


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



30th September 2013

Dear Sir/Madam

Brentwood Borough Local Plan 2015-2030 Preferred Options Consultation – Response by Childerditch Properties: Land at The Range North, Childerditch Industrial Park, Little Warley, Brentwood

Strutt and Parker have been instructed by Childerditch Properties, the landowners of Childerditch Industrial Park Brentwood to submit representations in response to the above consultation.

These representations are accompanied by three supporting documents including plans to propose the allocation of land at The Range North for employment purposes.

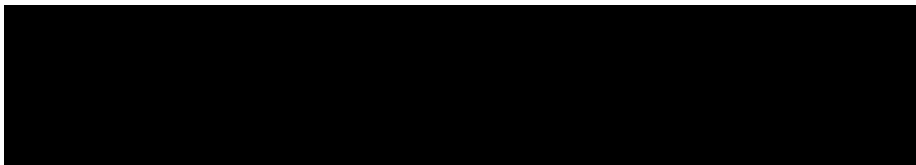
The supporting documents are as follows : -

- Employment Land Review (KELR) prepared by Kemsley LLP
- Landscape and Visual Appraisal and Green Belt Assessment (LVA/GB) prepared by Liz Lake Associates
- Accessibility Appraisal (AA) prepared by Journey Transport Planning

This letter sets out our detailed comments and responses to those issues of greater relevance to our client's interests in the Local Plan Preferred Options Consultation as follows : -

- Policy S3 Job Growth and Employment Land and paragraphs 2.38 to 2.46
- Policy CP4 – West Horndon Opportunity Area
- Policy CP10 – Green Belt and paragraphs 3.35 to 3.37
- Policy CP11 – Strong and Competitive Economy and paragraphs 3.38 to 3.48
- Policies DM1 and DM2 – General Development Criteria and Effective Site Planning
- Policy DM5 – Employment Development Criteria and paragraphs 4.16 to 4.17
- Policy DM6 – Areas Allocated for General Employment and Office Development and paragraphs 4.18 to 4.21

In particular, the letter sets out a description and background to Childerditch Industrial Park, the existing planning policy context and our detailed comments or objections setting out the reasons why land at The North Range should be allocated for General Employment at Policy DM6 of the Plan.



1. Childerditch Industrial Park

Site Description

- 1.1 Childerditch Industrial Park is an island site of some 11.25 hectares, comprising a range of B1, B2 and B8 employment uses with storage yards in some 35 units, employing approximately 500 people. The Park is located 2 miles south of Brentwood. It is a visually contained commercial area surrounded by predominantly agricultural land. The LVA/GB provides a detailed analysis of the site and its setting.
- 1.2 The Park is accessed via Childerditch Hall Drive to the A127, some 700m to the south, linking the Park to the M25 and nearby towns. The AA describes in detail the access to the site. Little Warley Hall Lane lies some 350 to 400m from the western boundary of the site. There is a ribbon development of some 15 properties along both sides of the Lane. Residential properties forming part of the client's ownership are on the eastern side of the Industrial Park. The nearest property in Little Warley Hall Lane is at least 150m from the western boundary of the site. The presence of established vegetation, both along the boundaries of the rear gardens of properties in Little Warley Hall Lane and the Park itself effectively screens the site from view as referred to in the LVA/GB.
- 1.3 There are no public rights of way traversing the site although there are a number of footpaths within the immediate vicinity, described in the LVA/GB. The Industrial Park lies within undulating agricultural land, and although in an elevated position relative to the A127, it is in fact positioned within a plateau making it inconspicuous from the A127. The Industrial Park is therefore visually well contained which is assisted by general topography, extensive planting both along its boundaries as well as from places of potential public view. This includes a substantial hedgerow along most of Little Warley Hall Lane referred to in the LVA/GB.
- 1.4 Substantial earth mounding works, approximately 4 metres high are in place adjacent to the western boundary of The Range North following planning permission granted in 1996. This is now well established and planted with trees and hedges and form a screen along the south and western boundary of the site protecting the visual amenity from the site to users of nearby footpaths as well as the residents along Little Warley Hall Lane.
- 1.5 Due to the nature of relief, the earth mounding and landscaping views into the site are generally restricted to glimpses of the open storage of plant and machinery along the northern boundary of the site. Other activities within the remainder of the Park are virtually hidden from public view.

Site History

- 1.6 The Industrial Park was first established in the early 1930's, originally as a brickfield with associated kilns. Sometime prior to 1945, the use was changed to that of manufacturing pre-cast concrete components. It was owned and operated by the Costain Group of Companies who also used part of the site as a depot for the storage and maintenance of public works, plant and machinery used in civil engineering contracts. The manufacturing concentrated on large pre-stressed beams used in bridge and tunnel construction, as well as small items such as railway sleepers.

- 1.7 In 1983, Costain discontinued the manufacture of concrete products and my clients purchased the site.

Existing Situation

- 1.8 The Industrial Park has been comprehensively planned and redeveloped over 30 years since my client acquired the site in 1983 with the benefit of planning permission. As well as new build, works of improvement, repair, and enhancement to most of the buildings on the site have taken place. The KELR provides details of the current operators and users of each plot. It will be noted from the KELR that the Park is a thriving employment site with only five of the 36 units currently being vacant and these are subject to offer or interest.

The Range North

- 1.9 These representations relate principally to The Range North, an area of open land at the western side of the Park, identified at Plan 1 attached to this letter. It is an area of open land, approximately 1.95 hectares in size, within the bunded area described at 1.4 above.
- 1.10 The land was used for open storage and the subject of a Certificate of Lawful Use and Enforcement Appeals in 2012 (APP/215151/C12/2180609 and 208/0803 refer). The appeals were dismissed on the basis that the lawful use for the necessary period of ten years could not be proven. It is important to note that the appeals did not consider the planning merits of the use of the land for those purposes. The upheld Enforcement Notice required the cessation of the use of the land for storage purposes and the removal of material associated with that use from the land. These requirements have been complied with.

2. Planning Policy Context

Brentwood Replacement Local Plan (BRLP) (2005)

- 2.1 In the BRLP, Childerditch Industrial Park is allocated partly for Employment and partly Open Storage purposes by Policy E6. The Range North is shown as being in the Green Belt (Policies GB1 and GB2) and Special Landscape Area (Policy C8).

Draft Brentwood Borough Local Plan 2015-2030 – Preferred Options (DBLP)

- 2.2 In the DBLP Policy DM6 provides for the allocation of areas for general employment and office development. The Preferred Allocations within that policy provides for the existing allocated employment land in the Local Plan of 11.25 hectares at Childerditch (Site 112). No additional land is referred to as a new employment allocation as part of the Draft Site Assessment accompanying the DBLP. Furthermore, the accompanying Individual Site Allocations Map does not identify the existing Park (notwithstanding the Allocations referred to under policy DM6) or any additional land being allocated for General Employment.
- 2.3 Policy CM10 of the DBLP refers to the Green Belt and states that “The general extent of the Green Belt will be retained subject to minor allocations made in the plan affecting Green Belt”.

3. Objections to the DBLP

- 3.1 In summary, whilst my client's generally welcome Brentwood Borough Council's (BBC) positive approach to providing for employment growth in the Borough, it is clear that the opportunity presented by The Range North to contribute to particular needs has been entirely overlooked, not considered or set aside without proper justification. Although not stated explicitly in the DBLP, it is assumed, for the purposes of these objections, that this is because of Green Belt considerations and failure to properly review the merits of the retention of the Green Belt in relation to The Range North. Our objections and/or comments on those policies affecting the site are set out below.

Policy S3 Job Growth and Employment Land

- 3.2 We generally welcome BBC's aspiration to increase the employment land allocation for the Borough. However, the level of allocation stated within the DBLP is based on unsound and out of date employment prediction figures. The document indicates a requirement for 22.35 hectares of land for employment across the Borough; this figure is set out in by the Heart of Essex Economic Futures as a dwelling constrained scenario for Brentwood Borough (2012) to provide an economic forecast for Brentwood based upon the housing allocation per annum provided. This report utilises a housing allocation of 170 dwellings per annum to indicate the level of employment provision required to support the population of the area.
- 3.3 In contrast, the DBLP presents an annual housing allocation target of 233 per annum, an increase of 63 dwellings annually on the figure used to inform a dwelling-constrained employment land allocation. On this basis, it is argued that the proposed level of employment land allocation of 31 hectares within the Local Plan Preferred Options (2015-2030) is insufficient and further new employment land should be allocated to provide a minimum level of employment provision to support the housing allocation target of 233 dwellings per annum.
- 3.4 Further analysis of the employment allocation indicates three further areas of concern in regard to the accuracy of figures provided. Firstly provision is made for 5,400 additional jobs, at an annual average rate of 285. In order to meet the requirement for 5,400 jobs, it would actually be necessary to provide an annual average rate of 360. Secondly, Figure 2.3 of the Local Plan Preferred Options (2015-2030) calculates the employment land requirement for the Borough by assessing the additional need for land, the loss of existing employment land and the existing employment land available for development. In particular, deliverability is clearly a concern in terms of 'existing employment land from the previous Local Plan process as this remains undeveloped. This may be because of a lack of interest in the sites in question, or because of inhibiting financial factors or access or infrastructure constraints. This means that the sites are not in fact necessarily suitable to be allocated as employment land with the doubts on delivery.
- 3.5 Thirdly, Figure 2.3 of the DBLP also proposes that BBC will lose 18.9 hectares of existing employment land across the Plan period of 15 years. The KELR provides a detailed breakdown of these losses. The KELR sets out a further analysis of the shortcomings in BBC's approach both to the amount of new sites being provided and their availability. In reality, the only new site being allocated is Brentwood Enterprise Park, the other sites being already in existence or for other uses, not for General Employment. It is our view that, if

this is to happen, BBC must ensure that there is a good supply of immediate deliverable employment land available in the right location and capable of accommodating a range of different uses in the short term to cater for requirements. Childerditch Industrial Park is a traditional industrial estate, providing a mixture of B1, B2 and B8 usage across the site. It is an accessible location, as confirmed by the AA. The Range North, as a new allocation, can be delivered immediately, and is well suited to assimilate businesses that will need to relocate as a result of the DBLP Strategy. Against this background it is considered that further land should be allocated for general employment use to meet the requirement for additional jobs.

Policy CP4 West Horndon Opportunity Area

- 3.6 The West Horndon Opportunity Area is promoted in the DBLP as a strategic growth area and is intended to provide for 5 hectares of new employment land allocation (Policy DM6). In reality the Opportunity Site is to replace an existing employment area. Whilst the merits overall of the allocation will be subject to scrutiny by others, from an employment perspective, it is considered that the site is most unlikely to be able to provide a range of employment opportunities, whether to assist with the relocation of businesses referred to at 3.4 and 3.5 above, or to meet known demand for the area as referred to in KELR.
- 3.7 Indeed, the Supporting Documents to the Opportunity Area make no reference to the nature of employment uses to be accommodated. No mention is made as to whether it is to assist in supporting manufacturing. BBC's removal of 18.9 hectares of existing employment land will leave a shortage of immediately available sites to support a use for General Employment. The deliverability of the site is questionable. It is a long term aspiration and will not therefore meet current employment needs to meet the objectives of BBC.

Policy CP10 : Green Belt

- 3.8 The principle purpose of these representations is to seek the allocation of The Range North for General Employment. Given that the site is designated Green Belt, it will be necessary to demonstrate that the release of that site would not prejudice the purposes of the Green Belt and that it would meet the requirements for release of Section 9 of the National Planning Policy Framework (NPPF).
- 3.9 Local Plans must be prepared with the objective of contributing to sustainable development, delivering the land needed to accommodate development, have a clear understanding of business and market needs in the area as well as address barriers to investment.
- 3.10 For the reasons set out at 3.3 to 3.5 above, we consider that there is insufficient land being allocated to accommodate the level and nature of development required. The NPPF allows for revisions to Green Belt boundaries in very special circumstances which do not undermine the purposes of the Green Belt.

- 3.11 In this instance, exceptional circumstances exist in that Brentwood has an economic need for additional employment land and this cannot be located in its entirety within the proposed Brentwood Enterprise Park so far identified. Furthermore there is a clear market demand for B1, B2 and B8 uses in Childerditch Industrial Park as referred to in the KELR.
- 3.12 As such, precluding a Green Belt release, purely in the interests of only safeguarding such land would go against the requirements of the NPPF, in so much as it would limit the economic development potential offered by The Range North site and not deliver the employment land required. To avoid allocating this type of land and ignoring this market purely to avoid a release of Green Belt would contradict the requirements of the NPPF as set out at paragraphs 160 and 161. These require local plans to support economic growth and provide for the needs of both quantitative and qualitative needs for all foreseeable types of economic activity over the plan period. Certainly there are implications of only focussing growth to the certain location currently proposed in meeting those objectives. As required by Paragraph 85 of the NPPF, our submissions set out in the LVA/GB confirm that a revised Green Belt boundary can be clearly defined by recognisable physical features of the established mounding to the west of The Range North, so there would be no harm.
- 3.13 In this respect, and with regard to the purposes of the Green Belt, the accompanying LVA/GB also confirms that The Range North is not located in a highly constrained area of Green Belt or high landscape sensitivity. Moreover :-
- It will not result in the unrestricted sprawl of large built-up areas because of the existing site features which act as a limit to development
 - It will not result in the merging of neighbouring settlements as there are no settlements adjacent or adjoining the site
 - It will assist in safeguarding the countryside from encroachment by the existence of a permanent and defensible boundary
- 3.14 As such, the release of the site would not undermine the purposes of the Green Belt (as set out at Paragraph 80 of the NPPF) and can effectively meet the criteria (as defined at Paragraph 85 of the NPPF) relating to the determination of new Green Belt boundaries.
- 3.15 The release of Green Belt land in this location is associated with a specific requirement for new employment land to address BBC's strategy for re-allocation of employment land, provide an immediately available site with an identified market demand as confirmed in the KELR. Given these requirements, the site forms a logical expansion to the existing General Employment area.
- 3.16 The allocation of this site will therefore assist in securing the future supply of General Employment land required to meet identified needs whilst contributing to the delivery of economic growth and sustainable development.
- Sustainable Development
- 3.17 The Childerditch Industrial Park has previously been considered as a sustainable location for employment by BBC; in the first instance allocating the existing site and now confirming that allocation in the DBLP. The DBLP also identifies a need for 31 ha of employment land in the Borough over the next 15 years. In our submissions at 3.3 to 3.5 we suggest that, in reality, further new employment allocations are required. The development of The Range

North will contribute to meeting this requirement. The KELR has also identified a specific need to provide for B2 and B8 Use Class Space.

- 3.18 There are a limited number of locations in the Borough which could meet such requirements. Childerditch Industrial Park is an existing key employment location within the Borough and the allocation of this site will further enhance the economic development potential of the area. The site will complement the Borough's intended employment site portfolio, providing the only new employment site, that is available immediately to accommodate B2 and B8 uses.
- 3.19 The development of The Range North has the ability to provide a large number of jobs in a variety of employers in a location which is accessible to a large local population. Using Homes and Communities Agency Employment Densities Guide (2010) and the options proposals set out at Figure 7 of the LVA/GB, the development could generate between 83 and 138 jobs based on a B2 use of the 3,000 sq.m to 5,000 sq.m of floor space indicated. The allocation of this site therefore has clear economic benefits in providing new employment. The economic benefits of the site go beyond simply the future occupiers of the site. Supply chain and associated business that trade with those at Childerditch will provide a further contribution to local job provision. By bringing forward the site for development in the short to medium term, it can complement the offer at Childerditch Industrial Park which now provides a relatively restricted choice of new development opportunities. It also offers an opportunity for inward investment as well as the relocation of existing businesses which is a key part of BBC's overall plan strategy.
- Environmental Role
- 3.20 The NPPF is supportive of development which helps to improve biodiversity, use natural resources prudently, minimise waste and pollution, and mitigate and adapt to climate change, including moving to a low carbon economy. Many of these matters would be addressed as part of a detailed planning application. Nevertheless, the LVA/GB confirms that development can have a positive impact on the surrounding environment. The proposed landscaping buffer along the northern site boundary referred to in the LVA/GB could provide significant ecological benefits to consolidate that at the western edge of the site. The development will therefore help promote the preservation and enhancement of habitats, ecological networks and provide a wildlife corridor.
- Social Role
- 3.21 Future development of the site will provide for employment opportunities. These jobs provide for a significant social benefit to the local community, particularly for those in nearby Brentwood and neighbouring settlements. The qualitative employment opportunities in Brentwood represent a material planning consideration in favour of the development of this site. The development provides the opportunity to aid relocation of existing businesses, and contribute to the local jobs market, which should be given sufficient regard in accordance with the provisions of the NPPF.
- 3.22 The NPPF seeks to promote and facilitate growth and sustainable development. The allocation of The Range North will therefore result in a net benefit when considered against all three limbs as detailed under paragraph 10 of the NPPF. The NPPF also notes at paragraph 14 that LPAs should positively seek opportunities to meet the development

needs of their area, through objectively assessing needs and providing local plans with sufficient flexibility to adapt to rapid change. The NPPF is permissive of revisions to the Green Belt in exceptional circumstances namely in this case, where the Green Belt boundary needs revising to objectively meet development needs (paragraph 17 of the NPPF). We consider that revisions to the Green Belt can be accommodated without adverse consequences. For the reasons set out above, the development of the site would not undermine the purposes of the Green Belt as set out in the LVA/GB. Therefore, the release of the site from the Green Belt is consistent with the criteria for amending Green Belt boundaries.

Policy CP11 Strong and Competitive Economy

3.23 This policy is generally supported. The Childerditch Industrial Park and an allocation of The Range North would meet a number of BBC's aims in terms of promoting and maintaining a strong and competitive economy and satisfy the following criteria in particular : -

- **Bullet Point C :**

The proposed level of expansion would represent a sustainable addition to Childerditch Industrial Park, making use of an underutilised area with a defensible boundary to the surrounding countryside and Green Belt as referred to in the LVA/GB. The Childerditch Industrial Park enjoys excellent access to the local and national road network as referred to in the AA. There are no other infrastructure constraints to development as confirmed in the KELR.

- **Bullet Point G :**

The size and nature of the expansion to the site would help to support local businesses in need of premises as referred to in the KELR. Critically, the DBLP sets out proposals for 18.9 hectares of employment land to be lost within the Borough, the majority of which consist of urbanised brownfield sites that will be lost in order to meet the needs of BBC's preferred housing allocation strategy. As an established and accessible site, an expansion to the Childerditch Industrial Park would provide a common sense, deliverable addition to employment provision within the Borough to support the needs of local businesses looking to relocate or get a foothold in the market. The scale of the development of the site that could be accommodated at the site, as indicated at Figure 7 in the LVA/GB, in conjunction with the existing uses present at the Park, means that it is well suited to supporting the needs of small and medium sized commercial enterprises for a variety of uses as referred to in the KELR.

Policy DM1 General Development Criteria

3.24 Policy DM1 provides general development guidance for managing growth within the Borough of Brentwood over the next 15 years. An extension of 1.95 hectares to the Childerditch Industrial Park would satisfy the criteria of Policy DM1 General Development Criteria as follows : -

- **Bullet Point A :**

The LVA/GB and supporting Figures, Plans and Cross-section confirm that the development on The Range North would not have a detrimental effect on the surrounding area. The bund that runs along the western perimeter of the site and proposed woodland planting at the northern boundary ensure that the quality and character of the landscape will not be affected by the addition of 1.95 hectares of employment land on site.

- **Bullet Point B :**

The Childerditch Industrial Park is exceptionally well located on the road network as indicated in the AA. The A127 lies directly to the South of the site and provides arterial vehicular access to London to the West and the rest of South Essex to the East. In addition, Junction 29 of the M25 lies no more than 2 miles to the west of the site, supplying convenient access to the national road network.

- **Bullet Point C :**

The AA demonstrates that an allocation on the site for a mixed B1/B2/B8 development of between 3,000 sq.m to 5,000 sq.m GFA would not give rise to a significant level of additional traffic movements. The increase in vehicular traffic would not be material or perceptible when set against the existing traffic on the A127 in the vicinity of the site. The existing access arrangements on both Childerditch Hall Drive and the A127 can accommodate the forecast increase in traffic without any noticeable impact for the purpose of highway capacity.

The accident record on the highway in the vicinity of the site have been reviewed and no accidents have been recorded in the latest three year period on either Childerditch Hall Drive or on the A127 at the Childerditch Hall Drive junction. As such the existing access arrangements are considered suitable to accommodate the additional traffic associated with an allocation without having a detrimental impact on that good safety record.

In terms of accessibility, the site is considered suitable and acceptable for the purposes of being allocated for employment purpose. It is well connected to the strategic road network which is suitable to accommodate the type of traffic that could be associated with the proposal. Whilst it is accepted that the site is not considered to be in a location accessible by means other than the private car, the nature and type of movements that are generated by the proposed allocation and by the existing uses on site would not be appropriate for a typical more accessible urban location where the environmental impacts of heavy vehicles would be incompatible.

- Bullet Points D and E

The proposed extension of 1.95 hectares to the Park will not unduly affect amenity. The operation of the Childerditch Industrial Park has functioned without unacceptable operational effects for the last 70 years and The North Range is screened and contained by the existing bunding to assist mitigation.

- Bullet Point F :

Opportunities can be provided as part of landscaping to incorporate biodiversity in and around The Range North as indicated in the LVA/GB.

Policy DM5 : Employment Development Criteria

3.25 The Policy is supported. This is on the basis : -

- Bullet Point A :

The proposed extension of approximately 1.95 hectares a The Range North will increase the total size of the Childerditch Industrial Park by a modest 1/10th. This addition to the site is of a scale that would not have a significant visual or impact upon the locality as indicated at the LVA/GB..

- Bullet Point B :

The existing and proposed landscaping will ensure that the visual impacts of any extension to the Childerditch Industrial Park will have minimal impacts upon the quality and visual amenity of the surrounding area. The existing bund at the boundary of the site, shields the site from the surrounding land. As a result, the development would be entirely contained to minimise its impact on the surrounding area.

- Bullet Points C/DE

As indicated at 3.24 above, the site lies in close proximity to the A127 which provides arterial access to London to the West and the rest of South Essex to the East. Access to the site is entirely suitable and the vehicular impact upon rural roads is minimal, given the direct routes to the A127, A12, M25. The illustrative plans at Figure 7 of the LVA/GB demonstrate that the site can easily incorporate appropriate parking provision.

Policy DM6 Areas allocated for General Employment and Office Development

3.26 Whilst the existing allocated employment land at Childerditch Industrial Park is supported, the policy and the associated Preferred Allocations fail to acknowledge, or even to have considered the opportunity offered by The Range North which we have set out and justified in these representations.

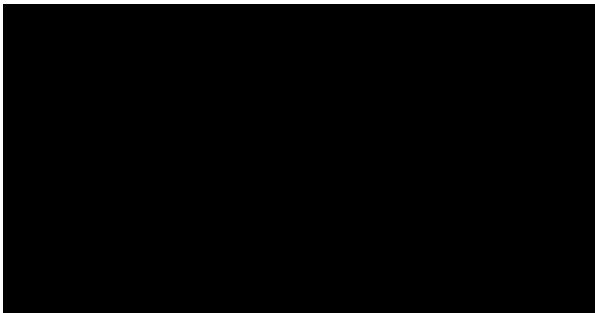
- 3.27 In particular, we have assessed the suitability of the land at The Range North for General Employment to meet local economic needs and have concluded that the de-allocation of employment sites, the need for additional land and market requirements require further land to be allocated, not least to ensure flexibility and deliverability in supply. This is supported in the KELR
- 3.28 The site falls within the Green Belt and therefore Green Belt changes would be required. The NPPF is permissive of such releases in exceptional circumstances at the time of preparation of the Local Plan. We have demonstrated that such circumstances exist in so much as there is a specific requirement for development in this location to meet the objectives of BBC and employment needs.
- 3.29 With regard to Green Belt policy, the site forms a logical extension of an already successful employment location and would provide a justifiable revision of the Green Belt, based on clearly identifiable physical boundaries. By adopting further landscaping mitigation measures, as set out in the LVA/GB, development of this site for employment uses would not impact on the openness of the Green Belt and would not result in urban sprawl or the coalescence of existing settlements.

4. Conclusion

- 4.1 In conclusion, the allocation of The Range North at Childerditch Industrial Park is considered to meet an identified market need and provide the type of employment land required to deliver the objectives of the emerging DBLP in accordance with the findings set out in the KELR. This confirms that there is additional need for employment land and the site would contribute to meet those requirements, not least in providing a deliverable site that can, in the short term, assist in BBC's overall strategy for the relocation/re-allocation of existing employment uses/sites. Childerditch Industrial Park is a popular location for a range of employment uses and there is a strong market for additional units in this location.
- 4.2 Our submissions have also demonstrated that development of the site for General Employment land will not undermine the purposes of the Green Belt as set out in the LVA/GB. This confirms that the site has low potential to lead to unrestricted urban sprawl. Development of The Range North would not result in the merging of settlements. The site does not perform an important role in safeguarding the countryside from encroachment. Furthermore, the development of the site would not have an effect on the setting and special character of a historic town. Subject to detailed ecological survey, the site could provide opportunities to provide an improved ecological corridor just beyond the northern boundary, linking woodland corridors to the east and west. The proposals also offer an opportunity to improve existing visual amenity. With regard to the NPPF and the 3 limbs of sustainability, the site is also considered sustainable.
- 4.3 Our representations therefore demonstrate that the site is entirely appropriate for General Employment uses. Changes can be made to the Green Belt in this specific location without having the overall objectives of the Green Belt and its allocation for General Employment Development would be consistent with National Planning Policy.
- 4.4 We therefore trust that the representations set out in this Statement and supporting

documents will be given careful consideration by BBC, as the Plan progresses. We also trust that BBC will be able to support the allocation of The Land at The Range North for the reasons we have set out.

We look forward to engaging with BBC and other stakeholders on our proposals following the submission of these representations.



Enc Plan 1 – Site Location
Employment Land Review
Landscape and Visual Appraisal and Green Belt Assessment
Accessibility Appraisal