



# F5H Council's response to Q65-76 employment - August 2020

## INSPECTORS' QUESTION 65

Can the Council direct us to where the Council's Economic Strategy is within the evidence please? How has this Economic Strategy and the other economic documents referred to in the Plan, influenced the approach to delivering economic growth during the plan period? Can the Council explain how the Plan sets out a clear strategy which positively and proactively encourages sustainable economic growth?

## Can the Council direct us to where the Council's Economic Strategy is within the evidence please?

1. The [Brentwood Economic Strategy 2017-2020](#) forms part of the Local Plan's evidence base. The Council would like to include both this document and the [Authorities Monitoring Report - Employment and Retail](#) for Examination.
2. These are provided as supporting evidence:
  - Examination library ref: **F5h1** Brentwood Economic Strategy 2017-2020
  - Examination library ref: **F5h2** Authorities Monitoring Report – Employment and Retail

## How the Brentwood Economic Strategy 2017-2020 and other economic evidence has influenced the approach to delivering economic growth during the plan period?

### The Brentwood Economic Strategy 2017-2020

3. The [Brentwood Economic Strategy 2017-2020](#) acts as a shared vision and framework to steer economic development and growth for the Borough. It sets out a series of economic aims and strategic priorities which are clearly outlined in the vision and strategic objectives of the Local Plan. These strategic priorities are referred to under paragraph 7.3 of the Plan, they include:

- P1. Support business development and growth;
- P2. Facilitate and deliver skills and employability support;
- P3. Facilitate and encourage business workspace, infrastructure and inward investment;
- P4. Facilitate and support stronger and more vibrant town & village centres;
- P5. Develop and support the borough's rural economy; and
- P6. Promote Brentwood Borough as a place to visit and invest, encouraging the visitor economy.

### Other economic evidence

4. In identifying future economic needs over the Plan period, the [Economic Futures 2013 -2033](#) (evidence document [C12](#)) produced four scenarios, based on economic forecasts from Experian and East of England Forecasting Model (EEFM), the Borough's objectively assessed housing need and past take-up of B class floorspace. These scenarios follow the labour demand, labour supply and past take-up approaches as recommended by the PPG for forecasting future employment land need. The outcome suggests that total estimated amount of employment land (B-class uses) needed to achieve sufficient growth in jobs range from 8.1 ha to 20.3 ha. Taking into account redevelopment of existing employment and forecast loss, the total additional employment land required between 2013 to 2033 range from 33.76 to 45.96 ha. This study also provides a high level job capacity analysis of identified potential employment sites.
5. It should be noted that although in planning context and planning guidance, 'economic development need' often places a strong emphasis on employment (B-class uses), economic growth covers many other land uses, such as education, health, retail and leisure, food and drink, among others. Therefore, the Plan's approach to delivering economic growth also considers these land use requirements and infrastructure requirements to support planned growth as part of a coherent integrated process. This approach is underpinned by robust evidence consistent with national policy and guidance including:
  - a. [Retail and Commercial Leisure Study](#) (evidence document [C14](#)): provides analysis of the existing retail and leisure facilities within the Borough, and a quantitative and qualitative assessment of the need for new retail, leisure and other main town centre uses. The study identified a need of 4,844 square metres (net) of comparison retail floorspace and 3,833 square metres (net) of convenience floorspace. A review of findings in this study is being undertaken as set out in the Council's answers to Inspectors' question 81.
  - b. [Housing and Economic Land Availability Assessment](#) (HELAA) (evidence document [C24](#)): reviews previously submitted site information to explore all potential site opportunities.
  - c. [Strategic Housing Market Assessment](#) (SHMA) (evidence document [C19](#)): although not focussed on economic needs, part of this study examines whether an economic uplift to the housing requirements is needed, to ensure that planning for housing, economic land uses and community facilities / services are integrated, so that the demand for labour is fulfilled and there is no need for unsustainable commuting to find work.

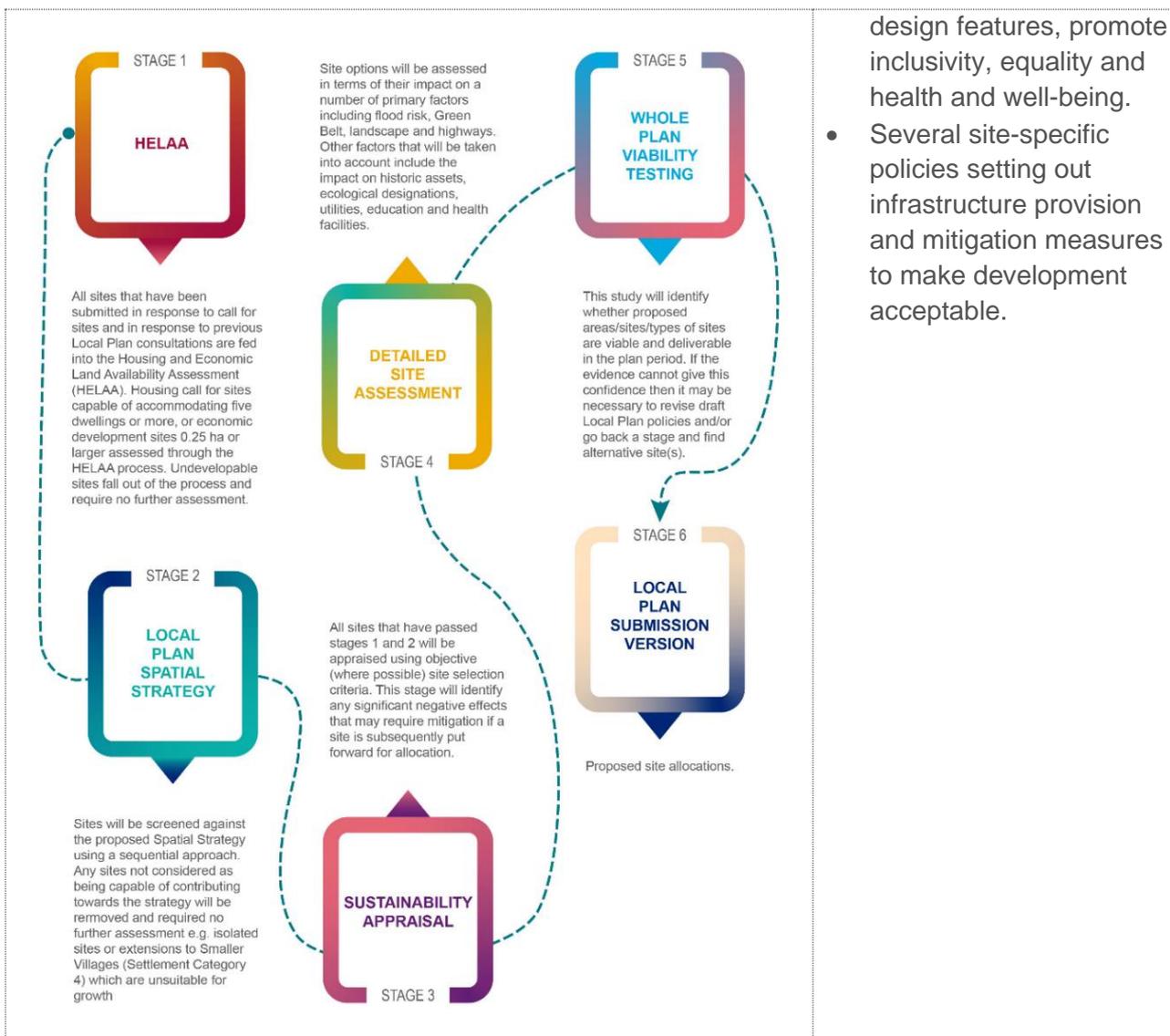
- d. **Authorities Monitoring Report - Employment and Retail**: reports on the status of undeveloped employment allocations, monitors the past delivery and losses of employment, retail and commercial leisure floorspace.
  - e. **Employment Land Review** (evidence document **C13**): analyses future demand for employment land in the early stage of the Local Plan, and provides policy recommendations to assist in preparation of the Local Plan.
  - f. **Sustainability Appraisal** (evidence document **A3**).
  - g. **Viability Assessment** (evidence document **C38**): quantify the costs of the Council's policies on development and to assess the effect of these and of CIL and then make a judgement as to whether planned growth is viable.
  - h. **Brentwood Town Centre Design Plan** (evidence document **C9**): considers how the Town Centre functions from various aspects, including urban design, buildings, spaces, economic viability and movement. The Design Plan explores future development opportunities to collectively enhance Brentwood Town Centre, strengthening its role as the focus for economic growth.
6. In addition, in preparation of the Plan and some of the above studies, regional and local strategies have been referred to, including:
- a. **Enterprising Essex: Meeting the Challenge** (Essex County Council, 2018)
  - b. Building Our Industrial Strategy - Green Paper (HM Government, 2017)
  - c. Essex Grow-on Space Feasibility Study (Essex County Council, 2016)
  - d. **Economic Plan for Essex** (Essex County Council, 2014)
7. The Council has also taken into account commercial agent feedback on employment sites to ascertain the level of market interest, views on strategic locations and commentary on employment land take-up and overall deliverability.
8. Further discussion on how the above evidence has influenced the Local Plan's strategy to deliver economic growth and policy requirements are set out in Table 65.1 below.

## The Local Plan's strategy to positively and proactively encourage sustainable economic growth

9. Policy PC01: Cultivating a Strong and Competitive Economy sets out principles for the delivery of economic growth during the Plan period and is underpinned by the Council's economic strategy and evidence regarding economic needs.
10. The aforementioned studies and their findings provide the basis to support the Local Plan strategic objectives, economic strategy and policies. The strategy to encourage sustainable economic growth positively and proactively can be summarised as followed:

Table 65.1: Summary of Local Plan strategy for sustainable economic growth

Approach	Relevant documents and Local Plan policies
<p><b>A. All sites submitted for employment allocation have been subject to a robust site assessment process. Priority is given to previously developed land in sustainable locations and new employment at sustainable locations or can be made sustainable.</b></p>	
<p>11. In order for the Council to select the most sustainable options for employment allocation purpose, all available submitted sites have been subject to a robust site assessment and selection process that involves the following stages:</p> <ul style="list-style-type: none"> <li>(i) HELAA</li> <li>(ii) Spatial plan strategy</li> <li>(iii) Sustainability appraisal</li> <li>(iv) Detailed site assessment</li> <li>(v) Viability testing</li> <li>(vi) Proposed site allocations</li> </ul>	<ul style="list-style-type: none"> <li>• <a href="#">Housing and Economic Land Availability Assessment (HELAA)</a> (evidence document <a href="#">C24</a>)</li> <li>• <a href="#">Sustainability Appraisal</a> (evidence document <a href="#">A3</a>)</li> <li>• <a href="#">Economic Futures 2013 - 2033</a> (evidence document <a href="#">C12</a>)</li> <li>• <a href="#">Viability Assessment</a> (evidence document <a href="#">C38</a>)</li> <li>• <a href="#">Brentwood Draft Local Plan: Preferred Site Allocations</a> see Figure 7: Site Assessment Process</li> </ul>
<p>12. Through this process of sites review and sequential analysis, as well as the Council’s overarching aim to deliver sustainable development in transit corridors, every opportunity to bring forward brownfield land in sustainable locations has been examined.</p>	<ul style="list-style-type: none"> <li>• <a href="#">Employment Land Review</a></li> <li>• <a href="#">Green Belt Study</a> (evidence document <a href="#">C18</a>)</li> </ul>
<p>13. In response to the scatter and limited availability and capacity of brownfield sites in Brentwood, and given the opportunity for new development to invest in infrastructure and facilities, new employment land in locations highly accessible and well-served by existing infrastructure provision, where development can be contained and can be made sustainable, and where Green Belt harm is minimised have been supported.</p>	<p><b>Relevant policies</b></p> <ul style="list-style-type: none"> <li>• Overarching policies requiring new employment developments to be of high-quality design, incorporate sustainable</li> </ul>

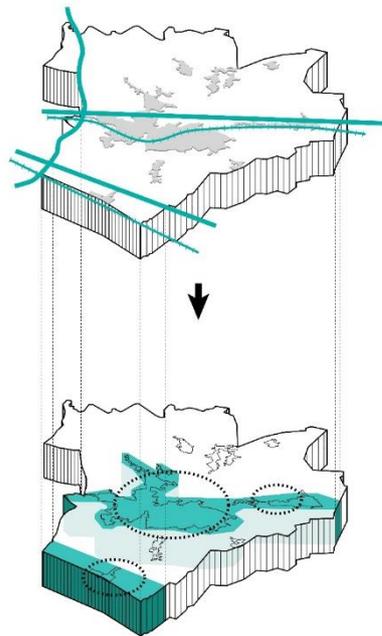


- design features, promote inclusivity, equality and health and well-being.
- Several site-specific policies setting out infrastructure provision and mitigation measures to make development acceptable.

**B. Planning for housing, economic land uses and supporting infrastructure as an integrated and coherent process.**

- The Council's planning strategy for housing, economic land uses and supporting infrastructure has been one integrated and coherent process to ensure new homes are delivered of the right type, in the right place, and linked to wider economic outcomes. This also ensures housing / labour supply align spatially with local demands and supporting services; promotes healthy, sustainable travels and consequently minimises impacts on the environment.
  - As such, all available options submitted to the Council have been screened against our spatial strategy, which is essentially based on sequential use of land and directing growth towards the two transit / growth corridors.
- Brentwood Economic Strategy 2017-2020
  - Housing and Economic Land Availability Assessment (HELAA) (evidence document C24)
  - Sustainability Appraisal (evidence document A3)
  - Economic Futures 2013 - 2033 (evidence document C12)
  - Retail and Commercial Leisure Study (evidence document C14)

- 16. Brownfield sites on these growth corridors have been prioritised. Other parts of the borough including larger villages are in a position to accommodate a very limited amount of employment and retail development, therefore the emphasis regarding employment land in these places will be on the provision of local services.
- 17. While some investment to improve the transport network will be inevitable, this growth strategy ensures economies of scale are reached, with the critical mass of development making it more viable for such investment to occur.
- 18. The below diagram illustrates a framework for spatial coordination at the Borough-wide scale.



- [Strategic Housing Market Assessment \(SHMA\)](#) (evidence document [C19](#))
- Green Belt Study (evidence document [C18](#))
- Housing Topic Paper
- Green Belt Topic Paper
- Sustainability Appraisal Topic Paper
- Spatial Strategy Topic Paper

**Relevant policies**

- Policy SP01: Sustainable Development
- Policy SP02: Managing Growth setting out that new development will be directed towards the two transit / growth corridors

**C. Providing sufficient housing, retail and employment space to support job growth.**

- 19. Achieving a responsive long-term housing supply not only provides accommodations for the local population but also plays a major role in deliver economic performance and more flexible labour markets.
- 20. Retail is recognised to contribute to economic development not only because it generates external income, but also due to its locally-oriented function of preventing the leakage of money out of the local area. As such the NPPF requires planning policies and decisions to meet anticipated needs for retail, leisure, office and other main town centre uses of at least ten years ahead.

- [Brentwood Economic Strategy 2017-2020](#)

**Relevant policies**

- The Plan identifies the locations and distribution of employment and retail floorspace development to meet the identified needs across Brentwood through Strategic Policy SP02: Managing Growth,

<p>21. In order to support Brentwood’s economic diversity, it is important to provide a flexible supply of employment land over the Local Plan period.</p> <p>22. As such, the Submission Local Plan positively plans for and supports the provision of new housing employment and retail floorspace to meet identified needs in full, using the most sustainable sites made available to the Council. In doing so it has relied on robust evidence in consistency with national policy and guidance.</p>	<p>Policy PC02: Job Growth and Employment Land, Policy PC03: Employment Land Allocations, and PC07: Retail and Commercial Leisure Growth.</p> <ul style="list-style-type: none"> <li>• Specific provision is identified in several employment site allocations, and residential allocations containing new employment development.</li> <li>• All policies in Chapter 7 Prosperous Communities of the Local Plan also provide the criteria for the detailed implementation of economic growth.</li> </ul>
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**D. Using land effectively and efficiently: previously designated employment areas are to be retained if they are still fit for purpose, or be redeveloped for more suitable uses**

<p>23. Where appropriate, previously designated employment areas have been retained in order to maintain supply and choice of employment floorspace.</p> <p>24. Undeveloped allocated employment sites from the previous plan period that are no longer fit for purpose have been re-designated. (More details can be found under the Council’s answer to question 67).</p> <p>25. Council owned assets have also been utilised to enable this.</p>	<ul style="list-style-type: none"> <li>• <a href="#">Housing and Economic Land Availability Assessment (HELAA)</a> (evidence document C24)</li> <li>• <a href="#">Authorities Monitoring Report - Employment and Retail</a></li> <li>• <a href="#">Brentwood Town Centre Design Plan</a> (evidence document C9)</li> </ul> <p><b>Relevant policies</b></p> <ul style="list-style-type: none"> <li>• Policy PC03: Employment Land Allocations retains previously allocated</li> </ul>
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	<p>employment land as set out in Figure 7.6</p>
<p><b>E. Ensuring the vitality of Brentwood Town Centre and other designated retail centres</b></p>	
<p>26. The Council aims to positively promote competitive town centre environments and manage their growth to stimulate improvement and regeneration. In doing so, it is important to provide for retail, commercial and leisure uses that are appropriate and that add values to the role and scale of designated centres that they operate within in line with the NPPF. The Submission Local Plan and its policies therefore direct major new retail, office and leisure investment to the borough’s designated centres according to their significance on the retail hierarchy.</p> <p>27. The revised NPPF (2018) acknowledged the significant challenges facing town centres and in particular the retail sector. It recognised that diversification is key to the long-term vitality and viability of town centres to ‘respond to rapid changes in the retail and leisure industries’. As such the policies within the Pre-Submission Local Plan also aim to clarify the range of uses permitted in Designated Centres, as part of a positive strategy for the future of each centre.</p>	<ul style="list-style-type: none"> <li>• <a href="#">Brentwood Economic Strategy 2017-2020</a></li> <li>• <a href="#">Brentwood Town Centre Design Plan</a> (evidence document C9)</li> <li>• <a href="#">Retail and Commercial Leisure Study</a> (evidence document C14)</li> </ul> <p><b>Relevant policies</b></p> <ul style="list-style-type: none"> <li>• Policy PC07: Retail and Commercial Leisure Growth</li> <li>• Policy PC08: Retail Hierarchy of Designated Centres</li> <li>• Policy PC09: Brentwood Town Centre</li> <li>• Policy PC10: Mixed Use Development in Designated Centres</li> <li>• Policy PC11: Primary Shopping Areas</li> <li>• Policy PC12: Non-centre Uses</li> <li>• Policy PC13: Night Time Economy</li> </ul>
<p><b>F. Support will be given to the sustainable growth and expansion of rural businesses</b></p>	
<p>28. The Council encourages the diversification and expansion of agricultural and other businesses and enterprise in the rural area.</p>	<ul style="list-style-type: none"> <li>• <a href="#">Brentwood Economic Strategy 2017-2020</a></li> </ul> <p><b>Relevant policies</b></p> <ul style="list-style-type: none"> <li>• Policy PC06: Supporting the Rural Economy</li> </ul>

<b>G. Co-ordinate development and supporting infrastructure provision</b>	
<p>29. New development can place additional demand upon existing infrastructure and services including the local and strategic transport network, healthcare, open spaces and education provision. As such, all development must be supported by the provision of infrastructure, services and facilities that are identified as necessary to serve its needs. The Council will continue working with landowners and partners to bring forward the infrastructure required to deliver planned growth set out within the Local Plan and the Infrastructure Delivery Plan.</p>	<ul style="list-style-type: none"> <li>• Infrastructure Delivery Plan (evidence document <a href="#">C28</a>)</li> <li>• <a href="#">Brentwood Economic Strategy 2017-2020</a></li> <li>• <a href="#">Viability Assessment</a> (evidence document <a href="#">C38</a>)</li> </ul> <p><b>Relevant policies</b></p>
<p>30. With development being directed towards the two transit / growth corridors, the Council seeks to align strategic transport infrastructure improvements with Brentwood’s proposed allocations and economic growth and to contribute to health and well-being whilst preserving the environment. This would be achieved by maximising the value of Elizabeth Line, improving the capacity of the stations and road network, ensuring the main settlements and new development have convenient access to high quality and frequent public transport services which connect to the town centre, main employment centres, rail stations, ports and airports in the wider region. Site allocations will only be supported if suitable transport measures and investment are led, coordinated and delivered in time to support planned growth.</p>	<ul style="list-style-type: none"> <li>• Strategic Policy SP04: Developer Contributions outlines how the delivery of infrastructure will be secured for example, by planning condition and/or planning obligation, or through other infrastructure funding sources.</li> <li>• Policy BE01: Future Proofing</li> <li>• Policy BE10 Connecting New Development to Digital Infrastructure</li> </ul>
<p>31. The Council places an importance on telecommunications infrastructure, including broadband, in unlocking new development and contributing to a prosperous economy in attracting new businesses and jobs, and ensuring the connectivity of residents to key services. This is set out in Policy BE10 Connecting New Development to Digital Infrastructure.</p>	<ul style="list-style-type: none"> <li>• Policy BE11: Strategic Transport Infrastructure</li> <li>• Policy BE12: Car-Limited Development</li> <li>• Policy BE13: Sustainable Means of Travel and Walkable Streets</li> </ul>
<p>32. Social infrastructure supporting local communities also plays an important role in facilitating economic growth of the borough by providing sufficient capacity to accommodate community need and demand. The Council seeks to protect its existing community assets and supports proposals for new and replacement facilities where there is a local need.</p>	<ul style="list-style-type: none"> <li>• Policy BE14: Sustainable Passenger Transport</li> <li>• Policy BE15: Electric and Low Emission Vehicle</li> <li>• Policy BE16: Mitigating the Transport Impacts of Development</li> <li>• Policy PC14: Protecting and Enhancing Community Assets</li> </ul>

	<ul style="list-style-type: none"> <li>• Policy PC15: Education Facilities</li> <li>• Policy PC16: Buildings for Institutional Purposes</li> </ul>
<p><b>H. Working in partnership to promote Essex for shared economic gain</b></p>	
<p>33. To maximise opportunities for economic growth and development, the Council has continued to work closely with the South East Local Enterprise Partnership (SELEP), the Essex Business Board (EBB) and the Brentwood Business Partnership (BBP).</p> <p>34. Additional economic and employment evidence base is expected to be developed as part of the Joint Strategic Plan alongside ASELA partners to formulate a sound strategic employment strategy and supporting policies for the wider area.</p>	<p>The Association of South Essex Local Authorities (ASELA) is currently undertaking a number of retail and employment evidence base documents to develop strategic employment and retail policies that will be included within the Joint Strategic Plan. To date ASELA have commissioned and started work on the following assessments to be undertaken:</p> <ul style="list-style-type: none"> <li>• Employment Grow-on Study;</li> <li>• Tourism Assessment; and</li> <li>• Town Centre Assessment</li> </ul> <p>(Note: these assessments are still work in progress and have not been completed).</p>

**INSPECTORS QUESTION 66**

In relation to Policy PC02 reference is made in paragraph 7.13 to a range of economic evidence that has informed the employment land and job growth needs, including the Brentwood Economic Futures 2013-2033 report and the SHMA1. The Economic Futures report provides economic forecasts for the ‘new Local Plan period (2013-2033)’ and concludes that the gross employment land requirement is estimated to be between 8.1 ha and 20.3 ha. Paragraph 7.19 of the Plan identifies these figures as part of the

calculation of the employment land requirement. However, as the plan period is now 2016-2033 rather than 2013-2033, is this level of employment land still justified by the evidence?

35. The [Economic Futures](#) (evidence document [C12](#)) modelled four economic growth scenarios that underpin the Local Plan employment land requirement:

	Scenario A	Scenario B	Scenario C	Scenario D
Based on	Experian's economic forecasts	East of England Forecasting Model (EEFM)	Housing growth assumption (380 dpa)	Past development rates
Forecast gross Employment Land Requirements (2013-2033)	20.3	8.5	13.1	8.1

36. The study also acknowledges the limitations to using economic forecasts, such as the changing context of the economy, which is going through a period of uncertainty at this time (i.e. Brexit, Covid-19 pandemic), and recommends the Council to take a flexible approach for when planning for future economic growth.
37. In Scenario C, the additional homes used in the forecast (7,600 resulting from housing growth assumption of 380 dpa over the period between 2013-2033) is only 2% lower than the additional homes proposed in the Plan (7,752 resulting from 456 dpa for the period 2016-2033). It is noted that Scenario C forecast is in the middle of the range.
38. With regards to the other scenarios, the updated Plan period to 2016-2033 affects the year the Plan period starts to three years later (2016, also in the past) but not the year it ends (2033). Therefore, retaining these figures to inform the employment land requirement despite this change in Plan period, allows us to consider the potentially outstanding unmet needs of the three-year period 2013-2016 in the absence of an adopted Plan.
39. This allows the Council to plan for a flexible employment land supply to respond to the changing nature of the economy. The Council considers this approach justified.

## INSPECTORS QUESTION 67

Paragraph 7.19 of the Plan then continues by stating that almost 21.01 ha of existing employment land will be redeveloped for alternative uses. The Plan seeks to re-provide this. Where in the evidence is the justification for the loss of this amount of existing employment land? Can the Council please clarify why it is necessary for these sites to be allocated for alternative uses and explain how this is a positively prepared strategy? Where will any existing operational uses be re-located to and is this justified and feasible?

### Where in the evidence is the justification for the loss of this amount of existing employment land?

40. The 21.01 ha loss of employment land was accounted from the following four sites. These sites came forward at different stages during preparation of the Plan, each being promoted for redevelopment. The sites were subject to a robust assessment process where priority is given to previously developed land in sustainable locations and were reviewed against the Council's spatial and economic strategies (for more detail please refer to the Council's response to Inspectors' question 65).

Site	Gross area	% of total loss
Site R02 Land at West Horndon Industrial Estate	15.06 ha	71.7%
Site R04 Ford Headquarters	3.25 ha	15.5%
Site R05 Council Depot site	1.71 ha	8.1%
Site R15 Wates Way Industrial Estate	0.99 ha	4.7%
<b>Total</b>	<b>21.01 ha</b>	

41. The loss of employment land on these sites was reviewed and informed by a range of evidence and discussed / updated throughout plan preparation process, including:
- [Housing and Economic Land Availability Assessment \(HELAA\)](#) (evidence document [C24](#));
  - [Authorities Monitoring Report - Employment and Retail](#);
  - [Employment Land Review](#) (evidence document [C13](#));

- d. [Sustainability Appraisal](#) (evidence document [A3](#));
  - e. [Strategic Housing Land Availability Assessment](#) (SHLAA) (evidence document [C27](#));
  - f. [Economic Futures 2013-2033](#) (evidence document [C12](#));
42. The loss of 21.01 ha of employment land is justified by looking at each of these sites individually, as discussed in the next section.

## Can the Council please clarify why it is necessary for these sites to be allocated for alternative uses and explain how this is a positively prepared strategy? Where will any existing operational uses be re-located to and is this justified and feasible?

43. The NPPF (2019, paragraph 117) is clear that *'planning policies and decisions should promote an effective use of land'*, in a way that *'makes as much use as possible of previously-developed or 'brownfield' land'*.
44. The following four sites are all previously developed land in urban areas, underutilised or vacant. Although located in accessible locations, current activities or non-activity on site has resulted in negative impacts to the surrounding areas and communities, such as traffic conflicts from deliveries by heavy goods vehicle movements, congestion, air quality, and noise. Redevelopment for more appropriate mixed-uses taking into account the surrounding context would address these issues and enable high quality sustainable development that improves the function, character and vitality of local areas.
45. The Local Plan seeks to retain some employment land on these sites or re-provide this loss in other locations in more suitable and sustainable locations. This is in addition to providing other supporting mixed uses and infrastructure. It is important to note that this does not mean that the Council will provide new employment land on a like for like basis but rather we will plan for a flexible employment land supply. This is because there are multiple other factors that have an effect on how much land is actually required to support economic growth, including using new employment land more intensively, rationalising existing sites and how businesses use premises, to provide for more efficient land use, as stated in the [Economic Futures Study](#) (evidence document [C12](#), paragraph 5.13).
46. The above explanation, together with the justifications for re-allocation of each site below, demonstrate that this is a positively prepared, justified and feasible strategy.

### Site R02 Land at West Horndon Industrial Estate, West Horndon

47. Site R02 is a brownfield site located within the West Horndon established settlement (Southern Brentwood Growth Corridor), in close proximity to the existing village, facilities and services including school, GP, shop, public house and village hall, as well as established public transport links (West Horndon station). It is noted that the site has better access to retail centres outside the Borough than to Brentwood Town Centre.

48. It was reported in the 2015-16 [Authorities Monitoring Report - Employment and Retail](#), that part of this site remained largely undeveloped, although partly used for open storage of motor vehicles.
49. Redevelopment on this site provides an opportunity to address conflicts arising from heavy goods vehicle and related traffic passing through the village, deliver a high quality sustainable new development that maximises opportunities for travel by sustainable modes. Mixed use residential-led development in the area will help strengthen the village centre by improving its function, character and vitality. It also allows for significant investment in necessary infrastructure on the Southern Brentwood Growth Corridor to create a sustainable location for growth.
50. Evidence documents examining redevelopment opportunity of the site include the [SHLAA](#), the [HELAA](#), which concludes that the site is suitable, achievable and available for housing development, and the [Sustainability Appraisal](#), which appraises the site's performance against different criteria.
51. Various options for strategic growth have been rigorously assessed in the [Sustainability Appraisal](#). This includes an assessment of the option to develop around West Horndon to the east and west. The proposed quantum and type of development on this site therefore takes into account the Council's aspiration to protect and enhance the village's character.
52. Representations on the January 2016 draft Local Plan indicated there are concerns over the potential need for businesses to move due to site reallocations. The focus of concerns was on the reallocation of West Horndon Industrial Estate. The Council's updated allocations aim to mitigate this reallocation by:
- a. retaining 2ha of employment land on site;
  - b. allocating a 5.5ha site at East Horndon Hall (site E13), close to the existing West Horndon Industrial Estate (which has since been granted planning permission by the Council, see reference 19/00315/OUT);
  - c. Childerditch Industrial Estate (site E12) is proposed for expansion which would offer more choice in the local area; and
  - d. allocating 25.85ha of employment land at Brentwood Enterprise park (site E11), also on the Southern Brentwood Growth Corridor, next to M25 Junction 29.
53. With regards to point (a) above, some of existing units would remain in employment use as part of the scheme with the potential for them to be integrated into the site at a later date. Through early stage discussions with the site promoters it is understood there would be a phased approach to development which would allow for the gradual vacating of the existing employment uses which are on short term leases. Further discussion regarding this site is provided under the Council's answer to question 48.
54. It is important to note that the Plan's strategy does not aim to re-provide new employment land on a like for like basis but rather to plan for a flexible employment land supply. The 2ha of employment land to be retained on site, as set out by Policy R02 of the Submission Plan, as well as new employment opportunities created by the new village centre (which will include retail and main town centre uses) would foster mixed use development supporting

existing and new communities. The Plan also aims to achieve viable multi-modal balanced links to employment sites on the Southern Brentwood Growth Corridor including the site at East Horndon Hall (E13) and Brentwood Enterprise Park (E11).

55. Several pre-application discussions with landowners, Essex County Council and West Horndon Parish Council have taken place to secure safe access to/from West Horndon Station and supporting infrastructure to the wider area. This principle to link new development in the corridor to a public transport interchange at the station is set out in the [South Brentwood Growth Corridor Sustainable Transport Vision](#) (evidence document C37).

### Site R04 Ford Headquarters, Warley

56. Site R04 is a brownfield site located within Brentwood main urban area forming the southern edge of the Brentwood settlement boundary (Central Brentwood Growth Corridor). It is approximately just over a kilometer to the south of Brentwood Station and in proximity to local retail and commercial uses.
57. The site has remained in use by Ford as a central office for its UK services, but came forward through the Call for Sites in May 2017 process to indicate possible suitability for residential development. Ford highlighted that the existing office building on site was designed specifically for Ford, and was bespoke for the operational services of Ford; the location of such a large commercial property on the edge of the built-up area is no longer suitable for large corporate businesses of this nature.
58. Ford closed the building and relocated its staff in 2018 and sold this land in 2020. Relocation of staff was mainly to Ford's offices in Dunton, nearby in Basildon Bough, remaining in South Essex.
59. The site re-allocation was consulted on in the [Brentwood Draft Local Plan Preferred Site Allocations](#) (evidence document B12). The HELAA concludes that the site is suitable, achievable and available for housing development.
60. Redevelopment of the site presents an opportunity to encourage greater public access and recreation, landscape enhancement, and wildlife conservation. The development will be required to provide good accessibility for bus services and improve nearby bus stop infrastructure.
61. Warley and its surrounding areas consist of a mixture of land uses with employment (particularly offices) being a major component. The Council therefore seeks to retain the continuation of employment uses in parts of the areas identified for possible redevelopment in Warley. The exact extent will be subject to detailed masterplanning, but for the purposes of the employment analysis, approximately 2ha has been set aside for retained employment uses.
62. Pre-application discussion has taken place with the site promoters to assess details and delivery of development, including public engagement. The site is split into two landownerships in terms of the existing building and surrounding land/car parking. The existing building is being progressed through residential conversion of 325 units (prior approval deemed not required, ref: 19/01708/PNCOU). An application for residential development on the surrounding land/car parking has recently been submitted for 152 units,

flexible commercial floorspace and a care home in line with the proposed site allocation policy (ref: [20/01111/FUL](#)).

### Site R05 Council Depot site, Warley

63. Site R05 is located within Brentwood main urban area, immediately to the south of site R04. The site is council-owned land and is currently being utilised as additional car parking, as well as the highways depot and auto garage.
64. It was reported in the 2015-16 [Authorities Monitoring Report - Employment and Retail](#) that half of the allocated employment land remained undeveloped. Current activities on site including vehicular movements are not appropriate use of land in residential area. The Council's Corporate Plan (2013-2016) set out an objective to utilise Council-owned assets.
65. The site re-allocation was consulted on in the [Brentwood Draft Local Plan Preferred Site Allocations](#) (evidence document [B12](#)). The [HELAA](#) concludes that the site is suitable, achievable and available for housing development.
66. Redevelopment of the site in co-ordination with site R04 will make better use of land, encourage greater public access and recreation, and landscape enhancement. The Council is engaging with the promoters of Site R04 to achieve a masterplan across landownerships, consistent with the proposed requirements of the site allocation policy.

### Site R15 Wates Way Industrial Estate, Brentwood

67. Site R15 is a brownfield site located in the Brentwood Town Centre.
68. In 2010, the [Employment Land Review](#), evidence document [C13](#) identified that the site was vacant despite being actively marketed. Vacant premises were independently verified on site during the assessment process. The review noted that the site was of a fair quality which indicates quality of premises is unlikely to be a factor in finding new tenants. Main vehicle and pedestrian access to the site is from Ongar Road (A128) causing air quality and noise issues as well as traffic conflicts arising from truck deliveries and vehicle movements passing through the car-dominated junctions of the Town Centre.
69. Lidl acquired the site in 2014 and since then the units on the site have been vacated. The site has now been vacant for several years.
70. In May 2019, a planning application was submitted seeking full permission for a new Lidl foodstore and outline planning permission for residential development (80 units) within Use Classes C2 (Residential Institutions) and/or C3 (Dwelling houses) (ref: [19/00707/FUL](#))
71. Other documents supporting redevelopment of the site include the [HELAA](#) which concludes that the site is suitable, achievable and available for housing development, and the [Sustainability Appraisal](#) which appraises the site's performance against different criteria.
72. Given its central location next to the High Street of Brentwood Town Centre and close to residential neighbourhoods, a residential-led mixed use scheme with the provision for retail and other main town centre uses on this site presents a more appropriate use of land. This also assists the Plan in meeting the housing demand, delivering new retail floorspace to support a thriving town centre, addressing the traffic conflicts and air quality. This fits with the Council's spatial strategy which seeks to prioritise the use of vacant brownfield land in

the urban areas, and the Council's economic strategy which aims to improve the movement network and retail offer in the town centre, in order to strengthen the role of Brentwood Town Centre as the focus for economic growth.

### INSPECTORS' QUESTION 68

The forecast loss of existing employment allocations is then identified in paragraph 7.19 with a figure of 4.65 ha. How has this forecast loss been determined and is it realistic?

73. The forecast 4.65 ha forecast loss of existing employment allocations was calculated based on extant planning permissions and permitted development allowing changes from employment to other uses.
74. In monitoring employment floorspace, the Council uses the following land use and site thresholds:
- a. Industrial and Warehouse uses: Use Classes B1-B8 of 100 sqm or more involving a gain or loss
  - b. Offices: Use Class B1(a) of 250 sqm or more involving a gain or loss
75. The 2015/2016 [Authorities Monitoring Report - Employment and Retail](#) reports +2,461sqm of employment floorspace completions and -7,185 sqm of employment floorspace to be lost to other uses. That results in a net figure of 4,724 sqm (0.47 ha) forecast loss of existing employment land. Further applications have come forward since and monitoring work was undertaken to indicate 4.65 ha of employment land could be lost if all of the extant permissions and prior approvals were completed.
76. It should be noted that since the submission of the Plan, two of existing employment lands have been granted permissions for residential use, as discussed under question 74. These are:
- a. The Old Pump Works on Warley Street. (ref: [17/01584/FUL](#))
  - b. McColls (ref: [19/01043/PNCOU](#))

### INSPECTORS QUESTION 69

Combining the above figures, the Plan identifies an employment land requirement ranging from 33.76 ha to 45.96 ha. Is setting the requirement out as a range effective and is it clearly identified in strategic policy within the Plan?

## Is setting out the employment land requirement as a range effective?

77. The [PPG](#) deals with quantitative assessment of employment land needs principally at paras 027 and 030. At para 027 it states:

***How can market signals be used to forecast future need?***

*Strategic policy making authorities will need to develop an idea of future needs based on a range of data which is current and robust, such as:*

- *sectoral and employment forecasts and projections which take account of likely changes in skills needed (labour demand)*
- *demographically derived assessments of current and future local labour supply (labour supply techniques)*
- *analysis based on the past take-up of employment land and property and/or future property market requirements*
- *consultation with relevant organisations, studies of business trends, an understanding of innovative and changing business models, particularly those which make use of online platforms to respond to consumer demand and monitoring of business, economic and employment statistics.*

*Authorities will need to take account of longer-term economic cycles in assessing this data, and consider and plan for the implications of alternative economic scenarios.*

*Paragraph: 027 Reference ID: 2a-027-20190220*

78. The PPG therefore puts forward a choice of four approaches that plan-makers should consider. In Brentwood, the forecast range that underpins the Local Plan is a combination of all of the above approaches. As set out in the [Economic Futures](#) (evidence document [C12](#)), four economic growth scenarios have been produced using:
- a. Experian's economic forecasts, which provide estimates of employment change in a range of sectors at the local authority level;
  - b. East of England Forecasting Model (EEFM) which integrates economic and demographic forecasting, producing mutually consistent forecasts of jobs, population and housing numbers. It is a job-led model, in which population and housing growth are partly driven by the demand for labour;
  - c. Housing growth assumption (380 dpa), which models the economic implications of providing for 380 dwellings per annum (dpa) over the period between 2013-2033;
  - d. Past development rates, drawing on past trends in completions of employment space based on monitoring data
79. To inform this study, consultation was also undertaken with local commercial agents regarding Brentwood's commercial property market geography and characteristics. A list of

consultees and discussion questions are included in Appendix 1 and Appendix 2. In addition, a safety margin has been applied to the above forecasts. The safety margin adds an allowance for factors such as delayed site delivery, providing flexibility for supply.

80. Setting out the requirement as a range allow the Council to plan for, and permit, a flexible employment land supply. This is because:
- a. there are multiple other factors that have an effect on how much land is actually required to support economic growth, including using new employment land more intensively, rationalising existing sites and how businesses use premises;
  - b. there are limitations to using economic forecasts, such as the changing context of the economy, which is going through a period of uncertainty at this time (i.e. Brexit, Covid-19 pandemic). National macroeconomic assumptions act as a basis for modelling down to the regional and local levels, taking a reference to the economic profile and sectoral composition of an area; they do not take into account specific local factors, which can have an impact on localised economic growth.
81. Therefore, the range of employment land required based on the four economic growth scenarios modelled in this study is justified, effective and positively prepared, in line with national policy and guidance.

## Is it clearly identified in strategic policy within the Plan

82. Policy PC02: Job Growth and Employment Land clearly sets out that provision is made to meet full employment needs based on forecast job growth.
83. The Council acknowledge that it can be made more explicit that Policy PC02 is a strategic policy. Therefore, the strategic status of this policy and its location within the Plan can be modified should the Inspectors recommend that this is necessary.

### INSPECTORS' QUESTION 70

The Plan, through Policy PC02 and individual site policies, allocates 47.39 ha of new employment land, which is more than the requirement. Can the Council explain why they propose to allocate more land than is required?

84. The proposed 47.39 ha of new employment land, being 3% above the upper estimate of employment land need, provides flexibility to insure against future contingencies, including future losses of employment space from permitted development and other external market factors.
85. It should be noted that forecasts are highly uncertain. Going forward, gains and losses of employment space should be rigorously monitored, as should market indicators such as

vacancy rates, rents and development viability. If monitoring suggests that demand is below (or above) the forecast, the next plan review should consider de-allocating some of the land identified (or alternatively allocating more sites) for employment development. As local plans are now required to be reviewed every five years, there will be more frequent opportunities in future to adjust policy in light of new evidence. It is not considered that the small over allocation has any material negative consequences for the plan as a whole and assists in maintaining a flexible supply to cope with higher growth scenarios.

### INSPECTORS' QUESTION 71

Paragraph 7.23 states that it summarises the employment site selection process. However it is not entirely clear in the Plan what approach has been taken in deciding which sites should be allocated and whether they are supported by robust evidence. We note that a Housing and Economic Land Availability Assessment (HELAA) was published in 2018, which has included consideration of the 2010 Employment Land Review and other evidence. Can the Council provide clarity on the process of site selection for employment site allocations in the Plan please?

86. Please refer to table 65.1, under the Council’s answer to the Inspectors’ question 65. This includes explanation of the Council’s site assessment and selection process, which is linked to the spatial strategy. The table also provides links to relevant supporting evidence.

### INSPECTORS' QUESTION 72

Are sites to be allocated through Policy PC03 as well as the individual site allocations and if so, why are the sites set out in Figure 7.6 rather than in the policy?

87. The sites set out in Figure 7.6 are sites to be allocated for employment use through PC03, in addition to other individual strategic employment site allocations E08, E10, E11, E12, E13, R01 and R03. The following modification is suggested to include these within the upper part of Policy PC03:

Policy Number	Proposed Modification
PC03  Figure 7.6	Delete Figure 7.6.  Amend first paragraph of Policy PC03 to read:  <b><u>Within these areas The following locations, as shown on the Brentwood Policies Map, are allocated for general employment and office development:–, set out in Figure 7.6 and on the Brentwood Policies Map,</u></b>

<b>Policy Number</b>		<b>Proposed Modification</b>	
	<u>Site Ref</u>	<u>Site Name</u>	<u>Area (ha)</u>
<b>Existing Allocated Employment Land</b>			
	Part of E12	Childerditch Industrial Estate	11.25
	E09	Hallsford Bridge Industrial Estate	3.41
	E04	Hubert Road Industrial Estate	3.78
	E07	Hutton Industrial Estate	10.48
	E02	Brook Street Employment Area	1.25
	E05	Warley Hill Business Park (excl. Regus)	2.5
	Part R04	Ford Offices, Eagle Way, Warley	2.0
	E03	BT Offices, London Road, Brentwood	3.5
	E06	OCE offices, Chatham Way, Brentwood	0.45
	Part R02	West Horndon Industrial Estate	2.0
		Sub-Totals	40.62
<b>Existing Employment Sites in the Green Belt</b>			
	<del>108</del>	<del>The Old Pump Works, Great Warley Street</del>	<del>0.79</del>
	111	Upminster Trading Park	2.6
	<del>321</del>	<del>McColls Headquarters, Ongar Road</del>	<del>1.6</del>
	228	Peri Site, Warley Street, Great Warley	5.36
		Sub-Totals	10.35-7.96
<b>Existing Employment Sites Not Previously Allocated</b>			
	Part of E10	Land at Codham Hall	9.01
	E12	Childerditch Industrial Estate	3.52
		Sub-Totals	12.53
<b>New Employment Land Allocations</b>			
	E11	Brentwood Enterprise Park (M25 Junction 29 works)	25.85

Policy Number	Proposed Modification		
	E08	Land adjacent to Ingatestone by-pass (part bounded by Roman Road)	2.06
	Part of E12	Childerditch Industrial Estate	5.87
	Part of E10	Codham Hall (New extension)	0.61
	E13	Land at East Horndon Hall	5.5
	Part of R03	North of A1023	2.0
	Part of R01	Dunton Hills Garden Village Strategic Allocation	5.5
		<b>Sub Totals</b>	<b>47.39</b>

**In these locations the Council will seek to achieve and retain a wide range of employment opportunities. Redevelopment or change of use of business, office, general industry and distribution for non B-class uses will only be permitted where:**

Table 72.1: Proposed Modification to Policy PC03

### INSPECTORS' QUESTION 73

What are the exceptional circumstances for the removal of employment sites from the Green Belt and where can we find this assessment in the evidence?

88. The NPPF 2019 states that '*Green Belt boundaries should only be altered where exceptional circumstances are fully evidenced and justified, through the preparation or updating of plans*' (paragraph 136) and that before concluding that exceptional circumstances exist, plan-making authorities '*should be able to demonstrate that it has examined fully all other reasonable options for meeting its identified need for development*' (paragraph 137).
89. As 'exceptional circumstances' remains undefined in the NPPF, relevant case law establishes that the following matters are relevant in the consideration of whether exceptional circumstances exist:
- the scale of the objectively assessed need;
  - constraints on supply/availability of land with the potential to accommodate sustainable development;
  - whether the need should be met in full having regard to constraints and the difficulties in achieving sustainable development without impinging on the Green Belt;

- d. the nature and extent of the harm to the Green Belt (or those parts of it which would be lost if the boundaries were reviewed); and
  - e. the extent to which impacts on the purposes of the Green Belt may be mitigated as far as practicable.
90. In respect of the first three points, the Council has evidenced a substantial need for economic development and to balance housing and job growth so far as possible (see explanation and relevant economic evidence under the Council's answer to Inspectors question 65). Through the site selection and assessment process, it becomes clear that there are severe limitations on options to meet this need without altering the Green Belt. Options to deliver sustainable development without amendments to the Green Belt boundary are also very limited. This is evidenced through a comprehensive site analysis by the HELAA (evidence document C24).
91. In respect of the last two points, the Green Belt studies play a key role in informing the Council's site assessment process as well as determining appropriate planning policy which would relate to the acceptability of proposed allocations from a landscape perspective:
- a. the Green Belt study (evidence document C18) which provides an assessment of potential employment sites in the Green Belt against their relative contributions to the purposes of the Green Belt designation;
  - b. the Mid Essex Landscape Character Assessment (evidence document C33); and the Landscape Sensitivity and Landscape Capacity Study: Potential and Strategic Allocation Options report (evidence document C32), which provides greater understanding of the potential variation across the Landscape Character Areas at a site-specific level.
92. Proposed alterations to the Green Belt boundaries are underpinned by additional work including the analysis of reasonable alternatives as part of the Sustainability Appraisal (evidence document A3) and wider sustainability and material considerations which are documented in the Sustainability Appraisal and the HELAA (evidence document C24).
93. In order to meet full identified need, Green Belt release was an unavoidable consideration. The Council maintains its position in that the Local Plan has been positively prepared, based on a growth strategy which seeks to meet all of its employment and housing needs and infrastructure requirements, consistent with achieving sustainable development. The Green Belt release for employment sites is therefore under exceptional circumstances as set out above.
94. More detailed information is provided in the Council's Green Belt Topic Paper which discusses exceptional circumstance justification for allocating each Green Belt site to come forward for employment development.

## INSPECTORS' QUESTION 74

Figure 7.6 includes four existing employment sites in the Green Belt. Are these sites to be allocated through the Plan and if so, will they remain washed over by the Green Belt? Is there a reason why these sites need to remain in the Green Belt? As relevant development proposals for these sites would need to demonstrate very special circumstances, can the Council clarify how this approach will be effective? Are there exceptional circumstances to justify removing these sites from the Green Belt and if so, where is this evidence?

95. The four existing employment sites in the Green Belt listed under Figure 7.6 are:

Ref	Site name	Area
108	The Old Pump Works, Great Warley Street (*)	0.79
111	Upminster Trading Park	2.6
228	Peri Site, Warley Street, Great Warley	5.36
321	McColls Headquarters, Ongar Road (*)	1.6

96. (\*): It should be noted that since the submission of the Plan, two of the above existing employment sites have been granted permission for residential use:

- a. The Old Pump Works, Great Warley Street. (ref: [17/01584/FUL](#))
- b. McColls Headquarters, Ongar Road (ref: [19/01043/PNCOU](#))

97. Therefore, in updating our latest position, these will be removed from the Council's employment land provision.

98. With regards to the Upminster Trading Park (111) and Peri Site (228), both are well established employment sites and considered as part of existing employment land provision as there are existing uses on sites. The latest activities can be understood from a brief summary of the planning history:

- a. Peri Site (228): The site is located on the B186/Warley Street, just north of the A127/Southend Arterial Road of the Southern Brentwood Growth Corridor. In 2007, the site was granted a Certificate of Lawful Use or Development confirming that the lawful use of the site fell within Use Class B8 ([07/00029/S192](#)). In 2016, the applicant demonstrated a very special circumstance for redevelopment in the Green Belt ([16/00152/FUL](#)) and was granted permission to demolish the existing office and warehouse and construction of new office for Peri's Head Office, warehouse and shed, together with ancillary buildings and works.

- b. Upminster Trading Park (111): also located within the Southern Brentwood Growth Corridor. The site was allocated in the Replacement Local Plan 2005 for employment purpose but was not removed from the Green Belt (as shown in the 2005 Proposals Map). In 2016, the site was granted a Lawful Development Certificate for an existing use or operation or activity including those in breach of a planning condition for ancillary car parking area (16/00807/S191). In 2017, the applicant demonstrated a very special circumstance to achieve planning approval for a storage building (17/00491/FUL).
99. There has been no indication to further expand or remodel to allow for increased provision of employment land. Therefore, it was not considered necessary to remove them from the Green Belt.
100. As they remain washed over by the Green Belt, any future proposals would have to demonstrate they comply with National and Local Policy regarding development in the Green Belt.

## INSPECTORS' QUESTION 75

Which parts of the evidence support the allocation, deliverability and viability of the Brentwood Enterprise Park (Policy E11)? Whilst Policy E11 refers to the need for highway works and the provision for sustainable transport, have the detailed transport infrastructure requirements been assessed and are they deliverable and viable?

## Justification for the Brentwood Enterprise Park allocation

101. Brentwood Enterprise Park (site E11) is a brownfield land, formerly used as a highway works site (M25 widening) since around 2010. The site is strategically well located within the Southern Brentwood Growth Corridor and has access to strategic connections to key economic centres in the region (including Tilbury Port, Southend Airport and those in Greater London). It is being promoted for employment development by the landowner and developer (St Modwen).
102. Although the site is within the Green Belt, in assessing all employment land options including the site itself, the following evidence documents and their findings have demonstrated an exceptional circumstance<sup>1</sup> to release Brentwood Enterprise Park site from Green Belt for employment allocation:
- a. The [Sustainability Appraisal](#) (evidence document A3): notes that development on this site presents an opportunity to capitalise on connections to key economic centres. With its excellent access onto the strategic highway network, Brentwood Enterprise Park will provide an opportunity for high-end modern premises, along with appropriate ancillary uses, e.g. a hotel. The Enterprise Park will also be well placed to make use of the new Lower Thames

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<sup>1</sup> Relevant matters in the consideration of whether exceptional circumstances exist are set out in the Council's answer to the Inspectors question 73.

Crossing, and may also provide premises for light industrial and distribution businesses relocating out of London (as premises in London come under pressure for redevelopment), helping to bolster the Borough's existing small stock of such uses. The [Sustainability Appraisal](#) also provides a site specific appraisal which informs policy requirements;

- b. The Green Belt study (evidence document [C18](#)): part 3 of this study, [Appendix L6](#), concludes that the site has moderate overall contribution to Green Belt purposes;
  - c. The Landscape Sensitivity and Landscape Capacity Study (evidence document [C32](#)): [Appendix L3](#) finds that the site (reference 101A) is Low Landscape Sensitivity, Low Landscape Value, with a resultant High Landscape Capacity (a high capacity site being more readily able to accommodate development); [Appendix L4](#) states Moderate Overall Sensitivity to Change, and considers the Site within the LCA as being Low (as L3 above). [Appendix L5](#) summarises the capacity for development as High (the highest ranking);
  - d. The Transport Assessment (evidence document [C35](#)): this finds the M25 Junction 29 (A127) to be operating (AM peak) at 152% of capacity under the future reference scenario, and at 184% under the future Local Plan scenario 'with sustainable travel mitigation consideration' scenario. The introduction of the Brentwood Enterprise Park therefore presents an opportunity to enable highways mitigation measures at this junction to improve its operation capacity. There is a proposal for a new M25 Junction 3km to the south to link the M25 with the new Lower Thames Crossing, and the associated proposal for necessary upgrades to M25 J29. In many respects this would assist with movements to and from the M25, open up opportunities for goods and services to flow more easily between Brentwood and the area of Kent and beyond across the Thames, strengthening links to a market area that is currently less accessible from the borough. Engagement has taken place with stakeholders and highways authorities to allow for a coherent delivery of these projects.
  - e. The [HELAA](#) (evidence document [C24](#)): concludes that the site is available, achievable, suitable and can be delivered within 1-10 year;
  - f. All other relevant economic evidence identifying economic growth needs.
103. The Brentwood Enterprise Park allocation is in accordance with the Council's spatial and sustainable economic development strategy.
104. Policy E11 in the [Submission Local Plan](#) (document [A1](#)) regarding development on site supports timely and effective delivery of development. The policy requires landscaping and earthworks in light of the sensitive Green Belt location and significant highways works to ensure good access to M25 J29.

## Deliverability and viability of the Brentwood Enterprise Park

105. The Brentwood Enterprise Park was not subject to site specific viability testing in the Local Plan [Viability Assessment](#) (evidence document [C38](#)). At the time of this study (2018), an assessment of the site's infrastructure requirements was not finalised.
106. However, further progress has been made since. Transport infrastructure required to enable delivery of the site (and growth in the wider southern corridor) has been assessed, detailed

and costed in the Southern Brentwood Growth Corridor Sustainable Transport Vision (document C37) and Transport Assessment (evidence document C35); these and other infrastructure requirements are summarised in the Infrastructure Delivery Plan (evidence document C28).

107. In addition, highways arrangements for bringing forward Brentwood Enterprise Park and Lower Thames Crossing are the subject of ongoing discussion between the Council, Essex County Council, Highways England, Lower Thames Crossing team, and the site promoter to allow for both projects to be delivered together without delay.
108. The Council and the site promoter have been working together actively to prepare a joint Statement of Common Ground setting out current position and the deliverability (including viability) of the site.

## INSPECTORS' QUESTION 76

The Plan provides a housing trajectory. Can the Council also produce an employment trajectory to assist us in understanding the timescales for delivery over the plan period?

109. Please find below the Employment Land Trajectory 2016 – 2033:

Policy Reference		Net New Employment Land (ha)	2016-2021	2021-2026	2026-2031	2031-2033	Related planning application
<b>Existing Allocated Employment Land</b>							
Part of E12	Childerditch Industrial Estate	11.25	11.25				
E09	Hallsford Bridge Industrial Estate	3.41	3.41				
E04	Hubert Road Industrial Estate	3.78	3.78				
E07	Hutton Industrial Estate	10.48	10.48				
E02	Brook Street Employment Area	1.25	1.25				
E05	Warley Hill Business Park exc. Regus	2.50	2.50				

Policy Reference		Net New Employment Land (ha)	2016-2021	2021-2026	2026-2031	2031-2033	Related planning application
Part of R04	Ford Offices, Eagle Way, Warley	2.00		2.00			
E03	BT Offices, London Road, Brentwood	3.50	3.50				
E06	OCE offices, Chatham Way, Brentwood	0.45	0.45				
Part of R02	West Horndon Industrial Estate	2.00		2.00			
	<b>SUB-TOTAL</b>	<b>40.62</b>	<b>36.62</b>	<b>4.00</b>	<b>0.00</b>	<b>0.00</b>	
<b>Existing Employment Sites in the Green Belt</b>							
PC03	Upminster Trading Park	2.60	2.60				17/00491/FUL
PC03	Peri Site, Warley Street, Great Warley	5.36	5.36				16/00152/FUL
	<b>SUB-TOTAL</b>	<b>7.96</b>	<b>7.96</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	
<b>Existing Employment Sites Not Previously Allocated</b>							
Part of E10	Land at Codham Hall	9.01	9.01				
E12	Childerditch Industrial Estate	3.52	3.52				
	<b>SUB-TOTAL</b>	<b>12.53</b>	<b>12.53</b>	<b>0.00</b>	<b>0.00</b>	<b>0.00</b>	
<b>New Employment Land Allocations</b>							
E11	Brentwood Enterprise Park	25.85		10.85	15.00		
E08	Land adjacent to Ingatestone by-pass	2.06	2.06				
Part of E12	Childerditch Industrial Estate	5.87	2.87	3.00			

Policy Reference		Net New Employment Land (ha)	2016-2021	2021-2026	2026-2031	2031-2033	Related planning application
Part of E10	Codham Hall (New extension)	0.61	0.61				
E13	Land at East Horndon Hall	5.50	5.50				19/00315/OUT (Approved)
Part of R03	Land North of Shenfield	2.00		2.00			
Part of R01	Dunton Hills Garden Village	5.50		5.50			
	<b>SUB-TOTAL</b>	<b>47.39</b>	<b>11.04</b>	<b>21.35</b>	<b>15.00</b>	<b>0.00</b>	
	<b>TOTAL</b>	<b>108.50</b>	<b>68.15</b>	<b>25.35</b>	<b>15.00</b>	<b>0.00</b>	