



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

23rd March 2016

Our Ref: AG/JR
BY EMAIL

Dear Sir / Madam,

BRENTWOOD BOROUGH COUNCIL LOCAL PLAN CONSULTATION (2013-2033)
REPRESENTATIONS ON BEHALF OF FORD MOTOR COMPANY

Iceni Projects Limited ('Iceni') is appointed by Ford Motor Company ('Ford') to advise on town planning matters relating to its commercial and strategic assets across London and the South of England including those within Brentwood Borough Council ('Brentwood BC'). As a major employer and key stakeholder in the borough, Ford welcomes the opportunity to comment on the Brentwood BC Draft Local Plan (2013-2033) consultation document which was published for consultation in February 2016.

a. Assets and commercial interests

Ford own and occupy a large commercial property on the land to the south of Eagle Way, Warley known internally as the 'Warley Office'. The property is home to Ford's financial headquarters and has been occupied by Ford since 1964 following Ford's relocation to the Borough from Central London. In total, Ford's assets at Eagle Way extend to 8.5 hectares (21 acres) with the existing buildings comprising 18,515 sq.m (199,221 sq.ft) of commercial floorspace. In total, circa. 1,731 people are currently employed by Ford at the site.

The existing offices at Eagle Way, Warley were designed specifically for Ford, and were bespoke for the operational services of Ford. The location of such a large commercial property in what is a fairly remote and unsustainable location on the edge of the built-up area of Brentwood adjacent to the Green Belt is unusual. Due to the site's location, Ford is largely reliant on car travel for its operations to and from the offices.

Ford also own an area of land to the north of Eagle Way which is currently utilised for staff car parking associated with the office buildings to the south. In total, the asset comprises 1.5 hectares (3.7 acres) of land. This parcel of land does not include any office buildings. Ford also lease an area of car parking in the northern area of the car park from Brentwood Council, this area of land is subject to an allocation for alternative use in both the existing Local Plan (where it is identified for commercial development) and in the draft consultation (where it is identified for residential development).

Ford's Warley offices to the south of Eagle Way are currently allocated in the adopted Brentwood Replacement Local Plan (2005) as employment land which is suitable for Class B1(a) or B1(b) purposes only. Ford's car park land to the north of Eagle Way is also allocated for employment purposes, but for a greater range of uses comprising Class B1(a), B1(b) and B1(c). With exception to a smaller parcel of open land to the east of Ford's existing offices, all of Ford's landholdings at Eagle Way fall within the defined settlement boundary and therefore outside of the Green Belt area.

b. Understanding of the strategic issues

Ford acknowledges the number of challenges that the new Brentwood Local Plan must address – principally the need to accommodate land for a significant number of new homes. Ford notes that the old regional plan target of 175 new homes per year has been abolished, and that the Borough's target is now increased to 360 new homes per year which equates to 7,200 new homes over the next 20 year period. On review of the Green Belt boundary (which comprises 89% of the land falling within the borough), Ford are aware of the challenge facing Brentwood BC with regards to allocating land for development – it is apparent that there is considerable pressure on the Green Belt to accommodate such growth. In addition, the Draft Local Plan identifies the requirement to identify land for a further 5,000 new jobs over the plan period (as discussed below), increasing the pressure on Brentwood BC to identify land for development.

The need for Brentwood BC to identify additional land for housing and employment is also required in order to address cross-boundary pressures such as London's future growth. This requirement is pursuant to the issue of a letter from Assistant Director of Planning (Stewart Murray) (dated 20th February 2014) to all local planning authorities on the periphery of Greater London. The letter highlights the significant population growth that London is experiencing and highlights that the population of London is expected to increase from 50,000 per annum in the 2011 Plan to over 100,000 per annum until the end of the present decade. The Greater London Authority ('GLA') highlight that there is 'considerable uncertainty as to the long term trajectory of this growth, not least because of the effects of the recent recession on the housing market in London and the wider south east'. Based on the current housing need, forecasted population growth could generate a requirement for 49,000 – 62,000 homes per annum in London.

The letter states that in order to accommodate this significant growth, the Mayor of London will seek, as far as is possible, to accommodate London's growth within the boundaries. As such, the GLA states that planning authorities such as Brentwood in the wider south east, where the housing market is influenced by that of London, are strongly advised to take account of these uncertainties when addressing NPPF paragraph 47. Accordingly, local planning authorities such as Brentwood BC and Basildon BC should seek to significantly boost the supply of housing by using their evidence base to ensure that its Local Plan meets full objectively assessed needs.

Further, the arrival of Crossrail at Brentwood and Shenfield in the next few years will improve the existing services and provide new direct trains to Central London. Whilst this provides a number of opportunities for development and investment in the borough; Ford believe that this will also result in an increase in people both living and working in the Borough – therefore placing further pressure on land for development.

c. The Commercial Spatial Strategy

Ford note that Policy 5.3 'Job Growth and Employment' of the Draft Local Plan seeks to make provision for 5,000 additional jobs to be provided in the Borough over the Plan period at an annual average rate of 250 jobs per annum. In order to provide for this number of new jobs, Policy 5.3 identifies the need for 32.8 hectares of new employment land within the Borough throughout the Plan period. Ford note that this capacity is met through the identification of a series of new employment land allocations including the Brentwood Enterprise Park, Land adjacent to Ingatestone by-pass, Childerditch Industrial Estate and the Dunton Hills Garden Village strategic allocation. These allocations collectively provide 32.81 hectares of new employment land.

However, it is apparent on review of the Draft Local Plan consultation that there is currently a lack of evidence base documents to inform such a strategy. Ford notes that Paragraph 2.16 of the Draft Local Plan '*several pieces of evidence are being undertaken alongside the Local Plan preparation to inform policies as they are being development and ensure the Council is able to produce a Plan as quickly as possible*'. Ford raises concerns regarding this approach in light of the requirements of Paragraph 158 of the NPPF which requires a local plan to be based upon up-to-date data and relevant evidence. Without key evidence base documents, the Plan will fall short of the requirements of the NPPF, and will be considered 'unsound'. Ford also questions how future employment and housing targets have been established within the consultation document in the absence of a comprehensive, up-to-date evidence base.

d. Land Use Designations

Land South of Eagle Way (Policy 8.4 and Figure 8.3)

The Council's approach to employment development and allocations is set out in Section 8 of the Draft Local Plan. Policy 8.4 'Employment Land Designations' and Figure 8.3 of the Draft Local Plan maintain the existing employment designation across Ford's landholdings at Eagle Way, Warley. As currently drafted, land currently designated within Figure 8.3 is protected for employment opportunities. Redevelopment of all land within Figure 8.3 will only be permitted where the proposal is for:

- **A** – *non-residential uses that provide significant employment with no reasonable prospect of locating elsewhere in the Borough, and there is no identified need for the site or buildings for Class B uses;*
- **B** – *the proposal is wholly for affordable housing, the site is vacant, and development would not prejudice continuation of adjacent uses;*
- **C** – *the propose is for any other use and is supported by a statement of efforts made to secure re-use for Class B1-B8 or similar uses and other non-residential uses that provides employment. This requires evidence that there is no realistic prospect of the site or building being used, or re-used for employment uses;*
- **D** – *the site or building would be physically unsuitable for Class B1-B8 use, even after adaptation.*

Ford acknowledges the requirement for policies which afford protection to existing employment sites. However Ford notes that the plan period runs until 2033, some 17 years from today. Whilst Ford's offices south of Eagle Way are currently operational and form an important location for Ford's finance operations; in the interest of protecting the long-term value and robustness of its operations, Ford requires flexibility in future planning policy to respond to its business needs.

As currently drafted, Policy 8.4 does not afford a great level of future flexibility for Ford's landholding. As noted above, the site is not a typical employment site and is unique to Ford's operational requirements. It is contended that if considering this site for new development it would be much more suitable for meeting the identified housing requirement as opposed to employment use, the later logically being identified in more accessible locations in key town centres and/or on key transport routes.

Ford believes that the extensive floorplates of the existing building would be unattractive to a future business, and that the current design does not allow for efficient sub-division. Ford therefore encourages Brentwood BC to consider a separate policy within the Local Plan which is specific to Ford's site. As such, an appropriate policy should be included within the Brentwood Local Plan that affords a level of flexibility for future employment, residential or mixed-use development should the site become surplus to Ford's operational requirements during the Plan period. The site's location outside of the extensive Green Belt boundary may present an attractive development opportunity in the future. This amendment to the Brentwood Local Plan is requested in the interest of protecting the value and future strategic opportunities for Ford's assets in Brentwood. The site would remain in on-going employment use, however should this situation ever change and Ford no longer require the office use, then there could be flexibility in future use, with the site potentially providing a windfall contribution to meet the housing need.

Land North of Eagle Way (Policy 7.4 and Table 7.2)

In the absence of a clear, revised Proposals Map, Ford has assumed that the employment designation to the north of Eagle Way, Warley is retained within the Draft Local Plan. Whilst Ford currently utilise the land to the north of Eagle Way for staff car parking; as a business, Ford will always look at ways in which their sites can work more efficiently, as such they could look at ways to reduce and rationalise car parking at its sites. Ford therefore believes that an appropriate policy should be included within the Brentwood Local Plan which provides future flexibility for the redevelopment of this site for range of land uses (employment, residential or leisure) should the car park become surplus to Ford's requirements during the Plan period. As currently drafted, Ford raises concerns regarding the

inflexible wording of the draft employment policies. Should the site become surplus to requirement during the Plan period, then there should be no requirement for Ford to justify the loss of employment on this land as it has not previously been used for employment uses – only ancillary car parking.

On review of the Draft Local Plan, Ford notes that the land north of its car park (north of Eagle Way), known as the 'Council Depot, The Drive, Warley – site reference 081' has been allocated for residential development for approximately 68 residential units. This is detailed in Policy 7.4 and Figure 7.2 of the Draft Local Plan which sets out the sites allocated for residential development over the Plan period. This highlights the development opportunity presented by the land to the north of Eagle Way. A more flexible policy wording for Ford's land to the north of Eagle Way may assist in realising or enhancing this development aspiration in future years.

e. Housing designations

Policy 7.1 – Dunton Hills Garden Village

In March 2015 Ford submitted representations to the joint consultation conducted by Brentwood BC and Basildon BC in relation to the proposed development at the 'Dunton Garden Suburb' ('DGS'). At this stage, Ford raised significant concerns regarding this strategic allocation across to the administrative boundaries of the two local authorities. The justification for Ford's objection is detailed below:

- The apparent lack of technical evidence to support such a proposal;
- Concerns that the evidence base which has been prepared simply does not support this site as a suitable location for large-scale development; and,
- Concerns regarding the capacity of this locality in terms of infrastructure and the potential for resultant negative impacts with the on-going operations of the Ford Dunton Technical Centre together with the planned commercial development north of the Ford test track (allocated in the draft Basildon Core Strategy) – particularly in relation to the existing highways network.

On review of the consultation summary published in December 2015 for the Dunton Garden Suburb, Ford is aware that over 1,500 consultation responses were received, and of those, c.84% raised objections to the strategic allocation. Principal concerns raised in these objections were presented in the Interim Sustainability Appraisal (February 2016) and related to environmental damage, loss of Green Belt land; uncertainty regarding infrastructure provision and concerns regarding the general deliverability and feasibility of the proposals.

Notwithstanding the level of objection received, and concerns regarding an appropriate evidence base – both local authorities (Brentwood and Basildon) appear to be promoting a strategic growth allocation in this location, and broadly consistent with the Dunton Garden Suburb consultation despite Basildon BC stressing a paragraph 11.88 of its own Draft Local Plan consultation that there were '*a variety of issues raised in the [Dunton Garden Suburb] consultation which it has not been possible for either Council to resolve in isolation of their Local Plans*].

For the purpose of this consultation, we have reviewed Policy 7.1 of the Brentwood Draft Local Plan which allocates land at the 'Dunton Hills Garden Village' for extensive residential-led development. Policy 7.1 states that the Council will work in partnership with the local community and other stakeholders to bring forward a new 'Borough Village' within the A127 Corridor. It is envisaged by the Council that 2,500 new homes, at least 5 hectares of employment land and supporting physical and social infrastructure will be delivered.

For the reasons set out in the objection to the Dunton Garden Suburb, Ford maintains an objection to the strategic allocation at the Dunton Hills Garden Village due to the perceived wider impact on Ford's operational facility and strategic site at the Dunton Technical Centre in Dunton, Basildon. Ford has also emphasised these concerns in response to the strategic allocation included in the Draft Basildon Borough Council Local Plan document which is currently out for consultation. Accordingly an objection has been made to Draft Policy H10 'Land West of Basildon' as part of this consultation.

f. Summary and conclusions

On behalf of Ford, we thank you for the opportunity to comment on the Brentwood BC Local Plan consultation document. We would be grateful for confirmation that these representations have been received. We also confirm that we would like to be involved in future stages of the plan-making process. I trust that the information enclosed is sufficient at this stage, however please do not hesitate to contact me (020 3435 4230 / agale@iceniprojects.com) or my colleague Jayme Radford (020 3657 5034 / jradford@iceniprojects.com) should you require any further information.

Yours sincerely,



Andrew Gale
DIRECTOR

cc. Birgit Kirby – Ford Land
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