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

12th March 2018

AG/JMc – 17/106
BY EMAIL

Dear Sir / Madam,

BRENTWOOD BOROUGH COUNCIL – DRAFT LOCAL PLAN – PREFERRED SITE ALLOCATIONS CONSULTATION JANUARY 2018

SUBMISSION ON BEHALF OF FORD LAND EUROPE

Iceni Projects Limited ('Iceni') are appointed by Ford Land Europe ('Ford') to advise on planning matters associated with its commercial asset at Eagle Way, Warley, Brentwood (the 'Site'). Iceni has been instructed by Ford to prepare and submit a 'Brentwood Draft Local Plan Preferred Site Allocations ('BBC PSA') Comment Form' and written submission to inform the current BBC PSA consultation. In order to inform this submission, please find enclosed the following:

- BBC PSA completed Consultation Form;
- Cover letter on behalf of Ford Land Europe.

Ford notes that the publication of the BBC PSA represents the first stage of consultation on the new Local Plan, following the Call for Sites in May 2017. Combined, the two consultations will inform the preparation of BBC's Housing and Economic Land Availability Assessment ('HEELA') (evidence base document for the new Local Plan). As BBC Officers will be aware, Ford submitted representations to the Call for Sites consultation in May 2017, demonstrating the Site's suitability and availability for residential development at a time when the site is identified surplus to Ford's commercial requirements. Accordingly, Ford welcomes the opportunity to comment on the BBC PSA and to work constructively with Officers throughout future stages of the new Local Plan preparation.

This representation is submitted in line with the consultation deadline of Monday 12th March 2018.

a. The Site

Location / Description

By way of background, the Site comprises 8.51 hectares (21.03 acres) of land located within Warley, forming the southern edge of the Brentwood settlement boundary. It is located approximately 1.36km south of Brentwood Train Station and 2.5km southeast of Junction 28 of the M25 Motorway. The Site was originally developed for military purposes before being occupied by Ford as their European headquarters in the 1950s. Whilst the head office function has since been relocated to Cologne, Germany, the Site has remained in use by Ford as a central office for its UK services.

Eagle Way runs east-west through the Site, dividing it into two parcels of land, as outlined below:

- **'The northern parcel'** - 1.37 hectares (3.39 acres) of land to the north of Eagle Way, currently utilised for staff car parking. A bus station is located on The Drive which runs along the western boundary, with Eagle Way running along the southern boundary of the northern parcel. To the north there is BBC owned land which is currently being utilised as additional car parking by Ford (on a lease agreement), as well as the highways depot and auto garage known as Council Depot. Located adjacent to the east is the Marillac nursing home and to the west there is a local centre with retail and commercial uses, beyond which there are predominantly residential uses.
- **'The southern parcel'** - 7.14 hectares (17.64 acres) of land to the south of Eagle Way where the main office building is located. The 6-7 storey office building has a NIA of 43,664 sq.m (470,000 sq.ft.), together with an ancillary data centre building, car parking and landscaping. The southern parcel is bounded by woodland and Warley Gap to the south, Clive Road to the west, Eagle Way to the north and woodland to the east. There are two dwellings located within 70m south of the site, with the Essex Regiment Chapel and Royal Anglian Regiment being located to the west.

Existing Planning Policy – Designations

In terms of adopted planning policy, the Site is currently subject to employment land uses designations as defined by the BBC Replacement Local Plan (2005). Land to the north of Eagle Way is designated for 'general employment', and the land to the south of Eagle Way is designated as 'office'.

b. Fords' response to the BBC PSA

In line with the requirements of the BBC PSA Consultation Form, the following provides a response on behalf of Ford to each of the relevant sections of the PSA consultation document.

Part 1 – Our Strategy for Growth

Spatial Strategy

Ford broadly supports the spatial strategy set out within the BBC PSA, in particular paragraph 34, which acknowledges that *'opportunities for brownfield redevelopment should be maximised wherever possible'* – forming the key focus for BBC's spatial strategy for growth across the Borough. In this regard, Ford wishes to highlight the suitability of the land at Eagle Way for potential future residential development, in supporting this endeavour whilst minimising pressure on BBC to release land for housing in the Green Belt (which it is evident, BBC are heavily reliant). This is discussed in further detail under Ford's comments to the BBC PSA Part 2 – Preferred Site Allocations.

Housing Need and Supply

Ford notes that since the publication of BBC's Draft Local Plan (2016), BBC has commissioned a new Strategic Housing Market Assessment ('SHMA'; January 2018) to update the previous assessment undertaken in 2015 – which accounts for most recent DCLG household projections. The SHMA (January 2018) indicates an Objectively Assessed Housing Need ('OAN') for 7,600 net additional dwellings over the BBC new Local Plan period (2013-2033), equating to the delivery of 380 dwellings per annum. Whilst Ford welcome's BBC's acknowledgement of the OAN within the BBC PSA (paragraph 42), Ford wishes to note that given the current position of the draft Local Plan, which is unlikely to be submitted prior to a revised National Planning Policy Framework ('NPPF') being published – the transitional requirements of the draft NPPF (March 2018; Annex 1) should be taken into account by BBC in determining the correct minimum housing need figure (namely, the 'Standardised Methodology'). In this regard, the Government's proposed standard methodology for calculating housing need indicates an OAN of 454 dwellings per annum for Brentwood – which should be considered as an appropriate level of housing growth over the plan period (equating to the delivery of 9,080 dwellings). Accordingly, Ford strongly encourages BBC to take forward the Standardised Methodology Figure of 454 dwellings per annum as the correct minimum figure to plan towards within the new Local Plan (in line with the latest national planning policy parameters/requirements). Notwithstanding, Ford encourages BBC to review the OAN figure as the Local Plan is progressed towards adoption, to ensure that the housing target is adequately reflected.

Ford also welcomes BBC's aspirations to 'deliver substantially more new homes than in recent years and that these be in sustainable locations' including at the 'Housing-Led Allocations' as a priority. In this regard, Ford strongly supports the inclusion of the 'Ford Offices, Eagle Way, Warley, Brentwood' (Site Reference 117A and 117B) as an identified Housing-Led Allocation within the BBC PSA for up to 350 dwellings in meeting Brentwood's housing requirements. (as detailed at Figure 9: Proposed Housing-Led Allocations). This will greatly relieve pressure on BBC to find additional land for housing within the Green Belt, whereby it is evident that BBC are currently heavily reliant, with over 52% of BBC's proposed housing allocations within the BBC PS currently designated on Green Belt land. This further exemplifies the requirement for residential development to be maximised at suitable brownfield sites in the Borough.

Specialist Accommodation

Notwithstanding the draft housing-led allocation within the BBC PSA (under Figure 9), Ford acknowledges that the BBC PSA (paragraph 72) makes reference to the '**Ford / Council Depot, Warley**' having the potential to integrate new C2 accommodation facilities (60-bed scheme). Whilst Ford is supportive of BBC seeking to accommodate such facilities across the Borough, Ford notes that there is no further evidence provided within the BBC PSA to fully justify this proposed land use at the Site. As such, Ford requests that further evidence is provided (including an assessment of capacity/need in the local area) before the next stage of the Local Plan is progressed. The suitability of such uses at the Ford site, is discussed in further detail under Ford comments to the BBC PSA Part 2.

Employment Land Requirements

Ford notes paragraph 116 of the BBC PSA highlights that BBC proposes to allocate a number of existing employment sites for residential / mixed-use development including Wates Way Industrial Estate (0.99 ha), the Council Depot site, Warley (1.71ha) (located immediately to the north of the Site), and the West Horndon Industrial Estate (15.06ha). Paragraph 117 of the BBC PSA then makes reference to the Site at Ford Offices, Eagle Way coming forward through the HELAA process as being suitable for residential development. Conversely, Paragraph 117 goes on to state:

"The Council are keen to see the continuation of employment uses in parts of areas identified for possible redevelopment in Warley. The exact extent will be subject to detailed masterplanning, but for the purposes of the employment analysis, approximately 2ha has been set aside for retained employment uses."

Whilst it is not clear within the BBC PSA whether this relates to the Ford Site explicitly, one would assume that this is indeed the case on review of the BBC PSA Part 2, whereby no other proposed 'Preferred Site Allocations' in Warley, include employment uses. However, no further explanation/evidence is provided. On behalf of Ford, we request BBC sufficiently evidence this requirement before the next stage of the new Local Plan is progressed.

Further, Figure 21: 'Employment Land Need' of the BBC PSA outlines a forecast employment land requirement of between 33.76ha to 45.96ha. Paragraph 124 of the BBC PSA continues to state that in total, when combining the updated original employment allocations from 2016 and new potential allocation sites, this produces a potential new employment land requirement of c.47.39ha (excluding the Ford Site) – resulting in a surplus of +1.43ha. As such, it is noted that with the new employment allocations alone, it appears that BBC have a sufficient supply of employment land to meet its overall forecast needs over the plan Period (which is indeed specifically recognised under Paragraph 125 of the BBC PSA).

Accordingly, Ford challenges the retention of any level of employment use at the Site, given the evident draft allocations/identification of other, more suitable sites elsewhere in the Borough to meet identified requirements. On this basis, Ford objects to the inclusion of employment uses within the draft allocation for the Site (as detailed under the BBC PSA Part 2) and encourage BBC to include the Site as a sole residential allocation in next version of the BBC new Local Plan. Further detailed comments relating to the Ford site and draft allocations 117A and 117B is included in the remaining section of this representation.

Part 2 – Preferred Site Allocations

Ford Offices, Eagle Way, Warley, Brentwood (Site Ref: 117A and 117B)

Ford notes that the current BBC PSA 'Part 2: Preferred Site Allocations' includes the Warley Site under draft '**Site Allocation 117A (Land South of Eagle Way)**' and '**Site Allocation 117B (Land North of Eagle Way)**' (collectively referred to as the 'Ford Offices, Eagle Way, Warley') for housing and employment development, with the potential for specialist care accommodation (referred to as 'Other Indicative uses'). Notably, the draft allocation further highlights that sites 117A and 117B have a collective site area of 8.09 hectares (ha) – of which, 4.00 ha is developable; with an indicative dwelling yield (net) of 350 residential units. The allocation is currently anticipated to come forward within years 10-15 of the new Local Plan.

Ford has conducted constant and regular reviews of its assets. As noted in the May 2017 submission, as a business, it is essential for Ford to maintain a degree of flexibility across its property portfolio in the coming years to allow rationalisation if that is deemed the most appropriate course of action to ensure it operates its facilities as efficiently as possible. Ford is therefore supportive in principle of draft Site Allocations 117A and 117B in the BBC PSA for future residential-led development – including demolition of the existing office building and structures and redevelopment for 350 new homes (subject to detailed feasibility and masterplanning). In this regard, Ford wishes to emphasise the suitability of the Site for residential development – particularly given its location within the existing settlement boundary; comprising of previously developed brownfield land whereby national planning policy and indeed the BBC PSA itself, acknowledges that housing growth should be directed as a matter of priority, with suitable sites maximised in achieving sustainable forms of development. This is particularly pertinent in BBC, acknowledging that the majority of the Borough (89%) falls within the Green Belt ('GB') whereby the scarcity of land for housing is critical – alongside a significant housing requirement (as detailed under Ford's comments to 'Part 1' of the BBC PSA).

As such, the Site provides a prime opportunity for providing much needed housing within the Borough, whilst alleviating pressures on BBC to find additional land for housing in the Green Belt – whereby it is evident that the Council are currently heavily reliant; acknowledging BBC PSA 'Figure 8: Housing Growth' which signifies that over 52% of BBC's housing is proposed to be accommodated within the GB (through proposed site allocations).

The need for BBC to identify additional land for housing is also required in order address cross-boundary pressures such as London's future housing growth, which has most recently been exemplified within the draft London Plan (consultation version December 2017). In this context, the Mayor of London has confirmed that local planning authorities within the wider south east, where the housing market is influenced by that of London should be working collaboratively with the GLA to significantly boost the supply of housing and ensure that Local Plans meet full objectively assessed needs. The arrival of Crossrail at Brentwood and Shenfield in 2019 further exemplifies this requirement – providing even greater connections to central London, which will inevitably result in an increase in people living in the local area. This in turn places further pressure on land for development, with the Site at Warley providing a key brownfield opportunity for housing.

Further, the Site is particularly suited for residential use given its location within the Brentwood Urban Area / Settlement Boundary, with existing residential uses in close proximity, in addition to well-connected highways infrastructure and services (with a designated local centre, located to the north-west of the Site). Further, the Conceptual Masterplan previously submitted by Ford in support of the Call for Sites consultation in May 2017, demonstrated that the existing vehicular access / egress points on Eagle Way and Warley Gap could be utilised to facilitate residential vehicular access; supporting a significant quantum of residential development on Site, whilst enhancing connectivity with the surrounding local area. Accordingly, residential development at the Site will further support the function, character and vitality of the area – completing the street scene along Eagle Way to the west, with the potential to provide both a range of housing types and sizes.

In line with Ford's representations to the Call for Sites consultation in May 2017, Ford also wishes to request that the draft allocation for the Site within the next stage of the new Local Plan is updated to reflect the Site's anticipated availability earlier in the Plan period - notably, 6-10 years versus the 10-15 years currently stated under the BBC PSA Draft allocation. This will help to deliver a significant

degree of Brentwood's housing requirement earlier in the Plan period (across the short-medium term; albeit, the availability of the Site will be driven by Ford's wider operations strategy).

Developable Area / Mix of Uses

As highlighted within Ford's previous representations to the BBC Call for Sites consultation (May 2017) – notably, the high-level 'Conceptual Masterplan' study entitled '*A Garden in the Woods*' (produced by Icen Projects), assessed the constraints and opportunities associated with the Site. Within this submission it was demonstrated that approximately 5.39ha of the 8.51ha site area would be suitable for residential development and associated infrastructure – representing the total "developable area". The remaining 3.12ha was proposed to be utilised for open space, amenity provision and soft landscaping. Notably, through this assessment it was also determined that the Site would be suitable for larger family dwellings and aspirational housing; including a mix of flats and houses. Accordingly, and in allocating the Site for future residential development, Ford encouraged BBC to consider the prospects of a higher quantum and density of development (c.35 dwellings per hectare).

Whilst Ford is supportive of the indicative capacity for 350 residential units at the Site, it is noted that the overall Net Developable Area identified within the BBC PSA (4 hectares) is lower than that originally assessed by Icen – with no further evidence provided by BBC within the BBC PSA to justify the figures proposed/diversion from the 5.39ha. Ford therefore encourages BBC to review the developable area proposed within the draft allocation.

It is also not clear at this stage how 350 residential units would comfortably be accommodated within the site boundary, particularly if additional land uses and services are also required. Further capacity testing has been carried out by Ford's design team, and whilst 350 homes can be accommodated, this will require a higher percentage of apartments rather than family homes, and the inclusion of the existing green space fronting Eagle Way – with no provision of additional land uses. From our initial testing, we do not believe that it is physically possible to accommodate 350 new homes in addition to 2.0ha of employment land a 60-bed car facility. Ford therefore requests that the wording within the draft allocation is amended to read 'up to 350 dwellings' to allow for future masterplanning and flexibility within the housing market. Further, and in light of the proposed amendment to delivery in the Plan period (6-10 years rather than 10-15 years), BBC should consider this allocation in the wider context of the Council's own allocation on the land immediately north.

Employment

As outlined under Ford's comments to the BBC PSA Part 1, Ford wishes to emphasise that the existing offices at Eagle Way were designed specifically for Ford and are bespoke for the operational and commercial requirements of Ford. It is therefore very unlikely that the Site could continue to support large-scale, modern employment uses of such a scale. It is also considered that the distance from Brentwood and Shenfield train stations would not be an attractive location for commercial investment – acknowledging that typically businesses requiring commercial properties of this size today, would pursue sites within close proximity of strategic infrastructure, trunk roads and more extensive local facilities and services. As such, and in light of current national policy parameters which specifically seek to promote sustainable forms of development, Ford wishes to object to the retention of employment uses at the Site – acknowledging that such a use is not considered an appropriate, or viable use of the Site in the future. There is also no further evidence within the BBC PSA to justify the retention of employment uses at the Site, which Ford would respectively request is made available. Further, whilst Ford acknowledges that there will be a requirement for commercial space in the Borough, land for residential development is critical in order to relieve any additional pressures on the Borough's Green Belt – with the Site representing an ideal opportunity for maximising residential development (including much needed family accommodation) which should be recognised under the draft site allocation.

Ford also notes with reference to the BBC PSA (Figure 23: Employment Land Need and Supply) that even without the 2 hectares of retained employment land at the Ford Site, BBC appear to have enough employment land supply to accommodate requirements over the Plan period (through new employment allocations). From our assessment it is noted that if the full extent of the 5.25ha of developable area at the Ford Site were to be released for residential purposes, the '*Forecast Loss of Employment Land by Re-allocations for other uses*' in Figure 23 would equate to 23.01ha (an increase

of 2ha), with the 'Combined Requirement' of employment land being 25.76ha to 47.96ha (increase of 2ha). Accordingly, it is anticipated that the new supply of 47.39ha through the 'Proposed Allocations' should sufficiently compensate for the full release of the Ford site for residential. Accordingly, and in tandem with the reasons outlined above, this further justifies the allocation of the Site for purely residential uses within the new BBC Local Plan, which Ford requests BBC consider before progressing next stage of the Local Plan.

Specialist Care Facilities (C2)

Whilst Ford supports BBC's aspirations to ensure that a sufficient degree of specialist care accommodation is provided across the Borough, Ford wishes to question the suitability of the Warley Site in accommodating such uses, alongside residential (as currently outlined under the draft allocation for the Site). Accordingly, and similarly to Ford's comments regarding the retention of employment uses at the Site, Ford wishes to highlight that due to the Site's location on the edge of Warley, it is considered that the Site does not represent the most suitable and sustainable location for specialist care accommodation. Indeed, this is also recognised within the BBC PSA itself (paragraph 71), whereby BBC contend that the provision of additional care facilities in the Borough should be located within larger sites with good access to services and facilities and to external spaces. Further, Ford notes that there is currently no supporting evidence provided by BBC to justify the potential "integration of new C2 facilities" at the Ford site within the draft BBC PSA (including an assessment of need in the local area). Accordingly, Ford wishes to request that such evidence is provided/progressed by BBC before commencing progress on the next stage of the new Local Plan.

In light of the above, Ford wishes to request that BBC considers removing the proposed employment use and care facilities as part of the allocation for the Site within the new Local Plan – recognising that the Site is most suitable for residential use.

c. Other matters

Ecology

Ford are currently in the process of commissioning an Extended Phase 1 Ecological and Habitat survey to assess the ecological constraints and opportunities associated with the Site and the neighbouring Country Park and wildlife site. The potential redevelopment of the Site offers a significant opportunity to further enhance the ecology and biodiversity of the Site and surrounding area.

Trees and Landscaping

Whilst there are a significant number of trees located across the Site, we understand there are no Tree Preservation Orders ('TPOs') associated with the land. Ford are in the process of commissioning a detailed Arboricultural Survey to understand the age and quality of the existing trees at the Site. As detailed in the May 2017 Conceptual Masterplan, there is a presumption in favour of tree retention wherever possible. This is essential in order to maximise the tree's contribution to an attractive and mature landscape and enhanced residential setting, as well as creating a noise and visual buffer along Eagle Way. Furthermore, the surrounding woodland setting has been incorporated into the Conceptual Masterplan through the design rationale of 'A Garden in the Woods'. In summary, the existing landscape offers a unique opportunity to deliver a residential development within a well-established and attractive woodland setting.

Please also refer to our submission dated May 2017 which provided further assessment of site specific considerations including highways and transport.

d. Summary

On behalf of Ford, thank you for providing the opportunity to comment on the BBC PSA consultation document. As noted above, Ford is broadly supportive of the draft allocation proposed for its site, subject to further discussions with BBC Officers regarding the proposed land uses and development capacity. Ford welcomes the opportunity to discuss this and future masterplanning further with BBC over the course of the preparation of the new Local Plan.

I trust that the enclosed is a helpful response at this stage, however please do not hesitate to contact me (020 3435 4230 / agale@iceniprojects.com) or my colleague Lucy Howes (020 3725 3840 / Lhowes@iceniprojects.com) should you require any additional information.

Yours sincerely,



Andrew Gale
DIRECTOR

cc: Mark Banham – Ford Land Europe
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