

**Brentwood Draft Local Plan
Regulation 18 Consultation
Preferred Site Allocations**

**Representations made on behalf of S & J Padfield &
Partners**

Codham Hall North

Reference: 101C & 101D

March 2018

1.0 Background and Overview

- 1.1 These representations are submitted on behalf of S&J Padfield and Partners regarding the Brentwood Local Plan Regulation 18 Draft Local Plan consultation and land at Codham Hall in particular.
- 1.2 The site is identified as comprising two draft allocations, referenced 101C and 101D throughout the Council's plan-making process. A plan showing the entire site proposed for inclusion in the plan at Appendix A to this representation.
- 1.3 Representations have previously been made on behalf of S&J Padfield and Partners in respect of this site throughout the plan making process and most recently to the 2016 Draft Local Plan Consultation.
- 1.4 The site that is the subject of this representation is situated in a strategic location to the north of the A127 at M25 Junction 29.
- 1.5 The site measures 17.63ha in total, with 101C providing for 9.62ha and 101D for 8.01ha. The site includes a significant amount of existing employment land provision.
- 1.6 The allocation of the site will therefore make an important contribution in supporting existing businesses and providing for jobs throughout the coming plan period.

2.0 Strategic Objectives

- 2.1 The Strategic Objectives identified within part one of the draft Local Plan are supported. Economic prosperity forms a key part of the objectives.
- 2.2 Objective SO2 sets out the Council's objective to direct development growth to the Borough's transport corridors. This approach is supported and has potential to provide for employment growth in locations where there is strong market demand, and to minimise environmental impacts on the wider Borough. The focus on the A127 and M25 Junction 29 and the role of this location in meeting employment needs therefore accords with this approach and will help support the existing businesses located here.
- 2.3 Objectives SO8 to SO14 cover economic prosperity in particular and we support the prominence given to this issue in the consultation document.
- 2.4 Objective SO8 is supported and in particular the draft Local Plan's recognition that attracting new commercial investment will be crucial in fostering a prosperous, vibrant and diverse economy with high and stable level of economic and employment growth.

3.0 Spatial Strategy

- 3.1 The proposed spatial strategy and in particular the main focus of growth along transport corridors with strategic allocations along the A127 corridor is supported. The draft allocation for employment land at Codham Hall is considered to relate well to this strategy.

- 3.2 Figure 5 in the consultation document identifies M25 Junction 29 as a key location for employment led development. This approach is strongly supported and recognises the importance of this strategic location.

4.0 Infrastructure Planning

- 4.1 The preparation of the IDP is supported and we note that the Council has published an online updatable webpage to provide information and updates on the Infrastructure Delivery Plan (IDP) for the Borough brentwoodidp.org/.
- 4.2 S&J Padfield and Partners, along with our appointed technical consultants, wish to be involved in this process at the earliest opportunities. Engagement has already been undertaken with Highways England. It will clearly be important that access to the Codham Hall North employment site is maintained and enhanced where possible as part of any future highways works for M25 Junction 29.
- 4.3 There may additionally opportunities to link the employment site at Codham Hall with accessibility and connectivity enhancements work through the A127 Supplementary Planning Document, and with the Brentwood Enterprise Park site to the south. It is however considered important that the plan provides for sufficient flexibility for applications and/or delivery at Codham Hall North whilst work on any Supplementary Planning Document is progressed.

5.0 Employment Land – Need and Supply (Paragraphs 106 to 124)

- 5.1 The NPPF gives a high importance to economic growth setting this out within the key planning principles and one of the three dimensions of sustainable development.
- 5.2 The Local Plan consultation sets out a number of Economic Aims and Strategic Priorities relevant to economic development.
- 5.3 Economic Aims A2 and A4 are supported setting out that the Local Plan will seek to:
- A2. Encourage high value, diverse, employment uses that will provide a significant number of skilled and high quality jobs;
 - A4. Enable the growth of existing business, the creation of new enterprises and encourage inward investment.
- 5.4 Strategic Priorities P1 and P6 are also strongly supported:
- P1. Support business development and growth
 - P6. Promoting Brentwood Borough as a place to visit and invest, encouraging the visitor economy

Economic Forecasts

- 5.5 We note that a number of economic scenarios have been considered. Scenario A is based on Experian employment forecasts as used in the latest SHMA. Given the relationship with the SHMA, the use of this forecast is supported and forms the most robust level of growth to ensure that employment needs are met within the forthcoming plan period.

Employment Land Requirements

- 5.6 We note that standard site plot ratios have then been used to calculate estimated gross employment land requirement, which based on higher growth scenarios is stated to be 20.3 ha.
- 5.7 Potential loss of existing employment land is set out in paragraph 117 to be up to 21.01ha with an addition of 4.65ha to allow for structural change through change of use of employment premises away from employment through use of permitted development rights for example. The recognition of potential change through PD rights is supported in order to ensure a robust employment land supply.
- 5.8 Paragraph 119 and Figure 21 set out new requirements for employment land. Accounting for forecast requirements, and loss of existing sites, produces a combined requirement of 45.96ha. It is considered important to plan for this higher level of growth as part of the emerging Local Plan.
- 5.9 Should the proposed housing needs within the plan period increase we consider it is important that employment needs are further increased to accord with this.

- 5.10 Importantly employment land and job requirements should be treated as net additional requirements. The role of sites such as that at Codham North will therefore be very important in not only providing for potential new employment land and jobs through business growth but also in maintaining and securing existing job provision already in place on site.

Employment Site Allocations

- 5.11 Paragraph 124 of the consultation document sets out that combined original employment allocations and new potential sites, this provides for a new employment total allocation of 47.39 ha. Existing employment sites not previously allocated are included at 22.88 ha and existing allocated employment land at 40.97ha. Sites that are already in employment use, even if not formally allocated, will of course not provide new land for jobs in the borough and the fact that this land area has been included in a separate total is therefore support. It nonetheless remains important to allocate sites such as Codham Hall North already in employment use to secure their longer-term use and ensure there can be the required level of net increase in jobs over the coming plan period.
- 5.12 It is noted that the Draft Allocations Document states that the early delivery of strategic sites within the A127 corridor will be important to maintain an effective stock of employment land. Support for the Codham Hall north site will be an important element of this.

Brentwood Economic Futures 2013-2033 Final Report (January 2018)

- 5.13 We note that the Local Plan consultation document is accompanied by a revised and update Economic Futures report prepared by Lichfields which we note provides indicative job capacity figures. This has of course been based on assumptions in terms of both site capacity and use class split.
- 5.14 Work to date at Codham Hall North has identified that the site presently provides for approximately 350 jobs from the businesses presently accommodated on site. The site is therefore already particularly important in terms of employment land supply and there is scope for this to further increase as part of work following the formal allocation of the site through the Local Plan. The Codham Hall North site also remains particularly suitable to accommodate demand from businesses that may be relocated from elsewhere either as a result of the strategy to identify housing sites in the draft Local Plan or as a result of wider structural changes including increase use of permitted development rights for conversion of employment premises and land to residential use.

6.0 Sustainability Appraisal

- 6.1 A supporting Sustainability Appraisal has been produced by AECOM to further support the evidence base of the draft plan. This was published in January 2018, and seeks to build on the findings of the 2016 Draft Plan, reviewing the various sites submitted against a range of specified sustainability topics and objectives.
- 6.2 On review of the site options appraisal, we do however have some concerns as to the assumptions made. In some cases the site at Codham North appears to have been scored down based on broad assumptions when any impacts would instead depend upon implementation. The site also appears to have been scored down in relation to educational facilities, which, whilst clearly of relevance to a housing allocation, is not directly applicable and should not be weighted in the same way in relation to employment land.
- 6.3 Others issues highlighted for sites 101C and 101D include relation to Local Wildlife sites. Despite the supporting text of the performance categories stating that the thresholds have been set to reflect an understanding that County Wildlife Sites and ASNWs have relatively low sensitivity, 400m, when any impact would again depend on implementation.
- 6.4 The sites have also scored 'amber' in respect of their relation to Air Quality Management Areas. Reviewing the scoring criteria, this indicates that the sites are within 1km of an AQMA, which does not appear to be a relevant consideration in this case.
- 6.5 The site at Codham North has also scored 'amber' under the criteria of Green Belt. Impact on the Green Belt is discussed in more detail in the later stages of this representation; however we do consider that this aspect as not given consideration to the detailed assessment work undertaken by Crestwood Environmental and the current status of the site. The supporting work undertaken by Liz Lake Associates alongside this representation is also very relevant in this regard. Similarly, the site is also scored 'amber' with regard to effect on Agricultural land despite the existing businesses and previously developed nature of the site.
- 6.6 Ultimately, the SA findings at the current stage about employment land are covered at para 10.14.2, where it states that '*...the proposal to support delivery of required new employment land. And in particular realisation of opportunities for the A127 corridor to develop as an employment cluster, is strongly supported*'. We welcome this view proposed by the SA, and will continue to take a proactive approach in addressing any shortcomings.

7.0 Evidence Base

- 7.1 We note that the Local Plan Regulation 18 consultation has been released alongside evidence base information including green belt and habitats assessment work in particular.

Green Belt

- 7.2 An updated Green Belt Study has been published by Crestwood Environmental alongside the Local Plan consultation.
- 7.3 The Green Belt review completed to support the Draft Allocations Document sets out the various parcels that have been assessed on their ability to contribute to the purposes of the Green Belt.
- 7.4 The Codham North site is identified within a larger parcel (no. 25) to the north of the A127. Whilst we note much of the borough is identified as having a 'high' contribution to Green Belt purposes, this parcel is deemed to have a 'moderate/high'. Whilst this is noted, we believe it remains particularly important to ensure that the particular circumstances of sites are taken into account. A finer grain level of assessment looking at the parcels similar to that in the accompanying Liz Lake Associates report would in our view be more appropriate. The supporting report prepared by Liz Lake Associates demonstrates that the site at Codham North does not presently positively contribute towards Green Belt purposes.

8.0 Site 101C / 101D – Land at Codham Hall Farm

- 8.1 Page 93 of the consultation document sets out the proposed area of allocation for Land at Codham Hall Farm (sites 101C and 101D). This includes site details, including access, opportunities, constraints and delivery timescales.
- 8.2 Site reference 101C is proposed to be allocated as an employment area totalling 9.62ha. Site reference 101D is proposed to be allocated for a landscaping area to total 8.01ha.
- 8.3 Site 101C currently supports a range of business and commercial uses. The allocation of this area will support the continued provision of jobs in this location and, together with site 101D, will also provide opportunities for enhanced landscaping, as well as further development of the quality and diversity of business and employment space on offer.
- 8.4 The site as shown in the Preferred Options Draft Allocation Document includes the full extent of the site put forward for inclusion in the plan, measuring 17.63ha.
- 8.5 In order to allow for landscape and enabling works to support employment delivery it is considered important that both sites 101C and 101D are removed from the green belt in their entirety. On this basis, it is considered more appropriate to include the site as a single reference within the final submission plan. Reference to landscaping could be made clear within the supporting text if so required.