



Brentwood Draft Local Plan Regulation 18 Consultation Preferred Site Allocations

**Representations made on behalf of St. Modwen
Developments Ltd and S & J Padfield and Partners**

Brentwood Enterprise Park

Reference: 101A

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1. Background and Overview

- 1.1 These representations are submitted on behalf of St Modwen Developments Ltd. and S&J Padfield and Partners regarding the Brentwood Local Plan Regulation 18 Draft Local Plan consultation and Brentwood Enterprise Park in particular.
- 1.2 The site is identified as site 101A within the draft Local Plan and forms a key part of the plan's proposed employment strategy.
- 1.3 Representations have previously been made on behalf of S&J Padfield and St. Modwen in respect of this site throughout the plan making process and most recently to the 2016 Draft Local Plan Consultation.
- 1.4 The Brentwood Enterprise Park site is located at M25 Junction 29 to the south of the A127. It should be noted that other sites included within the draft local plan, 101C and 101D, are situated to the north of the A127.
- 1.5 Site 101A is now identified in the Regulation 18 Draft Local Plan as totalling 35.47ha, 25.85 of which is identified as developable land. The site therefore plays a particular important role in providing a significant element of the Boroughs employment land. The site contributes significantly to the provision of jobs to support the growth of the Borough.

2. 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 Objectives SO2 sets out the Council's aspiration 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 strategic employment needs therefore accords with this approach. Sites on the strategic road network, M25 Junction 29 and the Brentwood Enterprise Park are therefore particularly important and well located in meeting strategic employment needs. This includes local and regional demand including demand as a result of structural changes and lack of available employment land within London. The location on the strategic road network is also particularly suited to distribution uses and uses that may generate considerable movement of large goods vehicles.
- 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. The Brentwood Enterprise Park will be especially important in attracting new investment and given the nature of the site is more likely to be suited to distribution uses alongside supporting office and other employment provision.

3. 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. This area and the strategic allocation at the Brentwood Enterprise Park site in particular will assist in bring forward new business and employment opportunities, and will support residential growth within the area and across the Borough and surrounding areas more generally.
- 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. Infrastructure Planning

- 4.1 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/. The site presently covers physical infrastructure, community infrastructure and green infrastructure.
- 4.2 The preparation of the IDP is supported and it is considered important that there is engagement from all stakeholders as part of this process. This is particularly the case with regards to transport infrastructure and connectivity along growth corridors at the A127 and M25 junction 29 in particular.
- 4.3 It is also noted that the latest Local Development Scheme identifies that an A127 Corridor Supplementary Planning Document (SPD) will now be prepared. This approach is supported and it is considered early engagement with all parties including landowners and the promoters of sites will be an important part of this strategy. St Modwen and S&J Padfield and Partners, along with our appointed technical consultants, wish to be involved in this process at the earliest opportunities and we look forward to working with the Council on this matter moving forward.

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

- 5.1 As stated in the Local Plan consultation document the NPPF gives high importance to economic growth setting this out within the key planning principles and one of the three dimensions of sustainable development. As stated in NPPF paragraph 7 this will mean building a strong, response and competitive economy by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth.
- 5.2 Paragraph 107 of the consultation recognises the importance of the Borough as being a high-quality environment within close proximity to London. This reflects the work in relation to the Brentwood Enterprise Park and the importance of growth in this strategic location.
- 5.3 The Local Plan consultation sets out a number of Economic Aims and Strategic Priorities relevant to economic development.
- 5.4 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.
- 5.5 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

Functional Economic Market Area

- 5.6 The Functional Economic Market Area (FEMA) approach is supported in general. The plan of course recognises this is not an exact science and we would suggest that it is also important to recognise the strategic employment sites such as the Brentwood Enterprise Park will potentially have influence over a greater area than smaller employment site provision in other locations.

Economic Forecasts

- 5.7 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.
- 5.8 With regards to job growth, Figure 19 in the Draft Plan indicates job growth in B use class jobs from 17,101 in 2013, to 21,234 in 2033, an increase of 4,133 jobs. Across

all sectors the increase is stated as being from 39,400 in 2013 to 48,900 in 2033, an increase of 9,500 jobs.

Employment Land Requirements

- 5.9 The Local Plan then goes on to set out employment land requirements based on assumptions on B use class development. As set out elsewhere in this representation there is significant demand for B8 and distribution uses which strategic site such as Brentwood Enterprise Park is very well placed to meet.
- 5.10 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. We support the use of higher land requirements given the likely requirements for B8 and distribution uses which have greater land requirements than office provision. Whilst some office provision will be located at the Enterprise Park site this will of course support office provision within Brentwood and other centres. It remains appropriate for the plan to have a positive policy approach to such uses.
- 5.11 Potential loss of existing employment land is set out in paragraph 117 as totalling 21.01ha through the reallocation of existing sites. An additional allowance of 4.65ha is also made 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.
- 5.12 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 given the need for flexibility in land supply that that the mix of uses on sites will vary.
- 5.13 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.

Employment Site Allocations

- 5.14 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.
- 5.15 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 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.

- 5.16 The plan recognises at paragraph 129 that the early delivery of strategic sites within the A127 corridor will be important to maintain an effective stock of employment land. In this regard the Brentwood Enterprise Park will clearly play an important role. St Modwen Developments and S & J Padfield and Partners are working with the Council to ensure delivery on the site can come forward early in the plan period.
- 5.17 The Draft Allocations Document is supported by the Economic Futures 2012-33 (2018) document, which explores the need for employment land in more detail. While this document is discussed later in the representation, it is pertinent to note that it sets out various scenarios drawn from different data in terms of quantifying and justifying the amount of land required to support the necessary number of new jobs and business required in the plan period. The Economic Futures Documents sets out that up to 45.93 ha will now be required, and concludes that Site 101A will contribute some 54% of this need, making it a significant allocation within the Plan. It also notes that the loss of employment land within the borough through the re-rolling of sites such as West Horndon Business Park as draft allocations for housing have led to a loss of established employment centres and land. This has increases the demand for new land to be found in sustainable locations elsewhere in the borough.
- 5.18 It is suggested that future assessment work moving forward with the Local Plan is increasingly based on known details regarding emerging sites rather than standard assumptions on employment land, use classes and job density. This approach will ensure the likely use class mix and job provision from sites is understood, and that overall needs across the plan can continue to be met.
- 5.19 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. We agree with the approach taken by Brentwood Borough Council to maintain the draft allocation of Site 101A, and it is considered a positive step to ensure that the emerging Local Plan adheres to Paragraph 21 of the NPPF and encourage sustainable economic growth.
- 5.20 The Draft Allocations Document sets out the Brentwood Enterprise Park site can come forward over the next 5 to 15 years. Ongoing technical work and engagement with Planning Officers and numerous other stakeholders will assist in bringing the site forward ahead of this period. It is therefore considered that this timescale should be adjusted to allow for delivery within years 1 to 10 of the plan period.

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

- 5.21 We note that the Local Plan consultation document is accompanied by a revised and update Economic Futures report prepared by Lichfields.
- 5.22 The Brentwood Economic Futures (2013-2033) Final Report, that forms part of the evidence base for the draft local plan, sets out 4 scenarios for quantifying the potential requirement for jobs in order to support the growth of the Plan Period.

5.23 We note the report provides indicative job capacity figures. This has of course been based on assumptions in terms of both site capacity and B1a/b, B1c/B2, and B8 split. We welcome the opportunity to work with the Council as the plan emerges to further develop the masterplan for the Brentwood Enterprise Park, the mix of uses and indicative job numbers on that basis. It is consider that site specific detail on likely use class mix should be used to better inform the employment land and job provision figures within the final version of the plan.

6. Sustainability Appraisal

- 6.1 A supporting Sustainability Appraisal has been produced by AECOM on behalf of the Council and published in January 2018.
- 6.2 The Sustainability Appraisal objectives themselves cover a wide range of issues including biodiversity, economy and employment. The assessment work carried out to date, however, is general in nature and founded on a number of assumptions. In a number of cases we would suggest there is either evidence available that the site will not result in adverse impacts or that any impacts would depend upon implementation. In this case we believe it more appropriate for the sustainability appraisal to note that effects will depend upon implementation rather than setting out potential for negative impacts.
- 6.3 As an example the sustainability appraisal notes the lack of proximity to educational provision. Whilst of relevance for a residential scheme this is of course not directly relevant to employment provision. Proximity to Air Quality Management Areas (AQMA) is also highlighted in the appraisal despite the site not impacting on nearby AQMA.
- 6.4 It is noted that the site is presently scored 'amber' under the criteria of Green Belt. It is considered important that the Sustainability Appraisal gives sufficient consideration to the evidence available and in particular that prepared by Liz Lake Associates to support this representations which demonstrates the site does not presently meet a number of Green Belt purposes.
- 6.5 The Brentwood Enterprise Park site has additionally been scored 'amber' with regard to effect on agricultural land. The site is of course previously developed in its nature and adjoining agricultural land is of poor quality given the previous disturbance to the land.
- 6.6 The SA findings at the current stage about employment land are covered at para 10.14.2, where it is stated 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 and will continue to take a proactive approach regarding promotion of the site.

		Type	Area	1. AQMA	2. SSSI	3. Nature reserve	4. Ancient woodland	5. Local Wildlife Site	6. Woodland	7. GP	8. Primary school	9. Sec school	10. Conservation Area	11. Scheduled monum't	12. Reg. Park/Garden	13. Listed Building	14. Flood Zone 2	15. Special Landscape	16. Green Belt	17. Agricultural land		
101A(i)	Brentwood Enterprise Park (M25 Works Site at A127/M25 junction 29)	E	23.4																			
101A(ii)	Brentwood Enterprise Park (M25 Works Site at A127/M25 junction 29)	E	35.5																			

Extract from sustainability appraisal

7. 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. There has not been any detailed highway work released. We believe it remains critical and essential to progress this work as soon as possible through the preparation of the plan. We and our appointed transport consultants remain keen to engage in this process moving forward.

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. The Brentwood Enterprise Park falls into Parcel 23, which has been assessed to have an overall contribution to the Purposes of the Green Belt as 'Moderate'.
- 7.4 The parcel is noted as having good containment provided by the M25, A127 and the rail line. When compared to other parcels, these transport linkages are considered necessary infrastructure that renders the parcel more suitable for the proposed development.
- 7.5 This representation is accompanied by a Green Belt report prepared by Liz Lake Associates which demonstrates that the site does not presently contribute towards a number of green belt purposes.

8. Site 101A Brentwood Enterprise Park

- 8.1 Page 92 of the consultation document sets out the proposed area of allocation for Brentwood Enterprise Park, site 101A. This includes site details, including access, opportunities, constraints and delivery timescales.
- 8.2 The proposed area of allocation has now been updated to total a gross area of 35.47 ha. Within this site the developable area is stated to be 25.85ha. This approach is supported and provides land to provide for enabling works including landscaping and screening as part of the wider scheme. Work has been undertaken to identify the developable areas of the site which will also exclude some areas of land affected by gas pipeline constraints for example. The proposal for 25.85ha of developable employment land therefore remains fully deliverable.
- 8.3 With regards to site access it is primary access will be provided to M25 Junction 29 and we are working closely with Highways England, Essex County Council, and other consultees in this regard. We support that it is stated there is potential for secondary bus access to Warley Street which will help to support the sustainability of the scheme.
- 8.4 The site is presently listed with a delivery forecast of years 5 to 15 of the plan period. Technical work is proceeding subject to Local Plan adoption it is considered that planning applications would be taken forward with delivery commencing on site within the first 5 years of the plan period. We would therefore suggest that the indicative delivery forecasts relates to years 0 to 10 of the plan period.