



**BRENTWOOD
BOROUGH COUNCIL**

Draft Local Plan

2013 - 2033

February 2016

COMMENT FORM

From 10 February to 23 March 2016 we are consulting on the Draft Local Plan for Brentwood Borough. You can view and comment on the Draft Local Plan online at www.brentwood.gov.uk/localplan

Alternatively, please use this form to share your views on the contents of the Draft Plan.

All responses should be received by Wednesday 23 March 2016

Please return forms to Planning Policy Team, Brentwood Borough Council, Town Hall, Brentwood, Essex CM15 8AY, or alternatively attach completed forms and email them to planning.policy@brentwood.gov.uk

Data Protection

All personal information that you provide will be used solely for the purpose of the Local Plan consultation. Please note whilst all addresses will be treated as confidential, comments will not be confidential. Each comment and the name of the person who made the comment will be featured on the Council's website.

By submitting this form you are agreeing to these conditions.

PERSONAL DETAILS

| | | | | | |
|--------|-----|-------------|--------|------------|----------------|
| Title: | Mr. | First Name: | Philip | Last Name: | Cunliffe-Jones |
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Address:

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[REDACTED]

YOUR COMMENTS

Please indicate which section(s) of the Draft Local Plan you are commenting on (where applicable please clearly state the Policy reference or paragraph number):

- i) Policy 5.4 and paragraph 5.71 of Draft Plan;
- ii) Policy 8.2
- iii) Policy 10.2

Please specify if you Support, Object or are providing a General Comment:
(tick as appropriate)

Support ☐

Object ☒

General Comment ☒

Comments (please use additional sheet if required):

- i) Policy 5.4 should allow for “click and collect” to support and possibly amend or reduce the net retail floorspace as “smart city” technology changes retailing patterns. There are recently introduced changes to Permitted Development rights but a scheme to allow co-ordination for the whole of town centre retail trends requires more flexible wording and scope. Collection may be replaced by delivery.

High Street retail offers and delivery options are changing quickly nationally. Amazon customers will soon be able to have hundreds of fresh foods and frozen foods delivered through Morrisons wholesale supply service. Amazon has been testing and developing since December 2013 delivery of packages to customer doorsteps by “octocopter” mini-drones with a 30- minute delivery time. Sainsbury’s has made a takeover offer for Argos which is justified by efficiencies in logistics. There is also a trend towards “smart cities”, and in addition customers are using apps and internet for retail choice. This increasing use of technology by both retailers and customers should be reflected in the Local Plan: it is part of the core planning function of achieving land use efficiency; also, the Local Plan should facilitate retail marketing outlets from retailers to the public either to home delivery or other collection points, not necessarily in the Town Centre.

The Council has statutory powers to enable its computer facilities to be used by any person on such terms as the parties consider appropriate (Section 38 Local Government (Miscellaneous Provisions) Act 1976) The Town Centre Renaissance Group should explore how a smart city approach can be promoted and co-ordinated. “Click and collect” and “smart city” technology may enable car parking spaces to be used efficiently to provide retail services to Crossrail passengers. Where traffic queues and car parking delays are evident or forecast a smart city approach should promote alternatives. The quantification of floorspace in the Town Centre should take account of technology trends to improve retailing in the Borough and allow for flexible alternatives in retail delivery.

Paragraph 5.71 should be revised and expanded. The Town Centre includes Warley Hill and Brentwood Station. The Masterplan will be a non-statutory planning framework, and its key principles should be embedded in the Local Plan. The Town Centre includes the Conservation Area, which is not just the High Street. The Masterplan should cover key Issues in the co-ordinated development of key sites, design must include technology and

also “smarter” property management, parking and traffic movement to avoid congestion. A design code for development in William Hunter Way, both rear of the High Street and in the major sites of the Council Car Park and Sainsbury’s, should allow for smarter use of car parking as well as housing above retail, with a type of timeshare approach to the use of car parking spaces.

- ii) Policy 8.2 relates to a site which is affected by Route 4 on the Highways England Consultation proposals for a new road crossing of the Lower Thames. The Route 4 new road would gouge out a visual scar in the Green Belt village landscape contrary to national planning policy and only justifiable by overriding national need. Route 4 is an alternative routing option and the Local Development Plan should reject this option, support growth of the Thames Estuary but allow for a limited coach transfer station.

Policy 8.2 should expand the proposed Green Travel plan to allow for a coach transfer station on part of the site. The strategic context for the Lower Thames Crossing will be part of the recommendations of the Thames Estuary growth Commission to be chaired by Lord Heseltine and to report to the Chancellor in 2017, as announced in the Budget Statement on 17 March 2016. It seems inevitable that the Lower Thames Crossing will bring forward a proposal for an additional Motorway Service Area (“MSA”), co-ordinated lorry parks and interchange facilities to maximise growth from ports and railways infrastructure in the Thames Estuary. The traffic model predicts that the new crossing will reduce traffic at the Dartford Crossing by 14%, and total capacity across the Thames with the new crossing would increase by approximately 70% with substantial journey time savings for local and longer distance traffic on the M25 and between Kent and Essex. The MSA at Thurrock would have some capacity freed up with the diversion of traffic to the new Lower Thames Crossing, but the logic of the new Road Crossing will promote a new MSA in the Tilbury area – possibly close to the Logistics Training Centre in the Thurrock Development Plan.

The background to MSA policy is set out in the Report and Appendices of the 1978 Committee of Inquiry into MSAs, the Prior Report. There was also a joint public inquiry between July 1994 and June 1995 into four competing applications for a MSA in the North East sector of the M25: all the applications were in the Green Belt. The LPA which successfully opposed all the applications argued that the M25 attracts many short journeys as people, often one to a vehicle, commute join and leave the M25 within one two or three junctions – the “short hop phenomena” partially explaining far lower turn-in rates for the MSAs at South Mimms and Thurrock than distance would normally predict. In addition, 60% of all journeys on the M25 had a trip end within its circumference, a statistic which did not allow for those journeys starting or finishing just outside the M25. Despite the reference in the Prior Report to the importance of coach transfer stations particularly on the edge of urban areas, there is no requirement within published Government guidance for coach transfer stations to be provided at MSAs.

A coach transfer station can be combined with a Green Travel Plan and share parking spaces on site. The hours of use for coach use and connections depend on demand but other than parking space only require toilet facilities and communications. While the County Council will act as co-ordinator, Parish Councils in Brentwood may consider exercising their powers under Sections 26-29 Local Government and Rating Act 1997 after establishing local needs. The site is within close proximity to railway stations on the C2C, Upminster to branch lines, and Crossrail stations as well as the motorway network. A coach transfer station at the site could become a useful and popular project in achieving to sustainable transport policies, and that should be included in the Local Plan.

- iii) Policy 10.2 does not take account of increasing parking stress in the Brentwood Town

Centre and Shenfield areas. A Residents' motion was to have been debated at the Economic Development Committee on the 10th March 2016 but has been postponed. In the light of the parking stress evidenced in that motion, the proposals in the Plan with respect of Chatham Way car park, and the inclusion of the Coptfold Road multi-storey car park in the Baytree Centre policy area require an explanation on achieving a feasible overall strategy of planned car parking provision and use, and not just referring to standards as the current draft policy proposes.

So far as Shenfield is concerned, despite the decking on Mount Avenue Station car park it is very difficult to park. Parking provision for commuters is supplemented by parking in householder drives and forecourts arranged by on-line agencies such as *yourparkingspace.co.uk*, *parkingmyspace.com* and *justpark.com*. In 2013, the Secretary of State issued guidance that no express planning permission was required for renting out driveways for parking. It seems that in advance of Crossrail approximately 80 driveways in Shenfield are let for commuter parking. This should be mentioned in the Local Plan text for this policy when amended.

The recommendation in the Report to the Economic Development Committee from the Head of Streetscene was that a strategic approach should be adopted. Policy 10.2 should be amended and outline the scope and parameters of such strategy. It is possible to have combined use of car parking spaces by both residents and shoppers at different times of the day and week, but careful management and monitoring of the spaces is required. This is presumably the intention behind the inclusion of the Coptfold Road Multi-storey car park in the Baytree Centre policy area. Policy 10.2 accordingly should be changed to allow a "smart city" approach to car parking so that parking for visitors, shoppers and commuters where available is communicated electronically and enforced by financial measures. Until such a strategy is worked out, the new car park proposals by Sainsbury, the Ongar Road Lidl Mixed use development, the Baytree Centre redevelopment and the William Hunter Way Car Park redevelopment should not proceed.

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