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AB/GC

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Dear Sir/Madam

Brentwood Borough Local Plan Strategic Growth Options Consultation – Response by Childerditch Properties: Land at The Range North, Childerditch Industrial Park, Little Warley, Brentwood

Strutt and Parker are instructed by Childerditch Properties, the landowners of Childerditch Industrial Park Brentwood to submit representations in response to the above consultation.

Comprehensive representations were previously submitted as part of the Council's 2013 Preferred Options Consultation including three supporting documents including plans to propose the allocation of land at The Range North for employment purposes.

The supporting documents included: -

- Employment Land Review (KELR) prepared by Kemsley LLP
- Landscape and Visual Appraisal and Green Belt Assessment (LVA/GB) prepared by Liz Lake Associates
- Accessibility Appraisal (AA) prepared by Journey Transport Planning

The technical evidence set out in those documents remains relevant and is referred to these representations.

This letter sets out our detailed comments and responses to those issues of relevance to our client's interests in the latest Consultation. In particular, the letter sets out a description and background to Childerditch Industrial Park and our detailed comments or objections setting out the reasons why land at The Range North should be considered as a proposed allocation for general employment to assist meeting the need for employment land for the Borough.

This representation has been informed by the latest information on the local economy, Brentwood Economic Futures 2015 – 2030 prepared by Nathaniel Lichfield and Partners (December 2014); hereafter termed the NLP Report. Reference is also made to the government's Planning Practice Guidance (PPG) that supports the National Planning Policy Framework (NPPF).



1. Childerditch Industrial Park

Site Description

- 1.1 Childerditch Industrial Park is an island site of some 11.25 hectares, comprising a range of B1, B2 and B8 employment uses with storage yards in some 35 units, employing approximately 500 people. The Park is located 2 miles south of Brentwood. It is a visually contained commercial area surrounded by predominantly agricultural land. The LVA/GB provided a detailed analysis of the site and its setting.
- 1.2 The Park is accessed via Childerditch Hall Drive to the A127, some 700m to the south, linking the Park to the M25 and nearby towns. The AA described in detail the access to the site. Little Warley Hall Lane lies some 350 to 400m from the western boundary of the site. There is a ribbon development of some 15 properties along both sides of the Lane. Residential properties forming part of the client's ownership are on the eastern side of the Industrial Park. The nearest property in Little Warley Hall Lane is at least 150m from the western boundary of the site. The presence of established vegetation, both along the boundaries of the rear gardens of properties in Little Warley Hall Lane and the Park itself effectively screens the site from view as referred to in the LVA/GB.
- 1.3 There are no public rights of way traversing the site although there are a number of footpaths within the immediate vicinity, described in the LVA/GB. The Industrial Park lies within undulating agricultural land, and although in an elevated position relative to the A127, it is in fact positioned within a plateau making it inconspicuous from the A127. The Industrial Park is therefore visually well contained which is assisted by general topography, extensive planting both along its boundaries as well as from places of potential public view. This includes a substantial hedgerow along most of Little Warley Hall Lane referred to in the LVA/GB.
- 1.4 Substantial earth mounding works, approximately 4 metres high is in place adjacent to the western boundary of The Range North following planning permission granted in 1996. This is now well established and planted with trees and hedges and form a screen along the south and western boundary of the site protecting the visual amenity from the site to users of nearby footpaths as well as the residents along Little Warley Hall Lane.
- 1.5 Due to the nature of relief, the earth mounding and landscaping views into the site are generally restricted to glimpses of the open storage of plant and machinery along the northern boundary of the site. Other activities within the remainder of the Park are virtually hidden from public view.

Site History

- 1.6 The Industrial Park was first established in the early 1930's, originally as a brickfield with associated kilns. Sometime prior to 1945, the use was changed to that of manufacturing pre-cast concrete components. It was owned and operated by the Costain Group of Companies who also used part of the site as a depot for the storage and maintenance of public works, plant and machinery used in civil engineering contracts. The manufacturing concentrated on large pre-stressed beams used in bridge and tunnel construction, as well



as small items such as railway sleepers.

- 1.7 In 1983, Costain discontinued the manufacture of concrete products and my clients purchased the site.

Existing Situation

- 1.8 The Industrial Park has been comprehensively planned and redeveloped over 30 years since my client acquired the site in 1983 with the benefit of planning permission. As well as new build, works of improvement, repair, and enhancement to most of the buildings on the site have taken place. The KELR provided details of the current operators and users of each plot. It will be noted from the KELR that the Park is a thriving employment site with only five of the 36 units being vacant.
- 1.9 In the Brentwood Replacement Local Plan (BRLP) (2005), Childerditch Industrial Park is allocated partly for Employment and partly Open Storage purposes by Policy E6. It covers an area of approximately 11.25ha. It is given the reference Site 112 in the NLP Report. The Report also confirms that only 0.59ha of land within that allocation remains undeveloped.

The Range North

- 1.10 These representations relate principally to The Range North, an area of open land at the western side of the Park, identified at Plan 1 attached to this letter. It is an area of open land, approximately 1.95 hectares in size, within the bounded area described at 1.4 above.
- 1.11 The land was used for open storage and the subject of a Certificate of Lawful Use and Enforcement Appeals in 2012 (APP/215151/C12/2180609 and 208/0803 refer). The appeals were dismissed on the basis that the lawful use for the necessary period of ten years could not be proven. It is important to note that the appeals did not consider the planning merits of the use of the land for those purposes. The upheld Enforcement Notice required the cessation of the use of the land for storage purposes and the removal of material associated with that use from the land. These requirements have been complied with.



2. Detailed Response to Consultation Questions

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

- 2.1 In summary, whilst my clients generally support Brentwood Borough Council's (BBC) broad areas providing for growth in the Borough, the approaches set out do not, in this document, properly consider or take into account time frames for delivery. Whilst it is acknowledged that the form of this consultation is generalised in seeking views on the amount of and directions for growth, specific sites have been identified for possible allocation and comment. There is little clarity at this stage to address the "what, where, when and how questions" referred to at Paragraph 010 of the PPG. It is clear that the opportunity presented by The Range North to contribute to particular needs has not been properly considered as evidenced elsewhere in the Consultation and the NLP Report. The site is located close to the strategic road network and railway station and affords an immediately achievable and deliverable prospect of meeting short term specific employment needs.

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

- 2.2 Having regard to our comments in relation to Q1, we generally support the identification of the A127 corridor as an area with a potentially greater capacity for growth is supported. As far as The Range North is concerned, our representations at the Preferred Options Stage in 2013 confirmed that the identification of this site for employment would be appropriate in landscape terms (as set out in the LVA/GB) and development of the site can be accommodated on the transport network. We therefore consider that The Range North site should be specifically identified within the next stage of the plan process as a key opportunity site within this area to meet employment needs in a suitable location.
- 2.3 The reference to congestion problems along the A127 at 2.19 of the Consultation is noted. The AA demonstrates that employment development on The Range North site for a mixed B1/B2/B8 development of between 3,000 sq.m to 5,000 sq.m GFA would not give rise to a significant level of additional traffic movements. The increase in vehicular traffic would not be material or perceptible when set against the existing traffic on the A127 in the vicinity of the site. The existing access arrangements on both Childerditch Hall Drive and the A127 can accommodate the forecast increase in traffic without any noticeable impact for the purpose of highway capacity.
- 2.4 The accident record on the highway in the vicinity of the site have been reviewed and no accidents have been recorded in the latest three year period on either Childerditch Hall Drive or on the A127 at the Childerditch Hall Drive junction. As such the existing access arrangements are considered suitable to accommodate the additional traffic associated with an allocation without having a detrimental impact on that good safety record.
- 2.5 In terms of accessibility, the site is therefore considered suitable and acceptable for the purposes of being allocated for employment purposes. It is well connected to the strategic road network which is suitable to accommodate the type of traffic that could be associated with the proposal. Whilst it is accepted that the site is not considered to be in a location accessible by means other than the private car, the nature and type of movements that would be generated by a proposed allocation at the site and by the existing uses would not be appropriate for a typical more accessible urban location where the environmental



impacts of heavy vehicles would be incompatible.

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

- 2.6 Given that this section is focused on housing sites, we do not have any particular comments as our representations deal principally with employment provision and The Range North. However, it is noted that the site options include reference to the opportunity for brownfield sites to contribute to meeting housing needs to avoid the need for Green Belt release, some of which are in employment use.
- 2.7 The Childerditch Industrial Park and the proposed employment area at The Range North can continue and add to providing a range of jobs to support the local economy, and assist in the reallocation of existing employment sites that either are not particular suited to meeting business needs or are considered better suited for residential uses in the new Local Plan.

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?

- 2.8 Having regard to our answer in respect of Q4, the redevelopment of existing employment sites at West Horndon is suggested (020 & 021) to provide an opportunity for housing growth. The proposed new employment provision at The Range North can provide contribution towards providing alternative provision for jobs or businesses displaced. It is also considered 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 Range North. The LVA/GB demonstrates that development could be accommodated at The Range North without significant harm to the landscape or Green Belt. Employment development in this location would also be well located in proximity to M25 to assist meeting employment and occupier demands as well as help overcome highway capacity issues and avoid issues with distribution traffic and HGVs travelling through residential areas as referred to in the AA.

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)?

- 2.9 The re-use of brownfield sites to meet housing needs is supported. This is referred to at 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 Range North is a site that, although currently within the Green Belt, can be developed for employment use without significant or wider adverse impacts on the landscape or Green Belt as referred to in the LVA/GB.

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?

- 2.10 The allocation of new sites close to the strategic highway network is strongly supported and the AA for The Range North confirms that release of this site for employment is achievable and can be easily accommodated on the A127.



- 2.11 Paragraph 21 of the NPPF confirms that the plan should “proactively encourage sustainable economic growth”. The NLP Report (December 2014) provides updated evidence on employment needs and set out the level of jobs alongside higher housing growth levels. Scenario C in the report sets out a Housing Growth that meets objectively assessed needs and accounts for past unmet need. This 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 is 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, as has been suggested by BBC, 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.
- 2.12 Available supply consists of 2.87 from existing allocations and 2.69 from extant permissions. This clearly re-emphasises the need for new sites 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.
- 2.13 The KELR provides a detailed breakdown of these losses. The KELR sets out a further analysis of the shortcomings in BBC’s approach both to the amount of new sites being provided and their availability. In reality, the only new site being allocated is Brentwood Enterprise Park, the other sites being already in existence or for other uses, not for General Employment. It is our view that, if this is to happen, BBC must ensure that there is a good supply of immediate deliverable employment land available in the right location and capable of accommodating a range of different uses in the short term to cater for requirements. Childerditch Industrial Park is a traditional industrial estate, providing a mixture of B1, B2 and B8 usage across the site. It is an accessible location, as confirmed by the AA. The Range North can be delivered immediately, and is well suited to assimilate businesses that will need to relocate as a result of the Strategy. Against this background it is considered that further land should be allocated for general employment use to meet the requirement for additional jobs.
- 2.14 In the context of the above 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.
- 2.15 The release of The Range North will be fully consistent with the objectives expressed in paragraph 4.6 of the consultation document.



- 2.16 The NLP Report provides clear indications for the direction of travel for future employment for the Borough. The report also provides a firm basis for a future allocation of The Range North for employment development. In particular:-
- Para 4.19 indicates that other than providing sufficient land in quantitative terms, it is also important for qualitative factors ranging from a choice of provision, flexibility in the event that some sites are not delivered and meet gaps in supply of particular types of premises or locations.
 - Para 5.6 confirms that there are issues with the new allocations previously undeveloped allocations and the resultant limited choice for new and existing occupiers to meet future employment needs which would constrain the Borough to meet business growth needs.
 - Para 5.7, this flags up the need for the Council to demonstrate that there will be opportunities available to meet needs over the short, medium and long term.
 - Para 5.9 confirms that re-allocation of the 18.9ha should take account of the local benefits of B Class sectors to maintain a diversified economy.

All of the above matters point to a clear justification to consider The Range North as part of the portfolio of employment sites for the Borough. It is achievable, deliverable and available in the short term to address these issues.

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

- 2.17 Transport is a particularly key issue with regards to infrastructure and the delivery of growth within the borough in general. The Range North proposal is supported by transport evidence prepared by Journey Planning demonstrating the site is fully deliverable.

3. Conclusions

- 3.1 In conclusion and in commenting on this consultation, it is considered that a proposed employment land extension at land to the east of Childerditch Industrial Estate; The Range North (Site 112B) will meet an identified market need and provide the type of employment land required to deliver the objectives referred to in the NLP Report and be in accordance with the findings set out in the KELR. These confirm that there is additional need for employment land and the site would contribute to meet those requirements, not least in providing a deliverable site that can, in the short term, assist in BBC's overall strategy for the relocation/re-allocation of existing employment uses/sites. Childerditch Industrial Park is a popular location for a range of employment uses and there is a strong market for additional units in this location.
- 3.2 Our previous submissions have also demonstrated that development of the site for general employment land will not undermine the purposes of the Green Belt as set out in the LVA/GB. With regard to the NPPF and the 3 limbs of sustainability, the site is also considered sustainable.



- 3.3 We therefore trust that the representations set out in this Statement and documents that were previously submitted will now be given careful consideration by BBC, as the Plan progresses.
- 3.4 We also trust that BBC will be able to support the allocation of The Land at The Range North for the reasons we have set out.

Yours sincerely



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