



Brentwood Enterprise Park

Brentwood Strategic Growth Options Consultation

**Representations on behalf of S & J Padfield and Partners and St
Modwen Properties Plc**

Prepared by Strutt & Parker

February 2015



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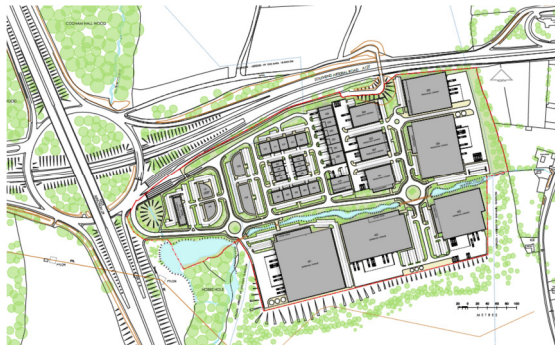
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Glenny LLP and Strutt & Parker (February 2015)

Appendix C Transport Appraisal Addendum prepared by Ardent Consulting
Engineers (February 2015)

1.0 Introduction and Background



- 1.1 The Brentwood Enterprise Park is a 23.5 hectare employment site to be located at the former highways works compound at M25 Junction 29.
- 1.2 The site provides an exciting and unique opportunity to meet a significant proportion of Brentwood Borough's employment needs to 2030 and beyond.
- 1.3 Comprehensive representations were submitted in support of the Brentwood Enterprise Park proposal as part of the Council's 2013 Preferred Options consultation.
- 1.4 These submissions included:
 - Concept Vision Statement
 - Commercial Market Report
 - Transport Appraisal
 - Flood Risk, Drainage and Utilities Statement
 - Green Belt Assessment
 - Landscape and Visual Impact Assessment
 - Ecological Scoping Survey
 - Arboricultural Report
- 1.5 In order to reinforce the commercial deliverability of the Brentwood Enterprise Park, S & J Padfield and Partners are now working in partnership with St Modwen Properties Plc a FTSE top 250 property development and investment company.
- 1.6 The technical evidence set out in these consultation documents remains relevant in demonstrating the continued deliverability of the proposals. This representation to the current consultation is submitted on behalf of S & J Padfield and Partners and St Modwen Properties Plc. In support of this representation to the Brentwood Strategic Growth Options consultation an update has been carried out to the Commercial Market Report and the Transport Appraisal. These updates take account of the latest evidence on needs in the Strategic Growth Options consultation and supporting evidence base reports including the Nathaniel Lichfield & Partners Brentwood Economic Futures Report 2015-2030.

2.0 Introduction to St Modwen

- **The UK's leading regeneration specialist:** wholly focussed upon regeneration.
- **An established business:** a FTSE 250 company with a 25 year track record.
- **Experienced management team:** extensive operational experience in regeneration and brownfield renewal.
- **A stable and growing business with a solid balance sheet:** a property portfolio of £1.3b with a see-through loan to value ratio of 30%.
- **Running costs underpinned by recurring revenue streams from a £539m portfolio of income producing assets:** net rental income typically covers the running costs of the core activities of the business.
- **Non-sector specialists :**
 - **Commercial development:** Consistent long term, high value commercial redevelopment activity. An active pipeline of commercial development opportunities of over 3m sq. ft.
 - **Diverse UK – wide portfolio and long-term development land bank of 5,900 acres:** Not over-exposed to any single scheme, tenant or sector.
 - **Residential development:** residential income stream experiencing strong growth via three routes to market – residential land sales, Persimmon Joint Venture and St. Modwen Homes.
 - **Active management to increase portfolio value and to reduce development risk:** through planning gains, pre-let, pre-sold and speculative opportunities and increasing the number of design and build projects.
 - **A portfolio of 150 regeneration projects comprising:** (built, in progress and proposed) over:-
 - 5 million sq. ft. of office space
 - 25 million sq. ft. of industrial and warehouse accommodation
 - 5 million sq. ft. of retail accommodation
 - 900,000 sq. ft. of leisure space
 - 30,000 residential plots



Meridian Metal, Henley Park



Adidas at night, Trafford Park



Woodinqdean Business Park

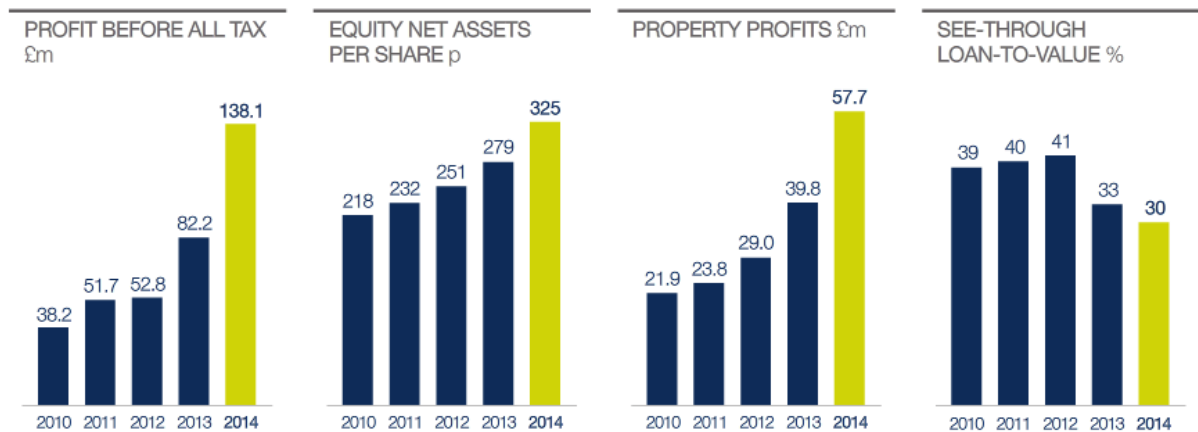


Park Point overlooking Austin Park, Longbridge

Financially Strong

- 2014 was a record year for St. Modwen with excellent increased returns across all performance metrics.

Financial highlights



- 68% increase in profit before all tax to £138.1m (2013: £82.2m)
- Shareholders' NAV per share up 17% to 324.9p (2013: 278.8p), and EPRA NAV per share up 16% to 344.1p (2013: 297.7p)
- Earnings per share up 57% to 52.7p (2013: 33.5p)
- Property profits up 45% to £57.7m (2013: £39.8m)
- Debt portfolio fully refinanced with earliest maturity now 2018 and successful launch of £100m convertible bond
- Total dividend for the year increased by 15% to 4.6p per share (2013: 4.0p per share)

Major projects



Bay Campus, Swansea

New Covent Garden Market



New Longbridge Town Centre



Siemens, Lincoln



Pets at Home, Trentham Lakes



Longbridge Technology Park



Hemms Heath Colliery 1996



10 years later – Trentham Lakes

3.0 Managing Growth

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

- 3.1 The broad areas identified in the plan are considered to be generally appropriate. The focus of the areas around transport corridors reflects the need to focus growth around these links. Whilst there may be smaller scale opportunities in other areas of the Borough it is recognised that strategic scale development is best located close to established road links and railway stations and in the A127 corridor in particular.
- 3.2 It is considered particularly important to continue to consider linkages between the identified corridors. The Brentwood Enterprise Park for example includes potential to deliver Green Transport Linkages between new employment provision, key settlements, and railway stations. This is likely to include links into the Brentwood area to ensure the site is developed in a fully sustainable manner whilst recognising that enterprise parks generating traffic movements from large goods vehicles will be best located at the strategic road network.

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

- 3.3 The identification of the A127 corridor as an area of the Borough with a potentially greater capacity for growth is supported. This reflects the landscape analysis carried out by the Council and that carried out by Liz Lake Associates in support of the Brentwood Enterprise Park proposal. We consider that the 23.5 ha Brentwood Enterprise Park site at the M25 / A127 junction (J29) should be specifically identified within the consultation document as a key opportunity site within this area. This reflects the history of the site and use as a works compound and the opportunity that this now presents to meet employment needs in a strategic location creating a gateway to the Borough.
- 3.4 We consider the plan should note that the Brentwood Enterprise Park site, located at the A127 and M25 interchange and previously used for M25 widening and highway works represents a particular sustainable and available site in this area that can be brought forward with minimal landscape impacts. This is supported by the Landscape and Visual Impact Assessment work undertaken by Liz Lake Associates.
- 3.5 The reference to congestion problems along the A127 is supported as this will be a key challenge in the emerging plan. The Brentwood Enterprise Park located at the A127 and M25 junction would help avoid the need for strategic traffic to travel along the A127 and would provide for direct access to other areas of the country via the M25. The work of Ardent Consulting Engineers identifies that there is sufficient highway capacity and that the Brentwood Enterprise Park site is achievable and deliverable. An update to the transport evidence work has been undertaken and is submitted as an appendix to this representation.

4.0 Sustainable Communities

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

- 4.1 In addition to considering the appropriateness of particular sites the current consultation should also consider the extent of housing and employment need that is required to be met by the latest plan. This issue is not directly covered by the proposed consultation questions.
- 4.2 Whilst the consultation document refers to the recent study of objectively assessed need carried out by the Council this is not itself identified in the Council's housing and demographic evidence base. We would suggest that it is particularly important that the evidence informing the emerging Local Plan is available alongside consultation in order to allow for complete and comprehensive representations to be submitted. The Council's online evidence base on housing and demographics currently consists primarily of the SHMA (July 2014), Great Essex Demographic Forecasts (Phase 6 September 2014) and the Heart of Essex Housing Growth Scenarios (June 2012).
- 4.3 The current plan does not set out a clear target at this stage however it is noted that objectively assessed needs is stated to be 360 dpa with an additional allowance for shortfall in other areas.
- 4.4 It is also noted that this appears to be based upon the 2011 household model and SNPP-2010 projection of 360 dpa. The Demographic Forecasts, however, also highlight that the dwelling growth necessary under the job led scenario equates to 420 dwellings per annum. This highest scenario is stated to account for job growth of 275 jobs per annum which remains below the level set out in Table 6 of the SHMA of 316 jobs per annum workplace employed and 321 jobs per annum total employed.
- 4.5 The 360 dpa referred to in the plan goes some way to meeting housing needs, but should be regarded as a minimum figure to be achieved, and there is evidence as set out above to support the need for higher levels of housing growth.
- 4.6 It is considered essential that the plan seeks to meet full objectively assessed needs both in terms of homes and jobs if it is to provide a sustainable basis for the future development of the district in social, economic and environmental terms. This is necessary in order to avoid the social and economic consequences of failing to meet the needs of local communities.
- 4.7 Given this section is focused on housing sites we do not have any particular comments. Our representations with regards to employment provision and the Brentwood Enterprise Park are set out in the following section.
- 4.8 The Brentwood Enterprise Park can however continue to provide a range of jobs to support the local and regional economy, and assist in the reallocation of existing

employment sites that either are not particularly suited to meeting modern business needs or are considered better suited for residential uses in the new Local Plan. The Commercial Market Analysis report submitted in support of this representation sets out details of the type of jobs that can be provided on the Brentwood Enterprise Park on a flexible basis in order to support this approach.

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?

- 4.9 The redevelopment of existing employment sites at West Horndon is supported (020 & 021) and provides an opportunity for housing growth in close proximity to the existing railway station and nearby local facilities. As set out above and in the supporting Commercial Market Analysis report, the proposed new employment provision at Brentwood Enterprise Park can provide not only for a new regional employment facility to attract jobs to the Borough but also contribution towards providing alternative provision for jobs or businesses displaced. This approach will help to reduce Green Belt impacts and ensure best use is being made of previously developed land in line with National Planning Policy.
- 4.10 The Brentwood Enterprise Park proposals have been developed with regard to potential housing growth at West Horndon and along the A127 corridor and include proposals for sustainable transport linkages in the form of a green travel route between key sites. Further details on this are provided in the Transport Appraisal Addendum submitted in support of this representation.
- 4.11 We consider that the plan should seek to continue to make best use of available sites that do not harm the wider landscape or Green Belt such as the existing Brentwood Enterprise Park site at Codham Hall. Employment development is well located in proximity to M25 to best meet employment and occupier demands as well as help overcome highway capacity issues and avoid issues with distribution traffic and HGVs travelling through residential areas.

Q5: Should the A12 corridor accommodate growth by releasing sites on the edge of urban areas?

- 4.12 In order to meet objectively assessed housing needs it is clear that release of sites within the Green Belt will be required.
- 4.13 Given the acknowledged highway capacity and congestion issues at the A12 / M25 Brook Street junction, the Council's preference for strategic scale housing and employment growth to be primarily located in the A127 corridor is supported.
- 4.14 We have no specific comments with regards to sites in the A12 corridor.

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)?

- 4.15 The re-use of brownfield sites is strongly supported and is particularly reinforced by paragraph 111 of the NPPF which states that “Planning policies and decisions should encourage the effective use of land by re-using land that has been previously developed (brownfield land), provided that it is not of high environmental value.” The Brentwood Enterprise Park is a particular example of a site that although currently within the Green Belt has been subject to significant previous development and can be developed for employment use without significant or wider adverse impact on the landscape or Green Belt.

5.0 Economic Prosperity

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?

- 5.1 The allocation of new sites close to the strategic highway network is strongly supported.
- 5.2 As set out in paragraph 21 of the NPPF, it is important that the emerging plan “proactively encourages sustainable economic growth”. The allocation of the site at Brentwood Enterprise Park would, as set out in the supporting Commercial Market Analysis, fully accord with current market local and regional employment demand and would be fully consistent with paragraph 21 of the NPPF which states that plans should “set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period”.
- 5.3 The Economic Futures Report prepared by NLP (December 2014) provides updated evidence on employment needs and sets out the level of jobs alongside higher housing growth levels.
- 5.4 Scenario C in the report sets out a Housing Growth that meets objectively assessed needs and accounts for past unmet need. This target is based on 6,200 dwellings (i.e. 413 per annum for 15 years) and results in a need for 7,440 jobs over the 15 year plan period (496 jobs per annum). It is stated that this will result in a need for 22.75 ha of allocated employment land for ‘B’ use classes. In addition to this, should 18.9 ha of existing employment land be reallocated for housing, the need for employment land would increase to 41.65 hectares. It is clear therefore that there is a very significant need for continued job growth over the plan period.
- 5.5 Available supply consists of 2.87ha from existing allocations and 2.69ha from extant permissions. This clearly re-emphasises the need for significant allocations at Brentwood Enterprise Park to successfully meet this need. The NLP report refers to the total proposed allocations as set out in the preferred options document of 31.01 ha. The Brentwood Enterprise Park totalling 23.5 ha can make a significant contribution to meeting this need.
- 5.6 As set out in the Economic Futures report, and given that the Brentwood Enterprise Park accounts for a considerable proportion of this need, it is important that the site provides for flexibility to meet market demands to ensure it is delivered. Further detail on this is set out in the attached Commercial Market Analysis report with details of the types of jobs that will be created. The site remains fully deliverable as evidenced by the technical work previously submitted and the updated highway work submitted alongside this representation.

- 5.7 There is potential for the development of the site to be phased and delivered in such a way so as to meet short, medium and longer term employment needs.
- 5.8 In the context of meeting a range of employment needs including B1 office, research and development and light industrial; B2 industrial, and B8 distribution it is particularly important that employment provision is located close to the strategic highway network. This will not only take into account existing infrastructure constraints within Brentwood Borough but will additionally ensure that the employment land provided meets occupier demands and drives inward investment. This is supported by paragraph 21 of the NPPF and the commercial market evidence work undertaken alongside this representation.
- 5.9 Brentwood Enterprise Park will support and be fully consistent with the Council's objectives as expressed in paragraph 4.6 of the consultation document and will minimise impacts on existing residents and roads. A strategic employment site in this location will provide for sufficient quantum of development to allow for sustainable Green Travel links to be provided to Brentwood and other key locations.
- 5.10 The plan should additionally recognise that diversity in employment offer can be provided within individual larger scale sites such as Brentwood Enterprise Park. The emerging proposals for the site have been designed so as to allow for flexibility in delivery and there are no technical constraints.
- 5.11 There is no evidence to suggest that strategic scale mixed-use employment allocations such as that suggested at Dunton Garden Suburb would meet occupier demands and would such allocations would not be directly located to the strategic road network.
- 5.12 The proposed allocation at the Brentwood Enterprise Park would enhance the status of Brentwood within the employment market and support job growth.
- 5.13 In addition to being located alongside the strategic transport network the Brentwood Enterprise Park is proposed to be delivered with a Green Travel Route providing sustainable linkages to key settlements and destinations. More detail on this is provided in the attached highway report.

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?

- 5.14 A focus of retail development in town centre is generally supported. The plan should however also allow for flexibility on allocated strategic employment or mixed use sites for an element of retail or commercial provision to enhance sustainability and viability. We consider there is likely to be demand for uses such as a hotel, bank and food and drink to serve business needs. This will assist in creating a sustainable and vibrant enterprise park.

6.0 Environmental Protection & Enhancement

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

6.1 Open space provision as part of the plan is supported. The provision of appropriate landscaping at development sites is also supported and the Brentwood Enterprise Park has been developed with appropriate landscape buffers and screening as set out in the Liz Lake Associates reports as previously submitted.

Q10: Please rate the level to which you value the landscape near where you live. (See Page 29)

6.2 Evidence on landscape assessment will be important in the emerging plan including in particular that undertaken by Chartered Landscape consultants. The Council's proposed allocations should be informed by such professional assessments based on a robust methodology. The Brentwood Enterprise Park proposal is supported by technical assessment work undertaken by Liz Lake Associates in the form of a Landscape and Visual Impact Assessment and Green Belt assessment.

Q11: To what extent do you think the following is present in the landscape near where you live: Houses; Commercial buildings; Nature Reserves; Farmland; Woodland; Wasteland; Infrastructure; Leisure Facilities; other? (See Page 29)

6.3 No comments.

7.0 Quality of Life & Community Infrastructure

Q12: Have we considered the main infrastructure issues? Are there other important issues to consider?

- 7.1 Transport is a particularly key issue with regards to infrastructure and the delivery of growth within the Borough in general. The Brentwood Enterprise Park proposal is supported by transport evidence prepared by Ardent Consulting Engineers demonstrating the site is fully deliverable and an addendum to the previous transport work is provided alongside this submission. Discussions have been held with the Highways Agency and Highways Authority and agreement reached. Alongside providing direct access to the strategic road network, the proposals will also provide for a green travel route to provide sustainable site access and link with surrounding areas and interchange stations.
- 7.2 Capacity at other junctions and along the A127 itself in particular are rightly identified as issues needing further work if the initial proposals for growth at Dunton are to be deliverable. A particular benefit of the Brentwood Enterprise Park proposal is that strategic road traffic will not need to travel along the A127 or through residential areas of the Borough, thereby minimising the impacts of the use on local residents.

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

- 7.3 The Brentwood Enterprise Park proposal is not reliant on external funding. Nonetheless it is considered that a key priority for infrastructure spending in general should be seeking to enable economic growth and joint working with the Local Enterprise Partnership (LEP). This will help to drive inward investment in the Borough and deliver further benefits as a result of private sector investment.

8.0 Conclusions

- 8.1 As set out above and in the enclosed supporting reports the Brentwood Enterprise Park remains fully deliverable and capable of meeting the full spectrum of employment needs over the plan period.
- 8.2 The site is superbly located to meet the needs of all business and St Modwen, a leading developer across all the commercial sectors, is fully committed to delivering the Enterprise Park and meeting employment needs over the short, medium and longer term in line with the Borough's Vision.
- 8.3 There is strong demand in the market from a wide variety of occupiers and currently B8 demand in particular is very strong. The emerging master plan proposals will also allow for relocation of occupiers from estates that might be subject to a change of use and ensure that small, medium and larger scale businesses can locate to Brentwood's new Enterprise Park.



Appendix A

Outline Master Plan Proposals



Appendix B

Commercial Market Analysis prepared by St Modwen Properties Plc, Glenny LLP and Strutt & Parker (February 2015)



Appendix C

Transport Appraisal Addendum prepared by Ardent Consulting Engineers (February 2015)