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**BRENTWOOD
BOROUGH COUNCIL**

Brentwood Borough Local Plan

Strategic Growth Options Consultation

January 2015

Consultation questionnaire

This consultation questionnaire relates to the Brentwood Local Plan Strategic Growth Options Consultation and is provided for you to make comments. Please take the opportunity to read the consultation document before filling in this form and returning to:

Planning Policy Team, Brentwood Borough Council Town Hall, Brentwood, Essex, CM15 8AY
or by email to planning.policy@brentwood.gov.uk

Comments need to be received by 5pm on Tuesday 17 February 2015

If you need any help completing this form please contact the Planning Policy Team using the contact details given above or by telephoning 01277 312620.

Personal Details

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Questions

The Council is seeking responses on key issues. Focused questions appear in bold boxes throughout the Strategic Growth Options document. These questions are summarised in this consultation questionnaire. More information can be found at www.brentwood.gov.uk/localplan.

Please use an additional sheet if necessary. Please note that all responses will be published online.



Q1: Do you agree with the broad areas, for the purpose of considering approaches to growth?

Yes No

Comments

Please see our letter dated 9th February 2015



Q2: Do you agree with the issues raised within each of these areas?

Yes No

Comments

Please see our letter dated 9th February 2015



Q3: Do you have any comments on the appropriateness of particular sites? Yes No

Comments

Please see our letter dated 9th February 2015



Q4: Given the greater capacity for growth along the A127 corridor, which of the sites put forward do you think is the best location for growth?

Comments

Please see our letter dated 9th February 2015

? Q5: Should the A12 corridor accommodate growth by releasing sites on the edge of urban areas? Yes No

Comments

No comments

? Q6: In order to provide for local need is it preferable for Greenfield sites on the edge of villages to be released, or to develop brownfield sites (both within the Green Belt)?

Comments

Please see our letter dated 9th February 2015

? Q7: To enable future employment need to be met do you agree that the most sustainable approach is to allocate new sites close to the strategic highway network? Yes No

Comments

Please see our letter dated 9th February 2015

? Q8: In order to ensure that the Town Centre remains economically sustainable, do you agree that a "Town Centre First" approach should be taken to retail development? Yes No

Comments

No comments



Q9: Are there opportunities for more open space provision in the area where you live?

Yes No

Comments

No comments



Q10: Please rate the level to which you value the landscape near where you live (on a scale of 1 to 5), as compared to other areas within Brentwood Borough, for the following aspects:

No comments

Aspect:	Very Low	Low	Average	High	Very High
Scenic Beauty / Attractiveness	1	2	3	4	5
Outdoor Recreation / Leisure Use	1	2	3	4	5
Wildlife Interest	1	2	3	4	5
Historic Interest	1	2	3	4	5
Tranquillity	1	2	3	4	5
Other – please specify:					
.....	1	2	3	4	5



Q11: To what extent do you think the following are present in the landscape near where you live (on a scale of 1 to 4):

No comments

Aspect:	Absent	Occasional	Frequent	Predominant
Houses	1	2	3	4
Commercial / Industrial buildings	1	2	3	4
Nature Reserves / Wildlife	1	2	3	4
Farmland	1	2	3	4
Woodland	1	2	3	4
Degraded / Derelict / Waste land	1	2	3	4
Infrastructure (Road / Rail / Pylons etc.)	1	2	3	4
Leisure / Recreation Facilities	1	2	3	4
Other – please specify:	1	2	3	4

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? Q12: Have we considered the main infrastructure issues? Are there other important issues to consider? Yes No

Comments
No comments

? Q13: What do you think the priorities for infrastructure spending should be?

Comments
No comments

Thank you for taking the time to complete this questionnaire

**Please ensure that you return comments to the Council by 5pm on Tuesday 17 February 2015
(see page 1 for details)**

12 FEB 2015

Boyer

Date: 09/02/15

Ref: 15.600

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Dear Sirs,

**West Horndon Industrial Estate – Brentwood Borough Local Plan Strategic Growth Options
Consultation January 2015**

These representations have been prepared by Boyer Planning on behalf of Graphic International Display Ltd, who own and operate premises located within West Horndon Industrial Estate. These representations make comments in respect of the following broad areas:

- The protection of employment sites West Horndon Industrial Estate (Site 020) and Horndon Industrial Estate (Site 021), to provide much needed jobs and employment opportunities; and
- The need to amend the Borough's Green Belt boundary in order to facilitate housing and economic development within the Borough between 2015 - 2030.

These representations seek to demonstrate that there are more suitable locations than West Horndon Industrial Estate in which to locate new development.

Reference is made within these representations to the questions upon which the Council are seeking responses, namely questions 1, 2, 3, 4, 6, and 7, as well as to background evidence published by the Council. This includes 'Brentwood Economic Futures 2015 – 2030', published by NLP, and to the interim Sustainability Appraisal prepared by URS.

Graphic International Display

Graphic International Display is a nationwide Point of Purchase (POP)/Point of Sale (POS) display company, designing and manufacturing POP materials and displays from its premises at 67/68 & unit 4 Horndon Industrial Park in West Horndon.

The firm currently employs over 50 members of staff at its site in West Horndon, which can exceed 100 employees when temporary staff is hired during peak/busy periods. The firm provides a comprehensive and complete instore display service, from initial design concepts through to the in house manufacturing of the displays, using a range of raw materials and manufacturing processes. Specialist manufacturing process include vacuum forming, acrylic fabrication, screen printing, laser cutting, laser engraving, CNC cutting, all aspects of carpentry, metalworking, spraying, final assembly, packing & distribution to stores.



The Company was formed in 1970 and moved into its West Horndon premises in 2009. Due to the ongoing success of the business, it purchased additional floorspace within the Industrial Estate in 2013 to expand its manufacturing operations. It features a wide and varied client list, including national and international blue chip brands such as Levi, Debenhams, The Body Shop and L'Oreal. As well as supplying to clients within the UK, it exports to over 20 foreign countries worldwide contributing to the UK balance of payments. It is proud to be ISO 9001-2000 quality assured, has full FSC accreditation and has been approved by SEDEX as being a highly "ethical" company through its working practices.

West Horndon Industrial Estate

West Horndon Industrial Estate, which measures upto 5ha, is located on Station Road which links to St Marys Lane and into Warley Lane providing access to the A127. The A127 runs west to east linking East Anglia and the county of Essex with Central London.

The Estate features a large number of industrial units, warehouses, workshops, distribution units, storage yards, secure compounds, and offices, which range in size from 50m² to 4,000m².

As of February 2015, there is only 1 vacant unit within the Industrial Estate, highlighting its success and vitality, which is due in part to the sites excellent links to the rest of the County (27 miles from Central London, 8 miles from Basildon and 5 miles from Brentwood), and the new London Gateway deep water sea port, which is only 25 minutes from the Estate.

STRATEGIC GROWTH OPTIONS CONSULTATION

These representations reflect the desire of Graphic International Display to remain in its present location at West Horndon Industrial Park, which remains a vibrant industrial park, and has an indicative job capacity of 165 jobs, as confirmed within the Economic Futures report. As such, the representations do not wish to make comment on issues which do not affect the business – namely, for example, questions relating to landscape and open space issues. These representations therefore focus on maintaining, protecting and improving upon the Borough's economy, as well as the Council's general approach to meeting its objectively assessed housing need.

It is noted that the Economic Futures report prepared by NLP highlights a requirement for between 18 – 23 hectares of employment land during the period to 2030, and that the supply identified by the Borough Council, **"may not be sufficient for meeting market and developer needs due to the limited choice of sites and uncertainty about when these may be delivered. These factors would merit further consideration by the Council."**

Q1: Do you agree with the broad areas, for the purpose of considering approaches to growth?

The Strategic Growth Options Consultation suggests the following three broad Growth Areas where new development could be accommodated between 2015-2030:

- a) North of the Borough;
- b) A12 Corridor; and
- c) A127 Corridor.

North of the Borough

The North of the Borough centres around the disparate collection of villages of Blackmore, Hook End, Stondon Massey, Wyatts Green, Doddinghurst, Keivedon Hatch and Navestock. These villages are located within the Green Belt and surrounded by areas of natural, attractive landscape.

This part of the Borough, despite featuring the M25 running parallel to the west, does not feature sufficient transport connections which would be required to facilitate any large scale strategic allocations within the Local Plan. As the Consultation Document acknowledges, the area only features local roads which connect onto A-roads, including the A414 to the north, or the A12 to the south. Without significant investment into highways infrastructure in this part of the Borough, which may include a new junction to the M25 to the west, it is considered that this area of the Borough is not sustainable to provide a significant level of growth in this area, as the Growth Options itself acknowledges.

It is noted that the Interim Sustainability Appraisal which forms part of the emerging evidence base for the Local Plan does not assess any potential strategic allocations within this Growth Area (discussed further below), which confirms its lack of suitability in providing sufficient new development over the plan period in order to contribute on a large strategic scale to the Council's housing or economic needs.

A12 Corridor

The A12 corridor centres on the main urban areas within the Borough, including Brentwood, Shenfield, and Mountnessing/Ingatstone. This part of the Borough features better transport connections, including the M25 to the west, the A12 running through from west to east and the main rail hub of Shenfield, as well as social and community infrastructure including schools, hospitals and retail centres. It is however acknowledged and understood that the A12 and M25 junctions suffer from congestion, particularly at peak periods, and consideration will therefore need to be given to significant infrastructure investment on the highways network to alleviate these issues.

Significant growth would therefore be sustainable within this corridor, particularly as the emerging Crossrail development, due to open at Shenfield in 2017, will significantly improve transport links into London.

The Sustainability Appraisal prepared by URS in January 2015 assesses the possible strategic site located to the South East of Brentwood, which the report acknowledges could deliver a large number of new dwellings. In assessing this site against four other strategic sites, the report found that it performs well in terms of economic and employment objective, as well as community and well being considerations, due to its accessibility to community infrastructure. Consideration should therefore be given during the next stage of the Local Plan to further explore the potential for a large scale strategic allocation at South East Brentwood.

A127 Corridor

The A127 corridor area only comprises the single settlement of West Horndon, a small village of 1,482 residents (2001 Census). The village features a railway station, providing links into London (Fenchurch Street) and to Southend-on-Sea, as well as a Primary School, industrial estate and a small number of local shops and services. Due to the areas links onto the A127 to the south, it is considered that development can be considered within the A127 corridor, particularly in light of the emerging Dunton Garden Suburb to the east of the area, though the Consultation Document acknowledges the need to invest and improve congestion on the A127.

The Sustainability Appraisal appraises two sites within the A127 Corridor – Dunton which could provide between 4,000 – 6,000 new dwellings, and West Horndon (including the industrial estate) which could provide 4,500 new dwellings to the east and west of the village.

As with the potential South East Brentwood strategic site, Dunton performs very well in terms of economic and employment objectives, as well as community and well-being considerations, and is highlighted as having potential for large scale growth.

In terms of West Horndon, the Sustainability Appraisal highlights a number of issues with providing such a large amount of new homes, including:

- Poor access to services and employment;
- Potential impacts to the Thorndon Park Site of Scientific Interest;
- Potential impacts to the Grade I listed Old Thorndon Hall, Thorndon Park Conservation Area and a Scheduled Ancient Monument; and
- Potential surface water flooding issues.

It is therefore considered that, whilst West Horndon can accommodate some growth during the plan period, the focus for new development within the A127 corridor should be given to the Dunton Garden Suburb.

Q2: Do you agree with the issues raised within each of these areas?

It is considered that any significant growth within the Borough will encounter significant issues relating to the need for significant investment to be made into the Borough's highways network, as well as the need for the Borough to allow for new development to be located within the Green Belt.

In preparing the next stage of the Local Plan, which should identify specific site allocations, the Borough Council will need to undertake a comprehensive Strategic Transport Assessment in order to properly understand the existing capacity of the major highway networks, including the A12, A127 and M25 junction. This will be required in order to ensure that new housing and employment opportunities are located within the most sustainable and appropriate areas, as well as to understand where improvements to the highways network are most required.

It may also be appropriate, at this stage, for the Council to investigate the potential for introducing the Community Infrastructure Levy, which would help to identify and provide funding for specific infrastructure schemes.

The Borough Council acknowledges at paragraph 1.4 of the Consultation Document that 3,000 dwellings will need to be provided within the Green Belt, a not insignificant number and over half of its requirement in the next 15 years. Further background evidence will need to be produced prior to the next stage of the Local Plan process to ensure that the most suitable Green Belt sites are properly identified and considered.

General infrastructure issues, such as school provision and access to local shops and services, will also need to be assessed during the next stage of the Local Plan process, though clearly the advantage of allocating 'strategic' sites, rather than a more dispersed approach to housing development, is that 'strategic' sites can provide a certain amount of new infrastructure as part of the development. Again, the

introduction of the Community Infrastructure Levy could help to direct funds towards specific infrastructure needs such as the provision of new schools, hospitals etc.

In addition, the Sustainability Appraisal highlights further potential issues in respect of such matters as impact upon SSIs, heritage assets, flooding and climate change. These will all need to be properly considered and assessed.

Q3: Do you have any comments on the appropriateness of particular sites?

The sites which have come forward for potential housing developments are shown on Figure 8 of the Consultation Document. This indicates a greater availability of land to the south east of Brentwood and Shenfield (the South East Brentwood Strategic Site identified within the Sustainability Appraisal), with small parcels of land, within the Green Belt, available around Brentwood and smaller villages to the north of the Borough. West Horndon Industrial Estate is highlighted on this plan as a 'Housing-led Mixed Use Site Option', specifically as sites 020 and 021.

The Economic Futures Report prepared by NLP assesses a number of different growth scenarios:

- Scenario A: a baseline scenario using only local economic forecasts;
- Scenario B: Modelling the economic implications of providing for a housing growth of 6,200 dwellings over the plan period (413 dwellings per year); and
- Scenario C: Modelling the economic implications of providing for a housing growth of 5,430 dwellings over the plan period (362 dwellings per year).

These scenarios indicate a need to increase the Boroughs job supply by between 1,930 jobs to 7,440 jobs by 2030.

In terms of employment floorspace, the report again assesses the potential floorspace requirements against the three scenarios above, and concludes that there is a need to provide an additional 18 – 23 hectares of employment floorspace by 2030.

Given the Council's requirement to provide an additional 18-23 hectares of employment floorspace between 2015-2030, amounting to a potential of 7,440 jobs, it is not considered appropriate that the successful and vibrant industrial estate – which has an indicative job capacity of 165 employees and with only 1 vacant unit – should be considered for a redevelopment. If any development should take place affecting the industrial estate, it should be to provide additional opportunities within the area to expand the industrial estate in order that it can contribute to providing much needed employment opportunities within the Borough. Any proposals to redevelop the industrial estate for housing will, therefore, be strongly resisted.

The Consultation Document also acknowledges at paragraph 4.4 that, **“when employment land is surrounded by houses it often causes nuisance such as heavy goods vehicles travelling through residential areas and noise complaints. This in turn often results in conditions being set which reduces the viability of employment uses.”** It is therefore questioned whether a mixed use housing led redevelopment of the West Horndon Industrial Estate would be appropriate and whether it would in fact impact upon the future viability of the industrial estate (which would clearly conflict with the need of the Borough to provide new employment opportunities and floorspace).

As previously discussed, it would, therefore, appear appropriate for development within the A127 Corridor to be centred on the Dunton Garden Suburb, which is proposing (albeit at a very early stage) upto 6,000 new dwellings, along with further employment and community facilities. Whilst Graphic International Display do not wish to comment directly upon this, they would, providing the required infrastructure is provided to support such a major scheme, support this approach in principle. It is therefore considered that sites 020 and 021 should not be considered for housing development.

Q4: Given the greater capacity for growth along the A127 corridor, which of the sites put forward do you think is the best location for growth?

As per the above, development should not be located within the West Horndon Industrial Estate due to its success and vibrancy. Development should be focused on areas elsewhere within the village, and in particular towards the proposed Dunton Garden Suburb to the east of the village.

Q6: In order to provide for local need is it preferable for greenfield sites on the edge of villages to be released, or to develop brownfield sites (both within Green Belt)?

Graphic International Display appreciates that the fundamental aim of the Green Belt is to prevent urban sprawl and to keep land, "permanently open". As per the provisions of paragraph 83 of the National Planning Policy Framework, any changes to the Green Belt boundary should only be altered in exceptional circumstances i.e. through the preparation or review of the Local Plan. Paragraph 84 of the NPPF goes on to state that when reviewing Green Belt boundaries, the Borough Council should take account of the need to promote sustainable patterns of development.

The Strategic Growth Options Consultation report confirms at paragraph 1.4 that, "**the capacity of brownfield sites in urban areas over 15 years is 2,500, some 3,000 short of total need.**" This is highlighted at Figure 8: Sites which have come forward for planning, which indicates very few available brownfield housing sites. The vast majority are located within the Green Belt (and principally, to the south east of Brentwood and to the south of the A127). It is clear, therefore, that, in order to meet its objectively assessed need (in the region of 360 to 549 dwellings per annum), a significant proportion of the Council's housing and economic requirements will need to be delivered on Greenfield (i.e. Green Belt, in this case) land.

In respect of the brownfield sites highlighted at Figure 8, the Council would also need to consider when these brownfield sites would become available. Paragraph 47 of the NPPF requires Local Authorities to, "**identify and update annually a supply of specific deliverable (available now) sites sufficient to provide five years worth of housing.**" It also requires local authorities to, "**identify a supply of specific, developable (in a suitable location for housing development and having a reasonable prospect that the site is available and could be viably developed at the point envisaged) sites or broad locations for growth, for years 6-10 and, where possible, for years 11-15.**"

In the case of West Horndon Industrial Estate, and as previously stated, with only 1 vacant unit on site, the majority of which are on long-term leases. As the site is currently close to capacity, it is therefore difficult to see how the Industrial Estate will be able to contribute to meeting the future needs of the Borough, and instead consideration should be directed towards new sites which are available.

The Sustainability Appraisal prepared by URS assesses the significant effects of development within Greenfield Sites or Brownfield Sites in relation to the five suggested locations for Strategic Development.

The report concludes across all topics, both options perform similarly across all topics (air quality, biodiversity etc.).

It is considered therefore that, whilst the general provisions of the NPPF would support the use of brownfield sites above Green Belt release, in this instance it is clear (and acknowledged by the Borough Council) that there is not sufficient brownfield sites to meet the requirements of the Borough Council and that Green Belt sites must be released.

Q7: To enable future employment need to be met do you agree that the most sustainable approach is to allocate new sites close to the strategic highway network?

Paragraph 34 of the NPPF states that, **“plans and decisions should ensure developments that generate significant movement are located where the need to travel will be minimised and the use of sustainable transport modes can be maximised.”**

Paragraph 35 of the NPPF goes on to provide that, **“plans should protect and exploit opportunities for the use of sustainable transport modes for the movement of goods or people. Therefore, developments should be located and designed where practical to...accommodate the efficient delivery of goods and supplies.”**

The NPPF clearly therefore supports the approach to deliver new employment led uses close to the strategic highway network, though it is acknowledged and confirmed through the Consultation Document that the Borough's infrastructure will need to be improved in order to adequately accommodate any significant increase on the highway network over the next 15 years.

In respect of 'Figure 12: Sites which have come forward for employment across the Borough', Graphic International Display would support the release of additional land in West Horndon in order to provide additional employment floorspace to support the Council's economic requirements, due to the area's close links to the A127 and rail station.

SUMMARY

Graphic International Display are supportive of the Boroughs needs to provide new housing and employment opportunities over the next 15 years, much of which could take place within West Horndon and the Dunton Garden Suburb.

However, it does not consider that a housing led mixed use redevelopment of the West Horndon Industrial Estate is appropriate, as it would add 5ha, as well as a minimum of 165 jobs, onto the Borough Council's current requirements to deliver between 18-23ha of employment land, and upto 7,440 new jobs. The Industrial Estate should therefore remain allocated as an Employment Allocation and any development within the vicinity of the site should be of compatible uses in order to support the vitality of this important existing employment location.

Boyer, on behalf of Graphic International Display, reserves the right to amend, add to and produce additional evidence in relation to these initial representations as the Local Plan emerges. Should you wish to discuss any aspect of these representations, please do give me a call.



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