

Brentwood Borough Local Plan **Strategic Growth Options Consultation**

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

Our Ref: C13074

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Summary

The following response to the current Local Plan Strategic Growth Options consultation follows our representations in October 2013 to the then Preferred Options consultation, made on behalf of our clients One Property Group, who have an interest in land at Brook Street/Nags Head Lane as identified on the plan attached as appendix 1.

In the previous consultation we submitted that:

- **Draft Policy S3 Job Growth and Employment Land:** 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.
- **Draft Policy DM6: Areas Allocated for General Employment and Office Development:** 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.

We responded that 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).

The following response will be set out within this context, and following the headings within the consultation document.

1 Introduction

What's Changed Since 2013?

The current Reg 18 consultation identifies that following the conclusion of the consultation in late 2013 it became apparent that several issues needed to be reconsidered, notably the need to review economic evidence in light of the related housing supply position, where the Council have acknowledged that housing needs should relate to objectively assessed needs rather than a reduced provision; the need for additional evidence on the economic impacts arising from the arrival of Crossrail and other related impacts; and a review of sustainability policies.

It goes onto suggest that it is essential that the Local Plan is informed by robust and up to date evidence. This accords with the advice of National Policy and Guidance as set out in the NPPF and Planning Practice Guidance that requires a Local Plan to be informed by robust and up to date evidence. It notes that in addition to the existing evidence base, since 2013 several technical studies have been produced or are forthcoming (as at December 2014), including of relevance the Brentwood Economic Futures 2015-2030 (December 2014). However, of concern is that the consultation document identifies that both the Crossrail Economic Impacts and Highways Modelling reports are suggested to be forthcoming, which discords with the NPPF.

Life of the Plan

Paragraph 1.15 states that the Local Plan period proposed in the 2013 Preferred Options was from 2015-2030, in line with the NPPF recommendation that Plans should ideally have a life of 15 years. It goes onto state that as part of the plan-making process the Council will need to consider whether a 15 year Plan period is appropriate, and acknowledges that in order to take account of previous years' shortfalls, particularly since 2013 and the abolition of the East of England Plan, it may be more helpful to begin the Plan period from 2013, recognising that the longer the Plan period, the more need that will be required to be met.

In our view, the Plan needs to take account of shortfalls since the publication of the NPPF, and to have a life of 15 years at least from adoption. The current Plan is proposed to run until 2030, and yet is not projected to be adopted in 2017, giving only a life of 13 years. Given that the Council is required both to review Green Belt boundaries and to define boundaries that endure, a longer period should be proposed to provide some certainty particularly given that some larger sites may deliver beyond 2030. We would suggest 2035 as an end date.

Strategic Objectives

We note that the Council has carried forward the strategic objectives of the Preferred Options consultation, notably to foster a prosperous, vibrant and diverse local economy by attracting new commercial investment in order to maintain high and stable levels of economic and employment

growth; and to optimise the social and economic benefits that arise from Crossrail for the benefit of residents and visitors to the Borough.

These objectives are supported, and will set the context for later sections of our representations.

2 Managing Growth

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

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

We noted that the 2013 Preferred Options consultation document proposed a spatial strategy that derived from an option to focus growth in Brentwood, Shenfield and West Horndon along with suitable developed sites in the Green Belt and brownfield development in other villages, but which was a variation on spatial option 2 (Transport corridor-led growth) as it proposed proportionately more growth at West Horndon because of the comparative capacity for growth in that location, and less growth in Ingatestone because of capacity and land constraints. However, we also noted that growth in and around Brentwood was limited based on a claimed lack of capacity in the Brentwood urban area and north of the Borough in terms of infrastructure such as roads (due to congestion), primary schools, GP facilities and a higher landscape value.

We note that the new consultation recognises that the level of growth required is now higher, specifically the need to meet full housing need, and that therefore, the previous strategy may not now be the most sustainable option.

However, in order to properly assess needs, constraints, and capacities and to properly establish a strategy based on these requires an up to date evidence base, as set out above.

Notwithstanding this, our comments on the 3 defined growth areas are as follows:

(A) North of the Borough

The consultation identifies that this area is made up of a collection of villages set amidst attractive natural landscape; identifies that brownfield land is not readily available; and that transport connections and local facilities are not as good in this part of the Borough and so it would not be sustainable to locate significant growth in the area.

This is supported.

(B) A12 Corridor

The consultation notes that the A12 Corridor contains a wide range of land uses; contains the Brentwood urban area, made up of Brentwood and Shenfield but also including Brook Street, Hutton, Pilgrims Hatch and Warley; and that there are development opportunities surrounding the urban areas, within the Green Belt. Apart from a comment on access to Brentwood from the A12 being only from Brook Street (M25 junction 28) and Mountnessing, there is no assessment of the accessibility and service range of Brentwood and related urban areas, and it is important to note

that Brentwood is where most jobs and services are located within the Borough, and therefore where growth should be concentrated in accordance with the mutually dependent sustainability objectives of the NPPF.

(C) A127 Corridor

The consultation notes that the A127 Corridor contains the single settlement of West Horndon; has a different landscape character to the rest of the Borough; and that although the A127 suffers from congestion problems it has more scope for improvements than the A12.

In our view, development along the A127 is more distant from the large mixed use area of the Brentwood urban area and development here is less sustainable than within or adjacent to the main urban area.

4 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?

Economic Issues

Under this heading we note that Brentwood Borough has an unmet need for new employment land, which is partly due to new homes, which create the need for new jobs. The Council is required to establish what this need is according to types of employment and to consider issues such as the level of commuting into London.

It goes onto state that evidence suggests the amount of new employment land required is up to 23 hectares (depending on the level of housing growth).

The NLP report Brentwood Economic Futures 2015-2030 (December 2014) notes that three different scenarios of future economic growth have been considered for the period 2015/16 to 2029/2030, based on a labour demand approach which reflects economic growth forecasts and potential housing growth scenarios. These scenarios include: a baseline scenario; a scenario based on the Council's objectively assessed housing need; and, a scenario which considers this objectively assessed housing need including an uplift to account for shortfalls over the period 2012-2015 before the Local Plan is adopted.

In our view the latter approach complies more closely with the advice of the NPPF.

NLP state that the overall job growth associated with these scenarios range from 5,750 jobs to 7,440 jobs over the period 2015/16 to 2029/30, notwithstanding the fact that these scenarios indicates a lower level of future job growth in Brentwood than has been achieved in the recent past, notable as NLP state that Brentwood has recorded strong levels of job growth over the last 17 years (30%) with the number of B Class jobs increased by 40% over this period. Additionally they note that the significant majority of job growth under each scenario is expected to be for office-based jobs, with some additional distribution jobs and with an anticipated decline in manufacturing jobs.

This implies a need for between 18.45 hectares and 22.75 hectares of employment land. Land for warehousing and distribution comprises the greatest requirement, followed by offices, with only limited additional land for manufacturing/ light industrial uses required. This implies a need for between -2.3ha and 40.1ha of employment land in overall terms.

The Local Plan Preferred Options proposed to re-allocate 18.9 hectares of existing employment land for other land uses including housing. This figure is included with the current consultation as the table on page 21, although importantly it states that the list is not exhaustive as all sites are being considered. NLP make clear that should this emerge as the preferred option, incorporating the replacement of these losses in their entirety on a like-for-like basis would increase future employment land requirements to between 37.35 and 41.65 hectares.

In our view the latter figure should be adopted as a minimum figure: higher if more existing employment sites are re-allocated to other uses.

Employment Site Options

Para 4.4 states that the Local Plan will need to consider the most appropriate locations for employment land, although then concentrates on employment uses that have potential neighbour nuisance problems, despite the NLP report making clear that the significant majority of job growth under each scenario is expected to be for office-based jobs.

Para 4.5 suggests that this is particularly relevant when it comes to the types of employment needed, such as more distribution warehousing with associated offices, and that for these types of uses alternative locations are needed close to the strategic highway network and near to key junctions.

It goes onto state that the 2013 Local Plan Preferred Options proposed land at M25 Junction 29 be used to provide a new business park. This would help meet the majority of unmet employment need.

In our view, 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.

Para 4.6 of the consultation states that other potential employment sites tend to be much smaller and scattered, although still within both the A127 Corridor or near to the A12. It suggests that on the basis that locations close to the strategic highway network and junctions are most appropriate because they meet modern business needs, that alternative locations outside of transport corridors have not come forward. It states that figure 12 within the consultation shows that the majority of new employment land could be provided in the A127 Corridor, which would create additional demands on infrastructure and services, although states that this could be mitigated by funding for improvements.

We challenged this at the previous consultation on the basis that 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”.

We also commented on the land at Codham Hall Lane which we noted 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 the Codham Hall Lane and M25 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 at the last consultation was land at West Horndon which was 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 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.

Conclusions & Changes to the Plan

In light of the above, it is considered that the Plan is contrary to the NPPF and in particular paragraph 14 which provides clear guidance on plan-making, and the clear core planning principle set out in para 47 which requires authorities to:

“Proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs. 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.”

The NPPF makes clear that the Government is committed to securing economic growth in order to create jobs and prosperity, building on the country’s inherent strengths, and to meeting the twin challenges of global competition and of a low carbon future, and that the Government is committed to ensuring that the planning system does everything it can to support sustainable economic growth. It goes on to state that planning should operate to encourage and not act as an impediment to sustainable growth. Importantly, it makes clear that authorities should facilitate flexible working practices such as the integration of residential and commercial uses.

Our clients, One Property Group, have an interest in land on the edge of the Brentwood urban area in close proximity to the M25. This is identified within the document as “Housing-led Mixed-Use Site Options ref 175B”, which the document notes in conjunction with housing site 032 and employment sites 127 and 175A could enhance the location as a key gateway to the Borough.

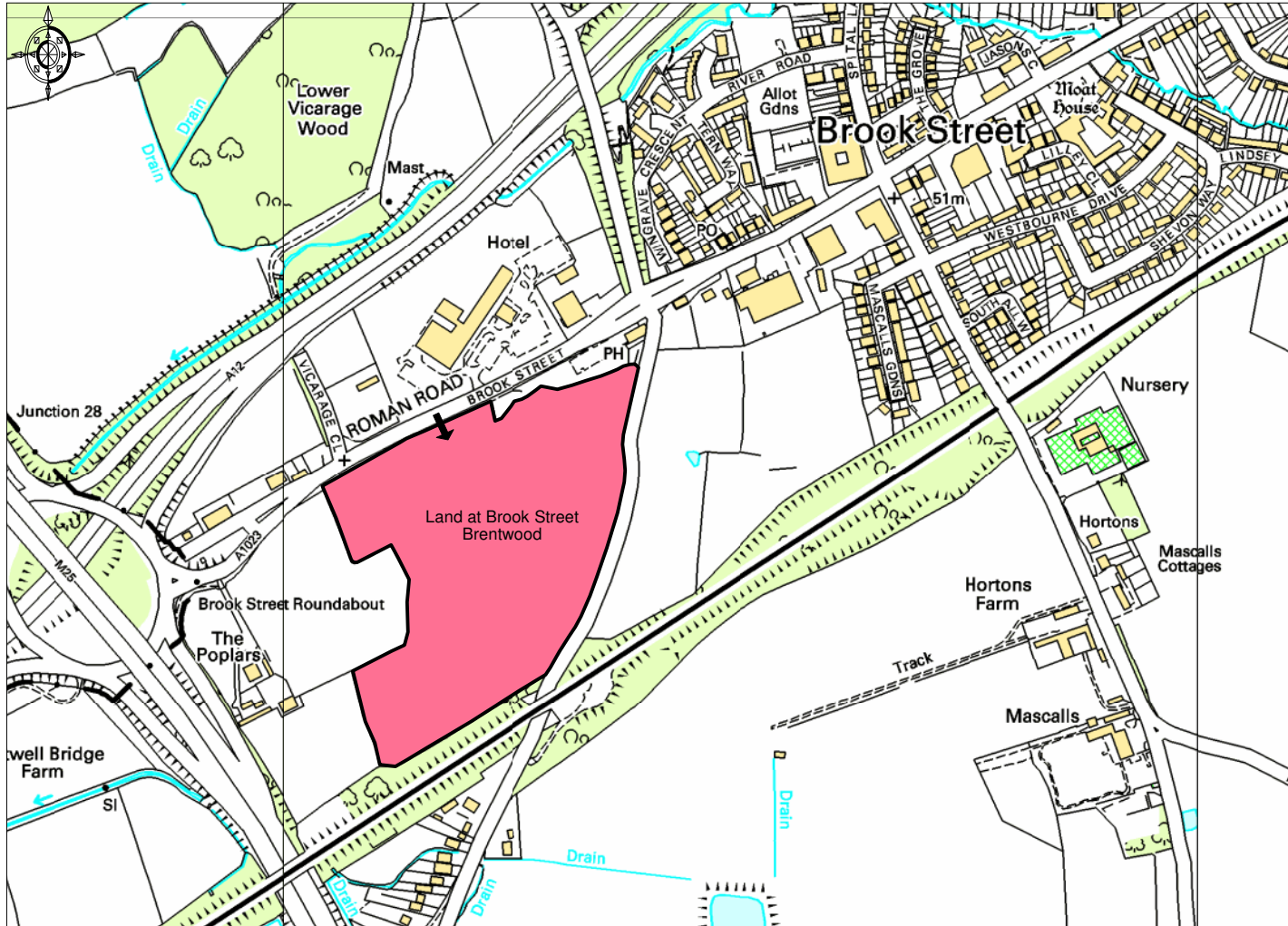
Our clients’ land is close to the centre of the town, with bus route 498 providing direct access to the town centre. At its closest point the site is within 100m of the Brook Street Roundabout M25 junction with the A12. The site lies on the southern side of Brook Street, which is the principal route 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. The site is accessible and its location is suited to housing and 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: The next consultation of the emerging Local Plan should include land to the south of Brook Street as a new mixed use allocation.

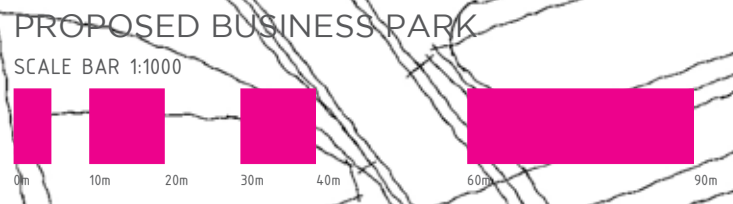
Appendix 1

Plans of Brook Street/Nags Head Lane site

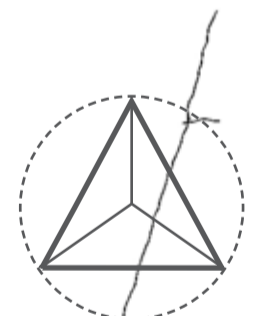


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