

**BRENTWOOD LOCAL PLAN 2015 – 2030
PREFERRED OPTIONS CONSULTATION**

**REPRESENTATIONS ON BEHALF OF S & J PADFIELD AND
PARTNERS**

SITE 101B – CODHAM HALL - NORTH

Prepared by Strutt & Parker LLP

October 2013

1. Introduction

- 1.1 Strutt & Parker LLP has been instructed by S & J Padfield and Partners to make representations on the Brentwood Local Plan 2015 – 2030 Preferred Options consultation document with regards to land at Codham Hall.

- 1.2 This representation specifically concerns Land at Codham Hall North of the A127 (Site 101B). Representations relating to the Brentwood Enterprise Park to the south of the A127 on the former M25 works site have been made by separate submission.

2. Background to land at Codham Hall

- 2.1 Codham Hall north, Site 101B, is an established employment site within the borough. Employment use on this site has been carried out for many years and the site is now home to a range of businesses that make an important contribution to the local economy.
- 2.2 There are many businesses located on the site including:
- Advanced Cooling
 - Axiom Design
 - ADM Wheat Storage
 - Balgores Motors
 - Cat Surveys
 - In Gear Events
 - Maintenance Services
 - Proctor Fencing
 - ProPlant
 - Tilda Storage
 - Volker Highways
 - West Cars
- 2.3 The site now provides a workplace for in excess of 600 employees.
- 2.4 The site provides valuable employment opportunities within the borough and is particularly beneficial for businesses that may have difficulty identifying premises to meet their needs within the borough's main urban areas.
- 2.5 The site is situated in a strategic location at the junction of the M25 and A127. The site has easy access on to the strategic road network and does not impact on local roads or on residential neighbourhoods.
- 2.6 The existing buildings on this site are well established over time having been adapted from former agricultural use. The buildings and uses on the site do, however, remain concentrated around the core central part of the farm and thereby reducing impact on the wider landscape.

3. Employment Need

- 3.1 The Brentwood Borough Council Local Plan 2015 – 2030 sets out a vision that the borough will continue to be a thriving, attractive and unique destination for people to live, work and visit.
- 3.2 The Strategic Objectives in Preferred Options document set out how the Council will achieve this vision. In particular the Council will “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”.
- 3.3 The distribution of residential development proposed in Policy S2 and Policy DM23 includes a number of existing employment sites which the Council considers can provide appropriate and sustainable locations for residential development.

Policy S3 (Job Growth and Employment Land)

- 3.4 Policy S3 of the plan sets out that provision is made for 5,400 additional jobs to be provided in the borough between March 2015 and March 2030.
- 3.5 This number of jobs is based on the evidence on employment job growth provided by the Heart of Essex Economic Futures Study (2012). The Sector Derived Scenario is summarised by Table ES.1 on page iii which sets out that this scenario would result in total employment growth of 5,400 by 2031 at an average of 285 jobs per year. Whilst some of this job growth will occur in sectors that do not require designated employment land, allocated sites will remain very important in accommodating this growth.
- 3.6 Discussion with the Council has indicated that Figure 2.3 of the Preferred Options document included a typographical error with regards to the additional land needed for employment. We understand this figure was intended to have been based on 9.5 ha as suggested by the Employment Land Review and Economic Futures dwelling constrained scenario. The sector derived scenario, whilst providing for a higher level of job growth, assumes a lower requirement for employment land due to lower levels

of storage and distribution uses and a higher number of office based jobs. Figure 2.3, as corrected, would therefore make clear that a minimum of 25.05ha of additional employment land is required in the borough, taking account of the need for 9.5ha of new employment land and the need to provide replacement employment land for those existing sites allocated housing.

- 3.7 It should be noted, however, that the evidence on employment land need is principally based on the Heart of Essex Economic Futures Study which assumed a level of housing growth equivalent to 170 dwellings per annum. Given the Preferred Options document now proposes an average growth rate of 233 dwellings per annum over the plan period this would suggest that the employment need may in fact be higher than that suggested in the Heart of Essex Economic Futures Study.
- 3.8 In summary, therefore it is clear there is a high level of employment need within Brentwood Borough.

Employment Land Allocations

- 3.9 Employment Land Allocations are stated in Policy S3 to total 31 hectares. Policy DM6 provides a breakdown of the Preferred Allocations. The policy makes clear that the proposed 31 hectares does not include the regularisation of 2 sites where there is existing employment use. This includes “Brentwood Enterprise Park (land at Codham Hall) (101B)”.
- 3.10 With regards to Site 101B it is stated in the notes that:
“Existing employment uses on site, allocate land for employment to regularise uses”.
- 3.11 We fully support the allocation of this existing employment site. This will allow the retention of the jobs that the site currently provides.
- 3.12 In this respect it is important to note that the employment growth figures set out in the Heart of Essex Economic Futures Study and in the Preferred Options consultation document are figures for **net** growth in employment. Any further loss of existing employment sites would result in a greater need for replacement employment land. It is therefore very important that suitable and successful existing employment sites such as site 101B are retained, supported and allowed to thrive.

4. Planning Policy considerations

Economic growth

- 4.1 The allocation of existing employment sites such as that at Codham Hall Site 101B is fully consistent with national planning policy as set out by the National Planning Policy Framework (NPPF). The following sections of the NPPF are considered to be especially relevant.
- 4.2 Paragraph 7 sets out that there are three dimensions to sustainable development: economic, social and environmental. The economic role of planning is stated to be to contribute to building a strong, responsive and competitive economy, by ensuring that sufficient land of the right type is available in the right places and at the right time to support growth and innovation.
- 4.3 Paragraph 17 sets out the local authorities should proactively drive and support sustainable economic development to deliver the homes, business and industrial units, infrastructure and thriving local places that the country needs.
- 4.4 Paragraph 19 states that significant weight should be placed on the need to support economic growth through the planning system.
- 4.5 Paragraph 152 states that local planning authorities should seek opportunities to achieve each of the economic, social and environmental dimensions of sustainable development, and net gains across all three.
- 4.6 With regards to business the NPPF states at paragraph 160 that local planning authorities should have a clear understanding of business needs within the economic markets operating in and across their area.
- 4.7 The allocation of the site is fully consistent with these key objectives of national planning policy. The formal allocation of the site for employment purposes would reflect the existing nature of the employment uses on the site and provide a greater degree of certainty over the status of the site. This would help provide confidence for

the businesses located on the site and would assist with economic growth in the borough.

Green Belt and Landscape

4.8 Although in existing active employment use, the site is currently located within the Green Belt.

4.9 Paragraph 80 of the NPPF states that the Green Belt serves five purposes:

- to check the unrestricted sprawl of large built-up areas;
- to prevent neighbouring towns merging into one another;
- to assist in safeguarding the countryside from encroachment;
- to preserve the setting and special character of historic towns; and
- to assist in urban regeneration, by encouraging the recycling of derelict and other urban land.

4.10 A comprehensive Green Belt Assessment has been undertaken of the land at site 101B by Liz Lake Associates Chartered Landscape Architects. In addition Liz Lake Associates have also undertaken a Landscape and Visual Review of the site. The Green Belt Assessment, submitted alongside this representation, demonstrates that the land at Codham Hall Site 101B (parcels 3 and 4) only fulfil two of five purposes of Green Belt policy.

4.11 As set out above the site is not currently open and is already developed with employment uses. The site therefore does not currently positively contribute in Green Belt terms and it is therefore considered entirely appropriate that the site is allocated to reflect its current employment use.

4.12 In landscape terms the site was identified in the Liz Lake Associates Landscape and Visual review as not representative of wider character, unremarked and not tranquil. This reflects the fact the site is in active employment use rather than being open landscape. There are opportunities through the allocation of this site to deliver positive landscape enhancements.

4.13 In terms of visual qualities the Liz Lake Associates report identifies that the site is of moderate low visual prominence and only has a partially visible urban edge.

- 4.14 The Liz Lake Associates report identifies that there is scope to improve views of the Codham Hall Site by introducing additional vegetation along the northern boundary and further internal plantings, particularly to the eastern areas. This would provide an enhancement over the existing situation.
- 4.15 It is clear therefore that this site is already in employment use and can be allocated for such purposes without any additional harm in landscape terms.

Other considerations

- 4.16 With regards to other planning considerations it should be noted that the existing businesses on site are successful and it is therefore it is not currently envisaged that any large scale redevelopment of this site would be undertaken. The allocation would, however, provide certainty for the existing business based on the site, helping them with future plans and facilitating business and employment growth.
- 4.17 The allocation of this site has been discussed with officers at Brentwood Council and given this is a regularisation of the existing use it has not been considered appropriate to undertake further assessment work at this stage. The allocation of the site reflects the existing planning situation. The uses that are carried out on site are already recorded in background traffic data for example and therefore the allocation of the existing site will not generate any additional pressures on local infrastructure.

5. Local Plan 2015-2030 Preferred Options

- 5.1 The Council's intention to allocate site 101B for employment use in Policy CP7 of the emerging Local Plan is fully **supported**. As is noted in the Preferred Options document this will regularise the existing situation.
- 5.2 The employment growth figures set out in the Heart of Essex Economic Futures Study and in the Preferred Options consultation document are figures for **net** growth in employment. It is therefore very important that this existing employment site is retained, supported and allowed to thrive. Should the site not be allocated, this would fail to regularise the employment use and would jeopardise both this existing employment site and the jobs that it provides to local people. It would also result in the need to find other employment sites within the borough which would result in greater harm in Green Belt terms.

Changes required to site boundary

- 5.3 The Preferred Options document makes clear that the area currently included in the proposed allocation at site 101B is intended to reflect the current employment uses on site.
- 5.4 Having reviewed the consultation document, however, it is apparent that the allocation boundary as currently proposed in the preferred options document does not accurately reflect the existing employment uses on site. The plan in its current form would therefore not regularise the existing uses as is the Council's intention.
- 5.5 We therefore request that a change is made to the plan in this respect. The plan attached to this representation shows the suggested changes to the boundary of site 101B to accurately reflect the area of land that is currently in employment use. The revised site would total 6.58 ha.
- 5.6 In addition to the area already included in the Preferred Options document, this revised area also includes:

- **Land to the north east of the site**

This part of the site is currently used by an Import Export Storage and Distribution company. The land was previously used as a highways depot.

- **Land to the south of Codham Hall itself**

This area of land is currently used for storage uses and as car parking for the employment site office. This area of employment land is also used by West Cars and extends southwards parallel to the access road as indicated on the attached plan.

- **Land to the west of the site**

This area of land is also used for employment and should be included within the allocation. The land uses in this area include storage and distribution, container storage and mobile homes. The businesses located here include Advanced Cooling and West Cars.

6. Conclusion

- 6.1 This consultation response has been prepared in relation to the Brentwood Local Plan Preferred Options Consultation 2015 -2030 and Site 101B at Codham Hall.
- 6.2 The allocation of this site for employment purposes reflects this existing use of this site and is strongly supported.
- 6.3 As demonstrated in the supporting Green Belt Assessment and Landscape and Visual Review carried out by Liz Lake Associates, this site currently does not positively contribute to the majority of the purposes of the Green Belt. This reflects the existing buildings on the site and we therefore consider that the site can be allocated and regularised without resulting in any additional impacts on the landscape. The Liz Lake Associates Green Belt Assessment confirms that should further development occur on this site, it is considered that this would have only 'slight' effects in terms of the functionality of the Green Belt. The allocation of the site provides an opportunity for additional landscape enhancement or planting as detailed in the Liz Lake Associates assessment which our client would be happy to discuss with the Council. This would provide for an improvement in landscape terms over the existing situation.
- 6.4 As we have explained in more detail above, the area proposed for allocation at site 101B does not currently include all of the existing employment use on this site. In order to support these existing businesses we consider that the extent of the allocation should be increased as indicated on the attached plan in order to accurately reflect the existing situation. This would support the existing businesses located on this site and help secure the jobs that it provides for local people. This is fully consistent with national planning policy and we would respectfully request that the Council make this change to the emerging Local Plan.

Appendix A - Plan of suggested changes to site 101B

Appendix B - Landscape and Visual Issues Report prepared by Liz Lake Associates

Appendix C - Green Belt Assessment prepared by Liz Lake Associates