





Brentwood Borough Council Draft Local Plan

Regulation 19 Consultation

Representations made on behalf of Childerditch Properties

Policy E12: Childerditch Industrial Estate

March 2019

Site Name:	Childerditch Industrial Estate
Client Name:	Childerditch Properties
Type of Report:	Draft Local Plan Regulation 19 Representations
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Appendix 1: Proposed Masterplan prepared by CMP Architects

Appendix 2: Access Appraisal prepared by Journey Transport Planning.

1. Introduction

- 1.1 These representations have been prepared by Strutt & Parker on behalf of Childerditch Properties for Brentwood Borough Council's (BBC) Regulation 19 Pre-Submission Consultation Local Plan (PSLP) and in particular, with regards to our client's land interest on the proposed allocation Childerditch Industrial Estate.
- 1.2 Childerditch Properties request the right for Strutt & Parker or any other professional advisor acting on their behalf to provide further responses in Hearing Statements or at the relevant sessions of the Examination in Public following the submission of the PSLP.
- 1.3 Childerditch Properties are the sole owners of Childerditch Industrial Estate. Representations have previously been made on their behalf in respect of the site throughout the Plan making process, including at the Call for Sites stage, as part of the 2013 Preferred Options Consultation and, most recently, as part of the 2018 Draft Local Plan Regulation 18 Consultation.
- 1.4 At present, the Estate provides some 35 units and between 700 and 800 people are employed here. All of these units are occupied and our clients continue to receive enquiries for occupation. The Estate therefore currently plays an important role in providing a significant source of the Borough's employment land and the provision of jobs. The proposed allocations provided for in the PSLP would build on the success of the Estate by creating new employment land. Located two miles from Brentwood on the A127, the Estate is ideally placed to offer future employment opportunities in a highly sustainable location with excellent transport links. Childerditch Industrial Estate is an 'island' site within the surrounding countryside, comprising a range of B1, B2 and B8 employment uses and storage yards.
- 1.5 The proposed allocation at Childerditch Industrial Estate is referred within Policy E12 of the PSLP. The proposed allocation of additional employment land, in combination with the existing Park, will provide a developable area of approximately 20.6 hectares of employment land. Accompanying these representations is a proposed masterplan prepared by CMP Architects which, whilst indicative at this stage, demonstrates how the Estate can be more efficiently and effectively developed. This document is copied to these representations at Appendix 1.
- 1.6 An updated Access Appraisal prepared by Journey Transport Planning is also submitted with these representations and is copied at Appendix 2. Within this document, consideration is given to the existing Estate and proposed allocations, and the cumulative traffic impacts arising from other developments in the A127 corridor. The Appraisal also considers the access from Childerditch Hall Drive onto the A127, to confirm that the proposed allocation of the site is deliverable in the context of the existing and proposed allocations referred to above.
- 1.7 Childerditch Industrial Estate is located just to the north of the A127, approximately halfway between Junction 29 of the M25 to the west, and the junction of the A127 and A128 to the east. Other sites proposed for allocation within the PSLP also found along this section of the A127 include Brentwood Enterprise Park (Policy E11) and Land at

Codham Hall Farm (Policy E10), which are located to the south and north of the A127 respectively.

- 1.8 Given the stage of the PSLP, these representations focus on the soundness of the Plan, in accordance with paragraph 35 of the National Planning Policy Framework (NPPF). Paragraph 35 confirms that Plans are sound if they are positively prepared, justified, effective, and consistent with national policy.
- 1.9 The PSLP is supported by an evidence base that includes a number of technical studies. These representations give regard to both the Pre-Submission Document and these studies.
- 1.10 The following section of these representations provide comment on draft policies, with particular regard to Policy E12, and other supporting text relevant to the proposed allocation at Childerditch Industrial Estate. Our client's overall position is one of firm support for the PSLP and this is expressed where relevant in these representations. Where concerns are raised in respect of PSLP or its evidence base, specific changes will be noted to assist Brentwood Borough Council in ensuring that the Plan is sound.

2. Regulation 19 Consultation Pre-Submission Document

Section 3: Spatial Strategy – Vision and Strategic Objectives

- 2.1 The PSLP sets out the overarching aims of the Spatial Strategy, which includes an emphasis on 'Transit-orientated Growth'. This identifies two key transit corridors, including the 'Southern Brentwood Growth Corridor'. The PSLP focuses growth on land within the Borough's transport corridors, with strategic allocations along the A127 corridor for employment, which is justified given the aims and objectives of the Plan.
- 2.2 The Council's strategy to direct development growth to the Borough's transport corridors 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 proposed allocation at Childerditch Industrial Estate will assist in meeting this objective, by bringing forward new business and employment opportunities along the A127 corridor. It will help support the planned residential growth within Borough. The Plan has been positively prepared in this respect.
- 2.3 The Strategic Objectives identified within Section 3 of the PSLP are supported. Economic prosperity forms a key part of the objectives. In order to be considered sound, it is important the Plan is consistent with national policy, which seeks to enable the delivery of sustainable development. Strategic Objective SO1 seeks to direct development to the most sustainable locations and this links to the proposed allocation at Childerditch Industrial Estate.
- 2.4 Strategic Objective SO3 supports opportunities that respond to the changing economic climate. Childerditch Industrial Estate is a traditional industrial estate that has developed over many years, as illustrated in the indicative proposed masterplan prepared by CMP Architects. It provides a mixture of B1, B2 and B8 uses across the site. The Estate will offer opportunities for a range of businesses seeking new premises within a highly sustainable location, which the A127 corridor offers through the proposed allocations. The indicative proposed masterplan sets out how the proposed allocation would allow for the redevelopment of the Estate and how this could come forward through a series of phased developments. This will be able to offer a number of units of varying sizes that would be suitable to a range of businesses, responding to the economic climate. The work undertaken by CMP Architects demonstrates how the Estate can be more efficiently and effectively developed, by providing a modern range of units for B1, B2 and B8 uses and associated infrastructure.

Figure 3.1: Key Diagram

- 2.5 Figure 3.1 provides a visual aid in support of the Spatial Strategy. It identifies Junction 29 of the M25 as a key location for 'Employment-led development' (Brentwood Enterprise Park) and Childerditch Industrial Estate as a location for new 'Employment land', in addition to the strategic housing-led development at Dunton Hills and the redevelopment of West Horndon. A focus on employment growth along the A127 corridor will reduce the need for additional employment sites in less sustainable locations elsewhere in the Borough. This approach is fully supported and recognises

the importance of this location for new employment opportunities. This approach is justified and demonstrates that the Plan is consistent with national policy in this respect.

Section 5: Resilient Built Environment

Policy BE11: Strategic Transport Infrastructure

- 2.6 We support part C of Policy BE11, which states that the Council will continue to work with the Highway Authority, statutory bodies and key stakeholders to deliver improvements to the ensure highway infrastructure capacity is maintained. Any future planning applications to be submitted in respect of new development at Childerditch Industrial Estate will be accompanied by the relevant transport studies.

Paragraph 5.105

- 2.7 Paragraph 5.105 states that, within the South Brentwood Growth Corridor, there is a recognition that provision of sustainable transport in this area is poor. Since the Draft Local Plan Regulation 18 Consultation, the Council has published an Infrastructure Delivery Plan (IDP) for the Borough. This includes, at Figure 3.14 of Chapter 3, a sustainable transport plan for the Southern Growth Corridor, which includes indicative locations for new cycle ways and a new bus route to connect Childerditch Industrial Estate, Brentwood Enterprise Park, Dunton Hills Garden Village and West Horndon Industrial Estate (to be redeveloped).
- 2.8 We support the principle of improving walking and cycling links within the land owned by our client, which extends to Little Warley Hall Lane. However, we would question the extent to which these new cycle ways could be delivered along the A127 corridor, as this would require every land owner to be committed to this initiative and an identification of funding. It is also not clear within the IDP who would be responsible for delivering this infrastructure improvement i.e. would this be the responsibility of Essex County Council, Brentwood Borough Council or landowners. This point needs to be clarified.
- 2.9 In respect of the new bus route loop that is shown within the IDP at Childerditch Industrial Estate, whilst our client broadly supports the principle of a bus service at the Estate, they consider that the circulatory route shown within the IDP is too prescriptive and misleading, and at this stage, a broad arrow would be sufficient within the IDP. Details of how the Estate could be served can be dealt with as part of the iterative masterplan process. If a bus service from the A127 were to drop off/pick up were to be brought forward, our client could support this if the bus were to stop outside the Estate, turn and move back down Childerditch Hall Drive.

Section 7: Prosperous Communities

- 2.10 This section of the PSLP confirms Brentwood Borough Council's Economic Strategy, which includes a number of Economic Aims and Strategic Priorities. These will help facilitate sustainable development, which is required to ensure that the Plan is sound.

Paragraph 7.1 of the Plan recognises the importance of the Borough as being a high-quality environment within close proximity to London. The economic aims include the desire to encourage high value, diverse, employment uses that will provide a significant number of skilled and high-quality jobs; and to encourage the better utilisation, upgrading and redevelopment of existing land and buildings. These aims are supported and are reflected in the indicative proposed masterplan accompanying these representations.

- 2.11 Childerditch Industrial Estate has a unique employment offer, insofar as it comprises a range of B1, B2 and B8 employment uses and storage yards. The proposed allocation provides the opportunity to build on the success of the Estate, by creating additional employment opportunities with a range of businesses. The proposed allocations will also enable the upgrading of the existing units on site through increased investment.
- 2.12 The accompanying indicative proposed masterplan prepared by CMP Architects sets out how the redevelopment of the Estate could come forward through a series of phased developments. The development of The Range North (previously identified as site 112D in the Regulation 18 Consultation) as a first phase will assist with the provision of funding to begin the process of upgrading the existing units and infrastructure at the Estate, and provide for the ability for reinvestment to develop the proposed southern extension (previously identified as site 112E in the Regulation 18 Consultation). This redevelopment would ensure compliance with the Economic Aims of the PSLP.
- 2.13 In addition to the Economic Aims, the PSLP sets out a number of Strategic Priorities. Of these, Strategic Policies P1 and P6 are strongly supported. P1 seeks to support business development and growth. P6 seeks to promote Brentwood Borough as a place to visit and invest, thereby encouraging the visitor economy. Childerditch Industrial Estate would assist in meeting those objectives.

Policy PC02: Job Growth and Employment Land

- 2.14 In determining the employment land allocations necessary to ensure that an adequate number of jobs can be provided, it is important that the Plan is sufficiently flexible to adapt to rapid change (as required by Paragraph 11 of the NPPF), and that it does so in a manner that ensures that the boundary of the Green Belt will not need to be reviewed before the end of the Plan period (Paragraph 136 of the NPPF refers).
- 2.15 As set out within Paragraph 2.54 of the PSLP, 89% of the Borough lies within the Metropolitan Green Belt. There is not sufficient land outside of the Green Belt for the Council to deliver the requisite level of housing and employment land. It is therefore necessary and justified to amend the boundary of the Green Belt as part of the Local Plan process. Paragraph 8.84 of the PSLP refers to the need to release land from the Green Belt in order to achieve the Council's growth strategy. This release has been carefully balanced to ensure that sustainable development can be achieved, whilst ensuring that the longer-term purpose, integrity and benefit of the Green Belt remains intact. We support the Council's approach insofar as our client's land interests are concerned and it is important to ensure that any changes to the Green Belt endure

beyond the Plan period, having regard to its intended permanence, as required by Paragraph 136 of the NPPF.

- 2.16 The PSLP is informed by an evidence base, including an assessment of the Functional Economic Market Area (FEMA) and the Brentwood Economic Futures 2013-2033 Report. The PSLP suggests a range of growth within the Borough, where at Paragraph 7.19(iv), it is stated that a range from 33.76 hectares to 45.96 hectares will be required. This includes land lost at existing allocations (i.e. at West Horndon). Childerditch Industrial Estate will therefore make a significant and important contribution towards the required land. It is well suited for businesses that may need to relocate as a result of sites that will come out of employment use to provide for housing. It is therefore considered the approach to Policy PC02 is justified in providing for 47.39 hectares of new employment land in excess of the higher forecasts; offering support for existing employment sites and the appropriate redevelopment of sites, to be able to adapt to rapid change and to remove the need for the Green Belt to be reviewed during the Plan period.
- 2.17 The PSLP sets out the proposed allocation at Childerditch Industrial Estate can come forward over the next 1 to 10 years. The indicative proposed masterplan prepared by CMP Architects provides an illustrative approach as to how the proposed allocation could come forward in conjunction with the redevelopment of the existing Park. The land is available now and there are no overriding constraints to delivery. The Plan would be justified and effective in this respect.
- 2.18 The Brentwood Economic Futures (2013-2033) Final Report sets out 4 scenarios for quantifying the potential requirement for jobs in order to support the growth of the Plan Period. The Report provides indicative job capacity figures, which have been based on assumptions, in terms of both site capacity and B1a/b, B1c/B2, and B8 split.

	Indicative Job Capacity			
	B1a/b	B1c/B2	B8	Total
Proposed New Allocations				
Brentwood Enterprise Park (M25 Junction 29 works site)	2,760	800	510	4,070
Land adjacent to Ingatestone by-pass (part bounded by Roman Road)	220	60	40	320
Childerditch Industrial Estate (extension 3 - southern growth to tree line)	630	180	120	920
Brentwood Enterprise Park (Codham Hall Extension)	70	19	10	100
Dunton Hills Garden Village	590	170	110	870
Land at East Horndon	410	120	80	610
Land north of A1023, Shenfield	210	60	40	320
Sub Total	4,880	1,420	910	7,210
Extant Permissions				
Extant Permissions	-600	-180	-110	-890
Sub-Total	-600	-180	-112	-890
Total	4,280	1,240	790	6,320

- 2.19 In respect of Childerditch Industrial Estate however, the Report has not taken into account that the existing Park can be redeveloped in a more efficient and effective manner to provide more job growth, as provided for in these representations. Overall, the proposed allocation will enable the upgrading of the existing units on the site through increased investment.

Policy PC03: Employment Land Allocations

- 2.20 Policy PC03 sets out a number of considerations that are intended to relate to existing and proposed employment sites identified in Figure 7.6 of the PSLP. This includes Childerditch Industrial Estate. However, the PSLP also includes a specific policy that relates to Childerditch Industrial Estate (Policy E12, which will be addressed later in these representations).
- 2.21 Paragraph 7.23 of the PSLP states that due to the difficulties of accommodating the quantum of employment land within other parts of the Borough, the opportunity has been taken to capitalise on the strategic connections of the South Brentwood Growth Corridor by extending employment land around Childerditch Industrial Estate. This approach is considered to be justified and consistent with national policy, as the proposed allocation seeks to make efficient use of an existing, highly sustainable employment site.

Proposed Modification

- 2.22 It is considered that greater clarification should be added to Paragraph 7.23, Part b. ii. on where Policy PC03 applies, as Policy E12 covers the entirety of Childerditch Industrial Estate. It should be added that the proposed allocation at Childerditch Industrial Estate allows for the redevelopment of the existing Estate and new development on the extended areas, which will provide a location for employment generating sui generis uses, as provided for by Policy E12.

Policy PC05: Employment Development Criteria

- 2.23 Policy PC05 does not specify whether it applies to existing and/or new employment land. The policy simply refers to development for employment uses. The wording of Policy PC05 is therefore ambiguous and is more restrictive than the site specific policy for Childerditch Industrial Estate (Policy E12). For example, Policy E12 requires provision to be made for improved walking and cycling links within the surrounding area.
- 2.24 Policy PC05 on the other hand states that employment uses will be encouraged provided that the proposal is accessible by public transport. At present, there are no public transport connections directly available to Childerditch Industrial Estate, and whilst this may change in the future, there is no guarantee of if and when this will happen. On this basis, we **object** to Policy PC05 in its current form as it would not allow for an effective Plan.

Proposed Modification to Policy PC05

- 2.25 It is suggested that Policy PC05, Part A. a. be amended to state that proposals provide opportunities to be accessible by public transport, walking and cycling. At Childerditch Industrial Estate, opportunities are limited to provide public transport; however, in bringing forward proposals for the site, this issue can be reviewed with Brentwood Borough Council and Essex County Council.

Section 8: Natural Environment

Policy NE9: Green Belt

- 2.26 Policy NE9 is supported. The Council has recognised the need to release some land from the Green Belt in order to meet its housing and employment needs. However, the land that will remain within the Green Belt should be protected throughout the Plan period and Policy NE9 achieves this, in accordance with the NPPF.

Policy NE13: Site Allocations in the Green Belt

- 2.27 It is considered that Policy NE13 should be removed from the PSLP. The criteria of the policy can be included other policies, such as the site specific policy for Childerditch Industrial Estate (Policy E12), and it is therefore not considered necessary to have a standalone policy duplicating these points. Furthermore, it is queried why the policy refers to the benefits of housing sites only and no other land uses.

Section 9: Site Allocations

Policy E12: Childerditch Industrial Estate

- 2.28 Policy E12 is supported. We consider that it is justified, effective, consistent with national policy and necessary for the reasons set out elsewhere in these representations. Policy E12 proposes to allocate land that has previously been promoted at the Range North (site 112D) and the land to the south (site 112E), in addition to the existing Childerditch Industrial Estate, to provide a total developable area of 20.64 hectares across the entire Estate. The release of these sites from the Green Belt is justified and will ensure that the Plan has been positively prepared.
- 2.29 At present, Childerditch Industrial Estate offers some 35 units. As part of the work supporting these representations, CMP Architects have undertaken an analysis of the Estate to identify how the existing Park could be regenerated for existing occupiers, redeveloped in areas to maximise efficiency, and expanded for future employment growth demand. The proposed masterplan at Appendix 1 provided for indicative purposes to support these representations, demonstrates the deliverability of the site over a period of time. The proposed allocations will extend the size of the Estate and as a whole, it is considered that it has the potential to accommodate around 50 units following redevelopment.

- 2.30 The development of The Range North (site 112D) as a first phase will assist with the provision of funding to begin the process of upgrading the existing units and infrastructure at the Estate, which will ultimately lead to the development of the southern extension. This infrastructure will include an improved primary route through the core of the site and a number of secondary routes stemming from this to provide access to the different areas of the site.
- 2.31 In addition to the work undertaken by CMP Architects, an Access Appraisal is submitted with these representations. The Appraisal at Appendix 2 confirms that the proposed allocation is deliverable in the context of the existing and proposed highway infrastructure, and will not have a significant impact on the efficiency or safety of the local transport network. The Appraisal also confirms that cumulatively, the allocation can be accommodated with other employment allocations along the A127 corridor, including those at Brentwood Enterprise Park and Codham Hall Farm.
- 2.32 The PSLP, at Appendix 2, confirms a delivery forecast of 1 to 10 years. Following the adoption of the Local Plan and confirmation that the proposed allocations at Childerditch Industrial Estate are removed from the Green Belt, a planning application supported by a package of technical information will be submitted to Brentwood Borough Council for the first phase of development at The Range North. Further applications will then follow for the subsequent phases.
- 2.33 It is very much expected that development will commence on site within the first few years of the Plan period, given the known demand as referred to at Paragraph 1.4 of these representations. We are in agreement that the entirety of the proposed allocations will be delivered within the 10 year period, which will ensure that the Plan is effective. Our clients purchased the site in 1983 and have a long term investment in the site and a desire to deliver the proposed allocations and enhancements to the existing site, as shown in the indicative proposed masterplan.
- 2.34 In respect of Part B, criterion b) of Policy E12, we support the principle of improving walking and cycling links within the land owned by our client, which extends to Little Warley Hall Lane. However, we **object** to Part B, criterion c) of Policy E12, as it is not considered to be necessary. The Access Appraisal copied at Appendix 2 does not identify a need to improve the junction where the A127 meets Childerditch Hall Drive. The Access Appraisal confirms that the additional traffic created by the proposed allocation will not have an impact on the A127 junction because due to the length of the access from the A127, vehicles will not be delayed on entry. On exit from Childerditch Hall Drive onto the A127, any queuing will be held on site and therefore the increase in vehicles will not have an impact on the A127.

Proposed Amendment to Policy E12

- 2.35 In light of the comments set out in the above paragraph, Part B, criterion b) should be removed from Policy E12.

Sustainability Appraisal

- 2.36 A Sustainability Appraisal (SA), published in January 2019, has been produced by AECOM on behalf of Brentwood Borough Council in support of the PSLP.
- 2.37 The SA forms only one part of the evidence base underlining the PSLP. The evidence base also includes documents such as the Brentwood Economic Futures 2013-2033 Report, Green Belt Study and Transport Assessment. In allocating additional land at Childerditch Industrial Estate, Brentwood Borough Council has taken a balanced judgement on the site constraints and the need to provide to create additional employment opportunities within the Borough.
- 2.38 The SA is currently focused on a spatial approach to the assessment of each criterion, using the distance between the site and various factors to judge the extent to which it either achieves certain objectives or not. However, it is considered that the SA fails to fully consider the nature of each proposal or the likelihood in practice of effects in sustainability terms, where a 'broad brush' approach has instead been taken to sites regardless of their intended use. For example, in respect of distance to a GP Practice, the proposed employment allocations at Childerditch Industrial Estate have been scored in the same manner as a residential allocation. However, it is considered to be less important for an employment site to be located within close proximity to a GP practice than a residential site, given the nature of the uses. Therefore, Childerditch Industrial Estate should be considered against a different set of criteria more relevant to the proposed employment allocation.
- 2.39 Provided below is an extract from the SA showing the scoring for the proposed allocations at Childerditch Industrial Estate. The proposed allocation includes Sites 112A, 112D and 112E. Site 112A relates to the existing allocation at the Estate. Site 112D relates to the proposed allocation at The Range North, and site 112E relates to the proposed southern extension allocation.

Site	Name	Use	Ha.	Flood risk	SSSI	Local Wildlife Site	Local Nature Reserve	Ancient woodland	Woodland	Green Belt	Conservation area	Scheduled Monument	Registered Park/Garden	Listed building	Special landscape area	AQMA	Agricultural land	GP	Primary school	Secondary school		
155	Brentwood School, Middleton Hall Lane, Brentwood	Community	20.26																			
238	Land between Navestock and Green Lane, Navestock		4.79																			
085A	Tipps Cross Community Hall, Blackmore Road, Tipps Cross		0.19																			
101Aii	Brentwood Enterprise Park (M25 Works Site at A127/M25 junction 29)	Employment	35.47																			
112A	Childerditch Industrial Estate		11.25																			
177	Land at Wash Road, south of Lower Road, Hutton		10.54																			
101C	Codham Hall Farm		9.62																			
187	Land south of East Horndon Hall		8.7																			
112E	Childerditch Industrial Estate		7.05																			
114B	Hubert Road Industrial Estate, Brentwood		3.78																			
118	BT Centre		3.59																			

Site	Name	Use	Ha.	Flood risk	SSSI	Local Wildlife Site	Local Nature Reserve	Ancient woodland	Woodland	Green Belt	Conservation area	Scheduled Monument	Registered Park/Garden	Listed building	Special landscape area	AQMA	Agricultural land	GP	Primary school	Secondary school
312	Land east of Nags Head Lane Sewage Treatment Works, Brentwood		3.39																	
116	Warley Hill Business Park		3.22																	
113A	Hallsford Bridge Industrial Estate		2.81																	
111	Upminster Trading Park		2.63																	
112D	Childerditch Industrial Estate		2.34																	
			ant																	

- 2.40 On review of the appraisal of Childerditch Industrial Estate, the site has not scored particularly well in relation to the criteria that has data available. However, it is considered that the SA, or at least the sustainability criteria, could be too sensitive when it comes to assessing sites against the criteria. The fact that no site performed 'particularly well' against any of the criteria suggests that the scope of the assessment makes many sites appear unsustainable, with limited opportunity to score 'green' in many of the objectives.
- 2.41 The NPPF, at paragraph 81, states that the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. Paragraph 16 of the NPPF states that Local Plans must be prepared with the objective of contributing to the achievement of sustainable development. Paragraph 17 further adds that Local Plans should include strategic policies to deliver the homes and jobs needed in the area.
- 2.42 Childerditch Industrial Estate is within a highly sustainable location, with excellent transport links in the form of the A127 and M25, which is a significant benefit to the occupiers of the site. The Estate is a successful employment site and the PSLP process provides a pragmatic response to the opportunity to build upon this success with further land being allocated. Indeed, as outlined above, the Council's own Spatial Strategy includes an emphasis on 'Transit-orientated Growth', which provides for new development along two key transit corridors in the Borough, including the Southern Brentwood Growth Corridor.
- 2.43 It is noted that sites 112A, 112D and 112E are presently scored 'amber' (performs poorly) under the Green Belt criterion. We do not consider that this aspect has been considered in sufficient detail by the SA given the particular circumstances of the site and existing uses.
- 2.44 Childerditch Industrial Estate is visually contained by the surrounding agricultural land. We note that within the Green Belt Study Part II: Green Belt Parcel Definition and Review Document updated in November 2018, Green Belt Parcel 20, which the Childerditch Industrial Estate is excluded from, has been scored as making a moderate contribution to Green Belt purposes.
- 2.45 As the existing site (112A) is excluded from the Green Belt, it is considered that this site should instead be considered to have 'no issue' in the SA assessment. There would be no loss of Green Belt land that would otherwise meet established purposes.

- 2.46 The Green Belt Study recognises that the primary land use within the Parcel is arable farmland, but that the secondary land use is an industrial estate (Childerditch) set within the Parcel. The Estate is an 'island site' excluded from this Green Belt Parcel. The Study considers that views across the Parcel are limited, where field boundaries with dense hedgerows reduce visibility.
- 2.47 Whilst the Study considers that undulating fields facilitate some views from the north, it is considered that views of Childerditch Industrial Estate will be limited from the north. The northern portion of the site is constrained by its topography, with some significant level changes and mature landscaping screening the existing buildings within the Estate. The northern most section of the Estate is only used as open storage and is also screened by existing woodland. These areas of the Estate form part of the existing allocation in any instance. The work undertaken by CMP Architects has given consideration to wider views of the Estate.
- 2.48 The proposed allocations at sites 112D and 112E are currently located within the Green Belt. However, as part of the Council's review of the Local Plan, the opportunity exists to review Green Belt boundaries, in accordance with paragraphs 138 and 139 of the NPPF. At paragraph 138 of the NPPF for example, it states that, when drawing up or reviewing Green Belt boundaries, local planning authorities should take account of the need to promote sustainable patterns of development. As part of the new Local Plan, the fringes of the existing Childerditch Industrial Estate can be released to provide a necessary and important contribution to employment land within the Borough within a highly sustainable location. Furthermore, it is considered that the areas proposed for allocation, adjacent to an existing employment site, are sequentially more appropriate than other sites in the Borough that currently have no employment use. This supports the Council's growth strategy, which requires land to be released from the Green Belt, and is therefore justified. The release of land has therefore been carefully considered taking all factors into account, to ensure that sustainable development can be achieved, whilst ensuring that the longer-term purpose, integrity and benefit of the Green Belt remains intact.
- 2.49 The Childerditch Industrial Estate sites have additionally been scored 'amber' with regard to effect on agricultural land, with the methodology stating that any site in land classified as Grade 3 will be 'amber' and Grade 2 will be 'red'. While the assessment notes that the dataset used is of poor resolution, the assessment has failed to adequately consider the existing nature of the sites (with particular regard to site 112D), as well as differentiate between Grades 3a and 3b. We would consider that the criteria should be amended to be more in line with the aims of Government policy, and that the sites be assessed on the basis of whether their use for employment purposes would lead to the loss of the best of the best and most versatile land. Furthermore, if the locally defined employment requirement is to be met, building on agricultural land is necessary.
- 2.50 The fact that no site performed 'particularly well' (scoring 'dark green') in any of the criteria, also suggests that the scope of the assessment was not sensitive to acknowledge the competing objectives of national and local policy, particularly that in the Green Belt, to meet needs for employment and other development.

2.51 Ultimately, it is important to note that the SA, at paragraph 9.6.6 states that “... *there is a strategic opportunity to develop the A127 corridor as an employment growth corridor, capitalising on connections to key economic centres in the region (including Tilbury Port, Southend Airport and those in Greater London). All sites will have good or excellent access onto the strategic highway network*”. Furthermore, at paragraph 9.6.7, it is stated that “... *With regards to site specific policy, the policies for the four employment should support timely and effective delivery*”. We support this view and will continue to take a proactive approach regarding promotion of and extension to Childerditch Industrial Estate through to the adoption of the new Local Plan, including attending the relevant Hearing Sessions at the Examination in Public.

3. Summary

- 3.1 The PSLP confirms that the Spatial Strategy substantially focuses on 'Transit-orientated growth', including the Southern Brentwood Growth Corridor, with strategic allocations along the A127 corridor for employment, which is supported.
- 3.2 The proposed allocation at Childerditch Industrial Estate is a recognition of the role that the Estate has in providing employment for the Borough. The proposed allocation would assist in meeting Brentwood Borough Council's identified need, to provide employment land required to assist meeting the Strategic Objectives of the PSLP Plan for the Plan period.
- 3.3 The Estate is ideally located along the A127 to provide excellent transport links for the businesses operating at the Estate, and this is reflected in the full occupation rate of the existing units. There is a strong market for additional units in this location. The proposed allocations at The Range North and the southern extension will provide additional land to build on the success of the existing Estate.
- 3.4 This submission demonstrates how the Estate can be more efficiently and effectively developed, by providing a modern range of units for B1, B2 and B8 uses and associated infrastructure.
- 3.5 In conclusion, we strongly support the proposed allocation at Childerditch Industrial Estate, as set out in the PSLP, and will continue to promote the Estate as the Plan progresses to Examination in Public, in consultation with Brentwood Borough Council and key stakeholders. We consider that the Plan is generally sound; however, we do object to two policies in their current form. These are Policies PC05 and E12, as set out at paragraphs 2.23 – 2.25 and 2.34 – 2.35 of these representations. However, within these representations, we have also set out suggested amendments to these policies that we consider would make the plan sound.