

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

2nd October 2013

Dear Sir / Madam,

Representation on Brentwood Borough Council Local Plan 2015-2030 (Preferred Options for Consultation)

I would like to write in support of the Council's overall approach to development outlined within the Preferred Options document, namely that it is proposed to direct the majority of development to existing urban areas and to protect the Green Belt.

The objection that I have to the Preferred Options document relates to paragraph 3.60 and the proposed Shenfield 'Park & Walk', namely its location. My comments on this are set out below:

- **Green belt**

The proposed 'Park & Walk site search area' identified in Figure 3.4 is mainly located with the Green Belt as identified by the adopted Local Plan Proposals Map (other than the Shenfield School building). The construction of a 'Park & Walk' car park in this location would be contrary to the objectives of the Green Belt, as outlined within the NPPF, and would not fall within the category of NPPF development 'exceptions' that could be considered acceptable within the Green Belt.

In addition the development of part of the Green Belt for a 'Park & Walk' car park would be contrary to the Council's approach to development outlined within Policy S1 (Spatial Strategy of the Preferred Options document), which seeks to protect the Green Belt.

On this basis it is considered that if the Council is to pursue this concept that an alternative location is found.

- **Redevelopment of existing car park**

Paragraph 3.60 states that if a suitable 'Park & Walk' facility is provided in Shenfield that this may provide the potential for other existing car parks around Shenfield Station to be made available for redevelopment.

It is considered that the proposed concept is flawed as it is currently proposed that additional car parking facilities would be provided resulting in the loss of Green Belt land (which the Council's strategic objective is to protect) which would then allow the redevelopment of existing car parks.

A more appropriate alternative would be to retain the existing car parks and withdraw the proposed 'Park & Walk' concept. Whilst I am aware that there would be a premium land value on the redevelopment of existing car parks around Shenfield Station (which the Council could benefit) from I do not consider that this is a 'sound' planning basis for progressing with this concept.

- **Evidence base**

I am also not aware of any evidence base produced as part of the emerging Local Plan that would justify or demonstrates the need for a new car park. This includes a justification for the release of Green Belt land in the 'Park & Walk site search area' as well as a demonstrated need for additional new car parking within Shenfield and its surrounds.

Whilst a 'Shenfield Parking Study' document is referred to on page 61 of the Preferred Options document I have not been able to locate this on the Council's website and it does not appear that this is publicly available.

- **Alexander Lane**

Paragraph 3.60 confirms that *"....Alexander Lane itself is not suitable for vehicles to access a site ['Park & Walk' car park]...."*. Therefore any 'Park & Walk' car park would need to be located close to Chelmsford Road to provide adequate vehicle access and to avoid congestion along the narrow road. For this reason, in addition to the above, if the Council decides to progress with this concept I propose that an alternative search area is identified.

However, should the Council pursue this concept on Alexander Lane, the 'Park & Walk site search area' should be narrowed to focus on the area at the northerly end of Alexander Lane, adjacent to Chelmsford Road, rather than the close to the railwayline (further to the south). The revised recommended area of search is shown below in Figure 1. In addition it would also be necessary to upgrade the existing pedestrian walkways along Alexander Lane to ensure that users of any 'Park & Walk' car park can safely move between the car park and Shenfield Station.

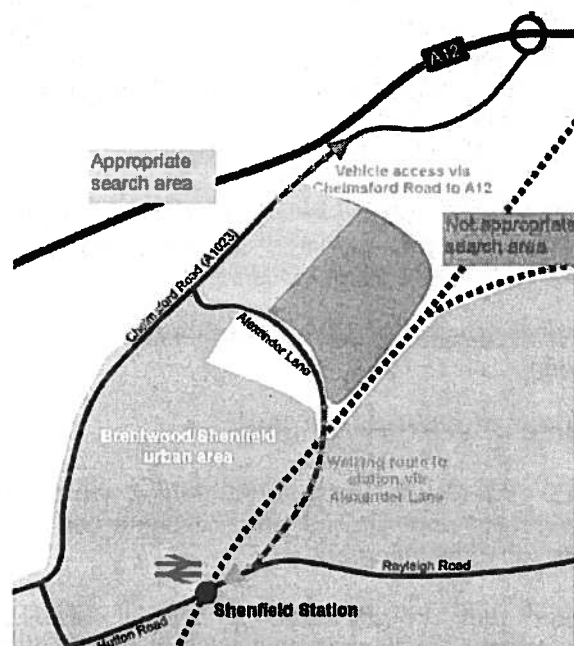


Figure 2: Revised search area (Yellow land = appropriate search area; Turquoise land = Not appropriate search area)

- **Summary**

Whilst I support the Council's general approach to directing new development to existing urban and developed areas I do not support the proposed 'Park & Walk' concept, in particular the proposed location, for the following reasons:

- It would result in the loss of Green Belt land for a use not supported by the NPPF on Green Belt land and which would be contrary to the Council's general approach to development throughout the Borough;
- Consideration is being given to the redevelopment of existing car parks around Shenfield Station if the 'Park & Walk' concept proceeds. The overall result of this would be the redevelopment of existing car parking sites and the loss of Green Belt land. The preferable (and more appropriate approach in planning policy terms) would be the continued use of the existing car parks and retention of Green Belt land;
- There is insufficient evidence available to justify the loss of Green Belt land and the need for additional car parking;
- Notwithstanding that I do not consider Alexander Lane to be a suitable location for the 'Park & Walk' concept, if the Council was to proceed with the concept an alternative search area should be identified or 'worst case scenario' the car park should be located adjacent to Chelmsford Road and not located within the part of Alexander Road closest to the railwayline.

For the above reasons I do not consider that this particular element of the Preferred Options document can be considered 'sound' in the context of the NPPF namely that it is not 'positively prepared', 'justified', 'effective' or 'consistent with national policy'.

I would be grateful if you could consider this representation and would be grateful if you could keep me updated on the progress of the emerging Local Plan.

Yours faithfully