



**BRENTWOOD
BOROUGH COUNCIL**

Local Plan 2015-2030

Preferred Options

July 2013

COMMENT FORM

(For official use only)

Comment
No.

Ack. date

You can comment on the Local Plan 2015-2030 Preferred Options online at www.brentwood.gov.uk/localplan. Alternatively, please use this form to share your views on the contents of the Local Plan.

PERSONAL DETAILS

Title: Mr

First Name: James

Last Name: Firth

YOUR COMMENTS

Please indicate which section(s) of the Local Plan you are commenting on (please clearly state the Policy reference or paragraph number):

Policy CP7

Please specify if you Support or Object (tick as appropriate):

Support

Object

Comments (please use additional sheet if required):

The allocation of site 101A, Land at Brentwood Enterprise Park, for 23.5 hectares of employment is strongly supported.

A Vision Statement has been prepared that provides full detail on the nature of the proposals and has been submitted as part of the current consultation.

A supporting Commercial Market Report has also been prepared by Strutt & Parker LLP with input from Mass & Co., local agents based in Brentwood. This report provides analysis and comment on the suitability and viability of the site for employment development as well as providing evidence to support the potential mix of uses that will ultimately be developed at Brentwood Enterprise Park.

Further technical evidence base reports demonstrate that the proposals are fully deliverable as well as consistent with both the objectives of the Council and those set out in national planning policy. Additional supporting reports submitted alongside this representation include:

- Transport Appraisal prepared by Ardent Consulting Engineers
- Flood Risk, Drainage and Utilities Position Statement prepared by Ardent Consulting Engineers
- Green Belt Assessment prepared by Liz Lake Associates
- Landscape and Visual Impact Assessment prepared by Liz Lake Associates
- Ecological Scoping Survey prepared James Blake Associates
- Arboricultural Report prepared by D F Clark Bionomique Ltd

Additionally a Topographical Survey has been undertaken by CAT surveys and has been used to prepare the illustrative proposals contained within the Vision Statement.

Comments specifically relating to Policy CP7 are set out below including the areas where we believe changes to current wording of the plan should be considered.

Policy CP7 – Brentwood Enterprise Park

Policy CP7 sets out that Brentwood Enterprise Park will provide new floorspace for employment development (Use Class B1, B2 and B8). The allocation of the site is strongly supported and is fully deliverable as set out in reports accompanying this representation.

In developing proposals for the site we consider that the Brentwood Enterprise Park site to the south of the A127 (site 101A) should be considered as a separate proposal to the existing employment uses at Codham Hall north of the A127 (site 101B). As demonstrated in the supporting commercial market report it is considered that site 101A has potential to attract some higher value occupiers such as office uses, research and development, and regional storage and distribution uses. The nature of this use is therefore anticipated to be distinct from the existing businesses that are located at Codham Hall north (site 101B). For this reason the sites have been considered separately in the representations that have been submitted. We consider that Policy CP7 could potentially make a clearer distinction between the new Brentwood Enterprise Park at site 101A and the regularisation of existing employment uses at site 101B.

Criteria a) to d) as set out in Policy CP7 are supported and the illustrative proposals for the site set out in the accompanying vision statement have been developed in order to address these criteria.

Land at the former M25 works site, south of the A127 (101A)

We consider that this part of the site would form 'Brentwood Enterprise Park'. The supporting vision statement demonstrates how approximately 92,000sqm (1,000,000 sq.ft.) of employment floorspace can be accommodated on site 101A. The site is fully deliverable, sustainable and viable. Allocation of the site is consistent with national planning policy and the Council's aspirations for the borough as set out in the emerging Local Plan.

As explained fully in the supporting Commercial Market Report it is considered that based on the

occupational market for the proposed uses on the site, the allocation should consist of 25% B1 uses located along the frontage to the site as desired with Policy CP7, B8 uses representing 50%, and a flexible allocation of B1/B2 and B8 uses representing 25%. This proposed flexibility will allow the site to accommodate a variation of different types of occupier.

When assumptions from the OffPAT HCA Employment Densities Guide (2010) (as used in the Heart of Essex Economic Futures report) are applied to this split it is considered that the site has potential to provide approximately 2,900 jobs. The exact number of jobs achieved will clearly depend upon the final mix of uses as well as the types of occupier who move to the Enterprise Park.

We consider that amendments to the wording of this part of Policy CP7 are required to allow for this mix of development.

We do not consider that the policy should make reference to a maximum of 12 ha of B8 use. The justification for the current policy wording is set out in paragraph 3.17 of the Preferred Options document and makes reference to the 12.1ha B8 demand identified in the Heart of Essex Economic Futures Study. It is important to recognise that the Economic Futures study considers new employment needs only and does not take into account the need for the site at Brentwood Enterprise Park to additionally provide replacement employment land for sites that have been reallocated for housing. The commercial market report undertaken by Strutt & Parker and submitted alongside this representation makes clear that there is potential to accommodate some of the existing businesses displaced by the proposed redevelopment of their existing sites. A considerable number of these relocated businesses will require B8 premises. This increases the overall need for B8 employment provision.

We consider the policy wording should also allow for additional uses such as the proposed hotel shown within the indicative vision statement, and should additionally allow for appropriate supporting land uses and amenity provision. With an estimated 2,900 jobs on site the provision of services and facilities on site would considerably enhance the site's sustainability.

Suggested Amendments

- Consider making a clearer distinction within Policy CP7 between the new Brentwood Enterprise Park at site 101A and the regularisation of existing employment uses at site 101B. We consider that Site 101A would form the main part of the new 'Brentwood Enterprise Park'.
- Amend the wording of Policy CP7 to state that the site is intended to provide a mix of B1, B2 and B8 use. The mix of floorspace on the site should consist of 25% B1 uses, B8 uses representing 50%, and a flexible allocation of B1/B2 and B8 uses representing 25%. The flexibility is intended to allow the site to accommodate a variation of different types of occupier and provide maximum support to the provision of local employment opportunities. We do not consider that the policy should include a reference to 12 ha of B8 floorspace given that a mixed use site would still be achieved by the mix distribution set out above.
- We consider that Policy CP7 should also be amended to state that appropriate secondary or

supporting land uses will also be considered appropriate at Brentwood Enterprise Park. This would allow for the provision of a hotel as shown on the indicative drawings and/or the provision of services and facilities to support the significant numbers of people who would work on this site. This would help to further enhance the site's sustainability.

Please return to Planning Policy Team, Brentwood Borough Council, Town Hall, Brentwood, Essex CM15 8AY, or alternatively attach completed form and email **planning.policy@brentwood.gov.uk**

Please note that all responses will be published online. More information can be found at **www.brentwood.gov.uk/localplan**

All responses should be received by Wednesday 2nd October 2013