

Brentwood Draft Local Plan 2013 – 2033

Land at Codham Hall North

Representations on behalf of S & J Padfield and Partners

March 2016

1.0 Introduction

- 1.1 This representation to the Brentwood Draft Local Plan Consultation 2016 has been prepared by Strutt & Parker LLP on behalf of S & J Padfield and Partners, with regards to the client's land at Codham Hall, North of A127 (site 101B).
- 1.2 The representation below sets out comments on the draft plan listed under policy or section number. In all cases the draft plan has been considered in the context of previous engagement and discussions with the Council.
- 1.3 Whilst the Local Development Plan has not yet reached formal submission or examination stage, in order to be considered 'sound' the Local Development Plan will be required to be:
- **Positively prepared**
the plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development;
 - **Justified**
the plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence;
 - **Effective**
the plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities; and
 - **Consistent with national policy** –
the plan should enable the delivery of sustainable development in accordance with the policies in the Framework.
- 1.4 Where relevant our comments will therefore make reference to the above requirements and suggest changes to the plan to ensure it can be considered sound at public examination and that the site at Codham Hall continue to provide jobs and meet employment needs with the district.
- 1.5 S&J Padfield and Partners look forward to continuing to work with the Council and other parties in taking forward the emerging local plan and supporting economic growth within the Borough.

2.0 Representations on draft Local Development Plan

Policy 5.1 – Spatial Strategy

- 2.1 The focus of larger scale development on key transport corridors is supported. The allocation of employment land in strategic locations such as the Brentwood Enterprise Park and the land at Codham North at Junction 29 of the M25 are particularly well suited to meeting needs whilst minimise negative environmental or amenity impacts in line with the Council's policies and those set out within the National Planning Policy Framework (NPPF).

Policy 5.3 - Job Growth and Employment Land

- 2.2 The plan notes that provision is made for 5,000 jobs over the plan period at an annual average rate of 250. It is stated that *“Providing this many jobs will require a total of 32.8 hectares of new employment land”*.
- 2.3 In the context of existing sites providing employment such as that at Codham Hall North it is important to note that the 5,000 jobs referred to is a net increase in jobs.
- 2.4 Allocate of existing employment sites such as Codham Hall will help ensure the site continues to provide employment use as well as provide opportunities to support the development of existing businesses on the site.

Policy 5.3 Supporting text

- 2.5 Paragraph 5.58 states that existing employment sites will be formally allocated. This approach is strongly supported and is considered to be essential if these sites are to continue to provide for employment within the Borough and if the plan is to be justified and effective. Figures 5.12 sets out the intention to formally allocate all existing employment uses within the Codham Hall area and in this regard is also supported.
- 2.6 As depicted in Figure 5.13 the allocation of existing sites that already provide employment does not in itself provide for additional available land for new development. It does, however, ensure that there is no further loss of existing employment and therefore avoids the need for allocation of further land in order to account for this.

Policy 6.6 – Strategic Sites

- 2.7 The identification of the Brentwood Enterprise Park as a strategic site within Policy 6.6 is strongly supported which recognises the critical importance of the sites to

delivering the Plan's overall objectives. As made clear in our representation elsewhere as well as within representations submitted on behalf of St Modwen Developments Ltd we consider strategic employment would be focused on the part of the site to the south of the A127. This provides the greatest opportunity for new employment development to meet strategic needs. The existing employment sites at Codham North make an important contribution towards existing total employment in the Borough. The formal allocation of the site is anticipated assist the existing businesses and employment uses on site. The site at Codham Hall North may not be considered to be a new strategic site in this context.

Policy 8.2 – Brentwood Enterprise Park and Policy 8.4 – Employment Land Allocations

- 2.8 The allocation of Brentwood Enterprise Park is strongly supported. In order to ensure the plan is fully effective we would however suggest that a further distinction is made between the main Enterprise Park site at the Former M25 Works 101A and the Land at Codham Hall, North of the A127 (101B).
- 2.9 The land at the Former M25 Works 101A provides for new employment development to meet strategic needs. The site at Codham North consists of existing employment uses and we believe, whilst being in many respects complementary, will continue to meet different types of employment need. For this reason we consider it may be more appropriate for the site at Codham Hall North to be included within separate policy allocations such as within Policy 8.4 which allocates employment land within the Borough rather than within Policy 8.2 dealing with the strategic allocation.

Figure 8.2 – Brentwood Enterprise Park and 'Site Allocations Maps'

- 2.10 As set out in further detail below the formal allocation of employment land at Codham Hall North is supported and is considered essential to avoid loss of existing employment, support existing business and contribute towards the net growth in employment required in the new Local Development Plan.
- 2.11 There is presently an inconsistency between those areas included within Figure 8.2 and those areas included in the supporting document 'Site Allocations Maps'. It is clearly important that areas for allocation are consistent to avoid confusion in the adopted Plan.
- 2.12 In order to accurately reflect existing uses on site we consider that the allocated area should be extended to include those on the attached representation. This area, totalling approximately 9.2 ha, contains existing uses and development that provide for employment in the borough. This area also accords with that previously submitted

to Brentwood Borough Council as part of the February 2015 Strategic Growth Options consultation.

- 2.13 Within the text following the plan, at paragraph 8.23 we would suggest that the first sentence is amended to state that “Land at Codham Hall, site 101B, provides an opportunity to **regularise** existing industrial uses...”

Figure 8.3 – Employment Land Allocations

- 2.14 The inclusion of the site at Codham Hall within figure 8.3 is supported. The area of land proposed for allocation however is considered to be incorrect and does not reflect either the areas previously proposed for allocation, the previous representations made on behalf of S&J Padfield and Partners or the area of existing employment use on site.
- 2.15 Given the stated intention of the plan to regularise and allocate existing employment use, and the need to ensure there is no loss of employment land as set out earlier in this representation, we therefore consider it essential that the area proposed for allocation is amended in order to fully reflect the existing uses on site.
- 2.16 The employment growth figures set out in the Heart of Essex Economic Futures Study and in the Preferred Options consultation document are figures for **net** growth in employment. Any further loss of existing employment sites would result in a greater need for replacement employment land. It is therefore very important that suitable and successful existing employment sites such as that at Codham Hall are retained, supported and allowed to thrive.
- 2.17 This approach is reflected in the update to the Council’s Economic Futures Study carried out by Nathaniel Lichfield & Partners (December 2014) which provides important evidence on this topic. The NLP report notes at paragraph 4.5 that *“proposed new employment site allocations 101B and 108 have existing employment uses on site and therefore do not represent additional land supply”*. In order to deliver a net increase in employment provision as requested by the NPPF and set out in the NLP report it is therefore especially important that the current extent of employment use at Codham Hall North is formally allocated for employment purposes.
- 2.18 Please find attached to this representation a plan indicating the area of existing use that it is considered should be included within the allocated area. This area contains a number of existing uses that are distinct from the wider Green Belt and provide existing employment in the borough.
- 2.19 This revised area accords with that previously submitted to Brentwood Borough Council as part of the February 2015 Strategic Growth Options consultation.

- 2.20 The proposed revised allocation includes existing landscape features that currently contain the site and provide for employment space. The revised area totals approximately 9.2 ha.
- 2.21 The site's current uses will benefit as a result of an allocation. The Brentwood Draft Local Plan states at paragraph 8.28 that '...in areas allocated for general employment and office development on the Proposals Map, the presumption is that existing uses will be retained, and that proposals entailing loss of employment premises and sites without replacement will be resisted.'
- 2.22 The site supports good accessibility from the wider area by car due to its proximity to the M25 and A127. There is also a potential for the site to be accessed using proposed green transport links such as the Green Transport Route detailed in policy 10.1 of the Brentwood Draft Local Plan, further boosting the green credentials of the site.
- 2.23 This approach would also accord with paragraph 28 of the NPPF which states that '*Planning policies should support economic growth in rural areas in order to create jobs and prosperity by taking a positive approach to sustainable new development*'.

Evidence Base

Assessment of Potential Housing, Employment and Mixed Use Sites in the Green Belt – Working Draft (February 2016) – Crestwood Environmental

- 2.24 The Assessment of Sites in the Green Belt report prepared by Crestwood Environmental has now been published by the Council. This report, however, was not available at the start of the consultation period and therefore we have only been able to provide initial comments at this stage.
- 2.25 With regards to this report the land at Codham Hall appears to have been assessed as two parcels both of which are considered to have only a low to moderate contribution to Green Belt purposes. This continues to support the formal allocation of the site which not only meets employment needs but only makes a low or moderate contribution towards Green Belt purposes.
- 2.26 We also welcome the findings that the towns would not coalesce if site was developed and that the site presently has limited or no countryside function.
- 2.27 We do, however, consider it important that the areas used in evidence base analysis accurately reflect those proposed for allocation. At presently the land at Codham Hall appears to have been considered within two parts. This does not reflect the current area for allocation as proposed in Figure 8.2 (Brentwood Enterprise Park) or the supporting document 'Site Allocations Maps'. As set out above there is presently

inconsistency in these areas and in any case we consider it essential that changes are made to accurately reflect the area of existing uses on site. This will support the existing employment uses provided on site, ensure there is no loss of employment land, and accurately reflect and regularise the existing uses as is the plan's stated intention.

Highway Modelling (February 2016) – Peter Brett Associates

- 2.28 The uses at Codham Hall are existing uses and appear to have been treated as such within the Peter Brett Associates Highway Modelling. This is support given that the formal allocation will allow the existing use to continue and will therefore not result in significant numbers of potential new trips as is the case with those sites newly allocated for employment. It is in our view correct that the highway modelling focuses on these sites. We would, however, continue to emphasise the need for any future highway proposals to continue to allow the successful operation of the site at Codham Hall in order to support the businesses and employment opportunities provided on site.

Appendix A – Proposed Allocation Area

Land North of A127, Codham Hall

