

EAST HORNDON BUSINESS PARK

BRENTWOOD LOCAL PLAN – REPRESENTATIONS OCTOBER 2013

The following representations have been prepared on behalf S. Walsh & Sons Limited which owns the freehold interest in the East Horndon Business Park, Tilbury Road.

The site has an extensive planning history, being the subject of a number of planning application and enforcement notices since 1955. The site was granted planning consent in 1970 for the use as a transport depot and this area has been expanded over the years, with planning consent granted in 1998 setting out the current extent of the lawful use of the site. The site has been subject to planning appeals and further enforcement, in particular in 2005 relating to the use of the land to the immediate east of the lawful site.

It has been noted that, despite having an unrestricted lawful use on the site, the Council have not included the site for employment purposes within the Preferred Options Document 2013 or within the Employment Review 2010.

The firm submitted, on behalf of the S. Walsh & Sons Limited, details of the site for employment purposes as part of the public "call for sites" to be considered under the SHLAA process in December 2009. Whilst the "call for sites" was designed for housing sites, the purpose of the submission was to draw the site to the Councils attention as there had been no consultation or "call for sites" for employment sites. An Indicative Masterplan was also submitted as part of the representations.

The SHLAA report of 2011 confirms this submission, giving the site the reference number B202.

Within Appendix 5: Discounted Brownfield Sites, it confirms that the 4.6ha site is currently within Industrial B2 and B8 and residential use. In regards to whether the site was suitable, available or achievable for residential development it states: -

Suitable

"No. The site is too remote for residential development and considered to be unsustainably located."

Available

"Yes. The owner has put this site forward preferably for commercial or leisure. The site is currently in use for B2 and B8 uses along with a residential property on the site."

Achievable

No. Due to its current use there is the potential for contamination on the site and noise from the adjacent A127. Residential development in this area may require the provision of additional services and infrastructure.

As stated above, the purpose of the submission was not for the allocation for housing but, as stated, for a preferred use for commercial or leisure.

It is therefore disappointing for the site not to have been included within the Employment Land Review 2010, which followed the 'Call for Sites', or within the Preferred Options Document 2013 now the subject of this consultation.

In relation to the above statement, we comment on the following proposed policies: -

Policy S3: Job Growth and Employment Land

S. Walsh & Sons Ltd supports the council's decision to adopt the growth option underlying this Policy. However, they question the employment allocations arising as a result of the policy (considered within Policy DM6 – see below).

The Company is pleased to see the Council seeking a higher figure for the provision of additional jobs, above the alternative growth options and the Council considering both existing and new employment sites/allocations. However, it considers that the Council's figures for existing employment sites requires further review, with the area of lawful use for East Horndon Business Park, which is an area in excess of 1 hectare and an overall site ownership extending to 4.6 hectares, excluded from these current figures.

Policy CP7: Brentwood Enterprise Park

Whilst the Company supports the identification of the former M25 work site for development as a new business park, it questions whether this site should be proposed to such an extent when there are existing lawful previously developed sites, such as at East Horndon Business Park suitable and available for such a use.

The Company also questions the wording within paragraph 3.15 of the justification of the policy. Paragraph 3.15 states that “**previously developed land in this location provides an opportunity for new employment land in the form of a business park**”. It is our understanding that the proposed 'Brentwood Enterprise Park' was constructed for contractors to undertake works to widen the M25 under permitted development. Now that these works have ceased and the site has been vacated, the land should now be returned to countryside. It is therefore considered that this site should not fall within the definition of 'previously developed'.

As the Brentwood Enterprise Site it is more open and readily visible from highway infrastructure and has a role in meeting the five purposes of Green Belt, as set out in Paragraph 80 of the NPPF, there is a strong argument to reduce the extent of development allocated and allow for other provisions, in particular our clients site at East Horndon.

Furthermore, by further allocations there will be a greater choice of employment sites, contributing to the overall economic prosperity of the town.

Policy DM5: Employment Development Criteria

S Walsh & Sons Ltd generally supports the wording of the Policy, which it considers to be NPPF compliant.

Policy DM6: Areas Allocated for General Employment and Office Development

S Walsh & Sons Ltd generally supports the objectives underlying the Policy which it generally considers to be NPPF compliant.

The Company does, however, request that their site at East Horndon Business Park is considered as a site allocated for general employment, either as existing or as a preferred allocation.

As with the Brentwood Enterprise Park and in particular the land at Codham Hall, this is a previous developed land, providing an excellent opportunity for new employment land to form a business park, incorporating some leisure opportunities. An Indicative Masterplan has been prepared and, whilst it has been previously submitted to the Council, we attach to this report for ease of reference.

It is proposed that the site can form a new business park, providing a mix of B-uses together with a leisure use, such as a hotel, as a feature building on the corner of the A128 and A127 roundabout.

The range of uses suggested is predominantly B1 office and light industrial uses. The proposals provide an opportunity to regulate the existing industrial uses and, whilst the site is heavily screened from the west and north, further landscaping and planting can be provided to create a buffer between the site and the A128.

The site is in a highly sustainable location in terms of highway networks, being located adjacent to the roundabout with the A127 and A128, with direct links to the M25, Brentwood, Thurrock and east Essex.

When considered in relation to the proposed Policy DM5, and in comparison with the new employment land allocations and the Existing Allocated Employment Land this site;

- Is in a strong location for accessibility where country lanes and residential roads are avoided, but easy access to the main arterial routes including A127, M25 and A12 (via M25 or A130).
- Requires limited landscaping and screening on the eastern boundary;
- Is of a size that allows for a comprehensive development, whilst being of a scale and nature appropriate to the locality.
- It is readily constrained by the A128, A127 and Tilbury Road, and thus makes a logical release from the Green Belt.

Furthermore, with the proposed allocation for housing within West Horndon (Policy CP4), replacing the existing employment land, this site is ideally located for an increase in employment numbers resulting from the additional housing.

Given the lawful uses, the condition of the land, the containment around primary roads and the existing screening, the site currently makes only a minor contribution to the purposes of the Green Belt as set out in paragraph 80 of the NPPF.

Other Benefits

East Horndon Hall is a listed building and there are both benefits to its setting and overall future, through the economic prosperity and continued maintenance and repair of the building, by the inclusion of the Hall within any employment designation.

Alternative office use for this building would be better for its long term future than its lawful residential use.