


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



2nd October 2013

Dear Sirs

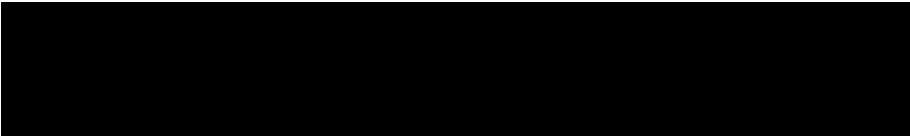
**Brentwood Borough Local Plan 2015 – 2030 Preferred Options Consultation
Brentwood Enterprise Park (Site 101A)**

I write on behalf of S & J Padfield and Partners in support of the allocation of Site 101A Land at Brentwood Enterprise Park for 23.5 hectares of employment use. This previously developed site represents an exciting and unique opportunity to meet future employment needs and provide jobs in the borough to the year 2030.

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
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- 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.

Representations on the Local Plan 2015 – 2030 Preferred Options

Policy S3 - Job Growth and Employment Land

Policy S3 of the Draft Local Plan sets out the Council's proposed approach to overall job growth and employment land. The policy states that "*provision is made for 5,400 additional jobs to be provided in the Borough between March 2015 and March 2030 at an annual average rate of 285*". The figure of 5,400 jobs appears to be the Heart of Essex Economic Futures study Sector Derived Scenario which describes a growth of employment in Brentwood of 5,400 jobs between 2012 and 2031 at an annual average of 285 per year. This includes growth from all sectors and is based on a 19 year period. If applied to a 15 year plan period a requirement for 5,400 jobs would result in a higher annual average rate of 360 jobs per year. As detailed in the Heart of Essex Economic Futures study these additional jobs include growth across all sectors including non B-use class sectors such as retail.

We consider that Policy S3 should be amended to reflect the correct annual average rate for jobs provision and to acknowledge that these additional 5,400 jobs will be provided across all sectors.

Suggested amendments

- Update Policy S3 to reflect the fact that 5,400 jobs over a 15 year plan period will require a higher annual average rate of 360 jobs per annum.
- Update the wording of Policy S3 to indicate that allocated employment land is anticipated to make a significant contribution towards providing for the 5,400 new jobs but do not assign the 5,400 jobs entirely to B-use class developments.

Justification to Policy S3, Paragraphs 2.38 to 2.45 and Figure 2.3

Whilst some of the 5,400 new jobs will occur in sectors that do not require designated employment land, allocated sites will remain very important in accommodating this growth. The Heart of Essex Economic Futures Study identifies the need for additional allocated new employment land by extracting those sectors falling within the B1, B2 and B8 use classes. The dwelling constrained scenario results in a need for an additional 9.4ha of employment land (1,244 jobs) over the period 2012 to 2031 and the sector derived scenario an additional 6.8ha (1,524 jobs) through assuming a higher level B1 office development and a lower level of B8 storage and distribution. This 9.4ha compares very similarly to the 9.5ha of employment land and 71,000sqm of employment floorspace that was found to be required in Table 4.13 of the Brentwood Employment Land Review (2010).

It is our understanding that the Council therefore intend to allocate sufficient land to provide for 9.5ha growth in employment land provision through the emerging Local Plan and this is supported as a minimum figure. The Economic Futures Study was based on housing growth of 170 dwellings per annum rather than the 233 dwellings per annum that is now proposed in the Preferred Options document over the period from 2015 to 2030. In order to balance homes and jobs it is clear a high level of employment growth will therefore continue to be required.

Additionally the Council's spatial strategy requires the reallocation of 18.9ha of existing employment land lost to residential development. Figure 2.3 in the preferred options document provides a summary of total employment land need. It should be noted, however, that Figure 2.3 as currently drafted includes a typographical / mathematical error in that the numbers listed should total 25.05 ha of employment land rather than the 22.35 ha currently stated.

Suggested amendments

- Clarify within the supporting text the approach taken to additional employment land.
- Update figure 2.3 to reflect the total employment land need of 25.05ha.

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.

Preferred Options Site Allocations Maps - Alterations to the boundary of Site 101A

It is considered that amendments should be made to the boundary of Site 101A as currently shown in the Local Plan 2015 -2030 Preferred Options consultation.

The illustrative drawings prepared in the supporting vision statement are still based on a site area of 23.5 ha. The site boundary used has, however, been amended slightly from that proposed in the current Preferred Options consultation. The proposed changes are explained in more detail on pages 8 and 18 of the supporting vision statement.

The proposed changes consist of the removal a small area of the site close to Hobbs Hole Wood from the site boundary. This area is subject to gas easement constraints and it is considered could more effectively be used as part of the landscaping scheme. This would additionally help provide a buffer to Hobbs Hole wood and help to preserve its ecological value.

It is proposed that an area to the south east of the site could also be included within the site in order to retain an allocation of 23.5ha. This area has been previously developed and although a restoration scheme has been undertaken the land remains unsuitable for agricultural operations. The site forms part of the parcel considered by the Liz Lake Associates and it is considered the area could be included without additional landscape harm. The proposed site area has been used for the indicative drawings contained within the supporting vision statement.

Even with the change to the boundary outlined above it is considered that approximately 2 ha of the site may remain constrained by easements. It is therefore considered that in order to deliver a full 23.5ha of useable employment land the site boundary the Council should consider further extending the site to the south and east as indicated on plan 4 on page 18 of the supporting vision statement. This further area of land has not presently been included on the illustrative plans, however, it is considered that this land could additionally be included in order to provide a full 23.5 ha of useable land. The site would still remain contained within the existing ridgeline to the south.

Suggested amendments

- Alter the boundary of Site 101A to exclude the area of land closest to Hobbs Hole Wood and include an additional area of land to the south east of the site in order to continue to provide a total of 23.5 ha of employment land.
- Given that approximately 2 ha of the land would still remain constrained by easements the Council should consider further altering site boundary to include additional land to the south east of the site in order to provide a total developable area of 23.5 ha.

Representations have been made on Site 101B, Codham Hall North of the A127 by separate submission.

Summary and conclusions

The allocation of employment land at M25 Junction 29 to form Brentwood Enterprise Park is strongly supported. The accompanying vision statement, commercial market report, and technical assessments demonstrate that the allocation of this site is fully justified and deliverable. We would request that the Council consider the suggested amendments set out above when developing the submission version of the Local Plan. S & J Padfield and Partners will be pleased to further engage with the Council, statutory consultees, stakeholders and the wider community as the plan progresses.

Yours faithfully



**James Firth MSc MRTPI
Senior Planner**