

# **Brentwood Borough Local Plan 2015-2030 Preferred Options for Consultation**

**Representations On Behalf of One Property Group  
In Relation to Brook Street, Brentwood**

Our Ref: C13074

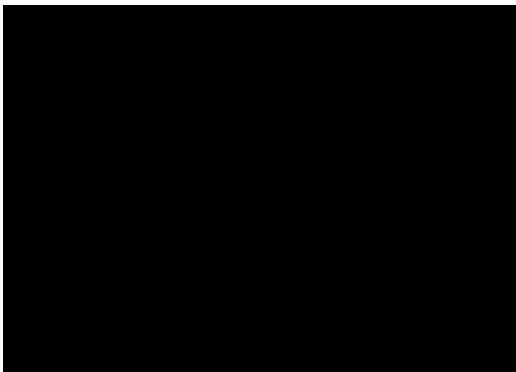
**October 2013**





## Phase 2

PLANNING &  
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## Policy S3: Job Growth and Employment Land

**Summary of Representation:** The proposed growth option is supported over the identified alternative growth options, which provide lower numbers of jobs for the Borough over the Plan period. New employment land is essential to support growth in the Borough, particularly given the low levels of employment land in recent years, and as a consequence the proposed growth option should be considered flexibly and job figures treated as minimums rather than as targets.

**Detailed Representation:** The Borough has seen limited new land come forward for employment uses over recent years. The Replacement Structure Plan's employment land provision for 1996 to 2012 amounted to just one hectare for the whole Borough. The latest Annual Monitoring Report (2011-2012) recognises the constraints on new employment land and identifies the need for this to be addressed through the Local Plan.

The proposed growth option is supported over the alternative growth options, which provide lower numbers of jobs for the Borough over the Plan period. However, the NPPF makes clear that authorities should proactively drive and support sustainable economic development to deliver the business and industrial units that the country needs, and that every effort should be made objectively to identify and then meet the housing, business and other development needs of an area, and respond positively to wider opportunities for growth.

New employment land is essential to support growth in the Borough, particularly given the low levels of employment land in recent years. The proposed growth option should therefore be considered flexibly and job figures treated as minimums rather than as targets. Should additional land be required for employment purposes, then this figure can be exceeded without requiring a review of the Plan. As a consequence, the Plan needs to identify sufficient land to enable its employment strategy to be operated flexibly.

**Proposed Change to the Plan:** The policy should be amended as follows:

The word 'minimum' added before '5400 additional jobs' in the policy text, with 'Total' and 'Indicative' replaced by 'Minimum' in the table headings, and the word 'minimum' replacing 'total' in the final paragraph.

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## Policy DM6: Areas Allocated for General Employment and Office Development

**Summary of Representation:** Policy DM6 should identify suitable land adjoining the principal urban area of Brentwood for employment land and specifically land to the west of Nags Lane, which represents a sustainable location for new development, in accordance with the core principles of the National Planning Policy Framework (NPPF).

**Detailed Representation:** This policy identifies five new locations for general employment land and office development within the Borough. The majority of this allocation is located at the proposed “Brentwood Enterprise Park”, with 23.41ha at the M25 works site and 4.04ha at land at Codham Hall Lane.

Although the M25 works site is well located in terms of access to the highway network, it is poorly located in terms of access by non-car modes. Also it is neither located within close proximity to facilities or services nor is it located near residential development and therefore employees working at this site will make all trips by car. The nearest stations are Brentwood (3.6miles) and West Horndon (4.7 miles) and there is no bus route to either station. As a consequence it will only be attractive to a very limited number of low employment density transport related uses.

Whilst it is noted that this site is covered by substantial amounts of hardstanding, it is queried as to why it is now being allocated as the previous use as a works site for the M25 improvements was a temporary use which, once ceased, should be returned to its former use in accordance with the Permitted Development agreement. The principle of the allocation of this site is questioned, as is the extent of land identified. The identification of 23.41ha results in an extensive site and it is likely that development would be visible from the surrounding area, changing the character of the area, not only covering a far greater area than the former works site, but also having a far greater impact.

The land at Codham Hall Lane is an existing, isolated employment site with a number of existing permitted industrial type uses within agricultural buildings. Again, this site is poorly located in terms of access by non-car modes and employees will make trips by car. As such similar considerations therefore apply in terms of accessibility and range of potential uses. Given the presence of existing uses, this site is likely to be slow to come forward as these uses will need to relocate in advance of redevelopment.

It is relevant to note that in respect of both of these sites, Essex County Council Highways commented that “some development” would be considered on these sites (Preferred Options Draft Site Assessment, 2013), it is questioned whether the County Council would be supportive of the extent of development proposed.

The other site proposed for a significant employment allocation is land at West Horndon which is proposed to accommodate 5ha of employment land along with 1,500 dwellings. As with the “Brentwood Enterprise Park” sites and also the smaller allocated site of the Old Pump Works at Great Warley (0.79ha), this site is not well located in terms of the principle urban area of Brentwood and Shenfield and therefore has limited access by non-car modes. These four sites have a total area

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of 35.84ha, i.e. 93% of the new employment allocations. This approach is contrary to the findings of the Issues and Options Consultation Preliminary Analysis (2010) where respondents expressed a clear preference for centralised growth, with development within and around the town of Brentwood.

As many of the evidence base documents referred to in the Draft Local Plan are not currently available, it is not clear whether the Council have undertaken a comprehensive assessment of sites. The evidence base documents that are referred to in the Local Plan but are not publicly available during the consultation period include a Landscape Sensitivity Testing and Green Belt Assessment, and these aspects form an essential consideration when identifying new Green Belt sites. It is queried whether the missing evidence base documents were prepared in advance of the Local Plan or whether they are being retrospectively prepared to accord with the Council's strategy. The Council do not appear to have considered the impact of releasing Green Belt sites, both in terms of their individual and cumulative effects. On the basis of information available, it seems that an arbitrary decision has been made to prevent further Green Belt release for both employment and residential development around Brentwood and Shenfield, the primary urban areas of the Borough.

A development strategy which focuses development in and around the primary urban areas is more sustainable and provides greater opportunities for reduced trip lengths and accessibility by non-car modes. This approach would accord with the Core Principles of National Planning Policy Framework (NPPF), which state that planning authorities should "proactively drive and support sustainable economic development" and "make the fullest possible use of public transport, walking and cycling, and focus significant development in locations which are on can be made sustainable".

Our clients, One Property Group, have an interest in land on the edge of the Brentwood urban area in close proximity to the M25 but also close to the centre of the town, with bus route 498 providing direct access to the town centre. At its closest point the site is within 100m of the M25 junction with the A12, known as the Brook Street Roundabout. The site lies on the southern side of Brook Street, which is the principal route from the Brook Street Roundabout in to the centre of Brentwood. The site is bounded to the east by Nags Head Lane and the railway line to the south. Opposite the site, on the other side of Brook Street, lies a substantial car sales centre and a large Holiday Inn hotel and conference centre.

This well contained site is ideally suited for development and could be complemented by development on the eastern side of Nags Head Lane. Initial proposals have been drawn up for the site and the draft scheme proposes a range of employment generating uses, as shown on appendix 1. The site is accessible and its location is suited to high-tech B1 uses, high quality offices, together with hotel and leisure uses. Initial work has also been undertaken by highways consultants in terms of access options and impact of development on the highway network. Since there are no insurmountable constraints to development on this deliverable, green field site, our client is keen to meet with officers of the Council to discuss their proposals and to develop proposals for the site further.

**Proposed Change to the Plan:** This policy should be amended to include land to the south of Brook Street as a new employment allocation.

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**Appendix 1**  
Draft Scheme



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