plan. Carrying over employment designations without justification is contrary to paragraph 22 of NPPF which states Local Authorities should "avoid the long term protection of sites allocated for employment use where there is no reasonable prospect of a site being uses for that purpose". Furthermore, we object specifically to the inclusion of the Brook Street employment area, as this site has been unable to attract suitable new occupiers and has been suffering long term vacancies. On this basis we do not consider that the continued allocation of this site is either justified or effective.



We support and positively promote the Alternative Allocations proposal, whereby some sites identified as employment allocations could be considered for alternative uses and request that Academy Place is considered for its potential to meet other objectives of the plan.

Policy DM9 'New Retail and Commercial Leisure Development' is supported in that it allows development outside the Boroughs Primary Shopping Centres up to 2,500 sq. m without requiring retail impact assessment. This ensures that local shopping provision can be provided to allow top-up shopping and local facilities in sustainable locations. We would not support an alternative approach which seeks to reduce this retail allowance, as sequential assessments will be undertaken to ensure that a 'town centre first' approach is undertaken.

I trust these representations will be received as "duly made" and taken into account in the Council's preparation of the final Development Plan Document. I reserve our right to make further comments at a later stage. Should you wish to discuss these representations further please do not hesitate to contact me.

Yours faithfully,