

Planning Statement

**Broadfields Innovation and Business Park, East
Horndon, Essex**

September 2022

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1. Introduction

- 1.1.1. This Planning Statement has been prepared by Savills on behalf of MM Properties (London) Ltd ('the applicant') in support of a proposed application for outline planning permission for the redevelopment of 29.9 acres of land known as 'Broadfields' to the west of Tilbury Road, East Horndon in Brentwood, Essex.
- 1.1.2. The proposals seek outline permission for the comprehensive redevelopment of the site to deliver a Net Zero Carbon development of up to 32,000 sqm of employment floorspace within Use Classes E(g)(iii), B2 and B8 and including an Ultra Rapid Electric Vehicle Charging Facility, a start up and enterprise hub of lower cost small medium and micro accommodation as well as a children's play area and associated works.
- 1.1.3. The site is allocated as Green Belt land situated outside of defined settlement boundaries in the Council's adopted Local Plan. For context, the site is located adjacent to the London Brentwood Commercial Park being developed by Goodmans which is under construction and partly pre-let. The site is within the defined Southern Growth Corridor.
- 1.1.4. The key differences between the current proposals and the previously withdrawn application are as follows:
- The development will deliver a Net Zero Carbon development in construction and regulated energy use;
 - The development will deliver a start-up and enterprise hub of smaller units ranging from 50sqm to 500sqm including a proportion of affordable workspaces;
 - The development will deliver an Ultra-Rapid EV charging station for vehicles;
 - The entire 29.9 acre site is now included within the development boundary allowing landscaped and ecology led design, retaining sensitive existing landscape features within the proposals;
 - A children's play area forms part of the proposals
 - The scale of buildings on the southern side of the site have been reduced; and
 - Landscaped bunds will be constructed within the site on the northern boundaries to provide visual and acoustic screening to nearby residential dwellings.
- 1.1.5. MM Properties (London) Ltd is submitting a new application for outline permission for the following compelling reasons:
- Legally binding national emissions targets cannot be met unless new development achieves Net Zero Carbon in construction and regulated energy use
 - Phasing out of fossil fuel vehicles by 2030 is impossible without a network of ultra-rapid electric vehicle charging facilities. There are currently very few facilities provided in the Borough

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- A prestigious high quality business environment is needed to attract occupiers to the Borough particularly from innovation sectors and new technologies.
- Without any small and very small business units available on flexible affordable terms, start-ups and growing small businesses cannot locate in the Borough.
- Without sufficient small and medium size business units growing SMEs cannot expand without leaving the Borough.
- The employment space lost through conversion and redevelopment cannot be replaced on the land allocated in the adopted Local Plan.
- The Local Plan is under immediate review and it is understood the Plan will need to make further allocations to address the shortfall in employment land.
- The Borough has very limited available premises in any use sector or size configuration.
- The wider property market area, of which the Borough forms part, also has availability rates approaching zero in most sectors and uses.
- The local and sub regional market requires immediate delivery of premises across all uses, sizes and configurations due to a longstanding lack of supply. The proposed development would make a contribution towards this to allow the market to function properly with a vacancy rate of around 8%.

1.1.6. The outline application has been submitted including the following information:

- **Sustainability Assessment and Net Zero Carbon Statement** prepared by Hodkinson
- **Site Location Plan** prepared by Nicholas Webb Architects
- **Parameter Plans** prepared by Nicholas Webb Architects
- **Design Code** prepared by the applicant
- **Indicative site layout** prepared by Nicholas Webb Architects
- **Indicative Elevations** prepared by Nicholas Webb Architects
- **Planning Statement** prepared by Savills
- **Economic and Property Market Assessment** prepared by Savills
- **Design and Access Statement** prepared by Nicholas Webb Architects
- **Landscape Visual Impact Assessment** prepared by Neil Tully Associates
- **Heritage Assessment** prepared by HCUK
- **Transport Assessment** prepared by Redwood Partnership

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- **Framework Travel Plan** prepared by Redwood Partnership
- **Archaeological Desk-Based Assessment** prepared by prepared by HCUK
- **Flood Risk and Drainage Strategy** prepared by Ardent
- **Noise and Vibration Impact Assessment** prepared by KP Acoustic
- **Phase 1 Geo-Environmental Risk Assessment** prepared by Terragen
- **Ecology Report** prepared by Surrey Wildlife Trust

- 1.1.7. Please note that a legal opinion is currently being prepared to assess the merits of the proposals against planning policies and this will be submitted in due course.
- 1.1.8. The planning application has been prepared on the basis that it would not constitute EIA development. The proposed development follows a recently withdrawn application on the same site which was itself subject of an EIA Screening Opinion request (21/01666/OUT). In a formal response dated 22 October 2021 Brentwood Borough Council confirmed that this development was not EIA development. It is our expectation that the same circumstances apply to this planning application.
- 1.1.9. We note the proposed development is considered to fall within Category 10 (a) of Schedule 2 of the EIA Regulations for 'Industrial Estate Development Projects' for EIA screening purposes. The proposals are below the indicative criteria and screening threshold for EIA which would normally be for developments being larger than 20 hectares in area.
- 1.1.10. The principal environmental effects from the development would relate to noise, transport, LVIA and heritage impacts. However these effects would be managed in accordance with standard methods including the implementation of measures contained within reports submitted with the application and the imposition of planning conditions.

2. Site and Surrounding Area

2.1.1. This section provides a description of the site and the immediate surrounding area, together with a summary of the relevant planning history.

2.2. The Site

2.2.1. The application site expands to approximately 13 hectares and comprises a broadly rectangular shaped parcel of land, located some 2km to the north east of West Horndon village. The site is currently comprised of a single residential dwelling with adjacent commercial yards and buildings. The immediate surroundings of the house are maintained as garden including the large field behind it. The rest of the land is overgrown unmanaged grazing land that has become scrubland.

2.2.2. The site is located to the west of the junction of the A127 Southend Arterial Road and A128. The eastern boundary is formed by Tilbury Road. To the north of the site there is a recently completed housing development at Elliots Close directly abutting the westbound A127 slip road. Beyond the substantial hedgerow on the southern boundary is open agricultural land. To the west of the site is Hollow Bottom Shaw, an area of woodland which is designated as a Local Wildlife Site.

2.2.3. Existing buildings on the site comprise a dwellinghouse known as Broadfields, alongside associated outbuildings and barn and vehicular hardstanding. Access to these buildings is currently provided from Tilbury Road. The site is well screened from the surrounding highway by existing substantial but overgrown hedgerows and established trees and vegetation along its boundaries. Land to the west of the site boundary provides a natural buffer. Land further to the west comprises an area of woodland.

2.2.4. The topography slopes a few metres from north east to south west across the site. To the north east there are large embankments each side of the A127 forming the A128 roundabout junction which acts as a screen to long views towards the site together with the intervening development at East Horndon Hall .

2.2.5. The site does not lie within a Conservation Area. The boundary of the Thorndon Historic Park Conservation Area is located approximately 150m north-west of the application site on the other side of the A127 dual carriageway. There are no Listed Building on the site. The closet Listed Building is East Horndon Hall.

2.2.6. The site is located in Flood Zone 1 and is considered to be at low risk from flooding.

2.3. Surrounding Area

2.3.1. The surrounding area mostly comprises arable farming land. West Horndon is situated approximately 1km west of the site and is a medium sized village. It includes a mix of houses and local services, as well as the West Horndon Industrial Estate which is located at the western edge of the village, opposite the train station.

2.3.2. West Horndon train station provides regular services to London Fenchurch Street, as well as Southend. There are also regular bus services which run along the A128 into West Horndon.

2.3.3. The M25 motorway is within 6km of the site to the west, with direct access from the A127 which bounds the site to the north. The town of Basildon is located approximately 3km east of the site.

2.4. Planning History

Application Site

- 2.4.1. We have undertaken a review of the Council's online planning history register in respect of the proposed development site. The most recent planning history for the Site relates to the previous application for outline permission on part of the site for up to 20,000 sqm of E(g)(ii), E(g)(iii), B2 and B8 floorspace (reference 21/01666/OUT) which was withdrawn by the applicant in February 2022. The applicant and design team has considered the feedback provided by BBC and its statutory consultees to inform the design of the current planning application.
- 2.4.2. In relation to the existing dwelling house known as Broadfields, there have been minor applications for alterations to the building, including approval of a loft conversion in 2012 (LPA ref. 11/01076/S192) and associated outbuilding in 2012 (LPA Ref. 11/01075/S192).
- 2.4.3. In terms of the wider site and area of previously developed land, there have been previous applications for redevelopment submitted, as noted below:
- **20/00695/OUT** - Outline application to construct detached two storey dwelling house (All matters reserved) – Submitted May 2020 and refused in July 2020
 - *The application was refused on following grounds of inappropriate development in the Green Belt (and a lack of very special circumstances) and a harmful impact on existing trees and vegetation.*
 - **15/00090/FUL** - Construction of 4 new dwellings and associated works – refused in March 2015
 - *The officers report associated with the application confirms the status of previously developed land on the site and states " the site is currently occupied by a number of derelict buildings as well as a large steel framed barn with further areas of the site being utilised for parking and outdoor storage as evidenced"*

Surrounding Area

- 2.4.4. An outline planning application was approved in 2020 for a development of up to 35,000sqm of A3, B1, B2 and B8 floorspace which is now under construction (reference 19/00315/OUT).
- 2.4.5. In addition, there a number of sites coming forward for redevelopment in the wider surrounding area. This includes the Dunton Hills Garden Village development subject of an outline planning application (reference 21/01525/OUT) for a Garden Community including up to 3,700 dwellings, 3 care homes, 5 gypsy/traveller pitches, schools, nurseries and creches as well as an employment hub and neighbourhood and sports facilities.
- 2.4.6. The West Horndon Industrial Park is also allocated for redevelopment to provide new housing for the borough. In May 2019 an EIA Screening Request was submitted to the Council (LPA Ref. 19/00782/EIASO) in respect of redevelopment of the site to include a mixed-use, residential led scheme including the provision of up to 750 new residential units and approximately 2700sqm of commercial and employment floorspace. The Council issued their Screening Opinion in June 2019 and confirmed it is not EIA development. No further planning applications have been submitted for this site.

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- 2.4.7. St Modwen have also submitted an application for planning permission to provide 4 industrial buildings totalling approximately 1,211,000 sqft at the BEP. The application is currently under consideration by the LPA. We consider that this development responds to a market for super large logistics operations and do not seek to address any other needs that are present in the borough and wider property market area.

3. Scope of Application

3.1.1. This section sets out the scope of the outline planning application which has been submitted with all matters reserved except access. The application will also include a Design Code for the development of each individual development plot within the site. The approach is intended to provide certainty for the LPA that the detailed development that comes forward at reserved matters stage is consistent with the design intent and vision described in the outline application whilst ensuring sufficient flexibility in the permission for future occupiers of the site subject to separate applications for the approval of reserved matters.

3.1.2. The matters submitted for approval are considered in further detail below and the information / documentation submitted for approval for each representative matter is identified.

3.2. Matters for Approval - Access

3.2.1. The Site is proposed to be accessed from Tilbury Road as per the previous outline application. There will be no direct access from the A127.

3.3. Matters for Approval – Development Plots and parameters

3.3.1. Development Plots: outline permission is sought for up to 32,000 sqm of new employment space which would be accommodated across a number of buildings of differing sizes and configurations on 7 individually serviced and accessed plots. A Parameter plan has been submitted with the application that shows the location of each plot and the maximum height of the building that could be built there.

3.4. Matters for Approval – Strategic Landscaping and above ground drainage features

3.4.1. The strategy for dealing with surface water drainage is via predominantly above ground interventions such as ponds, ditches and swales. Any surface water that cannot be attenuated above ground will be stored in attenuation under parking areas. The zones and minimum sizes of Suds features are shown on the landscape parameters plan submitted for approval, but we would expect that the drainage design could be captured via outline planning conditions or via the approval of reserved matters.

3.4.2. The site contains important existing landscape features and planting within and around the site. The features that will be retained are shown on the landscape parameters plan together with the zones that will be dedicated to appropriate new planting. It is also proposed to introduce narrow width planted bunds along the northern and north eastern boundary where residential property abuts the proposed development. A landscape buffer will be provided around the perimeter of the site. The existing landscape features around the periphery of the site will be retained to form the framework for new structural planting to follow, enhance and reinforce. No built form is proposed for these areas as shown on the parameters plan.

3.5. Matters for Approval – Design Code

3.5.1. A design code is submitted for approval that sets out the key design features that will be included in the future reserved matters submissions for the buildings that come forward for any of the development plots. We anticipate that this will provide the Local Planning Authority with sufficiently detailed information to

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consider the proposals against and would ensure Brentwood retains control over the appearance and form of development via the submission of reserved matters.

3.5.2. The application will include the following illustrative information to demonstrate how the Site could be brought forward within the parameters put forward subject to reserved matters consent:

- Indicative Masterplan
- Indicative Building Elevations
- Indicative Materials Palette
- Indicative Views
- Indicative Landscape Plan

4. Statement of Community Involvement

- 4.1.1. The planning application has been carefully designed to respond to feedback provided by residents and interested parties during the previously application. This section of the Planning Statement summarises the feedback provided and the applicant's response to the issues raised.
- 4.1.2. Approximately 15 responses were submitted to Brentwood by local residents during the determination of the previous application. The common themes within these responses were the perceived impacts on residential amenity due to congestion, noise and pollution, as well as transport impacts and concerns around safety for children living at Elliots Close. We consider that the technical matters relating to transport impacts and noise and pollution were addressed within technical reports submitted during the last application, or there would have been an opportunity to consider these matters further during subsequent applications for the approval of Reserved Matters or the discharge of planning conditions.
- 4.1.3. However the outline planning application and associated material have been prepared to address these concerns. In respect of noise impacts, the Noise Assessment prepared by KP Acoustics submitted with the application demonstrates that noise emissions would be considered to be acceptable subject to reasonable mitigation. The proposed landscaped bund with additional acoustic fencing if required has been added as a response to the representations of residents to the previous application. The Transport Assessment submitted has been scoped with Essex County Council and includes a cumulative assessment dealing with recently approved and ongoing applications including Dunton Hills Garden Village. This report demonstrates the development would not lead to any severe transport impacts as per the test in the National Planning Policy Framework.
- 4.1.4. The applicant has carefully considered the feedback provided by the residents of Elliots Close around site safety and implications on children. As a direct result the outline application incorporates a children's play area into the design which will be sited on the site's eastern boundary with Tilbury Road. This will make the play area easily accessible for residents.
- 4.1.5. Upon submission of the application, the applicant intends to notify local residents of the application via a letter drop. The letters will contain a summary of the proposed development and measures implemented to mitigate previous concerns and set out how interested parties will be able to submit representations to the Council during determination.

5. The Proposed Development

5.1. Overall Development

- 5.1.1. The proposals seek the comprehensive redevelopment of the site to deliver a Net Zero Carbon Development of up to 32,000 sqm of employment floorspace including a proportion of small units in the form of a start-up and enterprise hub and an Ultra Rapid EV charging facility for 16 vehicles together with associated parking, landscaping and infrastructure works.

5.2. Demolition

- 5.2.1. There is one existing private dwelling house (known as Broadfields) and other ancillary outbuildings and commercial buildings of varying size, located in the eastern part of the site adjacent to Tilbury Road. The proposals involve the demolition of all these existing buildings to facilitate the development.

5.3. Proposed Use

- 5.3.1. The proposed development will provide up to 32,000 sqm of new employment floorspace in total. The proposed use of the buildings is intended to be flexible in nature and it is suggested that these will comprise a variety of sizes, to respond to market demands and suit the needs of a range of Class E (g)(iii), B2 and B8 occupiers. The design approach at Broadfields is to create an extremely well landscaped setting for the development of commercial buildings sitting within individual plots. It is expected that this type of setting and the flexibility that it allows for occupiers will attract higher tech business to the Borough and the Southern Growth Corridor. This approach is considered to be unique and the development could be a flagship scheme for Brentwood. It is our view that is currently not possible to attract technology sector businesses to the Borough without premises that are capable of supporting these types of business.
- 5.3.2. Each building will have an ancillary office area, servicing yards and areas for staff and visitor car parking, in accordance with the Council's maximum parking standards. Details of car parking layout will be dealt with at the reserved matters stage once final occupation and design of the development plots is confirmed but the indicative site layout shows how parking might be laid out.

5.4. Access

- 5.4.1. The application is seeking detailed approval for the access to the site from Tilbury Road. The main spine road will serve all individual building plots which each have an access for vehicles and pedestrians and cycles.
- 5.4.2. The scheme envisages that each plot will be developed individually with each building's principle elevation presenting to the main spine road and parking and servicing in less prominent locations.
- 5.4.3. In terms of transport impacts we consider that the capacity of the A127 / A128 roundabout is sufficient to accommodate the traffic generated by the proposed development. Further information will be submitted as part of the planning application, but MM Properties (London) Ltd recognises that as part of the outline application, works to deliver a lights controlled junction at where Station Road meets the A128 may be justified.

- 5.4.4. Accessible parking will be included in the scheme at 5% of the total parking provision for the site. Provision is also made for electric vehicle parking, including 20% active and 20% passive spaces.
- 5.4.5. Cycle parking will be provided for all the units, in line with the Essex Parking Standards (2009). A total of 140 spaces will be provided for the commercial units and will be located within secure communal cycle stores at ground floor level in a number of locations across the site. There will be secure cycle parking for members of staff within the site boundary for each building along with associated shower and changing facilities in the buildings. Cycle routes through the site will link to the wider network improvements that will result from the DHGV development.
- 5.4.6. Refuse and recycling facilities will be also be provided for each unit and collected from the front of the buildings using the appropriate designated delivery and servicing areas.

5.5. Layout / Design Approach

- 5.5.1. The arrangement of the individual development plots across the site has been determined by the existing landscape features that are being retained, and the position of the central access road and above ground drainage features that are required. The detailed layout of the buildings within each plot is reserved for future determination however the indicative layout shows how a variety of different types and sizes of buildings might appear in the extensively landscaped setting.
- 5.5.2. In preparing the indicative layout, the architects have looked first to create a series of development plots/zones within the landscape that are capable of being developed individually and then to consider the way in which they might be built out in a cohesive manner. The parameters plan sets out the heights and sizes of buildings that are considered suitable for each zone with consideration being given to long views and visual impact in the wider setting.

5.6. Scale

- 5.6.1. The scale of individual buildings is not fixed to allow for maximum flexibility although the maximum proposed heights for buildings in each zone are shown on the Parameters Plan. This will allow the Council to assess the impact of the scheme on the surrounding heritage assets and surrounding landscape. The maximum heights are between 6m and 12m. The parameters plan illustrates how the height of buildings located in different parts of the site varies in response to the impact their scale might have in a wider landscape setting.

5.7. Appearance

- 5.7.1. The proposed development will provide a low density landscaped setting for a high quality flagship innovation and business park. This will provide a destination and setting that will attract businesses from all sectors of the economy including the technology sector. The appearance and character of the development is very important to appeal to different sectors. The illustrative materials submitted shows the type of high quality sustainable buildings that are could be delivered on the Site. The orientation of the buildings means that primary façades and entrances facing the main spinal road compliment the central structural landscaping to create a setting that is attractive to future occupants in the technology sector. The Design Code will set out the principle features that a detailed submission must follow without compromising flexibility. The final design and appearance of the proposed buildings will be dependent on future occupiers

and is reserved for future determination but will follow the principles and parameters established in this submission.

5.8. Landscaping

- 5.8.1. The site comprises overgrown unmanaged pasture and former agricultural land arranged as 3 principle parcels of land divided and enclosed by hedge and ditch features with intermittent trees along their lengths. As such the land is not prominent or readily visible in the wider landscape.
- 5.8.2. Full details of the planting of strategic areas and within development plots will be reserved for future determination, however the landscape parameters plan shows the extent of the areas and the approach that would be taken. All the existing landscape features around the site boundary will be retained and reinforced with new native planting. The intent is to enhance the existing environment rather than create a new one and the buildings will be less prominent features than the landscape setting.
- 5.8.3. Along the northern boundaries with residential properties it is proposed to construct a series of narrow interlinked bunds which will be planted with native trees and hedging. This will establish an immediately effective visual and acoustic buffer to protect the amenity of these properties. The bunds will sit within a wide landscaped buffer which will mature over time into a dense linear woodland rich in native species and wildlife.
- 5.8.4. The existing and enhanced landscape features will be linked together with new structural planting to enable wildlife to transit through the site and features to enable safe crossing of roads
- 5.8.5. Full details of the landscape and visual impact of the proposed development will be set out in an assessment to be prepared by Neil Tully Associates (NTA). Initial input from NTA following on from the previous application has helped inform the approach taken to the design and siting of buildings within the site to ensure that any visual impact is managed and mitigated.

6. Planning Policy Context

6.1.1. In accordance with Section 38(6) of The Planning and Compulsory Purchase Act (2004), planning applications should be determined in accordance with the development plan unless other material considerations indicate otherwise. The Development Plan for the Borough comprises the Brentwood Local Plan 2016-2033.

6.1.2. There are also a number of material considerations which are relevant to the determination of this application, including the National Planning Policy Framework (2021) and the relevant adopted local Supplementary Planning Documents.

6.2. National Planning Policy

6.2.1. At the national level, the Government published the updated National Planning Policy Framework (NPPF) in July 2021. The Government expects the planning system to deliver the homes, businesses, infrastructure and thriving local places that the country needs, while protecting and enhancing the natural and historic environment.

6.2.2. At the heart of the Framework is a presumption in favour of sustainable development. As set out in Paragraph 11, for decision making this means:

- *"approving development proposals that accord with the development plan without delay; and*
- *where there are no relevant development plan policies, or the policies which are most important for determining the application are out-of-date⁷, granting permission unless:*
 - *the application of policies in this Framework that protect areas or assets of particular importance provides a clear reason for refusing the development proposed; or*
 - *any adverse impacts of doing so would significantly and demonstrably outweigh the benefits, when assessed against the policies in this Framework taken as a whole.*

6.2.3. In terms of delivering sustainable development and building a strong, competitive economy, Paragraph 81 states significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

6.2.4. Paragraph 137 confirms that the Government attaches great importance to the Green Belt and that the essential characteristics of Green Belts are their openness and their permanence.

6.2.5. Paragraph 138 identifies the 5 purposes of the Green Belt;

- *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.*

6.2.6. Paragraph 147 states inappropriate development is, by definition, harmful to the Green Belt and should not be approved except in very special circumstances. Paragraph 148 states when considering any planning application, local planning authorities should ensure that substantial weight is given to any harm to the Green Belt. 'Very special circumstances' will not exist unless the potential harm to the Green Belt by reason of inappropriateness, and any other harm resulting from the proposal, is clearly outweighed by other considerations. The very special circumstances that prevail at Broadfields and indeed in Brentwood as a whole will be fully evidenced in this planning application. As per *Wildie v Wakefield Metropolitan BC [2013]* "it is incumbent on the planning authority to consider the countervailing benefits said to be served by the development; and then to consider whether those benefits clearly outweigh the harm so as to amount to very special circumstance. In order to qualify as 'very special', circumstances do not have to be other than 'commonplace', i.e. they do not have to be rarely occurring".

6.2.7. What is required therefore is a qualitative, not a quantitative judgment and to consider cumulatively the very special circumstances that clearly outweigh the harm. This is simply a matter of planning judgement for the council members. There can be no doubt in this case, as evidenced in this statement and in the planning documents, that the judgement of the council to grant planning approval would be entirely rational and lawful and would accord fully with green belt policy. And while not intending to extract a particular special circumstance at this point it must be stated that Section 80 of the NPPF provides that significant weight should be attached to the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.

6.2.8. Paragraph 150 sets out that certain other forms of development are also not inappropriate in the Green Belt provided they preserve its openness and do not conflict with the purposes of including land in the Green Belt. This includes the re-use of buildings provided that the buildings are of permanent and substantial construction.

6.3. Supplementary Planning Documents

6.3.1. BBC has also adopted a number of Supplementary Planning Documents which are a material consideration in respect of planning applications. This includes the Essex County Council Parking Standards: Design and Good Practice (2011), the Developer's Guide to Infrastructure Contributions (Revised Edition 2015), Sustainable Drainage Systems Design Guide (2015) which will be referenced within this Statement where necessary.

6.4. Local Planning Policy

6.4.1. The Brentwood Local Plan was adopted in March 2022, however as acknowledged in the Inspectors Report to Brentwood Borough Council that the Council is required to implement an immediate review of the Plan by June 2024. This review requires the Council to consider the Objectively Assessed Housing Need and 'all other matters that need to be assessed and taken into account for the purposes of plan preparation' and that includes the linked matter of employment..

6.4.2. The applicant made extensive submissions during the examination process for the now adopted Plan in relation to the amount of employment land that was being allocated for development. Recognising there will be further housing sites allocated to meet an updated objectively assessed housing need, we consider that this would justify a review of employment allocations. It remains the case the Borough has a significant shortfall of existing employment sites and site allocations to satisfy considerable demand, and propose to submit a robust market assessment with the planning application that analyses the considerable missed opportunity in Brentwood. The application will include a detailed and robust justification for more land to be allocated for employment purposes. Alongside the demonstration of the need for further employment land to be allocated in sustainable locations is the fact that the site is located in the Southern Brentwood Growth Corridor which is recognised as a key transit corridor. The Plan states this area will act as a focus for a wider M25/A127 employment cluster considering existing employment uses in the area.

6.4.3. Other relevant Local Plan policies include:

- Policy MG02 (Green Belt)– states that All development proposals within the Green Belt will be considered and assessed in accordance with the provisions of national planning policy.
- Paragraph 4.10 (Proposals Affecting the Green Belt) – states all proposals coming forward in non-allocated Green Belt locations will be assessed in accordance with Strategic Policy MG02 Green Belt and national policy on Green Belt. Development will be considered inappropriate and refused unless very special circumstances are demonstrated and/or where the exceptions apply in line with the NPPF. One of the Council’s objectives is to support the rural economy and sustainability of villages. Where proposals align with these exceptions, proposals will be supported.
- Policy NE01: (Protecting and Enhancing the Natural Environment) - states that all proposals should, wherever possible, incorporate measures to secure a net gain in biodiversity, protect and enhance the network of habitats, species and sites (both statutory and non-statutory) and avoid negative impacts on biodiversity and geodiversity. Compensatory measures will only be considered if it is not possible fully to mitigate any impacts.
- Policy BE01: (Carbon Reduction and Renewable Energy) – states development should meet the minimum standards of sustainable construction and carbon reduction
- Policy BE16: (Conservation and Enhancement of Historic Environment) – advises that Development proposals that would be likely to cause either less than substantial or substantial harm to, or loss or partial loss of, a designated asset or its setting will be assessed in accordance with the statutory framework and national planning policy.
- Policy BE14 (Creating Successful Places) – stipulates that Proposals will be required to meet high design standards and deliver safe, inclusive, attractive and accessible places.

7. Principle of Development

7.1.1. This section of the Planning Statement sets out the main planning issues arising from the application proposals with reference to the planning policy framework set out in the previous chapter.

7.2. Green Belt Assessment

7.2.1. The site is designated as Green Belt in the adopted Local Plan. A small proportion of the site is considered previously developed land, comprising an existing dwelling house and associated outbuildings and hardstanding. However, it is accepted that in order for the redevelopment of the site to be appropriate then very special circumstances need to be demonstrated to justify the grant of planning permission. In assessing whether very special circumstances exist, it is necessary to undertake a planning balance exercise. On one side is the consideration of the harm caused by way of inappropriate development and any other harm. On the other side, the significant benefits of the scheme and whether they are sufficient to constitute very special circumstances sufficient to outweigh any harm. Paragraph 148 of the NPPF states that 'very special circumstances' must 'clearly outweigh' the harm caused.

Impact on the Objectives of Green Belt

7.2.2. As set out in Section 13, the NPPF sets out five general objectives of the Green Belt. It is considered that the redevelopment of this site does not undermine the purposes of the Green Belt as a whole. The fundamental aim of the Green Belt is to check unrestricted sprawl and to keep land permanently open. As a result of the contained nature of the site, the proposed development would not lead to unrestricted sprawl and the proposed landscape strategy will ensure that the site is visually and physically well contained thus limiting the impact on the openness of the Green Belt because there are only limited views from and into the site.

7.2.3. The Council appointed Crestwood Environmental Ltd. to undertake an assessment of the Green Belt in relation to potential housing, employment and mixed use allocations. Most recently, the Green Belt Study Part 3 'Assessment of Potential Housing, Employment and Mixed Use Sites in the Green Belt and their Relative Contribution to the Purposes of the Green Belt Designation' was published in January 2019. This Study did not assess the application site in isolation but instead a larger area measuring 69 hectares.



Green Belt Study Part 3 (2019)

- 7.2.4. This Study concluded that the Land east of Thorndon Avenue, West Horndon site (Ref. 038B) makes a "moderate to high" contribution to Green Belt, in relation to its purposes (as defined in the NPPF). However, it should be noted this refers to the whole area, whereas the application site boundary only comprises part of this land adjacent to Tilbury Road.
- 7.2.5. The results of the Green Belt Study are discussed further below in our assessment of each of the Green Belt purposes:
- **To check the unrestricted sprawl of large built up areas;**
 - In respect of Purpose 1, the Council's Green Belt Study concluded that the site was 'Not Contained' and was not considered to be adjacent to, or would only be weakly associated with, existing large built-up area. The study does conclude that even though a site may be considered 'Not Contained', if it comprises brownfield land at present then there may be no countryside encroachment as a result of redevelopment. This applies to the eastern part of the site which comprises previously developed land.
 - The closest built up area is West Horndon which is separated from the site by approximately 0.8 km of open fields and the dense areas of woodland at Hollow Bottom Shaw, Straight Path Shaw and Round Shaw. It is considered that development of this site will not lead to coalescence or urban sprawl associated with West Horndon. The site is contained by highway including the A127 to the north, Tilbury Road to the east and a collection of rural buildings to the west, and these permanent features provide a clear limit to the extent of the proposed development. Furthermore, a proportion of the site area (0.4ha) comprises previously

developed land (brownfield land) and therefore it is not considered that any encroachment into the countryside occurs in this location

▪ **To prevent neighbouring towns merging into one another;**

- With regards to Purpose 2 the Council's Green Belt Study concluded the site had 'Separation Reduced, but Functional' with significant countryside gaps existing between towns. The development of the assessed parcel of which the application site forms a small part, would narrow a gap between towns without (visual or physical) merging.
- In line with the above, the surrounding Green Belt land including important woodland areas will prevent West Horndon and the application site from merging. The nearest settlements are West Horndon located to the south west and Laindon to the East. The site is bounded by highways to the North and East, and a substantial old native hedge and ditch to the South and to the West by the woodland and Hollow Bottom Shaw, part of which is protected as a Local Wildlife Site. There are substantial areas of open space between the application site and the nearest built up areas which is designated as Green Belt. This would mean the surrounding land forming the remainder of parcel 038B would prevent the development merging with West Horndon.
- Regardless of how proposals evolve for possible development at Dunton Garden Village, the application site will not contribute to any sense of coalescence between the settlements in the future. The development will not lead to the merging of towns or significantly reduce the countryside 'gap'.

▪ **To assist in safeguarding the countryside from encroachment;**

- In respect of Purpose 3, the Green Belt Study considered the site to comprise Functional Countryside, "being 'countryside' Sites with no evidence of previous or extensive built development".
- However, it is important to note that the part of the site to which this application relates includes some previously developed land, comprising the dwellinghouse and outbuildings and hardstanding. To the north of the application site boundary is the existing residential development at Elliots Close. This should be taken into account when considering the contribution the site makes as functional countryside.
- The application site has limited function as open countryside. There is no public access to the site. The site comprises overgrown unmanaged low quality grazing. Visually it is well contained by roads, buildings to the North and East and existing landscaping features to the south and west. The physically and visually contained nature of the site and existing previously developed land to the east of the site means that the prevailing open character of the wider countryside will not be materially altered.

▪ **To preserve the setting and special character of historic towns;**

- With regards to Purpose 4, the Green Belt Study concludes the site has a 'Moderate Relationship with Historic Town'. However, this is linked to land within the wider parcel of land assessed in the Green Belt review which is within a Conservation Area. However, the application site boundary does not include this area. The site is separated from any adjacent towns or built settlements and is not located within or adjacent to a Conservation Area.
- West Horndon is not a historic settlement and there are no historic settlements in the immediate surrounding area which would be affected by the application proposal.
- **To assist in urban regeneration by encouraging the recycling of derelict and other urban land.**
 - This Purpose has not been assessed in detail as part of the Council's Green Belt Study.
 - The eastern part of the site is occupied by an existing residential property, associated outbuildings and buildings and yards in commercial use. The application proposals will recycle this brownfield land as part of the wider redevelopment.
 - There are no existing derelict or urban sites within the Borough that are capable of supporting the type of development proposed. The pressure to unlock land for housing within the existing urban areas has led to the loss of a very substantial amount of employment land. It is evident that the policy generally has helped re-use previously developed land but once there is no more land to recycle then this part of the policy simply harms economic prosperity.

7.2.6. The foregoing demonstrates that the proposed development will not conflict with any of the purposes of the Green Belt. It also clearly demonstrates that the application site makes a limited contribution to the existing Green Belt, when viewed independently from the wider parcel that assessed in the Council's Green Belt study.

Impact on the Openness of the Green Belt

7.2.7. As above, the eastern part of the site is already developed comprising an existing dwellinghouse and associated outbuildings and hardstanding, some of which is in commercial use. This part of the site is therefore considered to comprise previously developed land, as can be seen from the site photograph below.



Google Maps (2021)

- 7.2.8. This was acknowledged by Officers in the committee report for a previously refused planning application for redevelopment of part of the site (LPA Ref. 15/00090/FUL). The report states *“the site is currently occupied by a number of derelict buildings as well as a large steel framed barn with further areas of the site being utilised for parking and outdoor storage as evidenced”*. This confirms the status of this area of land measuring 0.4 ha as comprising previously developed land.
- 7.2.9. The remainder of the application site comprises undeveloped poor quality overgrown land that does not benefit from any public access or wider function as open countryside. The site is enclosed by the A127 and existing built development to the north, and Tilbury Road to the east.
- 7.2.10. The western, eastern and southern boundaries of the site are enclosed by mature trees and hedging that effectively screen views into the site. These existing landscaped boundaries will be maintained and enhanced as part of the redevelopment proposals and the surrounding open countryside, which is considered be of better quality than the application site.
- 7.2.11. Careful consideration has been given to the location of the development zones/plots, which will be located in a setting formed by retaining, reinforcing and enhancing all perimeter planting, forming and planting narrow bunds adjacent to residential properties to the north. The proposals will also retain and emphasise the key hedges, trees and watercourses within the site. Buildings will be set well away from the site’s boundaries. The quantity and quality of the landscaping that can be achieved within the development will be illustrated by a landscaping masterplan and described in the landscape section of the Design and Access Statement. As a result of the existing screening afforded by the hedges and trees surrounding the site and the opportunities for new planting, it is considered that the proposals would have limited impact on the visual openness of the wider landscape.

7.2.12. The areas that will remain undeveloped and planted with native species will be set out on a landscape parameters plan that will form part of the submission. It is considered that the extent of retained features combined with extensive areas of new planting will mitigate the impact of the new buildings and hardstanding introduced into previously undeveloped areas.

7.3. Very Special Circumstances

7.3.1. It is important to assess whether other considerations exist that constitute very special circumstances sufficient to outweigh any harm to the Green Belt, thus justifying the grant of planning permission. In order to qualify as 'very special', a qualitative judgment is required as to whether the circumstances and benefits of the application scheme, considered cumulatively, constitute the very special circumstances which clearly outweigh the identified harm. This is considered to be the starting point for any assessment.

7.3.2. It is our view that there are a number of significant factors in favour of the proposals which cumulatively constitute very special circumstances sufficient to outweigh any harm to the Green Belt.. These factors are set out below.

Legally binding national emissions targets cannot be met unless new development achieves Net Zero Carbon in construction and regulated energy use

7.3.3. There is a global climate crisis and an indisputable need to reduce CO2 emissions. The proposed development will achieve a certified Net Zero Carbon status in construction and regulated energy use. This standard goes far beyond the requirements of local and national planning policy and building regulations, however it is the developer's absolute commitment to achieving them on the Site for what would be a first for the Borough.

7.3.4. The proposed development will deliver a substantial number of jobs and economic benefits. It is the applicant's view that as 40% of global carbon emissions derive from construction that the industry must act now to reduce its impact on the planet. The proposed development will provide a benchmark for what can be achieved and a demonstration of how economic growth can be achieved without contributing to global warming.

Phasing out of fossil fuel vehicles by 2030 is impossible without a network of ultra-rapid electric vehicle charging facilities in place yet there are none currently in the Borough.

7.3.5. Brentwood has no Ultra-Rapid charging facility in the Borough for electric vehicles (EVs). There are just 2 EV charging locations currently and neither provide ultra-rapid charging. A transition from fossil fuels transport to EVs is underway and there is no infrastructure to support it. The power and locational requirements of effective EV charging limit potential sites and they must 'piggy back' major development to obtain enough power at a viable cost.

7.3.6. The scheme will include a 16 vehicle ultra-rapid electric vehicle charging facility. The location is ideal being on the strategic road network, able to serve the major new developments at DHGV and BEP and the Lower Thames Crossing. The power requirements of ultra-rapid EV charging are so great that the costs are unaffordable unless they can 'piggy back' on the new infrastructure required by new commercial

development or locate adjacent to a major substation. These proposals will enable the provision of the vital new infrastructure which must be in place to enable the transition away from fossil fuels.

The Local Plan is under immediate review and increased housing numbers and the need to replace the employment space lost through conversion and redevelopment will require further allocations to address the shortfall in employment land.

- 7.3.7. Almost all the Borough's stock of offices has been converted to residential use. The vital need to replace the lost job opportunities and economic activity is considered fundamentally important because there are no alternatives to releasing land outside of the built up area as there are no sites allocated for a sufficient quantum of development as the area is constrained.
- 7.3.8. The Local Plan does not provide for sufficient employment land to meet the needs of the economy over the plan period. The plan is under an immediate review and further employment land allocations will be required to correct the shortfall. There have been no other viable employment sites proposed in the Borough and for very similar reasons to the justification to develop East Horndon Hall the site should be allocated in the forthcoming review.
- 7.3.9. The need to plan for sufficient employment land means that increases in housing numbers produced by the immediate local plan review will necessitate a review of employment land provision. It is also inevitable that the employment space lost through conversion and redevelopment cannot be re-provided on the land allocated in the plan as it would require very high town centre densities to be achieved on greenfield sites. Broadfields Innovation and Business Park would substantially address the employment land needs of the Borough.

A prestigious high quality business environment is needed to be able to attract occupiers to the Borough particularly from new and emerging technologies sectors.

- 7.3.10. The Broadfields site would provide the Borough with a very well connected, high quality development of flexible buildings in a range of potential sizes and configurations, attractive to businesses in all sectors of the economy including new and emerging technologies. Unless the type of accommodation that meets the requirements of modern efficient businesses is available in the Borough those businesses will be unable to locate themselves in Brentwood.

The Borough has a significant undersupply in available premises in any use, sector or size configuration.

- 7.3.11. The research carried out in advance of this planning application has shown that for some time the failure to deliver any meaningful amount of new floorspace and the losses due to redevelopment and conversion have led to a critical demand/supply imbalance. Without premises available businesses cannot locate in the Borough and those that are already in Brentwood are unable to remain if their premises needs change for any reason. This situation continues to harm the local and wider economy. The Broadfields proposals are being made in response to a situation that requires immediate action instead of being subject to the Local Plan Review exercise.

The wider property market area, of which the Borough forms part, also has availability rates approaching zero in most sectors and uses.

- 7.3.12. The Borough suffers from an acute lack of choice for businesses in terms of location, type and size of available premises for existing and future businesses in the Borough. Our evidence shows a complete absence of vacant and available stock in every sector of the market. This lack of choice and lack of stock precludes a functional occupiers market causing significant harm to the local economy. The need to correct this situation is a very special circumstance.
- 7.3.13. The situation in Brentwood is reflected in the wider property market area where a similar failure of the planning system to deliver sufficient suitable premises to meet the needs of the economy has led to critically low availability rates. Economic growth is negatively impacted by the failure of the planning system to respond to the needs of business.

Without any small and very small business units available on flexible affordable terms start-ups and growing small businesses cannot locate in the Borough.

- 7.3.14. There are no available small and very small business units (50-150m²) in the Borough and very low stock of small units generally, harming the ability to attract start-ups and expanding small innovative businesses. The Development will provide 22 individual small units varying in size from 50 – 400 sqm and 10% of them will be offered at discounted affordable rents.
- 7.3.15. There is no doubt that small business and start-ups, that are unsuitable to operate from home, need affordable and flexible premises. The benefits of possessing a good supply of this type of accommodation is that Brentwood will become a target destination for these new enterprises. The applicant's research has demonstrated that the supply of such units is zero but if any do become available they are let immediately, suggested significant 'hidden' demand. Brentwood is an entrepreneurial area and the provision of 22 small and micro units within the start-up and enterprise hub will drive new economic growth in the Borough,

Without sufficient small and medium size business units growing SMEs cannot expand without leaving the Borough, nor can they locate here in the first place.

- 7.3.16. There are no available medium size business units in the Borough (150-500m²) and a very low stock of small to medium size units generally, harming the ability to retain expanding small businesses within the Borough. The development will provide 22 units in size range between 50 – 400 sqm and 10% will be at discounted affordable rents.
- 7.3.17. It is vital to support the small and medium size businesses that are the lifeblood of the economy. Within the start-up and enterprise hub there will be 22 small to medium sized units of between 100 sqm and 400 sqm to meet the needs of growing businesses. The flexible simple inclusive occupational leases at the hub will enable businesses to respond to changes in their premises requirements without leaving the Borough. Analysis of the local and wider property market reveals that there is no availability of this type and where it does become available it is immediately let. This is a serious impediment to business if their property needs cannot be met.

The local and sub regional market is not functioning effectively as it requires immediate delivery of premises across all uses, sizes and configurations in order to achieve a minimum frictional vacancy rate of around 8%.

- 7.3.18. The foundations for a successful local economy and job market are the availability of high quality efficient business space for start-ups and growing enterprises. Brentwood has zero availability of this type of space. The proposed development will deliver up to 22 very small, small and medium size zero carbon business units. These will help correct a very significant shortage and create opportunities for new business to start up and grow in the Borough, The provision of start-up and follow on premises with affordable occupational costs are very special circumstances.
- 7.3.19. There are no available medium to large business units in the Borough (500m² to 10000m²) and a very low stock generally harming the ability to attract and retain SME's within the Borough. The development will provide up to 5 to address this shortfall.
- 7.3.20. The proposed development at BEP of very large logistics premises will, in the medium term address some of the acute shortage of property in this sector, the most significant employment allocation in the recently adopted plan is therefore going to address a specific niche in the market for large scale logistics only. This leaves the Borough underprovided for in all other occupational sectors despite over 60% of the employment land allocations for the plan period at the BEP coming forward. The highly specialised nature of the BEP proposals is a function of its ideal location for very large footprint logistics. This factor is considered to constitute very special circumstances.
- 7.3.21. The overarching problem is one of long term supply being constrained to a level where the imbalance with need is so great that the market ceases to function effectively. The applicant has calculated that the local market requires an increase in supply across all sectors sizes and uses of at least 20,000 sqm just to provide the liquidity the market urgently needs. Simply put, business is 'stuck' due to a dysfunctional property market and these proposals, providing a range of property sizes and types would significantly resolve the issue in the short term. Subject to securing outline planning permission it is the applicant's intention to commence development as soon as possible subject to pursuing applications for the approval of reserved matters and the discharge of relevant planning conditions.
- 7.3.22. In addition to the foregoing factors that cumulatively constitute very special circumstances, the following are supporting factors:
- The site is partly previously developed land, in the amount of circa 4,300 sqm (0.4ha);
 - The site does not currently make a significant contribution to the Green Belt;
 - The site is adjacent to the strategic highway network and in a sustainable and very convenient location for employment use and as part of a cluster comprising BEP, Childerditch Industrial Park, DHGV and The London Brentwood Industrial park at East Horndon Hall;
 - The site is within the emerging Brentwood Southern Growth Corridor;
 - The site is well screened and its development is considered to have little impact in the wider landscape

- The development can support the sustainable transport objectives of the council including highways and cycleway improvements
- The development will, through the funding of local tree planting and biodiversity improvements, enhance the landscaped appearance of the Borough, improve biodiversity and improve air quality;
- The applicant is committed to investment in local carbon reduction and sequestration schemes locally as part of the commitment to Net Zero Carbon. The funds, which would be secured via a legal agreement, would be paid to the council to be spent on mitigation schemes in Brentwood.
- The relief of longstanding suppressed demand and a considerable range of economic benefits including a number of jobs during construction and operation; and
- The site is immediately deliverable.

7.3.23. Further detail in relation to the identified very special circumstances is set out below.

Provision of Employment Land

7.3.24. At the national level, the NPPF provides an overarching framework for the production of local policy documents and decision making. At the heart of this is the presumption in favour of sustainable development. In this regard, Paragraph 8 states that there are three dimensions to sustainable development; economic, social and environmental. For plan making, this means, that LPA's should positively seek opportunities to meet development needs, and that the Local Plan should meet objectively assessed need with sufficient flexibility (Paragraph 11).

7.3.25. As set out in Paragraph 82 of the NPPF, LPAs should plan proactively to meet the development needs of business. In developing local plans, there is a requirement to:

- *set out a clear economic vision and strategy which positively and proactively encourages sustainable economic growth, having regard to Local Industrial Strategies and other local policies for economic development and regeneration;*
- *set criteria, or identify strategic sites, for local and inward investment to match the strategy and to meet anticipated needs over the plan period;*
- *seek to address potential barriers to investment, such as inadequate infrastructure, services or housing, or a poor environment; and*
- *be flexible enough to accommodate needs not anticipated in the plan, allow for new and flexible working practices (such as live-work accommodation), and to enable a rapid response to changes in economic circumstances.*

- 7.3.26. Paragraph 83 of the NPPF states planning policies and decisions should recognise and address the specific location requirements of different sectors. This includes making provision for clusters or networks of knowledge and data-driven, creative or high technology industries; and for storage and distribution operations at a variety of scales and in suitably accessible locations.
- 7.3.27. In order to achieve the foregoing, the National Planning Policy Guidance, sets out a requirement for LPA's to carry out an assessment of the land which is suitable, available and achievable for housing and economic development.
- 7.3.28. The Council's most recent employment land assessment, which underpinned the preparation and examination of the Brentwood Local Plan, comprises the Economic Futures Report (2018) and other supporting reports which make up the employment evidence base.
- 7.3.29. The 2018 Economic Futures Report (EFR) analyses the demand for and supply of employment land for the period 2013 to 2033. In considering demand for employment land the EFR presents four employment growth scenarios. The gross land requirement (before taking account of anticipated loss of existing employment land) ranges from 8.1 hectares to 20.3 hectares. The 2018 EFR calculates the loss of existing employment land that results from the change of use of employment sites over the draft Plan period amounts to 21.0ha. This anticipated loss increases the employment land requirements to between 29.1 hectares and 41.3 hectares.
- 7.3.30. However, taking into account the relevant proposed allocations from the draft Local Plan, alongside several extant planning permissions and prior approvals that would lead to a loss of about 5.7 hectares of employment land, the ERF suggests there will be a shortfall in employment land against the requirement.
- 7.3.31. Local Plan Policy PC02 requires provision for 5,000 additional jobs to be provided in the Borough over the Plan period. Job growth will be distributed primarily through new employment allocations but supported by existing employment sites and redevelopment where appropriate. The policy identifies a gross employment land requirement of between 33.76 hectares and 45.96 hectares. This is higher than the requirement in the 2018 EFR because it forecasts additional loss of existing employment allocations of 4.65ha through 'structural change, changes in allocation threshold and permitted development'. The policy allocates 47.39 hectares of new employment land which are detailed in Policy PC03 'Employment Land Allocations'. The application site is not allocated for employment use.
- 7.3.32. However, it is the applicant's position that the Council's employment land policies within the Brentwood local plan significantly underestimate the amount of employment land required to meet the needs of its economy and that the Council have failed to correctly calculate the amount of land needed to replace the employment floorspace lost. The error is substantial and undermines the soundness of the local plan in relation to employment and economic growth. A full critique of the council's evidence base documents and its conclusions about the amount of land it requires to meet its needs has been set out in the Employment Market Assessment (EMA) which was prepared by Savills Economics Team and submitted with the previous application. A new version will be submitted with the proposed application although there have been no significant changes.
- 7.3.33. Table 6.1 below sets out the Council's updated employment land position, based on the evidence presented at the Examination in Public of the draft Brentwood Local Plan.

Table 7.1: BBC's Updated Employment Land Position

Land	Scenario A (ha)	Scenario B (ha)	Scenario C (ha)	Scenario D (ha)
(1) Requirement for Employment Land	-20.3	-8.5	-13.1	-8.1
(2) Re-allocation of Employment Land	-21.0	-21.0	-21.0	-21.0
(3) Combined Requirement	-41.3	-29.5	-34.1	-29.1
(4) Proposed Allocations	46.64	46.64	46.64	46.64
(5) Extant Permissions	-6.05	-6.05	-6.05	-6.05
(6) Net Land Available	40.59	40.59	40.59	40.59
(7) Surplus/Deficit	-0.71	11.09	6.49	11.49

Source: 2018 EFR; Savills (2021)

- 7.3.34. There are two key changes from the evidence presented in the EFR, based on information provided by BBC. The total area of the land allocations (row 4 in Table 4.1) is reduced because 'Land adjacent to Ingatestone by-pass (part bounded by Roman Road)' has a net developable land of 1.6ha, not the 2.06ha which had been assumed in the 2018 EFR. Also the Extant Permissions (row 5 in Table 4.1) has been reduced from 9.3ha (which is the council's most recent assessment of land lost as a result of new planning applications which reduce existing employment premises) to 6.05ha. The reduction is because there is a loss of 3.25ha for the Ford Offices, Eagle Way is already included in the 21.0ha from Re-allocation of Employment Land (row 2 of Table 4.1). This avoids double counting.
- 7.3.35. Whilst the identified deficit of employment land is problematic because it shows by their own figures that BBC has not allocated sufficient employment land, the shortfall is substantially greater than set out in the Council's figures. In calculating how much employment land should be allocated to replace the lost employment floorspace the Council have made assumptions about the plot ratios of new employment development that are categorically unachievable and which are only achievable on town centre sites of which it has allocated none. This is detailed in full in the enclosed EMA prepared by Savills.
- 7.3.36. Overall, based on the evidence presented in Savills EMA, the Plan should allocate an additional 12ha to realistically replace all its lost employment floorspace. This would alter Table 6.1 to the extent that all four of the scenarios would have an employment land deficit. The proposed Broadfields Innovation and Business Park is of sufficient scale to help provide this additional capacity to overcome the shortcomings of the Local Plan.
- 7.3.37. The Council's ERF also acknowledges the importance of delivering the Brentwood Enterprise Park which has an area of 25.9ha, equating to 54.5% of all new employment land allocated. An application is now live and shows a development of around 1.21m sq ft of 4 large and super large logistics units. The Brentwood Enterprise Park is a major scheme with complex and extensive infrastructure, access and servicing requirements. The need for very large scale distribution premises is not disputed and it undoubtedly the location is ideal. The consequence for the Borough however is that the majority of the employment land allocated in the local plan will be entirely given over to this specialised use and just 4 buildings. The EFR

acknowledges that delivering Brentwood Enterprise Park will also take time and states *"the Council may need to bring forward other allocated employment sites to fill the supply gap that could arise if Brentwood Enterprise Park does take time to deliver"*. It would be reasonable to add 'or fails to deliver any floorspace other than super large logistics space'

- 7.3.38. This demonstrates the increased importance of delivering other employment allocations and the application site in order to provide choice and flexibility for occupiers. The application site is entirely within the applicants control and therefore is readily available and deliverable immediately.
- 7.3.39. If the application site does not come forward for employment development it will be necessary, in order to meet assessed needs, to find other employment land, increasing pressure on the Green Belt elsewhere in the borough. In this context the site is extremely well located for employment purposes (on the A127/A128 junction, and within the South Brentwood Growth Corridor) and as will be demonstrated in a new LVIA and DAS, the scheme will be in a form which is well-contained within the surrounding landform and well screened by existing and proposed tree belts. The applicant is not aware of any other site suited to meet the Boroughs employment need than this.
- 7.3.40. In terms of meeting the need for specific employment uses, we set out below a summary of the need for a variety of employment land in the Borough and how the proposed Broadfields Innovation and Business Park will help meet this demand.

Industrial and Logistics Use

- 7.3.41. The Covid-19 pandemic has accelerated the ongoing increase in demand for modern industrial premises to meet the needs of occupiers for more efficient floorspace to more effectively manage their increased inventory and delivery requirements. This has largely been driven by the significant growth in online retail sales.
- 7.3.42. Within Brentwood, the markets are significantly supply-constrained and this is impacting the local economy. The current availability rate for industrial premises is 1.3% and existing and prospective occupiers are now forced to seek premises outside the borough. Most floorspace in the wider Property Market Area (PMA), as defined in the enclosed Savills EMA, is comprised of mid-sized (10,000 to 50,000 sqft) and larger premises (greater than 50,000 sqft). There is limited provision for smaller requirements. Most floorspace in the PMA is of average or below average, dated premises. There are few premises that meet the requirements of modern occupiers and even fewer that are available.
- 7.3.43. In spite of the acute shortage of premises there has been a limited supply response, particularly in BBC where virtually no new development has been completed. The gap analysis shows that on the PMA level there is only enough supply to meet the market's requirements over the next 1.5 years. In BBC, given the low rate of availability, the need for new industrial floorspace is immediate.
- 7.3.44. To operate more efficiently and effectively the property markets should have a rate of availability closer to 8%. This ensures that there are sufficient premises for occupiers to choose. Without sufficient premises, occupiers are unable to expand as needed and will need to seek find premises outside of the BBC area. The development proposal would help to address the immediate need for industrial premises and be an important

source of new industrial floorspace. The development would go some way to addressing the long established suppressed demand in the property market area.

Light Industrial Use

- 7.3.45. The analysis presented in Savills EMA shows that the light industrial market is significantly supply-constrained; there are no existing premises that are above average quality; and the level of delivery has been very low.
- 7.3.46. Brentwood currently has availability rates of 1.8% respectively which indicates that there a shortage of light industrial premises. The market is highly constrained and occupiers are being forced to seek premises outside of the area. In spite of the shortage of supply there has been a limited supply response. Since 2009 only around 33,000 sqft has been delivered. This is insufficient to ensure that premises which meet the requirements of modern occupiers are being delivered.
- 7.3.47. With regard to demand, the market's performance reflects its supply constraints. On the wider Property Marker Area level, demand has been held back by a lack of availability. In Brentwood demand has been steady but the light industrial market is small.
- 7.3.48. The gap analysis shows that there is an acute under supply of light industrial premises.

Table 7.2: Supply-Demand Balance for Light Industrial Premises in the PMA

Demand – Supply Balance Factors	
Current Availability (sqft)	20,000
Under Construction (sqft)	0
Total Supply	20,000
Immediate Additional Floorspace Required to Achieve an 8% Vacancy Rate	162,000
Estimated Net Absorption in 2021 (Based on trend growth in net absorption)	14,000
Total Floorspace Demand	176,000
Ratio (Supply / Demand)	<2 months

Source: Savills (2021)

- 7.3.49. The analysis finds that there is less than two months' worth of supply and that the market requires significantly more floorspace to ensure that the market operates efficiently.
- 7.3.50. This suggests that light industrial premises would have an important role as part of the overall mix of uses delivered at the proposed Broadfields Innovation and Business Park. The proposed development parameters set as part of this outline application have been designed to ensure that a range of units could be delivered on site, including those of size and scale to suit a variety of light industrial, research and development, technological uses.

Choice and Flexibility

- 7.3.51. Paragraph 81 of the NPPF states significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development. Paragraph 82 requires the LPA to be flexible enough to accommodate needs not anticipated in the plan, to allow for new and flexible working practices. This means that more floorspace is required than the specific need identified.
- 7.3.52. As highlighted above, the allocation of the Brentwood Enterprise Park (BEP) will provide over 50% of the Borough's new employment land supply. Whilst this allocation is supported, given the type of development and its very limited ability to meet any need other than from very large logistics operations and potential risks and delays associated with the sites delivery, it is important to consider the opportunity that bringing forward other employment sites, such as Broadfields Innovation and Business Park. The site will address the issues of choice and flexibility in the local market, whilst also addressing the fact that the Brentwood Enterprise Park will take time to deliver and will only meet very large scale logistics need leaving all other sectors needs unmet.
- 7.3.53. The Local Plan recognises the contribution that small and medium sized enterprises make to the Borough's economy but the proposed allocations do not provide enough choice and flexibility to sufficiently cater for them. The location of the Brentwood Enterprise Park make it highly desirable for pure logistics operations. We consider the development of the Broadfields Innovation and Business Park will provide an alternative location for a flexible range of uses for existing businesses in the area, for example as an alternative for occupiers to relocate to.
- 7.3.54. The proposed scheme will assist in providing additional choice and flexibility for existing and new businesses in and outside the Borough helping to meet the requirements of the NPPF, which constitutes a very special circumstance in a Borough with critically constrained supply and high levels of demand.

Demand for Innovation and Business Park Uses

- 7.3.55. The Broadfields Innovation and Business Park responds to an identified need in Brentwood and seeks to provide high quality, sustainable and modern floorspace that would suit the needs of a range of occupiers. In particular it is considered the Park would provide flexible floorspace to suit a range of modern business and innovation employment and industrial uses, including: smart/digital and green technologies; life science; manufacturing; and environmental technology uses, alongside more traditional employment and industrial uses. Potential occupiers for the business park are discussed in the Savills report. The individual development zones/plots can deliver larger single buildings of smaller multiple units. The proposed start-up and follow-on enterprise hub will provide 30 individual units ranging from very small (50sqm) to medium (500sqm) to meet the needs of small business for reasonably priced flexible efficient modern premises to start up and grow. Such businesses cannot locate in Brentwood if there are no premises for them, and our analysis has shown that there are none.
- 7.3.56. The site is considered to be an optimum location for the proposed uses being close to local labour markets and the strategic highway network. Its size and the setting that will be created enable the development of a unique, commercially attractive business environment and the scale to accommodate buildings with a wide variety of different internal configurations that will attract all types of occupiers in all sectors of the economy.

The way the site is planned mean that a pharmaceutical manufacturer would be equally at home there as a company developing new green technologies, sorting parcels or processing data Furthermore the site is well located with respect to nearby attractive residential neighbourhoods. The wider area around the site has a residential catchment that has relatively high skills. It is expected that the positive skill characteristics of the local labour market will be attractive to enterprises locating at the Innovation and Business park.

7.3.57. The scheme will be certified as Net Zero Carbon in construction and regulated energy use. The design approach is focused on landscaping and ecology and achieving Net Zero Carbon. Businesses operating at the 'high tech' end of the economic spectrum and their employees demand this type of development. This will be a flagship development for Brentwood capable of attracting a new type of business to the area and retaining them for the long term.

Summary

7.3.58. In assessing whether very special circumstances exist, it is necessary to undertake a balancing exercise. Based on the foregoing assessment, we have identified that the proposed scheme will result in some harm to the openness of the Green Belt. However, it is considered that the identified factors and benefits associated with the proposed development of the site constitute **very special circumstances** which clearly outweigh any harm to the Green Belt at East Horndon. In summary these considerations comprise:

- There is a significant existing and planned undersupply of employment land and premises in the short and medium term, as envisaged in the emerging Brentwood Local Plan which will be addressed by the delivery of additional employment land at Broadfields
- The Borough suffers from an acute lack of choice for businesses in terms of location, type and size of available premises for existing and future businesses in the Borough, including those needed to meet increased demand for industrial and logistics premises which has increased as a result of the Covid-19 pandemic. The delivery of the proposed development at Broadfields will address this shortage and lack of choice;
- The Borough has lost a great many employment premises over recent years and the job opportunities they afforded. The Broadfields proposals are capable of providing around 500 jobs in addressing a meaningful proportion of the deficit.
- There is a global climate crisis and an indisputable need to reduce CO2 emissions. The proposals are capable of delivering economic growth and new jobs in a net zero carbon development, a standard in excess of current policy requirements.

7.3.59. Furthermore, the site comprises partly previously developed land, is well located to take advantage of the strategic highway network and in a sustainable location for employment use and is immediately deliverable.

7.3.60. It is therefore considered that the principle of development is appropriate in this instance and accords with national and local planning policy.

7.4. Loss of Residential Accommodation

- 7.4.1. As above, the NPPF states significant weight should be placed on the need to support economic growth and productivity, taking into account both local business needs and wider opportunities for development.
- 7.4.2. The proposed development will result in the loss of a single dwelling house, known as Broadfields. This is a large detached property, in private ownership and does not provide affordable accommodation. Alongside the main dwelling house are a number of ancillary outbuildings which make up the area of previously development land on the application site. The existing dwelling is not listed and not considered to be of any historic or architectural merit.
- 7.4.3. The urgent and critical need for new employment floorspace in this location forms the a principle part of the very special circumstances case and with the other matters weighing in favour of the application it is submitted that the benefits outweigh any harm to the Green Belt as a result of the proposed development. In the planning balance it is considered that the significant benefits associated with the proposed development of the Broadfields Innovation and Business Park would outweigh any harm resulting from the loss of one existing dwelling house.

8. Other Planning Considerations

8.1.1. This section of the Planning Statement provides justification in support of the planning and design issues that arise from the outline planning application, with reference to the Parameter Plans and technical reports in support of the proposed development.

8.2. Noise

8.2.1. A Noise and Vibration Assessment has been undertaken by KP Acoustics and will be submitted in support of the application. The report will contain recommendations that acoustic barriers be used in certain critical locations to mitigate the potential for noise impact on residential neighbours from vehicular movements within the site. The provision of the proposed bunds, intervening planting and acoustic fencing is demonstrated to provide an acceptable living environment for neighbours. Furthermore, traditional reversing sounders are recommended to be replaced with white noise sounders to reduce noise impact to neighbouring residences. The new scheme has a reduced noise impact and implementation of detailed mitigation measures could be dealt with by an appropriately worded planning condition.

8.2.2. Vibration levels have also been measured and are negligible, with no mitigation measures required.

8.2.3. With the inclusion of the recommended noise mitigation measures, the proposals are considered to be acceptable with regards to noise and are in accordance with the NPPF, and local plan policies PC08 and BE14.

8.3. Net Zero Carbon and Sustainability

8.3.1. The NPPF provides a framework for achieving sustainable development. In terms of the environment this means protecting and enhancing our natural, built and historic environment; including making effective use of land, helping to improve biodiversity, using natural resources prudently, minimising waste and pollution, and mitigating and adapting to climate change, including moving to a low carbon economy.

8.3.2. There is no national or local planning policy requiring that new development achieves Net Zero Carbon in construction and regulated energy use. In order to meet the national net zero targets by 2040 the construction industry must do more to reduce emissions from development. Globally the industry accounts for 40% of all emissions. These statistics show the scale of the issue facing the planet but these proposals in Brentwood will deliver economic growth and jobs without contributing to emissions. Achieving this benchmark will be a first for the Borough and one of only a handful nationally. The costs and challenges to meet the certification requirements are substantial but given the scale of the global warming crisis it is considered essential to take every opportunity that is presented to achieve economic growth and job creation without increasing carbon emissions.

8.3.3. The application is accompanied by a statement from Hodkinson setting out the way in which the performance of the development will be measured and certified. The report explains the specific measures that will be utilised in order to achieve a Net Zero Carbon development in construction and regulated energy use.

- 8.3.4. The net zero strategy consists of a number of measures and commitments including a considered approach to the specification and resourcing of materials high in associated carbon dioxide emissions. This will focus on how concrete, steel and aluminium materials can be used in the most sustainable way by incorporating recycled content and reducing wastage. In addition, the development will ensure energy efficient design promoting low energy usage with all fabric elements in office and administration areas being insulated to achieve a very high standard of thermal efficiency. The development is expected to maximise passive energy benefits by maximising daylight penetration through the use of roof lights and the use of 'light' cladding and orientation of glazing to maximise solar gains and minimise summer overheating.
- 8.3.5. The applicant is also committed to provide an extensive array of photovoltaic (PV) panels to generate electricity capacity across the site. This could exceed 1 megawatt of power that could offset more than 3,000 tonnes of carbon dioxide emissions. This renewable power generation will also assist in reducing the burden of the development on the local electricity supply and will reduce the energy costs for building occupants. There are further commitments to sustainability measures within the application including an ultra-rapid electric vehicle (EV) charging station for up to 16 vehicles and at least 20% of all parking spaces on the development will be fitted with EV charging points. The development will also be designed to meet BREEAM Excellent representing a high standard of sustainable construction and addresses multiple environmental considerations.
- 8.3.6. Whilst there are many different methods that will be used to reduce carbon emissions in construction there are some excess carbon emissions that require investment in carbon offsets. The applicant intends that this investment will be made in local projects in consultation with the Council to deliver the carbon reductions and sequestration where it is most relevant. The report estimates the likely level of investment that will be required to acquire the amount of carbon offsets necessary to achieve a net zero certification based on the illustrative submitted design. At the detailed design stage a more accurate assessment of individual buildings can be made as part of the certification process. It is proposed that the payments to the Council that are agreed will be required to fund local offsetting projects will be secured through a s106 agreement.
- 8.3.7. The range of measures that will be implemented in the final construction and design of the scheme and individual buildings and carbon offset contributions are considered to make the development entirely acceptable in terms of energy and sustainability.

8.4. Flood Risk and Drainage

- 8.4.1. The Environment Agency Flood Map shows that the entire site is located within Flood Zone 1, which is designated as land at low risk of flooding, with less than 1 in 1000-year annual probability of flooding (0.1%).
- 8.4.2. Based on the characteristics of the site, it is proposed to discharge attenuated surface water runoff from the site into the existing watercourse running along the western boundary at less than the existing greenfield runoff rate. The approach previously submitted was not challenged by the LLFA and it is considered that pursuing a similar strategy will be acceptable. In the revised proposals the significant existing watercourse running east west across the site will be retained, reinstated and utilised to convey surface water away from the site. Surface water will be attenuated within the site using conveyance swales and attenuation ponds and where necessary below ground attenuation features. The proposed blue infrastructure will fulfil a visual and ecological function in addition to the operational

- 8.4.3. The surface water drainage strategy has been designed to ensure no flooding occurs as a result of the 1 in 100-year rainfall event (including a 40% allowance for climate change).
- 8.4.4. The FRA therefore demonstrates that the flood risks associated with the site can be managed appropriately. The proposals are therefore compliant with the aims of the NPPF and Brentwood Level 1 Strategic Flood Risk Assessment.
- 8.5. Heritage**
- 8.5.1. There are two designated heritage assets within close proximity to the site; East Horndon Hall (Grade II) and Thorndon Hall, Registered Park and Garden (Grade II*). In order to fully assess the impact of the development proposals on heritage significance, a Heritage Statement has been prepared by HCUK and submitted as part of this application.
- 8.5.2. In terms of the impact on East Horndon Hall (Grade II), this is separated from the site by Tilbury Road and located some 200m from the site. The Hall is already surrounded by built development, and land adjacent to the Hall has already been permitted to be redeveloped to provide a new employment and industrial park. The proposed units on this scheme have been designed to vary in scale, and as shown on the Development Plots Parameter Plan, the smaller buildings will be located closest to Tilbury Road and existing built development.
- 8.5.3. In terms of the impact on Thorndon Hall, Registered Park and Garden (Grade II*), this does abut the site on the western boundary but it is considered this area of the RPG already make a less significant contribution to the overall asset, being separated from the wider RPG by the A127 and also already comprising built development to the north of the application site and western boundary of the RPG. Furthermore, the scheme proposals do not seek to interfere with existing landscape buffer around the site.
- 8.5.4. The Heritage Statement concludes that there will be no harm to the significance of either East Horndon Hall or Thorndon Hal RPG and therefore Paragraph 196 of the NPPF will not be engaged, and there will be no conflict with relevant heritage policies at a local level.
- 8.5.5. The heritage report submitted with the application addresses comments previously provided by the County Archaeologist during the previous application. The County Archaeologist commented on the Heritage statement to the effect that the application could not be properly assessed because it was in outline and matters of layout and scale are dealt with at reserved matters stage. He went on to state that the scoping of designated and non-designated heritage assets was not agreed and that the impact on these must also be considered. The report that will be submitted with the revised application will, as before, properly assess the relevant Heritage assets for impact. As before, only those which are capable of being affected will be assessed although the report will increase in scope to refer to the assets mentioned by the county. The conclusions of the previous report were not challenged and the issues raised by the County Archaeologist were not sustainable objections to the grant of planning permission.
- 8.6. Archaeology**
- 8.6.1. A desk-based assessment of the archaeological context of the site has been undertaken by HCUK Group and is submitted with this application. This confirms that the site does not contain any designated

archaeological assets, where there would be a presumption in favour of preservation in situ and against development proceeding.

- 8.6.2. Potential impacts upon the designated archaeological assets (scheduled monuments) in the site's wider zone of influence have been considered, and the assessment concludes that the implementation of the proposed development will not result in an adverse impact on, harm to, or loss of significance from either of the identified scheduled monuments of Thorndon Old Hall and the adjacent former Church of St Nicholas either in terms of an effect on their physical fabric or through changes to their wider setting.
- 8.6.3. On the basis of available evidence, it is therefore considered that the proposed development accords with current legislation, the planning policies contained within the NPPF and the policies of the adopted Brentwood Local Plan.

8.7. Transport and Parking

- 8.7.1. The application is submitted in outline with all matters reserved except for access. The proposed access is one of the matters to be considered in detail at this stage of the application. A Transport Assessment, prepared by Redwood Partnership, has been submitted in support of the application.
- 8.7.2. The applicant's transport consultant has been engaging with the County highways department to agree the transport impacts of the proposed development. Preliminary work using updated DoT traffic growth figures shows that the development would not have an adverse impact on the highway network subject to the provision of a new lights controlled junction at the end of Station Road and the A128. The Roundabout shortly to be constructed as part of the East Horndon development has capacity to accommodate the proposals traffic in its current form but it is understood that the DHGV scheme will require it to increase in size on land controlled by DHGV. The preliminary design for the light controlled junction are shown at a greater capacity than required by the Broadfields proposals.
- 8.7.3. The proposed development incorporates sufficient car and cycle parking to meet the needs of occupiers and having regard to the Council's maximum parking standards, as well as the Essex County Council car parking standards. The site can accommodate up to 466 car parking spaces and would provide circa 140 cycle parking spaces. Final parking numbers will be determined at reserved matters stage when the use of the buildings is known.
- 8.7.4. Electric vehicle charging points are provided within the Development. An allocation of 20% active spaces and 20% passive spaces will be provided. A commercially operated ultra-rapid EV charging facility for 16 cars will be provided within the scheme.
- 8.7.5. The site is located near to a range of transport options which will provide realistic choices of sustainable modes of transport for staff or visitors to the site. Being located close to the A127 Southend Arterial Road the site is ideal in providing a short HGV route to a principle transport route without the need to pass through residential areas. The close proximity of the DHGV housing development and the opportunity to create an employment cluster with the East Horndon development mean that service by a new bus route is viable.
- 8.7.6. As per the Transport Assessment submitted with the application, the traffic impacts of the development on the highway network are demonstrated to be within acceptable limits under all scenarios and not 'severe' as specified within the NPPF. The development will provide a significant package of off-site highway

improvements to encourage walking and cycling to the site and will include a substantial traffic signal improvement of the A128 Tilbury Road/Station Road junction. The assessment shows that the proposals will not have an unacceptable or adverse traffic impact on the surrounding highway network.

8.8. Ecology

8.8.1. The Surrey Wildlife Trust have been instructed to prepare a further Ecological assessment providing an update to the assessment prepared as part of the previous application by Corylus Ecology. A Preliminary Ecological Appraisal has been submitted with the application covering the key ecological constraints and survey work.

8.8.2.



8.8.3.

8.9. Contamination

8.9.1. A Phase 1 Preliminary Risk Assessment has been prepared by Terragen Environmental Consultants and has been submitted with the application.

8.9.2. The report identifies that the risk of potentially significant harm being caused to sensitive receptors by the impact of the potential environmental hazards identified at or surrounding the site in its current state with regard to the proposed end use is considered low.

8.9.3. The risk of the site being classified as contaminated land by the local authority under the provisions of the statutory guidance made under Part IIA of the Environmental Protection Act (1990) is low.

8.9.4. Due to the presence of potential sources of contamination Phase 2 site investigation and Tier 2 GQRA could be undertaken if only required to confirm the qualitative assessment, refine the preliminary CSM and determine the requirement for and scope of additional investigative works, and/or remedial measures to be incorporated into the development. It is considered that the mitigation methods identified above can be secured via an appropriately worded planning condition if required. The proposals are therefore considered to be acceptable with regards to contamination.

8.10. Health Impact Assessment

8.10.1. Local Plan Policy MG04 (Health Impact Assessments) states to ensure new development is designed to promote good health, a HIA is required for major non-residential developments. The purpose of the

document is to identify opportunities of positive health impacts and potential negative impacts and how they might be mitigated.

- 8.10.2. The proposed development has been designed in this context and as per the NPPF which acknowledges the planning system can play an important role in facilitating social interaction and creating healthy, inclusive communities. Section 4.22 of the Local Plan sets out a series of issues that impact on the physical, social, and mental health and well-being of communities. This includes the location, density and mix of land use, street layout and connectivity, access to public services and employment opportunities as well as leisure and recreation activities, noise, climate change and transport. We consider that this Planning Statement read in conjunction with the wider pack of technical reports submitted with this planning application clearly demonstrate how the development will promote good health in accordance with Policy MG04. Further analysis on the HIA will be submitted to Brentwood during the course of determination.

9. Planning Balance

- 9.1.1. In determining the application proposals, a balancing exercise is required of the weight to be attached to the other material considerations against the requirements of the statutory development plan as provided for in Section 38(6) of the Planning and Compulsory Purchase Act 2004. The decision taker must weigh up all of the benefits and harm resulting from a proposal, with reference to all relevant policies and provisions of the Development Plan as a whole and then come to a balanced view on whether planning permission should be granted or refused.
- 9.1.2. The NPPF sets out the clear presumption in favour of sustainable development which comprises three dimensions - economic, social and environmental considerations. It identifies that where a proposal is demonstrated to be sustainable development and in accordance with the Development Plan, planning permission should be granted, without delay.
- 9.1.3. The potential impacts of the application proposals have been assessed and this Planning Statement concludes that it has been demonstrated that very special circumstances exist that clearly outweigh all relevant harm to the Green Belt and that the scheme will provide a number of other planning benefits.
- 9.1.4. The proposed development therefore constitutes sustainable development and the planning balance is considered to be strongly in favour of the proposals being granted planning permission. Further information on the planning balance exercise will be provided in due course.

9.2. Section 106 Agreement Heads of Terms

- 9.2.1. It is considered that a significant proportion of the mitigation associated with the application could be secured via planning conditions, however it is recognised that some of the measures will likely need to be captured within a Section 106 Agreement. The applicant welcomes further discussions on the scope of mitigation with Brentwood Borough Council, however at this stage proposes the following Heads of Terms:
- Payments to the Council and other investments in Carbon offsetting as part of Net Zero Carbon strategy
 - Mechanism to secure proportion of affordable workspaces within the start-up and enterprise hub
 - Financial contribution or works to provide lights controlled junction at Station Road / A128
 - Travel Plan monitoring
 - Contributions to wider footpath cycleway network

10. Conclusion

- 10.1.1. This Planning Statement describes proposals for a Net Zero Carbon development comprising up to 32,000 sqm of employment floorspace including a start-up and enterprise hub and an Ultra Rapid Electric Vehicle charging facility for 16 cars together associated parking, landscaping and infrastructure works in a high quality, landscaped development
- 10.1.2. The planning application will be submitted in outline form with all matters reserved except access. Matters of layout, scale, appearance and landscaping are reserved however development parameters will be set out in the Parameters Plan. Indicative material will be submitted with the application to demonstrate how the development would come forward at reserved matters stage will appear within the constraints of the parameters plan and design code.
- 10.1.3. The application is accompanied by a full suite of application documents that demonstrate how any environmental or other impacts of the proposed development will be mitigated as required. As a result there will be no unacceptable impacts anticipated as a result of the development that cannot otherwise be compensated through mitigation.
- 10.1.4. It is our view that there are a number of significant considerations which cumulatively constitute very special circumstances sufficient to outweigh any harm to the Green Belt. In summary these considerations comprise:
- **Legally binding national emissions targets cannot be met unless new development achieves Net Zero Carbon in construction and regulated energy use.** The proposed development will deliver a substantial number of jobs and economic benefits and will be certified Net Zero Carbon embodied in construction and regulated energy use.
 - **Phasing out of fossil fuel vehicles by 2030 is impossible without a network of ultra-rapid electric vehicle charging facilities in place yet there are none in the Borough.** The scheme will include a 16 vehicle ultra-rapid electric vehicle charging facility which will enable the provision of the vital new infrastructure which must be in place to enable the transition away from fossil fuels.
 - **The Local Plan is under immediate review and increased housing numbers and the need to replace the employment space lost through conversion and redevelopment will require further allocations to address the shortfall in employment land.** Broadfields Innovation and Business Park would substantially address the employment land needs of the Borough which the current plan does not adequately provide for.
 - **A prestigious high quality business environment is needed to be able to attract occupiers to the Borough particularly from new and emerging technologies sectors.** The Broadfields site would provide the Borough with a very well connected, high quality development of flexible buildings

in a range of potential sizes and configurations, attractive to businesses in all sectors of the economy including new and emerging technologies.

- **The Borough has approaching zero available premises in any use, sector or size configuration.** Without premises available businesses cannot locate in the Borough and those that are already here are unable to remain if their premises needs change for any reason. This situation continues to harm the local and wider economy.
- **The wider property market area, of which the Borough forms part, also has availability rates approaching zero in most sectors and uses.** The situation in Brentwood is reflected in the wider property market area where insufficient suitable premises have been delivered to meet the needs of the economy.
- **Without any small and very small business units available on flexible affordable terms start-ups and growing small businesses cannot locate in the Borough.** There is no doubt that small business and start ups, that are unsuitable to operate from home, need affordable and flexible premises. Brentwood is an entrepreneurial area and the provision of 20 small and micro units within the start up and enterprise hub will drive new economic growth in the Borough.
- **Without sufficient small and medium size business units growing SMEs cannot expand without leaving the Borough, nor can they locate here in the first place.** It is vital to support the small and medium size businesses that are the lifeblood of the economy. Within the start-up and enterprise hub there will be 12 small to medium sized units of between 100 sqm and 400 sqm to meet the needs of growing businesses. This is a serious impediment to business if their property needs cannot be met.
- **The local and sub regional market is not functioning effectively as it requires immediate delivery of premises across all uses, sizes and configurations in order to achieve a minimum frictional vacancy rate of around 8%.** The overarching problem is one of long term supply being constrained to a level where the imbalance with need is so great that the market ceases to function effectively.

10.1.5. In addition to the foregoing factors that cumulatively constitute very special circumstances, the following are supporting factors:

- The site is partly previously developed land, in the amount of circa 4,300 sqm (0.4ha);
- The completed development could generate approximately 700 new jobs, £500,000 a year in rates and £50m in gross added value per annum
- The site does not currently make a significant contribution to the Green Belt;

- The site is adjacent to the strategic highway network and in a sustainable location for employment use established by the East Horndon Hall development under construction;
- The site is within the emerging Brentwood Southern Growth Corridor and would form an employment cluster alongside East Horndon Hall and DHGV;
- The development can support the sustainable transport objectives of the council including highways and cycleway improvements; and
- The site is immediately deliverable.

10.1.6. Despite being located in the Green Belt, Broadfields will make an important contribution towards delivering much needed new employment floorspace in an accessible and sustainable location. The proposed development will create a significant number of new jobs and generate substantial economic activity, providing suitable premises to support for the growing demand from sustainable enterprises and business, many displaced from London.

10.1.7. The proposals will achieve a net zero carbon development, generating all their regulated energy needs on site and is a sustainable development in accordance with the requirements of the NPPF. This Planning Statement has assessed the material considerations arising from the proposals against the prevailing planning policy framework and has demonstrated that the scheme complies with the relevant national, regional and local planning policy guidance.