

Planning Policy Team (fao Phil Drane)  
Brentwood Borough Council  
Town Hall  
Ingrave Road  
Brentwood  
Essex  
CM15 8AY

19 March 2019

Dear Mr Drane,

**CONSULTATION on the Brentwood Pre-submission Local Plan 2019**

We write further to the above consultation on the above on behalf of our clients, Hermes Investment Management and Hermes Property Unit Trust (“Hermes”), the asset manager and owner of the West Horndon Industrial Estate, Station Road, West Horndon (your site refs 021 & 022).

You may recall, Hermes acquired Threadneedle’s interest (approximately covered by your site ref 020) last year, so they now own the bulk of the larger West Horndon Industrial Estate which includes your site refs 020 and 021. Their discussions to acquire the land shown by your site ref 152 are well advanced and will be subject to planning permission for the residential-led, mixed use redevelopment of the land which is allocated by R02 in the Pre-submission draft of the Local Plan.

As you know from the last consultation in March 2018, our preparation of a planning application for residential led mixed-use development on the western portion of the industrial estate (including land identified as site refs 152, 021 and part of 020) was well advanced, and we had expected to submit the planning application sometime last year. However, following the acquisition of Threadneedle’s interest and taking account of the views of Brentwood’s officers and West Horndon Parish Council, Hermes took the decision to expand the planning application to include the whole of the land identified as R02. This has resulted in additional work and will require further pre-application discussions and consultations (with Brentwood BC, Essex CC and West Horndon Parish Council). Our revised aim is to make the hybrid planning application for the whole site later this year (around September/ October).

Hermes has made representations to the various drafts of the local plan over the time of its ownership. It is not our intention to repeat any of those in relation to the Pre-submission draft

of the Local Plan. Instead, our representations will focus solely on matters that affect the draft allocation R02. Please note, in expressing support or comment on the matters set out below, Hermes is affirming they consider the Pre-submission draft of the Local Plan to be sound.

**Page 22 Settlement Category** – SUPPORT: West Horndon as a large village within settlement Category 2.

**Page 24 para 2.14** – SUPPORT for improvements to access to West Horndon station arising from and facilitated by Dunton Hill Garden Village.

**Page 39 para 3.21 (b)** – SUPPORT.

**Page 92 Policy BE11 (B ii)** – SUPPORT Strategic Transport Infrastructure designed to improve access to West Horndon station; arising from and facilitated by Dunton Hill Garden Village.

**Page 95 para 5.96 (c)** – SUPPORT

**Page 96 para 5.105** – SUPPORT

**Page 103 para 5.121** – SUPPORT

**Page 114 para 5.155** – SUPPORT

**Page 177 Policy PC03 Employment Land Allocations include 2.0 hectares of R02** – SUPPORT & COMMENT: insofar as this includes the employment to be retained on the site, as well as the new employment opportunities created by the new village centre (which will include retail and non-retail uses).

**Page 181 para 7.30** – SUPPORT

**Page 185 Policy PC07 Retail and Commercial Leisure Growth** – SUPPORT & COMMENT: it is important to note the Brentwood *Retail and Commercial Leisure Study* (Dec2014) by NLP. The emerging West Horndon master plan includes a new village centre which incorporates shops and non-retail uses, such as potential health facilities. NLP suggested an additional 2000sqm of retail may be appropriate as part of the redevelopment of the industrial estate. Our latest masterplan shows around 2700sqm, but this includes non-retail uses.

**Page 186 para 7.53** – SUPPORT

**Page 187 Policy PC08** – SUPPORT & COMMENT: the new village centre for West Horndon is likely to include an additional 2700sqm of retail and non-retail accommodation.

**Page 231 Policy NE10 Green Belt** – COMMENT: West Horndon is not within green belt, so it is unclear what purpose reference to it in this policy serves.

**Page 244 para 9.7** – SUPPORT the reference to R02 on the list of Strategic Housing Allocations.

**Page 254 Policy R01 (II) d**- SUPPORT

**Page 269 Policy R02: LAND AT WEST HORNDON INDUSTRIAL ESTATE & supporting paragraphs**

– SUPPORT & COMMENT: Hermes' draft masterplan for the whole site includes a variety of dwelling types, including flats (making up the proposed village centre, nearest to the Station Road entrance and West Horndon station) and 2, 3 & 4 bed houses. At present, the R02 site measures 17.6 hectares gross, which nets down to 15 hectares (after allowing for 15% POS and landscaping) in the latest draft of the masterplan. The current layout is nearer 750 dwellings, which is well over the figure of "around 580 new homes" set out in the policy.

**Page 309 Appendix 1 Housing Trajectory** – SUPPORT & COMMENT: the timing of the supply of houses accords with the proposed phasing and Hermes' management of the existing leases on the estate. Please note comments in relation to the numbers of new dwellings the site can accommodate.

**Page 318 Residential Lead Sites** – SUPPORT & COMMENT: it is unclear how Brentwood BC have worked out the gross (17.06ha) and net (10.23ha) figures as set out in the table accompanying the site allocation plan. It is also the case that the draft Local Plan's gross to net calculations given for all the larger residential allocation sites varies, sometimes considerably. At present, the R02 site measures 17.6 hectares in total, which nets down to 15 hectares (after allowing for 15% POS and landscaping) in the latest draft of the masterplan. The current layout is showing the number of dwellings to be nearer to 750, well over the figure of "around 580 new homes" set out in the policy. It is also noted that the density of development is lower in the Hermes' latest masterplan (50dph) than that suggested by draft Local Plan (56.7dph), although it is accepted that this depends entirely on the chosen base.

Please let me know if anything is unclear. We would ask that you acknowledge receipt of these representations.

Yours sincerely

Christopher McGough BA (Hons), PgDip, MRTPI  
Director