



Date: 20 September 2013

Planning Policy Team
Brentwood Borough Council
Town Hall
Brentwood
Essex
CM15 8AY

Dear Sir,

BRENTWOOD BOROUGH LOCAL PLAN 2015 - 2030 (PREFERRED OPTIONS)
REPRESENTATION BY DEVELOPMENT SECURITIES PLC
LAND AT MOUNTNESSING ROUNDABOUT (FORMER SCRAPYARD), ROMAN ROAD,
MOUNTNESSING

I am instructed by Development Securities plc to submit representations upon the Preferred Options version of the Brentwood Borough Local Plan 2015-2030. The representations relate specifically to Land at Mountnessing Roundabout (Former Scrapyard), Roman Road, Mountnessing. Development Securities plc are the owners of the Mountnessing Roundabout site.

The site has been historically known as the Mountnessing Scrapyard site. However, so as to avoid confusion, the representations refer to the site as the Mountnessing Roundabout site. The site has a Local Plan site reference 107 and is subject to Policy DM7.

At this stage, the Development Securities representation is submitted as an objection to the Local Plan. However, we consider there is clear potential for this objection to be resolved. Indeed, Development Securities and their professional advisors have had a number of meetings with the officers of the Borough Council over the past year and we hope that this dialogue will continue.

a) **Background**

The Mountnessing Roundabout site is currently in Metropolitan Green Belt. However, as its previous name suggests, it was formerly a scrapyard and therefore represents a brownfield site (previously developed land) in the Green Belt. The brownfield nature of the site, and its status as previously developed land, is confirmed by the draft Local Plan, for example, see preferred allocations/page 84 and paragraph 4.21/page 88.

The Mountnessing Roundabout site has a lengthy planning history, having been the subject of a number of development proposals since the mid 1980s. In particular, the site has had the benefit of planning consents for hotel / leisure developments since November 2000. Indeed, the site benefits from an extant consent at the current time for a hotel / leisure scheme as follows:-

- Hotel - 5,910 sqm (130 rooms)
- Leisure - 2,536 sqm
- Restaurants - 1,840 sqm

The total floorspace of the consented scheme is 10,286 sqm (110,718 sqft). 392 car parking spaces are proposed as part of the scheme. Again, the existing planning permission for hotel / leisure is



recognised in the draft Local Plan, for example, see preferred allocations/page 84 and paragraph 4.21/page 88. This planning permission, and the fact that it can be built out, is highly relevant to future development proposals on the site.

b) Policy DM7

In broad terms, the Mountnessing Roundabout site is allocated by the draft Local Plan as a new employment allocation, as listed in the 'preferred allocations' at the foot of Policy DM6. More specifically, the site is subject to its own policy, i.e. Policy DM7.

Policy DM7 confirms that the site is allocated for employment development (Use Classes B1/B2 and B8), but subject to three criteria. Development Securities do not take issue with the allocation of the site for employment purposes, including uses within Class B1, B2 and B8. However, Development Securities' concerns relate to the lack of flexibility within the policy, to allow for other employment generating uses to take place on the site. Development Securities believe that the policy should provide for greater flexibility for four reasons:-

1. **PLANNING HISTORY** - As explained above, the site has an extant consent for an hotel / leisure development. Development Securities are able to implement this planning permission. As currently drafted, the policy will not permit uses allowed by this extant consent. It is noted that an 'alternative approach' was considered which would have allowed for hotel and leisure use. The text of the plan (see penultimate paragraph/page 88) accepts that "this approach may therefore be equally worth consideration". In the opinion of Development Securities, it is illogical to have a site specific policy which fails to recognise the ability to build-out an extant consent.
2. **MARKET DEMAND** - Development Securities are currently undertaking a market demand exercise, so as to establish whether there is a prospect of bringing forward an employment development, within Use Classes B1, B2 and B8, on the site. At the time of writing, the results of this exercise are not known. However, provisional advice has suggested that the site is not suitable for a business park, that office requirements are focused on the town centre and that demand for industrial units is limited. Consequently, Development Securities wish to retain flexibility within the policy at this stage, in the absence of favourable market advice. Clearly, it will be undesirable to progress an allocation for uses which are unlikely to materialise. This indeed will be contrary to the objectives of the draft Local Plan and the National Planning Policy Framework (NPPF).
3. **POLICY OBJECTIVES** - The draft Local Plan seeks to maximise the potential of previously developed land and aims to secure the creation of jobs. The primary objective of allocating sites for employment purposes is to ensure that job creation in the Borough can match housing requirements. Indeed, making the best use of previously developed land and job creation are key objectives of the NPPF. Even Policy DM6, the relevant employment policy, states the Council will seek to achieve a 'wide range' of employment opportunities. As described above, it is not clear at this stage whether or not the Mountnessing Roundabout site can deliver an employment development, which is restricted purely to Use Classes B1, B2 and B8. It may be that jobs and development of the site can be secured by way of a wider definition of employment development, for example, by allowing for the development of a leisure development, restaurants or even uses classified as sui generis, which do not compete with the town centre.
4. **SITE LOCATION** - The Mountnessing Roundabout site represents a significant development opportunity in the Borough. As recognised by the draft Local Plan (see paragraph 4.21/page 88),



the location is a "key gateway" to Brentwood from the A12 (Junction 12), being accessible to the highways network, Brentwood town centre and Shenfield station. Additionally, of course, as described above, it represents previously developed land. Consequently, in light of the site's characteristics, there is clear benefit in maximising the prospects of bringing forward development.

In order to provide the necessary flexibility, Development Securities suggest that a final sentence be added to the Policy DM7 to read as follows:-

"Other forms of economic development (to include Use Classes D2 or Sui Generis) may be acceptable provided they satisfy all of the above criteria".

Indeed, similar wording to the above has been produced by officers of the Borough Council and shared with Development Securities. However, the above wording has been refined slightly to provide the required flexibility.

c) **Green Belt**

The draft Local Plan refers to in several places to a 'Policies Map'. For example, Policy DM7, in relation to the Mountnessing Roundabout site, refers to site ref. 107, as set out on the 'Policies Map'. However, it is understood that the Policies Map has not yet been issued. Consequently, it is not known for certain whether the Mountnessing Roundabout site will be retained in the Green Belt.

Development Securities request that the site be taken out of the Green Belt. Clearly, as confirmed by the NPPF, the review of the Local Plan is an appropriate time to alter Green Belt boundaries. For example, paragraph 83 of the NPPF states that through the preparation or review of the Local Plan, "authorities should consider the Green Belt boundaries having regard to their intended permanence in the long term, so that they should be capable of enduring during the plan period". Furthermore, paragraph 84 of the NPPF 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". Most importantly, paragraph 85 is clear that local planning authorities should "not include land which it is unnecessary to keep permanently open".

In light of the above, especially in relation to paragraph 85 of the NPPF, it is highly relevant that the Mountnessing Roundabout site has a live consent for a substantial amount of built floorspace (i.e. in the order of 10,000 sqm), plus it is allocated in the draft Local Plan for an employment development. Consequently, there is a strong prospect that a sizable development will come forward on the Mountnessing Roundabout site. In which case, the site will not remain "permanently open". Indeed, in light of the site's planning history and pending Plan allocation, there is no purpose in retaining the site's Green Belt status. To retain the Green Belt allocation will be misleading, will undermine the Council's overall Green Belt objectives and procedurally, could prejudice the prospects of securing an appropriate development on this brownfield (previously developed land) site. Additionally, it may weaken the ability of the Council to oppose development on other Green Belt sites, where no development history exists.

As has been accepted by the Borough Council for many years, the Mountnessing Roundabout site is a 'development site'. Development on a site of this size (noted by the draft Local Plan as being 2.6 ha) cannot satisfy the purposes of Green Belt land, for example as listed within paragraph 80 of the NPPF.



Accordingly, Development Securities formally request that the Mountnessing Roundabout site be deleted from the Green Belt, by way of this Local Plan process.

d) Summary

In summary, Development Securities plc support the general objective of securing employment development on the Mountnessing Roundabout site. However, there is a danger that employment development, which is currently restricted to that within Use Classes B1, B2 and B8, will not materialise on the site. In order to enhance the prospects of development of the site, and as a consequence job creation, it is requested that Policy EM7 be worded with greater flexibility, so as to allow for other employment uses.

Furthermore, it is requested that this development site be removed from the Green Belt. The site is a brownfield site, with an extant consent for a substantial amount of built floorspace. Furthermore, it is acknowledged by the Council to be a development site, where employment development is proposed. There is no purpose in including the site in the Green Belt.

As stated previously, Development Securities and their advisors have attended a number of meetings with Borough Council planning officers. This dialogue has been useful and Development Securities anticipate continued contact, both via this Local Plan process and possibly in relation to specific development proposals. Indeed, it is hoped that the concerns of Development Securities can be resolved by way of further discussion with officers.

I will be grateful if you could keep me up to date on the progress of the draft Local Plan.

Yours faithfully,



DANNY SIMMONDS
Planning Director

Enc.