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Planning Policy Team (fao Phil Drane)  
Brentwood Borough Council  
Town Hall  
Ingrave Road  
Brentwood  
Essex  
CM15 8AY

17 February 2015

Dear Mr. Drane,

**Brentwood's Strategic Growth Options Consultation (Jan 2015).**

We write further to the above consultation on behalf of our client, Hermes Property Unit Trust ("Hermes"), the owners of the Horndon Industrial Park, Station Road, West Horndon (your site ref 021).

As you know from our previous correspondence and meetings with both Brentwood Council and West Horndon Parish Council, we have been jointly working towards a master-planned redevelopment of Horndon Industrial Park, combined with the West Horndon Industrial Estate (your site ref 020) on Childerditch Lane, West Horndon.

You will have a copy of a draft illustrative master plan already on file; used for consultations purposes with West Horndon Parish Council, at the preferred options stage open day back in 2013, and, more recently, as part of discussions in respect of the emerging West Horndon Neighbourhood Plan.

Our letter to you in September 2013, in response to the preferred options draft local plan, pointed out that our joint approach with Threadneedle did not preclude the redevelopment of the open Green Belt land to the north coming forward as part of a larger masterplan. However, we were concerned with the "all or nothing" approach the Council seemed to be taking at the time, particularly given the considerable local opposition to the loss of Green Belt and the development of the open land. This was in contrast to the reception to proposals for the future of the industrial estate, which have been broadly welcomed by local residents and the Parish Council.

It should be noted that West Horndon Parish Council's position in relation to the redevelopment of the industrial estate's for residential led mixed use development continues to be supportive (we can say this with some confidence given the representations that appear on their website in respect of this current round of consultation).

It is worth restating that the industrial estates are old and increasingly ill-suited to the requirements of today's commercial tenants. As a consequence of the age and condition of the stock, the costs of on-going maintenance just to keep the estates going are increasing; undermining viability. You will also be aware that the comings and goings from Horndon Industrial Park (021), in particular, along with its unsightly nature, has made it a source of complaint from local residents for many years.

Hermes/ Threadneedle's landholdings are previously developed land within the boundary/ built up area of West Horndon, unconstrained by Green Belt or flooding issues. They are serviced sites in a highly sustainable location, coming into the heart of the village, close to a railway station and bus services, as well as being an established part of the village with easy access to West Horndon's services and facilities. The combined landholdings are large, particularly so relative to West Horndon. Their redevelopment would make a significant contribution to the requirement for housing land within Brentwood as a whole. Properly master-planned, their redevelopment would also enhance West Horndon in terms of improvements in housing choice and any other commercial, retail and community uses the village needs to ensure it is developed into a more sustainable community.

We note that both the industrial estates appear as part of Brentwood Council's 5 year housing land supply (source: *DRAFT Brentwood interim five year housing land supply 2013 to 2018* (June 2014)). Despite having no planning permission for residential use, nor being an allocation within an adopted local plan, our client agrees with the Council's approach. Our client has repeatedly signalled and confirmed that the redevelopment of the site is likely to come forward within the next 5 years and we continue to support the estates inclusion within the 5 year housing land supply.

Our representations to the latest consultation round are made within the context set out above; they have been restricted to making representations (in answer to the set questions) which relates mostly to industrial estates within West Horndon.

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

Hermes understands and supports the approach taken in the identification of the three broad areas, but only so far as this does not detrimentally affect the redevelopment potential of the industrial estates within West Horndon.

Sites 020 and 021 have already been identified within the Council's five year housing land supply. They are previously developed sites, sustainably located within the West Horndon, close to good public transport links and serviced by adequate road infrastructure. Their redevelopment for residential led mixed use is supported by local residents and the Parish Council.

Their redevelopment for residential can be achieved in a fashion that will be beneficial to the development of West Horndon itself, as well as making an important contribution to the supply of land for housing within Brentwood as a whole.

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

Hermes broadly agrees, but wishes to emphasise West Horndon's considerable potential for sustainable growth.

The village is located close to good road links and has excellent rail links. The redevelopment of the industrial estates will remove most of the unwelcomed HGV traffic from the village, which will not necessarily be replaced by car related traffic (although it is clear residents would see this as an improvement). The existing railway station, close to the industrial estates presents a notable opportunity for public transport led growth.

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

Horndon Industrial Park (site ref 021) and West Horndon Industrial Estate (site ref 020) have significant potential to contribute to the sustainable development of West Horndon.

The sites have already been identified within the Council's five year housing land supply. They are previously developed sites, sustainably located within the West Horndon, close to good public transport links and serviced by adequate road infrastructure. Residential led redevelopment of the estates is supported by local residents and the Parish Council.

**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?**

The consultation documents states:

*“There is potential for larger growth opportunities in the A127 Corridor as part of strategic mixed-use allocations (residential-led) at West Horndon or cross boundary development at Dunton. The 2013 Preferred Options proposed strategic allocations of residential-led mixed use development at West Horndon Village. An alternative to this could be development at Dunton. Development along this corridor could provide potential funding for improvements to capacity along the A127.” (para 3.12)*

The paragraph above presupposes that it is one or the other i.e. West Horndon or Dunton Garden Suburb. This is not the case.

There are obvious difficulties associated with bringing forward the Dunton Garden Suburb (which is also greenbelt affected by flooding issues, but without the benefits of existing infrastructure) and the potential, at least, for a lengthy period of time before any beneficial development could come forward.

The redevelopment of the industrial estates in West Horndon for residential led mixed use would be in accordance with the broad thrust NPPF and is supported by local residents and the parish council. Their objections to development of the greenbelt land around the village should not cloud the minds of policy makers to the benefits of bringing forward the redevelopment of the industrial estates – particularly in circumstances where the industrial estates have been identified in the latest draft of the 5 year housing land supply. It would be a false premise if the Council's approach was to show the option as an “all or nothing” choice to development of West Horndon.

Hermes considers West Horndon is the best location for an appropriate quantity of growth. The village is an existing community, well served by road and rail infrastructure, with two large, and increasingly problematic industrial estates within the identified settlement boundary that could be beneficially redeveloped for residential led mixed use development.

The broad thrust of planning policy as set out in the NPPF, the preferred options draft of the LDP and the emerging Neighbourhood Plan supports this approach. Local residents and the Parish Council also back residential led development on the estates.

**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?**

Among the reasons for the decline of the industrial estates (020/ 021) within West Horndon, a significant one is the relatively poor road links to the strategic highway network (particularly the A127 and the nearby motorways) – the local roads and railway line crossings are ill-suited to the needs of modern business, particularly those generating HGV traffic. However, our traffic experts suggest local roads within and around West Horndon are adequately suited to the car traffic from a residential reuse of the estates; that would replace the industrial estates' commercial traffic in the event of redevelopment.

However, Hermes considers employment sites situated close to the strategic highway network would be successful and would encourage Brentwood to bring forward new employment sites in these locations

**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?**

This approach is consistent with the NPPF and is generally supported by Hermes, as it encourages development in the most sustainable way. However, this approach should not undermine efforts to bring forward retail uses as part of the master-planned residential led mixed use development of the West Horndon industrial estates.

Policy for the redevelopment of the industrial estates should be framed in a similar fashion to the preferred options draft of the LDP, which set an objective of an appropriately sized retail offer for West Horndon – and was largely been supported by local residents and the Parish Council.

Hermes Property Unit Trust is as keen as ever to take a full part in the local plan making process, but they are concerned that the progress of the local plan – they would be grateful to understand what status the preferred options draft of the local plan has now, for example.

They note that there is the further opportunity to comment on the Interim Sustainability Appraisal (before the end of this week) and the Dunton Garden Consultation (by 16 March). These documents are being considered and comments will be provided in due course.

Kind regards

Chris

