



YOUR COMMENTS

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

Various policies and paragraphs as stated overleaf

Please specify if you Support or Object (tick as appropriate):

Support See overleaf
Object

Comments (please use additional sheet if required):

See overleaf

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

Please note that all responses will be published online. More information can be found at www.brentwood.gov.uk/localplan

All responses should be received by Wednesday 2nd October 2013

CHAPTER 1: INTRODUCTION AND CONTEXT

Vision

- **Reference:** Bold text below paragraph 1.34 (second paragraph)
- **Response:** Support subject to amendments
- **Proposed amendment(s):**
 - The reference to ‘niche shopping’ should be amended to simply read ‘shopping’, reflecting that fact that the former is only part of the retail offer in Brentwood town centre
 - The text should be amended to include a reference to the opportunity for new residential development in the town centre, taking advantage of Crossrail and making an important contribution to housing supply

CHAPTER 2: SPATIAL STRATEGY

No comments

CHAPTER 3: CORE POLICIES

Policy CP3 – Strategic Sites

- **Reference:** Policy text relating to the Baytree Centre
- **Response:** Support subject to amendments
- **Proposed amendment(s):**
 - The entry for the Baytree Centre should make clear that the retail uses may include a range of A class uses. Providing for A3 and A4 uses (and to a lesser extent A2 uses) alongside A1 uses will:
 - Make the best of an improved public realm by allowing bars, restaurants and cafés to offer outdoor seating, thereby helping to create sense of place
 - Help to ensure the vitality and viability of this part of the town centre by widening the commercial appeal of any new ground floor units, thereby maximising the likelihood that the units will be let
 - Be consistent with the aspirations of the section of Policy CP12 which deals with the night-time economy
 - For consistency with Policy CP6, the range of acceptable uses should include leisure, though this should be an acceptable use rather than a required use, as it is not clear that there is sufficient demand from D1/D2 occupiers

Policy CP6 – The Baytree Centre

- **Reference:** Policy text
- **Response:** Support subject to amendments
- **Proposed amendment(s):**

- The entry for the Baytree Centre should make clear that the retail uses may include a range of A class uses. Providing for A3 and A4 uses (and to a lesser extent A2 uses) alongside A1 uses will:
 - Make the best of an improved public realm by allowing bars, restaurants and cafés to offer outdoor seating, thereby helping to create sense of place
 - Help to ensure the vitality and viability of this part of the town centre by widening the commercial appeal of any new ground floor units, thereby maximising the likelihood that the units will be let
 - Be consistent with the aspirations of the section of Policy CP12 which deals with the night-time economy
- The reference to leisure should be amended to make clear that this is an acceptable use rather than a required use, as it is not clear that there is sufficient demand from D1/D2 occupiers

Policy CP6 – The Baytree Centre

- **Reference:** Supporting text
- **Response:** Support subject to amendments
- **Proposed amendment(s):**
 - New development at the Baytree Centre will provide more than a simple improvement to the retail offer. Additional text should therefore:
 - Highlight the opportunity for the development of a substantial number of dwellings on the site which would make an important contribution to housing supply
 - Note the opportunity to improve the public realm, drawing on the text at paragraph 2.49 and at Policy CP12 of the Preferred Options document
 - Given the potential of the site to deliver a significant number of dwellings, the policy should make clear that the development of a landmark building will be acceptable on the site (subject to meeting the requirements of design policies elsewhere in the plan)

Policy CP9 – Protecting the historic and natural environment and landscape character

- **Reference:** Policy text
- **Response:** Support subject to amendments
- **Proposed amendment(s):** The final paragraph should be amended so that the words 'to protect or enhance' are substituted for 'to maintain or, where possible, enhance'. This is a more positive approach which is likely to ensure a higher standard of development in conservation areas.

Policy CP12 – Thriving Town and Local Centres

- **Reference:** Policy text
- **Response:** Support subject to amendments

- **Proposed amendment(s):** For the avoidance of doubt, the section on the night-time economy should make clear whether it relates to all centres or solely to Brentwood town centre

Policy CP15 – High Quality Design

- **Reference:** Policy text
- **Response:** Support subject to amendments
- **Proposed amendment(s):** We welcome the proposed policy, but recommend that additional text is added which notes that buildings which exceed the typical heights in the immediate area may be acceptable where they respond positively to the site and setting. That will ensure that the policy as it stands is not interpreted too narrowly and in a way which would prevent development coming forward which is in fact of a high standard.

CHAPTER 4: DEVELOPMENT MANAGEMENT POLICIES

Policy DM10 – Non-Retail Uses

- **Reference:** Policy and supporting text
- **Response:** Object
- **Proposed amendment(s):** We regard this policy as overly prescriptive, for two reasons:
 - In general terms it fails to reflect the fact that successful town centres of the size of Brentwood must offer more than simply A1 retail
 - More specifically, the policy may prevent future developments at locations such as the public realm at the Baytree Centre from creating the sense of place which will be so critical to their success, as it will not be possible to animate the public space through A3 and A4 uses

We recommend a less prescriptive approach which allows a more qualitative judgment to be made on the extent to which the introduction of other A uses will impact on the vitality and viability of the centre in which they are located.

At the very least the policy should make clear that a range of A uses will be acceptable in certain locations, such as the units surrounding the public realm at the Baytree Centre where A3 and A4 uses could make an important contribution to its vitality and viability.

Such an approach would ensure consistency with Policy DM27 of the Preferred Options document.

Policy DM21 – Preservation and Enhancement of Conservation Areas

- **Reference:** Policy
- **Response:** Support subject to amendments
- **Proposed amendment(s):** We recognise the importance of protecting heritage assets, but in some cases buildings make only a negligible contribution to the character or appearance of a conservation area, and a replacement could make a more significant contribution. We therefore recommend that criterion c is amended so that it reads (new text underlined):

Where any or part demolition is proposed, the structure makes no material contribution to the character or appearance of the area, the structure makes a limited material contribution to the character or appearance of the area and the proposed replacement will make a greater material contribution or the structure is considered to make a negative contribution to the appearance of the Conservation Area

Policy DM23 – Housing Land Allocations – Major Sites

- **Reference:** Policy and supporting text
- **Response:** Support subject to amendments
- **Proposed amendment(s):** For the avoidance of doubt, we recommend that the policy makes clear that the estimated capacity is for net additional dwellings.

Policy DM24 – Affordable Housing

- **Reference:** Policy and supporting text
- **Response:** Object in part
- **Proposed amendment(s):** We support the aspiration for social inclusion, but we are concerned that it may not be possible to disperse affordable housing throughout the new development. Doing so can make management of housing stock by housing associations and other providers very difficult.

We therefore recommend that the policy is amended so that dispersal of affordable housing through new developments is not required.

Policy DM30 – Provision of Open Space in New Development

- **Reference:** Policy
- **Response:** Support subject to amendments
- **Proposed amendment(s):** For the avoidance of doubt, we recommend that the policy makes clear that only one of the criteria must be satisfied for a commuted sum to be acceptable. This could be achieved by adding the word 'or' at the end of each of the first two criteria.

Policy DM38 – Parking

- **Reference:** Policy and supporting text
- **Response:** Support subject to amendments
- **Proposed amendment(s):** At present it is not clear what the proposed standard is. Both the policy and paragraph 4.175 defer to other documents, but paragraph 4.174 sets out specific standards. A consistent approach is required.

Regardless, it is critical that the policy, and not simply the supporting text, makes clear that a lower standard of car parking may be acceptable in town centre locations with a high level of access to services. That will allow efficient use of sites and the maximisation of housing delivery, making an important contribution to housing supply in Brentwood.