
Brentwood Emerging Local Plan

Main Modifications consultation

1. **The Main Modifications fails to address the acute shortage of employment premises in Brentwood**

1.1.1. This document addresses the Council's decision not to increase the amount of employment land and premises in the Schedule of Potential Main Modifications. This document needed to respond to (1) the existing deficit of employment land and premises that is harming the economy and (2) remedy the errors it in the Council's approach to calculating how much employment land is required over the plan period to replace lost premises.

1.1.2. Considerable evidence demonstrating the need for more employment land allocations was provided to the Council over the course of consultation and examination of the draft local plan which demonstrated that the shortage of employment land is at a critical point and that the Council needs to respond positively to address the acute lack of employment premises to support its economy.

1.1.3. This document sets out the following points:

- There is an immediate need for more new employment premises to address the shortage.
- The shortfall is has been causing harm the economy for several years because it is suppressing employment growth and economic activity. Businesses are leaving the Borough because there are no suitable premises to accommodate them.
- The draft local plan proposes employment sites and a quantum of land that fail to realistically re-provide employment land that was lost to residential development. To adequately address this, the Borough needs to allocate an additional 12 hectares.
- Broadfields Innovation & Business park could immediately deliver employment premises to address Brentwood's deficit.
- The Council must commit to an early review of its employment land position.

2. **Today there is virtually no vacant floorspace in Brentwood ... evidence demonstrates this is stifling job creation and harming economic growth**

2.1.1. **Table 2.1** sets out the current vacancy rates in Brentwood's key employment sectors. There is virtually no vacant floorspace in the Borough and this is impacting its key employment sectors.

2.1.2. As the Council's own evidence base states (in the 2018 Brentwood Economic Futures report), property markets generally require a vacancy rate of about 8% to ensure its efficient operation. Across Brentwood's three employment sectors, the amount of vacant floorspace is well below what is required. About 230,000



sqft of floorspace is immediately required to ensure its key employment sectors have sufficient suitable premises.

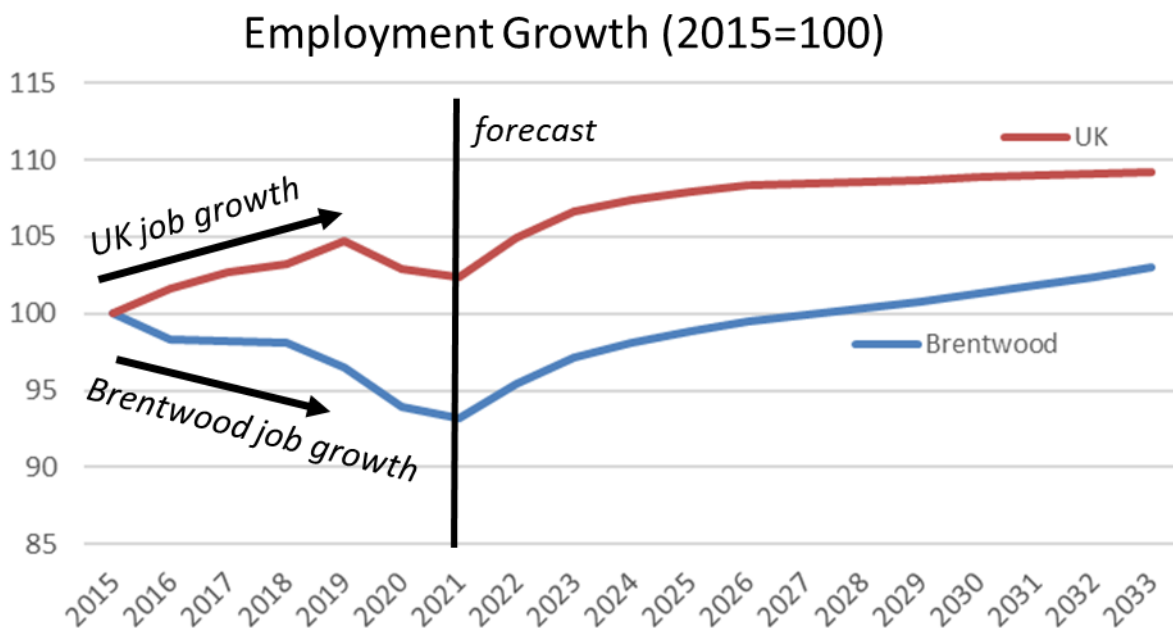
Table 2.1 Current Vacancy Rates in Brentwood

Sector	Vacancy Rate (%)
Industrial	1.4%
Light Industrial	1.7%
Offices	1.2%

Source: CoStar (2021)

2.1.3. **Figure 2.1** shows Brentwood's current and forecasted employment performance compared the UK over the period of the draft local plan (2016-2033). Since 2015 the Borough's economy has steadily lost jobs and underperformed the national economy. The downward trajectory began well before Covid-19 and continues through to today. Given Brentwood's high-skilled, affluent and entrepreneurial residents, this result is contrary to expectations. The lack of suitable employment floorspace is a key cause for Brentwood's poor economic performance.

Figure 2.1 Brentwood's Employment Growth Compared to the UK



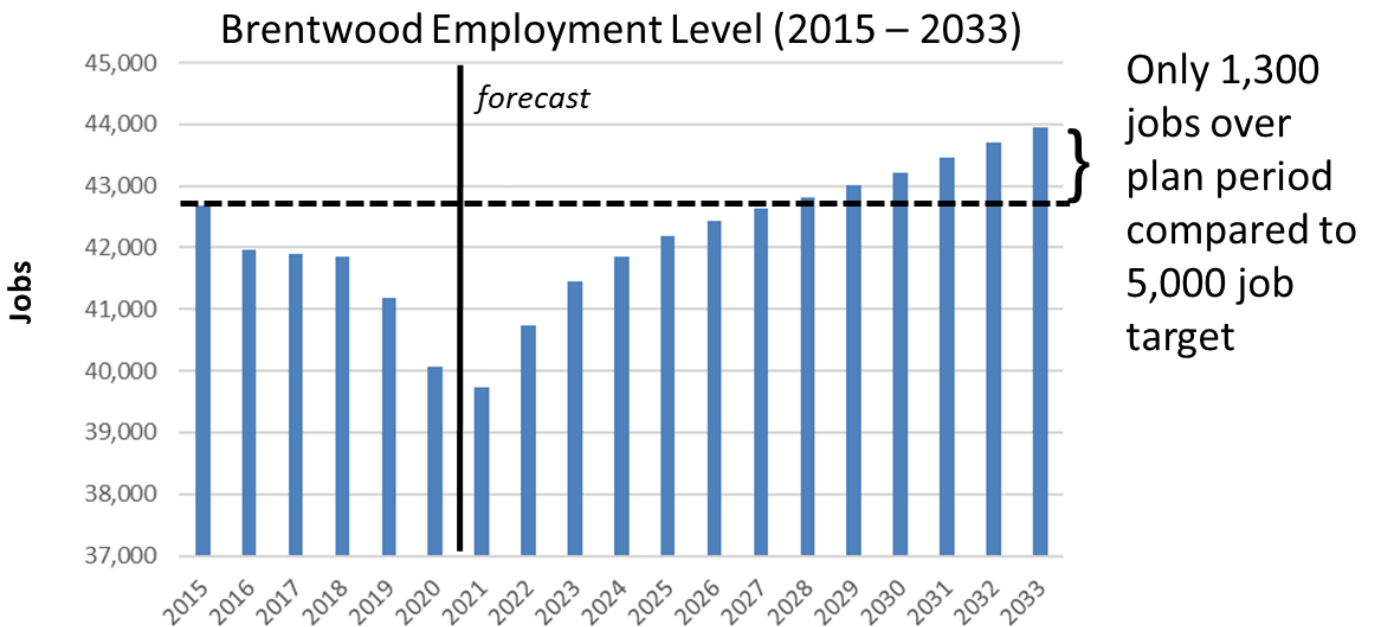
Source: Oxford Economics (2021)



2.1.4. Policy PC02 Job Growth And Employment Land sets out the Council’s aspiration for 5,000 additional jobs over the period for the draft local plan (2016 to 2033). But **Figure 2.1** above shows that **Brentwood is unlikely to even regain the jobs its lost since 2015 ...until 2028**. This means it will have only 5 years to reach its goal in the draft local plan of 5,000 new jobs.

2.1.5. **Figure 2.2** shows that given the current situation, the forecast is for Brentwood to deliver just 26% of the employment target in the draft local plan. **Whilst the forecast shows that Brentwood’s jobs recovery is expected to begin in 2022, the recovery will struggle to take hold with no available employment floorspace to facilitate it.** Therefore the forecast is likely to be overly optimistic. This situation underlines the impact that the shortage of floorspace is having on Brentwood’s real economy.

Figure 2.2 Brentwood Historic and Forecasted Employment Level Over Draft Plan Period



Source: Oxford Economics (2021)

3. The Borough has lost 870,000 sqft of offices but the plan for replacing those lost jobs is not credible; 11.6 hectares of additional land is required.

3.1.1. The Council has lost more than 81,000 sqm (870,000 sqft) of office floorsapce. The Council’s evidence is shown in **Table 3.1** from examination document F27B.

Table 3.1 Brentwood’s Calculation of Lost Office Floorspace (sqm) Since 2016

Employment floorspace extant permissions as at 31 March 2020 (sqm)			
Use class	Extant permission (+)	Potential loss (-)	Potential net floorspace (+/-)
(former) B1a	239	-81,677	-81,438
(former) B1(b,c)	1,040	-838	202
B2	457	-1,588	-1,131
B8	1,900	-5,032	-3,132
Mixed B1/B2/B8	37,486	-5,703	31,783
Total	41,122	-94,838	-53,716

Source: Brentwood Local Plan Examination Note F27b

3.1.2. The Council it intends to replace more than 75% of its lost floorspace (63,000 sqm / 680,000 sqft) at development densities that are akin to town centre locations. But the Council’s employment land allocations entirely in out-of-town locations where high density office development is unfeasible. The Council’s plan to replace this floorspace lacks credibility.

3.1.3. The Council’s own evidence base is sceptical about its future proposed office locations. The Brentwood Economic Futures (2013-2033) Final Report states:

*‘The Council may also need to be cautious when considering future office locations. **The current allocations have poorer public transport connections than other parts of the Borough and lack access to the Borough’s existing high-quality amenities** (e.g. Brentwood town high street). The allocations are also located away from the Borough’s two Crossrail stations, which could significantly help drive growth in the future.’ (page 39)*

3.1.4. Evidence was presented in the examination which showed that for the Council to realistically replace its lost office floorspace a further 11.6 hectares of employment land is required. The additional employment land would ensure that the lost offices could be replaced at more realistic development densities.

3.1.5. The Brentwood Economic Futures (2013-2033) Final Report raised the alarm about the Council’s ability to provide new employment sites for businesses displaced by employment premises lost to residential use. If Brentwood does not provide sufficient employment land, the report states that there is the risk that:

*‘**businesses could relocate from the Borough and shift the centre of economic growth away from Brentwood to neighbouring local authorities.**’ (page 39)*

3.1.6. Figures 2.1 and 2.2 demonstrate that **the report’s warning are now observed on the ground.**

4. The Broadfields Innovation and Business Park is a readily deliverable site that could address the problem

- 4.1.1. The proposed Broadfields Innovation and Business Park would deliver 20,000 sqm of floorspace for employment that would immediately address the lack of available employment floorspace. The proposal allows for a flexible approach toward the mix of employment uses so that it could meet a range of requirements.
- 4.1.2. The Property Market Assessment report which accompanied the planning application for the business park identified 12 million square feet of employment floorspace requirements that included the borough within its area of search. The floorspace requirements are distributed across small, mid-sized and large requirements. For Brentwood to take advantage of this demand, it requires new floorspace to accommodate it. Broadfields could accommodate this demand quickly.

5. Brentwood should commit to an early review of its employment land position

- 5.1.1. The Schedule of Potential Main Modifications includes a commitment by the Council to an early review of the Local Plan to ensure it looks ahead over at least a minimum 15-year period. (As of today, the Local Plan looks ahead over just 12 years.) The Council also cites the need to address housing need as a rationale for an early review. However, **given the precarious state of the Council's employment land position, we strongly recommend that the Council also commits itself to an early review of its employment land.**
- 5.1.2. The Council's acute shortage of employment floorspace will not be alleviated by the current mix of employment land allocations. At the very least, the Council should commit itself to an early review of its employment land to remedy the lack of suitable employment premises..