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



17th February 2015

Dear Sir / Madam,

Re: Brentwood Borough Local Plan - Strategic Growth Options Consultation – SJ & CM Norris: Land adjacent to the A12, Chelmsford Road, Shenfield

I write in relation to the Brentwood Borough Council Strategic Growth Options Consultation. Strutt and Parker LLP are acting on behalf of SJ & CM Norris, who own the land outlined in red on the enclosed plan.

The purpose of this letter is to outline the suitability of the land adjacent to the A12, Chelmsford Road, Shenfield to support an apportionment of the Councils objectively assessed housing need within the emerging Local Plan. In addition, direct responses are provided with regards to the Brentwood Borough Council Strategic Growth Options Consultation framework.

This representation confirms that the land adjacent to the A12 at Chelmsford Road, Shenfield at Kelvedon Hatch represents a greenfield land opportunity which would support the Council's need to provide a sustainable level of housing and meet the objectively assessed housing needs.

The questions addressed in detail are:

- *A1: Do you agree with the broad areas, for the purpose of considering approaches to growth?*
- *Q2: Do you agree with the issues raised within each of these areas?*
- *Q3: Do you have any comments on the appropriateness of particular sites?*



- *Q5: Should the A12 corridor accommodate growth by releasing sites on the edge of urban areas?*
- *Q6: In order to provide for local need is it preferable for Greenfield sites on the edge of villages to be released, or to develop brownfield sites (both within the Green Belt)?*
- *Q7: To enable future employment need to be met do you agree that the most sustainable approach is to allocate new sites close to the strategic highway network?*
- *Q8: In order to ensure that the Town Centre remains economically sustainable, do you agree that a “Town Centre First” approach should be taken to retail development?*
- *Q12: Have we considered the main infrastructure issues? Are there other important issues to consider?*

Q1: Do you agree with the broad areas, for the purpose of considering approaches to growth?

Yes, the broad areas for considering growth are supported. In particular, recognising the importance of Cross Rail and the A12 corridor as important factors to consider when planning for growth is supported. It is also supported that the document recognises that housing demands of the Borough cannot be met from brownfield land alone. In this regard, in order for the plan to comply with the National Planning Policy Framework it is important that the Council seek to plan for the infrastructure requirements within the Borough, associated with the proposed housing and employment growth required over the plan period. This is particularly the case with the arrival of Cross Rail.

Q2: Do you agree with the issues raised within each of these areas?

Yes, In particular the recognition of congestion in and around Brentwood is considered to be an important factor. In this regard it is considered that the land adjacent to the A12, Chelmsford Road, Shenfield as a park and ride could be important to reduce congestion between Shenfield Station and Brentwood Town Centre and the Mountnessing Roundabout. The land has previously been promoted for use as park and ride to Shenfield Station. The applicant is also happy to consider wider benefits of the scheme to alleviate traffic between the park and ride and Brentwood Town Centre, if the need dictates.



Q3: Do you have any comments on the appropriateness of particular sites?

Yes, site reference 158 (land between the A12 and A1023) is supported for reasons set out in our previous representation (refer to Appendix A). As referenced in the recent Shenfield Parking Strategy Report, it is acknowledged that there is currently a degree of uncertainty in the level of additional parking demand to be created as a result of Cross Rail. In this regard it is important that the Local Plan, plans for the event that the parking demand is high as a result of Cross Rail, with the potential for a number of users driving from the north to Shenfield.

In order to adequately plan for this growth it is considered that site reference 158 should be allocated for land as park and ride with a mixed use employment/leisure area. Whilst it is the applicants view that this land is fully deliverable and that there is clear demand for the park and ride, given the contradictory advice in the level of parking demand as a result of Cross Rail at this stage, one option would be to safeguard the land for park and ride and commercial use. Then once Cross Rail arrives and the need dictates, the land could be brought forward as a park and ride, with commercial use. Whilst this is not the preferred approach of the applicant, it is one option in order to ensure that the Council is making adequate provision for the infrastructure requirements associated with Cross Rail.

Q5: Should the A12 corridor accommodate growth by releasing sites on the edge of urban areas?

Yes, the A12 is a strategic link within the Borough and provides a good opportunity for growth on the edge of Urban Areas. In order to facilitate this growth provision for a park and ride and employment opportunities at land between the A12 and the A1023 will be important in reducing congestion from the A12 and providing some employment land in a strategic location to meet some of the required 23 hectare demand identified in the plan.

Q6: In order to provide for local need is it preferable for Greenfield sites on the edge of villages to be released, or to develop brownfield sites (both within the Green Belt)?

As identified in the consultation document there is not adequate land within brownfield areas to meet the housing and employment growth required to meet the objectively assessed need over the



plan period. In this regard it is important that the Council releases land from the Green Belt in order to provide both the jobs and housing that the Borough requires.

Q7: To enable future employment need to be met do you agree that the most sustainable approach is to allocate new sites close to the strategic highway network?

Yes, this approach is strongly supported. In this regard site 157 (land adjacent to the A12 and A1023) provides a sound location for employment land with associated park and ride. It benefits from direct access onto the A12 and good links with Shenfield Train Station and Brentwood Town Centre. Allocating part of this land for employment, along with a park and ride provides for a very sustainable location for employment facilities. It will also have the potential to be of significant benefit in alleviating congestion within Shenfield and Brentwood.

Q8: In order to ensure that the Town Centre remains economically sustainable, do you agree that a “Town Centre First” approach should be taken to retail development?

Yes, the ‘Town Centre First’ approach is generally supported. The proposed park and ride has the potential to offer an alternative to parking within Brentwood/Shenfield Town Centre and could help support existing retailers within the existing centres. In particular it is considered that A1/A2 uses should be restricted to town centre locations.

The proposed site 157 has the ability to offer potential for A3/A4 use as part of the proposals, which given the scale would not conflict with the Town Centre First Approach.

Q12: Have we considered the main infrastructure issues? Are there other important issues to consider?

Yes, it is positive that the Council have recognised the need for the Local Plan to consider travel infrastructure that links with Cross Rail including pedestrian, cycle and vehicular transport. It is also positive that Brentwood Borough Council are currently carrying out further transport modelling to inform this strategy and the that further assessment will be made of the economic impact of Cross Rail.

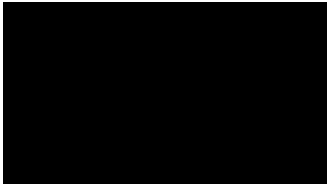


The results of this modelling will be critical to informing what additional transport infrastructure (including car parking) will be required in Shenfield and Brentwood as a result of the arrival of Cross Rail. It is considered important that the Council has adequate car parking available to meet the needs and demand of Cross Rail, prior to the proposed opening in 2018. As detailed in our previous representation (refer to Appendix A) land in-between the A12 and the A1023 is fully deliverable as a park and ride with commercial/leisure land. It is capable of being run privately or by Essex County Council if the demand dictates.

For the reasons set out within his representation, in order for the plan to be considered sound, the land adjacent to the A12 at Chelmsford Road, Shenfield should be allocated as part of the emerging Brentwood Borough Council Local Plan.

If you have any questions regarding this representation please do not hesitate to contact me on my client's behalf.

Yours sincerely,



David Fletcher MSc MRTPI
Associate
Strutt & Parker