
Brentwood Borough Council Local Plan Representations

On behalf of MM Properties (London) Ltd

Executive Summary

1.1 MM Properties object to the Draft Local Plan and request that land at East Horndon Hall (site ref. 187) is allocated under Policy 8.4 (Table 8.3) to deliver a new Industrial Park which will provide a range of new flexible commercial space to respond to market demands and provide an appropriate choice of sites. We consider that the proposed economic growth strategy set out in the draft Local Plan needs to be reconsidered for the following reasons:

- The policy and supporting text regarding the amount of floorspace and land required to meet future employment needs is very unclear and the figures on need should be reassessed to increase the employment land requirement to ensure an appropriate supply of sites which meet future needs both in the short and medium term. Without amendments, it is considered that the draft Local Plan will constrain employment opportunities over the plan period.
- The draft allocation of Brentwood Enterprise Park (BEP), will provide approximately 65% of the Borough's new employment land supply. Whilst the allocation of BEP is supported overall, we have significant concerns in relation to the proposed strategy on relying on one site to deliver such a large proportion of the Council's employment requirements across the plan period. We therefore object to the proposed approach and consider additional sites should be allocated to provide more choice and respond to market requirements.
- The type of businesses currently located at West Horndon Industrial Estate are, in the main, Class B2/B1c uses with ancillary offices, occupying relatively small units. It is estimated that the redevelopment of this site for housing will lead to the displacement of around 100 businesses. We consider that the lack of choice in suitable alternatives and businesses will leave the Borough.
- The development of a new Industrial Park at East Horndon Hall will provide a genuine choice for the existing businesses at the West Horndon Industrial Estate which would ensure local jobs are retained and the delivery of new housing is not undermined.
- The site at East Horndon Hall is more suitable than the identified sites at Codham Hall and Childreditch as it is visually less prominent and better connected to the highway network and will have a purpose built access. The East Horndon Hall site is physically contained and will not lead to coalescence or a loss of valuable countryside
- Overall, the site will increase the employment land supply in the Borough, improve the choice for operators and assist the Council in meeting the requirements of National Planning Policy and Guidance and the address the recommendations in the Economic Futures Report.

1. Introduction

- 1.2 These representations have been prepared by Savills UK on behalf of MM Properties (London) Ltd in response to the Brentwood Draft Local Plan consultation document. These representations are made specifically in relation to the land to the south of East Horndon Hall (Site Ref. 187). Through these representations, MM Properties are promoting the site for redevelopment for commercial development, to provide Class B1, B2 and ancillary B1a floorspace.

2. Site and Surroundings

- 2.1 The site is situated at the junction of the A128 (Tilbury Road) and A127 and the northern part of the site is currently in use, as employment land with both S.Walsh&Sons and Sims Milling operating out of the East Horndon Hall site. S Walsh and Sons provide bulk transport and other services to the construction industry and Sims Milling carry out road planing operations and use the site to store planings and plant equipment. Outside of these uses, the site comprises green open space which is allocated, Green Belt land. The site is completely contained by the A127 and A128, it has good access onto the A127 via the A128.



- 2.2 To date, it is our understanding that the Council has previously assessed the site for residential development and found it to be unsuitable as a result of its green belt location but we are not aware of the Council undertaking any assessment of the site's suitability for redevelopment for commercial uses. Following discussions with Council officers, the site is being promoted for employment use only within Class B2, B1c and ancillary B1a use.

3. Allocation Proposals

- 3.1 MM Properties have developed an indicative scheme for the site which was submitted with the previous representations. This shows the site being redeveloped for 190,000sqft of employment floorspace in high quality, purpose built units, surrounded by planted boundaries, with a high quality water feature in the middle of the site. This is enclosed for reference.
- 3.2 Our client envisages that the entire site will be developed with shared access, servicing and infrastructure to provide high quality, flexible employment floorspace. It is proposed to provide a wide range of unit types to ensure an appropriate choice and respond to market demands and requirements. From our initial market testing, we consider that there is significant demand for a range of commercial floorspace in this location will come from a number of sources but particularly businesses relocating from West Horndon Industrial Estate.

4. Key Policy Considerations

4.1 These representations set out our clients position in respect of the draft employment land allocations and whether these and the associated draft policies meet the aims of National policy and whether the proposals reflect the evidence base supporting the draft Local Plan. The representations cover the following areas:

- Employment Land Requirement;
- Choice;
- Other sites;
- East Horndon Hall

4.2 At the national level, the National Planning Policy Framework (NPPF) (2012) provides an overarching framework for the production of local policy documents and decision making. At the heart of this document is a presumption in favour of sustainable development. In this regard paragraph 7 states that there are three dimensions to sustainable development; economic, social and environmental. For plan making this means, that Local Planning Authorities should positively seek opportunities to meet development needs, and that local plan should meet objectively assessed need with sufficient flexibility (paragraph 14).

4.3 As set out in paragraph 20 of the NPPF, Local Planning Authorities (LPAs) should plan proactively to meet the development needs of business and support an economy fit for the 21st century. In developing local plans, paragraph 21 places a requirement on LPAs to:

- *set out a clear economic vision and strategy for their area which positively and proactively encourages sustainable economic growth;*
- *set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;*
- *support existing business sectors, taking account of whether they are expanding or contracting and, where possible, identify and plan for new or emerging sectors likely to locate in their area. Policies should be flexible enough to accommodate needs not anticipated in the plan and to allow a rapid response to changes in economic circumstances;*
- *plan positively for the location, promotion and expansion of clusters or networks of knowledge driven, creative or high technology industries;*
- *identify priority areas for economic regeneration, infrastructure provision and environmental enhancement; and*
- *facilitate flexible working practices such as the integration of residential and commercial uses within the same unit.*

- 4.4 In order to achieve the foregoing, the National Planning Policy Guidance (ref ID. 3-001-20140306) sets out the requirement for LPAs to carry out an assessment of the future land which is suitable, available and achievable for housing and economic development uses over the plan period.

Employment Land Requirement

- 4.5 In respect of land requirements for sustainable economic development, the Council carried out an Employment Land Review (2010). However, this did not include an assessment of our client's site and is also considered out of date as it was prepared prior to the publication of the NPPF which is now the overarching material consideration. The Council commissioned an assessment of employment land in 2014 (Economic Futures Report (NLP) 2014) but this also failed to take account of the land at East Horndon Hall.
- 4.6 The draft Local Plan sets out the amount of land and new jobs required over the proposed plan period. Draft Policy 5.3 states that the Council will make provision for 5,000 additional jobs over the plan period at an annual rate of 250, which the Council state equates to a need for 32.8 hectares of new employment land allocations. The employment land requirements are based on growth scenarios however, the Economic Futures Report (2014) states that based on the lowest growth scenario there will be a need for 1,930 jobs, whilst the highest is 2,570 additional B class jobs without taking into account of the loss of existing employment land as a result of housing allocations.
- 4.7 Taking into account the loss of employment land through housing allocations, the overall job growth requirement identified in the NLP Report increases to 5,750 based on the lowest scenario and 7,440 on the highest scenario. There is very little evidence to justify why the Council has adopted a figure which is less than the lowest scenario. We therefore object to the identified number of jobs required as it is not robust and needs to be increased to reflect the highest economic growth scenario and population projections.
- 4.8 Draft Policy 5.3 also sets out the extent of new employment land required and states that providing 5,000 new jobs will require 32.8 hectares of employment land, however, it is unclear how this land requirement is derived from the job growth. This takes account of the proposals to re-allocate 18.9 hectares of employment land for housing. However, we consider that the employment land allocation needs to increase to reflect a higher job growth requirement across the Borough.
- 4.9 Moreover, the Economic Futures Report (2014) identifies that the overall employment land requirement is for up to 41.65 hectares and there is no justification as to why the council has not followed this approach. We would therefore suggest that this should represent the minimum employment land allocation requirement for the plan period.

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- 4.10 In addition, it is very unclear where the 32.8 hectares is derived from as the paragraph 5.61 sets out the calculation which ends with a requirement of 36.74 hectares, but the draft policy is 3.94 hectares less than this.
- 4.11 Overall, the approach adopted in the draft Local Plan to job growth and employment land requirements is considered flawed and needs to be reconsidered to increase the employment land requirement to ensure an appropriate supply of sites which meet future needs both in the short and medium term. Without amendments, it is considered that the draft Local Plan will constrain employment opportunities over the plan period.

Appropriate Choice of Sites

- 4.12 The National Planning Policy Guidance requires LPAs to provide sufficient employment land in both quantitative and qualitative terms. In respect of the qualitative factors, LPAs should identify land that improves the choice of the land available, provides flexibility for occupiers and also in case some land does not come forward, meets gaps in the supply of particularly types of premises and locations and improves the quality of provision.
- 4.13 The NLP Economic Futures Report (2014) forms part of the Council's Evidence Base and concluded that the Council should prepare a trajectory for employment sites; identify more sites to create more choice, identify more land to mitigate any impact resulting from housing allocations.
- 4.14 The draft allocation of Brentwood Enterprise Park (BEP), will provide approximately 65% of the Borough's new employment land supply. Whilst the allocation of BEP is supported overall, we have significant concerns in relation to the proposed strategy on relying on one site to deliver such a large proportion of the Council's employment requirements across the plan period. In our view, this does not accord with the requirements of the NPPG or the conclusions of the Economic Futures Report. We therefore object to the proposed approach and consider additional sites should be allocated under Policy 8.4 to provide more choice and respond to market requirements. This approach will also assist in mitigating reliance on BEP, which does not benefit from any planning permission at this point.
- 4.15 It is considered that this does not provide sufficient choice for employment land throughout the Borough. The Economic Futures Report (2014) has highlighted this to the Council and it is considered that the draft Local Plan fails to address this.
- 4.16 In addition to the number of sites allocated for employment land, the proposed allocations also fail to provide adequate choice for the type of employment land required. At paragraph 8.6 of the Local Plan, the Council recognise the value of small and medium sized business in the Borough, yet we consider that these businesses will not be provided for through the allocation of Brentwood Enterprise Park, as it is likely to be

dominated by higher value land uses which is unlikely to be compatible for small and medium sized businesses.

- 4.17 Policy 8.2 does not identify the floor area of each employment use at Brentwood Enterprise Park and as such there is currently little control in the policy as to what is provided in this location and therefore no guarantee that it would meet the needs of employers / operators in the Borough.
- 4.18 Specifically in relation to West Horndon Industrial Estate, this currently comprises around 16 hectares of employment land which has been identified for redevelopment for housing in the draft Local Plan. From an initial review, the type of businesses currently located at West Horndon Industrial Estate are, in the main, Class B2/B1c uses with ancillary offices, occupying relatively small units. It is estimated that the redevelopment of this site for housing will lead to the displacement of around 100 businesses. We consider that the lack of choice in suitable alternatives will mean some businesses will have no choice but to relocate outside of the Borough. the development of a new Industrial Park at East Horndon Hall will provide a genuine choice for the existing businesses at the West Horndon Industrial Estate which would ensure local jobs are retained and the delivery of new housing is not undermined.
- 4.19 It is our understanding that, the release of the West Horndon Industrial Estate for housing is favoured by residents as it will remove businesses that currently cause noise, dust, general disturbance, highway safety issues and congestion. However, it is considered that the Local Plan fails to provide sufficient land immediately available to meet the needs of these operators displaced by the redevelopment of West Horndon. In this regard the draft Local Plan fails to address a key aim of protecting and promoting small and medium businesses, including start up businesses.
- 4.20 The Council has identified the provision of additional land for employment uses at Codham Hall and Childerditch Industrial Estate under Policy 8.4, however, these sites are small employment sites in the countryside rather than purpose built facilities, and are significantly constrained by their accesses. The Local Plan fails to consider whether these sites are suitable for certain businesses and this needs to be addressed in the next iteration of the Local Plan.
- 4.21 In this regard, even though, the quantum of land identified at Brentwood Enterprise Park meets the quantitative need of replacing West Horndon Industrial Estate and is supported by our client, it is considered that the Brentwood Enterprise Park will not provide for small and medium sized businesses or non confirming green belt uses. The sites at East Horndon could provide immediately deliverable employment land which will accommodate the uses not provided for in the current version of the Local Plan.
- 4.22 Overall, the Council's draft approach to the number of employment sites, is at odds with National planning policy and guidance, as well as their own advisors NLP and it is considered that more sites need to be identified to meet the qualitative needs of employment in the Borough.

Delivery

- 4.23 There is a clear relationship between the delivery of employment land and the delivery of land for housing as existing employment land needs to be released for housing but the employment space needs to be re-provided. It is considered that the council has failed to address this in the draft allocations of employment sites. The Economic Futures Report (2014) suggests that the Council complete an employment trajectory to determine the availability and likely delivery of sites. The advice has not been followed by the Council and it therefore not clear whether the proposed employment allocations will come forward in a period that reflects the need for housing on the employment sites that are to be redeveloped.
- 4.24 Notwithstanding this, it is appropriate to consider that as a result of the infrastructure requirements associated with the Brentwood Enterprise Park it is unlikely that this will be delivered in the first five years of the plan period. In addition, the delivery of the employment land at Dunton is unlikely to come forward prior to the housing because of the associated infrastructure requirements and the funds necessary to do this and as such the delivery of this is unlikely to come forward in the first five years of the plan period, if this strategic allocation is progressed.
- 4.25 The Council has prepared a housing trajectory, set out in Appendix 2 of the draft Local Plan, which identifies the delivery of residential units at West Horndon in 2019. However, without the delivery of sufficient employment land, as set out above, the existing operators at West Horndon will have no reasonable alternative site. The sites at East Horndon are immediately available and provide a reasonable alternative for the existing operators at West Horndon, allowing the West Horndon site to come forward within the identified timeframe for housing.
- 4.26 Therefore, the Council needs to identify reasonable alternative sites that meet the needs of displaced operators at West Horndon as well as delivering in time to allow for the release of housing in line with the trajectory.

Other Sites

- 4.27 Notwithstanding questions over delivery, we have assessed the other employment sites identified in the Draft Local Plan and it is considered that our clients site is far more suitable, as set out in the forthcoming sections.
- 4.28 Specifically in relation to the land at Codham Hall and Childerditch Industrial Estate, these both suffer serious issues over access to and from the sites which not only makes them unsuitable in terms of highways but will also make them undesirable to prospective occupiers.

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- 4.29 In addition, both of these sites are already developed and it is questionable to what extent new employment floorspace can be accommodated on the sites in a sustainable way which retains the existing operators in situ.
- 4.30 Notwithstanding the foregoing, if the Council chose to allocate the aforementioned sites, it is considered that, for the reasons set out in terms of employment land and choice, the sites at East Horndon Hall should still be allocated to supplement the proposed allocations.

5. East Horndon Hall (site 187)

- 5.1 Our client is promoting this site to provide employment land and as the site, is vacant, it is available for immediate delivery. There are no impediments to delivery such as highways or contamination. Land to the north is currently in employment uses and is partially developed. This site is being promoted for employment use by the land owner. We have identified the need for Class B2, B1c and ancillary B1 uses as a result of the loss of West Horndon Industrial Estate and general job growth and the loss of other employment sites to housing. In addition, it will provide for the likely under delivery of Class B2 and B1c uses at Brentwood Enterprise Park and as such it is considered that the East Horndon Hall site could accommodate those uses and exclude Class B8 uses.
- 5.2 The sites have been assessed as part of the Council's Assessment of Potential Housing, Employment and Mixed Use Sites in the Green Belt (draft 2016) and the assessment states that the previously developed site makes a low to moderate contribute and the wider site makes a moderate contribution to the Green Belt.
- 5.3 The Assessment of the Greenfield site, suggests it is not contained. This is incorrect, as it has boundaries formed by the A128, A127 and the Tilbury Road. As well as the surrounding roads, there are substantial embankments and extensive screening which provide a very clear boundary. It is not considered likely that the development at West Horndon or Dunton would result in development close to the site and as such any concerns regarding the potential coalescence with the adjacent settlements as a result of the development of this site, are unsubstantiated.
- 5.4 The development proposals for the site, will provide high quality, flexible floorspace for use by B1c and B2 operators which will have to relocate from West Horndon but whom also want to relocate to Brentwood from elsewhere. In this regard, the client is committed to providing a high quality, sustainable development but one that meets the needs of operators that may be less desirable to the Brentwood Enterprise Park as they will not align with a hotel or restaurant uses.
- 5.5 In addition, the site is 14 acres in isolation or 20 acres with the site to the north and can therefore accommodated 200,000sqft (or 280,000sqft if both sites were developed) of employment floorspace necessary for Class B2 operators, in an unconstrained environment on a dedicated site that will be entirely suitable for their needs.
- 5.6 It is considered that the allocation of these sites aligns with the overall transport led employment strategy and would not undermine the approach of having a strategic employment allocation at junction 29 of the M25. In addition, the site would provide additional choice for employment operators in the Borough and prevent the loss of several businesses to areas outside the Borough which would be detrimental to the wider aims of the Council.

5.7 Overall, the site will increase the employment land supply in the Borough, improve the choice for operators and assist the Council in meeting the requirements of National Planning Policy and Guidance and the address the recommendations in the Economic Futures Report.

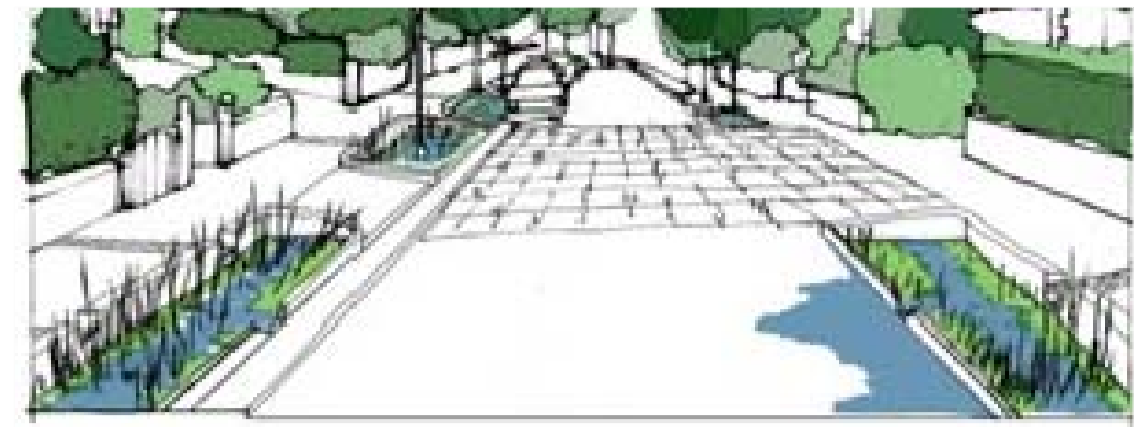
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Revision: Date
A: 22.07.15
 TREES AND LAKE UPDATED

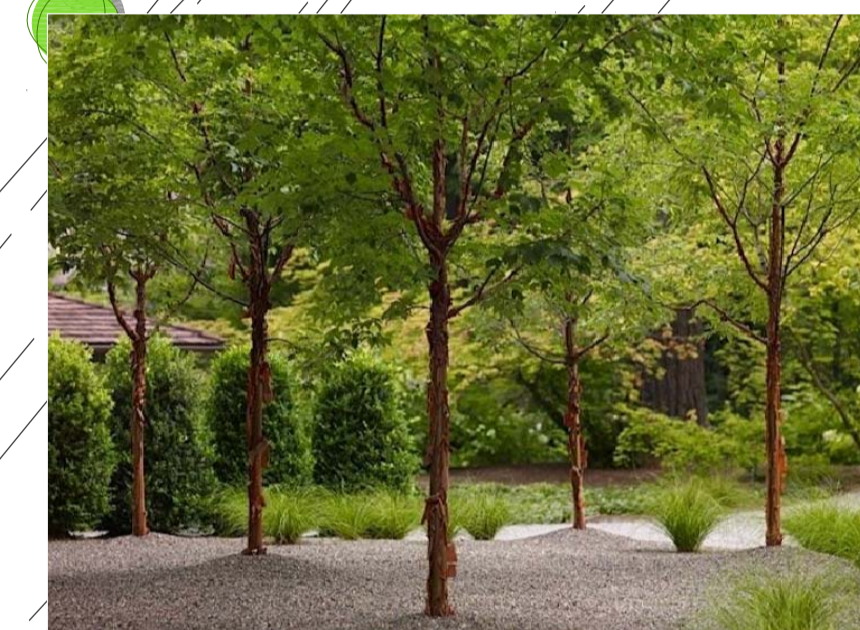


HIGH QUALITY WATER FEATURE WHICH ACTS AS A RAINFALL OVERFLOW AS WELL AS PROVIDING VISUAL AMENITY TO THE PARK

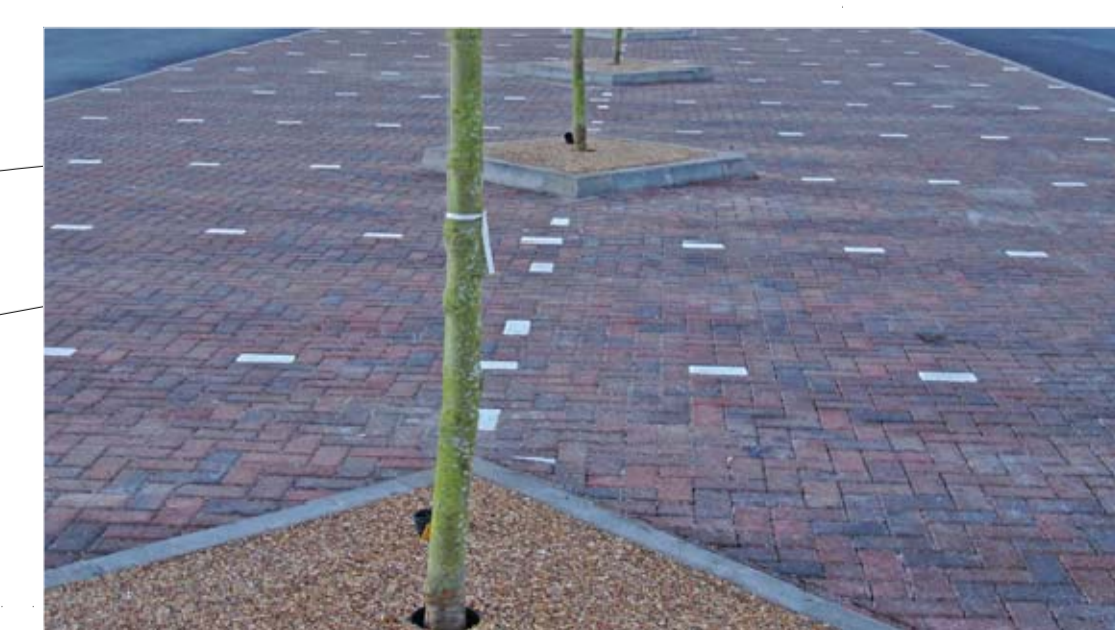
DETAILING WILL BE RURAL AT THE PARK PERIMETERS



HIGH QUALITY LANDSCAPE DESIGN



STRUCTURAL PLANTING WILL BE COMPREHENSIVE ON DAY ONE AND GROW INTO VERY SUBSTANTIAL SCREENING AS PART OF THE LOCAL LANDSCAPE.



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Project:
EAST HORNDON BUSINESS PARK

Drawing Title:
PRE-PLANNING: PROPOSED SITE PLAN: DESIGN CONCEPTS

Scale: AS SHOWN	Drawn by: DMS
Date: JULY 2015	Checked by: HD / JD
Drawing Number: 1232-SK-24	Revision: A