

Representation

Consultation on the Main Modification to the Brentwood Local Plan

Representation on Main Modification MM4 and MM10

Strategic Policy MG01: Spatial Strategy and New Policy MG06: Local Plan Review

Introduction

This representation is made on behalf of MM Properties (London) Ltd. to the consultation on the Schedule of Potential Main Modifications to the Brentwood Local Plan 2016-2033 as submitted for Examination on 14 February 2020. Specifically, this representation focuses on Main Modification MM4 and MM10 and the Plan's failure to allocate the required amount of new employment land to meet the borough's need over the plan period.

Executive Summary

Main Modification MM4 proposes new Strategic Policy MG01: *Spatial Strategy* which sets out that the amount of new employment land required over the plan period is 46.64 ha. This representation objects to this Main Modification. It also objects to the new employment land requirement figure as it is significantly below the employment land required to meet the borough's needs over the plan period. The accompanying report attached to this representation provides robust details on the assessed need for new employment land required in the borough and recommends that an additional 11.6 ha of new employment land is needed. This additional employment land is needed to address the Council's unrealistic approach to replacing lost office floorspace and is required to support the Council's proposal to create at least 5,000 additional jobs over the plan period.

Therefore, this representation objects to Main Modification MM4 which proposes new Strategic Policy MG01. This representation requests that in order for the Plan to be found sound, Policy MG01 is amended to require that **at least 58.24 ha** of new employment land is proposed to be allocated.

Main Modification MM10 introduces new Policy MG06: *Local Plan Review*. New Policy MG06 provides a commitment to a partial review of the Plan to commence immediately upon the adoption of the Plan with submission of the review for examination within 28 months. The partial review is to meet the objectively assessed housing need for the borough, including an updated full Green Belt review and an update on the spatial strategy.

This representation also objects to Main Modification MM10 as an immediate partial review of the Plan does not include a commitment to meet the full new employment land need. In order for the Plan to be found sound, this representation requests that new Policy MG06 is amended to include a commitment to meet the new employment land need of **at least 58.24 ha** in full as part of the immediate partial review of the Plan.

Main Modification MM4

Main Modification MM4 amends policy SP02 to become Strategic Policy MG01: *Spatial Strategy*, and incorporates provisions on new employment and retail floorspace originally set out in Policy CP02 and Policy CP07. In parallel with the amendment made by MM4, Main Modification MM57 deletes Policy CP02 as the provision of new employment land to be provided over the plan period and sets this out only in new Policy MG01.

MM4 Strategic Policy MG01: *Spatial Strategy* sets out the Council will work positively and proactively with the development industry and wider stakeholders to enable the development of the allocated sites in order to meet the borough's housing and employment needs and targets. It goes on to set out that in order to facilitate a significant increase in new jobs to promote sustainable communities, provision is made for a total of 46.64 ha of new employment land, which in combination with modest amounts of retail floorspace, is to enable the creation 'of at least 5,000 additional jobs'.

The accompanying report prepared by Savills Economics Team, is the culmination of previous representations made to the draft Plan during the plan making and examination process. The report considers the new employment floorspace required in the borough to meet its needs over the plan period. It identifies a current acute shortage of employment floorspace in the borough. The report also sets out evidence from Oxford Economic (2021) which demonstrates over the plan period only 1,300 jobs are expected to be created. This poor performance is linked to



the lack of employment floorspace in the borough and is significantly below what is needed to meet the Council's proposal to create at least 5,000 additional jobs.

The accompanying report identifies that there is a need for an additional 11.6 ha of new employment land in the borough over and above that identified in the Plan. There is an immediate need for additional employment floorspace to meet the current shortfall in replacing office floorspace as well as the need for extra allocated employment land to provide enough suitable land to meet the Council's commitment to create at least 5,000 additional jobs in the borough.

For this reason, this representation objects to Main Modification MM4 and Policy MG01: *Spatial Strategy* as the Plan fails to allocate adequate new employment land to meet the borough's need over the plan period. The result of inadequate employment land allocated in the Plan is that the Council will fail to meet its requirement to enable the creation of at least 5,000 additional jobs. It is considered that Main Modification MM4 does not address the employment land need in the borough and the Plan cannot be found sound.

Main Modification MM10

Main Modification MM10 introduces new Policy MG06: *Local Plan Review* committing to a partial review of the Plan commencing immediately upon the adoption of the Plan for submission within 28 months. The partial review is limited to allowing the Plan to meet only the full objectively assessed housing need of the borough. An updated Green Belt Review will be undertaken and allocation of further sites for housing is committed to. The immediate review does not currently extend to include meeting the borough's employment land requirement.

There is a significant shortage of identified new employment land in the Plan. This is set out in the attached report. In the event that Strategic Policy MG01: *Spatial Strategy* is not amended to allocate an additional 11.6 ha of new employment land, new Policy MG06 should be amended so that the immediate partial review of the Plan also identifies land to meet the employment land need of the borough, in addition to housing need. The Green Belt review should also consider land suitable for employment uses to identify new employment sites where these cannot be located on brownfield or greenfield sites in order to ensure adequate and sufficient employment land is allocated in the borough to meet its needs.

This representation objects to Main Modification MM10 and new Policy MG06 as the modification limits the partial review of the Plan to only identifying land to meet the housing need of the borough. MM10 and new Policy MG06 fails to commit the partial review to include identifying land to meet the employment need of the borough. The Plan as it currently stands, even with Main Modifications, fails to identify adequate employment land to meet the borough's needs. Should the Plan be adopted as it currently stands, the immediate partial review should include a commitment to identify employment land to meet the shortfall needed in order to identify at least 11.6 ha of additional employment land to ensure the delivery of 5,000 new jobs that the Council is committed to delivering over the plan period.

For this reason, it is considered that Main Modification MM10 and new Policy MG06 does not positively plan to address the under provision of identified employment land needed in the borough. Therefore, the Plan cannot be found sound.

Requested Amendments to Make the Plan Sound

To address the two above issues and in order for the Plan to be found sound, it is requested that the following two amendments are made to the Plan.

- It is requested that Policy MG01 is amended as set out below (new text shown in blue, deleted text in ~~red strikethrough~~):

Strategic Policy MG01: Spatial Strategy

Quantum of Development

A. The Council will work positively and proactively with development industry and wider stakeholders to enable the development of the allocated sites identified on the Policies Map in order to meet the borough's housing and employment needs and targets. To facilitate a significant increase in the delivery of new homes as well as jobs to promote sustainable communities, provision is made for:

a. ...



b. ...

c. a total of ~~circa 46.64 ha~~ at least 58.24 ha of new employment land, 1,604 square metres (net) of comparison retail floorspace and 4,438 square metres (net) of convenience floorspace, to enable the creation of at least 5,000 additional jobs.

- It is also requested that new Policy MG06 is amended as set out below (new text shown in blue) in order to ensure the delivery of at least 58.24 ha of new employment land and to make the Plan found sound.

Policy MG06: Local Plan Review

The Council will bring forward a partial review of the Plan with the objective of meeting the full Objectively Assessed Housing Needs and full employment floorspace needs. This will commence immediately upon the adoption of this Plan with submission of the review for examination within 28 months. Specific matters to be addressed by the review shall include the following (amongst all other matters that need to be assessed and taken into account for the purposes of plan preparation):

- A. an update of Objectively Assessed Housing Needs and full employment floorspace needs in accordance with the NPPF 2021 and related guidance;
- B. an updated full green belt review and an updated spatial strategy (informed by the green belt review) in turn to inform the sustainable allocation of further sites to meet the full Objectively Assessed Housing Needs and full employment floorspace needs as assessed in part A above;
- C. the allocation of further sites to meet as a minimum the full Objectively Assessed Housing Needs and full employment floorspace needs in accordance with the updated spatial strategy for the full period of the plan review;
- D. a review of transport and highway issues to cater for local plan growth throughout the period of the review (in consultation with National Highways and Essex County Council) taking into account:
 - i. the optimisation of existing, and the introduction of further, sustainable transport measures where appropriate along with the the need to provide improvements to and around:
 - a. A12 junction 12;
 - b. M25 Junction 28;
 - c. M25 junction 29
 - ii. any additional transport and highways infrastructure that will be needed to meet in full the updated Objectively Assessed Housing Needs and full employment floorspace needs and facilitate the further allocations taking into account implemented and committed highway schemes.

Summary and Conclusion

Brentwood Borough Council has prepared a schedule of Potential Main Modifications to the Brentwood Pre-Submission Local Plan and Addendum of Focussed Changes to the Pre-Submission Local Plan to address issues of soundness and/or legal compliance identified by the Inspectors.

Considerable evidence that demonstrates the need for more employment land allocations in the Plan was provided over the course of the examination of the draft Local Plan. The accompanying report prepared by Savills Economics Team identifies that an additional 11.6 ha of new employment land is required to be allocated to meet the employment land needs of the borough. The report also identifies the current acute shortage of employment floorspace in the borough. Evidence from Oxford Economic (2021) demonstrates over the plan period only 1,300 jobs are expected to be created. This is substantially below the commitment of the Council to deliver at least 5.000 additional jobs.

Additional employment land is required to be allocated in order for the Plan to be found sound.



This representation objects to Main Modification MM4 and Strategic Policy MG01: *Spatial Strategy* as the amendment made by MM4 sets out that the amount of new employment land required over the plan period is only 46.64 ha. This figure falls short of the new employment land needed over the plan period. The accompanying report provides robust details on the objectively assessed need for new employment land required in the borough and recommends that an additional 11.6 ha of new employment land is needed which should be identified in policies in the Plan.

This representation requests that in order for the Plan to be found sound, Policy MG01 is amended to require that at least **58.24 ha** of new employment land is proposed to be allocated.

This representation also objects to Main Modification MM10 which introduces new Policy MG06: *Local Plan Review*. The proposed immediate partial review of the Plan does not include a commitment to meet the full new employment land need. In order for the Plan to be found sound, this representation requests that new Policy MG06 is amended to include a commitment to meet the new employment land need of **58.24 ha** in full as part of the immediate partial review of the Plan.

It is considered that with the requested amendments set out in this representation, the Plan could be found sound.

Savills

Date: 11 November 2021