



# Consultation Statement on the Brentwood Town Centre Design Guide

November 2019

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## 1. Introduction

- 1.1 This Statement of Consultation provides an overview of the public consultation that took place between 05 February and 19 March 2019 with residents, stakeholders and interested parties on the Brentwood Town Centre Design Guide (BTCDG).
- 1.2 The Statement describes how the public and other stakeholders were consulted. It also summarises the comments received during the consultation period, details how the issues raised have been dealt with in working towards a final issue of the BTCDG for adoption.
- 1.3 The BTCDG will be considered by the Council's Policy, Resources and Economic Development Committee as to whether it should be adopted as a Supplementary Planning Document (SPD).

## 2. The Consultation Process

- 2.1 The engagement processes of the BTCDG consultation and the preparation of this Consultation Statement are in accordance with statutory requirements set out in the Town and Country Planning (Local Planning) (England) Regulations 2012.
- 2.2 Brentwood Borough Council supports a continuous process of engagement in which it considers views on the BTCDG even outside of formal consultation periods.

### Period of Consultation

- 2.3 The consultation took place for six weeks between 05 February to 19 March 2019. It consulted on a range of design guidance for new development within Brentwood Town Centre.

### Methods of Communication and Engagement

- 2.4 Publicity and awareness raising including the use of Brentwood Town Centre branding, printed media and social media were used to raise people's awareness of the consultation and to encourage representations to be made to the BTCDG.
- 2.5 The BTCDG document and information of the consultation events were made available via the Council's website, posters, phone calls and drop-in sessions.
- 2.6 Public drop-in sessions were held at the Baytree Centre on Friday 01 March and Saturday 02 March 2019, providing an opportunity for people to ask questions on the BTCDG as well as the Pre-Submission Local Plan.
- 2.7 A digital notice was issued to those on the Council's consultation database, informing residents and stakeholders about the BTCDG consultation. This information was also placed on the Council's website.
- 2.8 Representations (comments) to the consultation were invited via:
  - a) Email to [planning.policy@brentwood.gov.uk](mailto:planning.policy@brentwood.gov.uk); and
  - b) Letter.

## Representations Made

- 2.9 A total of nine comment forms received following the Consultation period via email and letter, seven from residents and two from other Planning Authorities. Detailed representations and the Council's responses are available in Appendix 1.

## 3. Summary of the main issues raised

### Comments from other Planning Authorities

- 3.1 We received comments from Essex County Council and Chelmsford City Council.
- 3.2 Chelmsford City Council considered that the guide was clear and comprehensive and had no further comments to make.
- 3.3 Essex County Council commented that there was a lack of reference to the Essex Design Guide and the need to liaise with Essex County Council during application process.

### Comments from residents

- 3.4 We also received comments from seven local residents; five of which objected to development in the Town Centre.
- 3.5 Two residents people welcome the introduction of the document to provide set of design principles, but also raised some reservations and/or would like more information on transport improvement measures, Baytree Centre area, affordable housing, night time economy impacts and waste disposal.
- 3.6 Questions received during drop-in events regarding the BTCDG was based around the parking provision, cycling provision, retail environment and the opportunities and constraints of site allocations in Brentwood Town Centre proposed in the Pre-Submission Local Plan. These were answered directly at the events.

### Other comments received outside the consultation period

- 3.7 We also received a letter from National Federation of the Blind of the UK (NFBUK) with regards to using shared space. NFBUK advised that the Council should not support shared space designs as shared space is not the right way to improve the street environment for all pedestrians. NFBUK suggested that:
- a) any "shared space" scheme (or scheme that includes shared space features) that is currently either under construction or in planning should be re-assessed to ensure that it is fully accessible by all vulnerable groups; and
  - b) any "Shared space" schemes or other similar schemes going forward under an alternative name but including design components associated with this approach will no longer gain approval.
- 3.8 Informal comments from Create Streets highlighted that the document is lengthy and that it benefits public realm more than building quality.

## 4. Conclusion

- 4.1 All the key issues and points raised from the consultation process have been considered to inform the final publication of the BTCDG.

## Appendix 1: Public Participation Report

Ref	Respondent	Representation	Council's response and action
1	ECC	Document as a whole: BTCDG makes no reference to the Essex Design Guide (2018). It is unclear how the Essex Design Guide 2018 has been considered and incorporated into the BTCDG. The EDG includes new socio-economic themes alongside best practice design standards. These new design themes address Active Design, Ageing Population, Health and Wellbeing, Digital and Smart Technology and Garden communities.	<p>The Essex Design Guide (2018) despite being endorsed by the emerging Brentwood Local Plan, is not formally adopted by Brentwood Council. The BTCDG has considered and incorporated the EDG's design principles where appropriated.</p> <p><b>Action:</b> a list of non-statutory design documents is now provided under Chapter 1, page 9. This list includes the EDG.</p>
2	ECC	Vision for the town centre 2030: It should be clarified that any planning application will be considered against a range of guidance and plan policies, and not just the Brentwood Town Centre Design Guide (BTCDG). This includes the Essex Design Guide 2018; Manual for Streets; Building for Life; and Secured by Design, in conjunction with Local Plan policies such as HP06 Standards for New Housing, HP13 Creating Successful Places, Policy HP18 Designing Landscape and the Public Realm, BE18 Green and Blue Infrastructure and BE22 Open Space in New Development.	<p>Reference and link to the emerging Local Plan have already been provided in Chapter 1, page 9.</p> <p>Some of the mentioned non-statutory documents have already been referred to in the BTCDG in relevant chapters.</p> <p><b>Action:</b> Text and two diagrams illustrating planning application process and relevant policies and documents are now added on page 9 and 15 for further clarity.</p>

3	ECC	Chapter 05 Public realm and materiality - 5.1 Streets: BTCDG should refer to ECC's Highways Technical Manual and guidelines on Streets and Roads, which provide specific technical guidance on how to build a layout in compliance with Essex Highways and Manual for Streets standards. ECC as the Highway Authority need to be consulted throughout all stages of the design and planning application processes, including pre-application and post determination.	Compliance to technical standards is more of a technicality matter than design matter and will be consulted with ECC throughout the design and planning application processes.
4	ECC	Chapter 05 Public realm and materiality - 5.2 Parking: Specific reference should be made to the Essex Parking Standards - Design and Good Practice (2009), which sets out vehicle parking standards for Essex. Any deviation from these standards are required to be supported by appropriate evidence of relevant local circumstances that justify any such deviation.	The Council's adopted parking standards is set out by the emerging Brentwood Local Plan and not a function of the BTCDG.
5	ECC	Chapter 05 Public realm and materiality - 5.3 Key junctions: the BTCDG must also consider the technical requirements and function of junctions, and ECC as the Highway Authority need to be consulted throughout all stages of the design and planning application processes, including pre-application and post determination.	Noted. Compliance to technical standards is more of a technicality matter than design matter and will be consulted with ECC throughout the design and planning application processes.
6	ECC	Chapter 05 - Public realm and materiality - 5.5 Urban green infrastructure: reference should also be made to the Essex Design Guide, with regards the impact of planting on sight-splays. The guidance provides details on the type of planting considered suitable within sight-splays at different types of junctions. Early consultation with the local highway authority is necessary to avoid any conflict with these requirements. Welcomes reference to ECC's guidance on SuDs and the need for consultation with the Flood Team during the pre-application process. The NPPF (paragraph 165) identifies that SuDS, where possible, should provide multifunctional benefits. This should be referenced in the BTCDG.	Regarding impact of planting on sight splays: Noted.  <b>Action:</b> added "ensure trees are of suitable scale to buildings height, proximity to junctions and sight splays".  Regarding reference to multifunctional benefits of SuDs from NPPF: this is not necessary.
7	ECC	Chapter 06 – Sustainability: Only minimal reference is made to Active Design principles in this section. Active Design Guidance has been produced by Sport England in partnership with Public Health England, and Active Design Principles have been embedded within the Essex	Active Design Guidance by Sport England is a non-statutory document which has already been considered and elaborated in the BTCDG.

		Design Guide. BTCDG should provide references to these principles.	<b>Action:</b> a list of non-statutory design documents is now provided under Chapter 1, page 9 for clarification. This list includes the Active Design Guidance.
8	Resident	<p><b>Transport improvement measures need more detailed:</b></p> <ol style="list-style-type: none"> <li>1. Clarify the role of public transport in the town and how will public transport use be facilitated by design;</li> <li>2. Cycle paths and cycle parking: the BTCDG does not show where the cycle paths would be created, and the cycle parking located. The document refers to the need to improve links between the Station and the High Street and refers variously to improvements to Kings Road, Queens Road and sometimes Rose Valley. Further information is needed to show precisely what these links might look like in more concrete terms for cyclists;</li> <li>3. Car park provision: The BTCDG does not yet provide sufficient evidence of the measures required to reduce demand or of having designed an environment in which demand will be reduced within the required timescale. The 3 Council owned car parks which are ear-marked for re-development will see more than a 20% reduction in the provision of car parking, not to mention this will be reduced further by the needs of the occupiers. These re-developments have the potential to lead to an increase in congestion and other negative consequences for the Town Centre unless countervailing measures at the appropriate rate are taken.</li> <li>4. The multi-storey car park (MSCP): the Vision seems to envisage an enhanced role for MSCP with at least 2 different scenarios for its future development being canvassed. To the extent that either or both scenarios might involve encroachment on the open green space, then the design should be re-considered. In terms of any re-development of the MSCP, assuming stakeholder agreement, it should be noted that any prior development of the Chatham Way car park site may preclude the option of</li> </ol>	<p>1,2,3: Transport improvement measures and parking provision are crucial to the function and viability of Brentwood Town Centre and are therefore considered in detailed in the emerging Brentwood Local Plan, Infrastructure Delivery Plan and the Council's emerging Sustainable Transport Strategy.</p> <p>The function of the BTCDG is to provide guidance on the place-making aspects of such measures.</p> <p>4: The illustration on page 11 is an artistic impression and not the final design solution. Any application for development in the Town Centre not qualifying for Permitted Development would still need to apply for planning permission, by which stage detailed design and mitigation measures would need be consulted upon.</p>

		relocating existing parking provision at the MSCP to this site at a later date.	
9	Resident	<b>Baytree Centre Area:</b> Support the intention to improve permeability of movement between Coptfold Road and the High Street, but different stakeholders need to be involved. The DG should emphasise the value of the open green space situated between Coptfold Road and the Baytree Centre (page 126) and the potential that it holds for drawing pedestrians through this area and the BTCDG should not anything to be done which might jeopardise or diminish this asset.	Noted.
10	Resident	<b>Agree with public art interventions in key locations</b> as part of the wayfinding strategy to reinforce Brentwood's unique character.	Noted.
11	Resident	<b>The section on "Sustainability"</b> mentions the need to "future proof the town for an uptake in electric cars, buses and cycling", it would be useful to have more discussion about electric charging points, the provisioning of them and whether the siting of them has any place within the public realm.	Noted. The Council will seek appropriate infrastructure for electric and low emission vehicles at new developments as set out in Policy BE15 in the emerging Brentwood Local Plan. However, it is recognised that a) as technology improves rapidly, the future of charging is mostly going to be home based and b) provision of EV charging in the public realm requires a more detailed transport analysis and is outside the framework of the Design Guide. Provision of EV charging in the public realm of the Town Centre therefore will be considered in the wider context by the emerging Sustainable Transport Strategy.
12	Resident	<b>Affordable housing:</b> Concerned people are being priced out of the borough, with a knock-on effect on services.	Affordable housing is an issue to be considered by the emerging Brentwood Local Plan and not a function of the BTCDG.



13	Resident	<p>Objected to development on Westbury Road and Crown Street on grounds of inadequate infrastructure, excessive retail units that Brentwood does not need, noise, disturbance and nuisance to the detriment of neighbours' quality of life, safety for road users, prioritizing the night life economy at the expense of residents' wellbeing, size, depth, width, height and massing of future development having impacts on existing residents, parking, Green Belt, flooding.</p>	<p>The proposed allocations on Westbury Road and Crown Street are being considered following public consultation of the emerging Brentwood Local Plan. The Plan is subject to public examination and adoption process.</p> <p>When the Brentwood Local Plan is adopted, development on proposed allocated sites still require planning permission, by which stage the BTCDG will be able to influence their design schemes.</p>
14	Resident	<p>There is no mention of the night-time economy negative impacts: loud music, pavement drinking, excessive noise. The BTCDG should address the limits and saturation point for the Town Centre's night-time economy capacity. Currently it is one dimensional and mainly aimed at under 30s and visitors, offering little consideration for the real age profile of local residents. The council have prioritised the night life economy at the expense of our wellbeing.</p>	<p>Managing the night-time economy including its impacts is addressed in the emerging Brentwood Local Plan and will be assessed on a case by case basis through the planning application process.</p>
15	Resident	<p>Bins have increased in size and occupied pavements and pedestrians' space across the Town Centre. There is no requirement in the BTCDG to address the issue of excessive waste generated and the requirement to screen bin site.</p>	<p>The Essex and Southend-on-Sea Waste Local Plan adopted in July 2017 sets out where and how waste management developments can occur and contains the policies against which waste management planning applications are assessed.</p> <p>The BTCDG provides brief guidelines regarding integration of bin storage in residential area and provision of bins in the public realm but further details need to be assessed on a case by case basis through the</p>

			planning application process.
15	NFBUK	<ol style="list-style-type: none"> <li>1. Shared space is not the right way to improve the street environment for all pedestrians. For clarification, shared space being discussed are schemes that include the lowering or removing of kerbs and taking away of push button crossings; and where there is no delineation separating pedestrians from other traffic, including bicycles. This is because:</li> <li>2. All pedestrians are affected in those schemes where pedestrians are expected to share streets and roads with motorists or cyclists, and where tactile surfaces have been used in place of detectable height kerbs, and push button crossings have been removed. Many people, including older people and young children, have difficulty judging where it is safe to walk or cross without kerbs and controlled crossings. Blind, deaf-blind and partially-sighted people are affected the most.</li> <li>3. The UK Department for Transport (DfT) Disabled Persons Transport Advisory Committee also drew the same conclusion in a position statement it published on 13th June 2018 (Reference 4) when it stated that shared space discriminates unlawfully and is contrary to Section 21 of the Equality Act 2010. Street or road designs lacking navigational and safety features break equality law.</li> <li>4. The relaxation on the pause of shared space was not based on any evidence but on concerns raised by industry and should not be followed.</li> <li>5. Request that the Council will no longer support shared space designs (or designs incorporating the shared space features listed above) when high streets, town centres, residential or commercial centres in your area are being planned or re-designed. This means: <ol style="list-style-type: none"> <li>a. any "shared space" scheme (or scheme that includes shared space features) that is currently either under construction or in planning should be re-assessed to ensure that it is fully accessible by all vulnerable groups.</li> <li>b. any "Shared space" schemes or other similar schemes going</li> </ol> </li> </ol>	<p>Noted.</p> <p><b>Action:</b> References to shared space have been removed where appropriate. In character areas where friction between motorists and pedestrians is less likely, such as tertiary streets in residential areas, text were added to require shared space schemes to ensure that it is fully accessible by all user groups, including children and those with visual and hearing impairments.</p>

		forward under an alternative name but including design components associated with this approach will no longer gain approval.	
16	Create Streets	<ol style="list-style-type: none"> <li>1. Key strength is large number of sensible points and principles, particularly helpful in preventing blank facades and too much repetition.</li> <li>2. Key weakness is the document is too long and the visual palette or examples are broad.</li> <li>3. Clearer guidance on materials, façade patterns is needed. Where it is clear this is undermined by other images or points. Recommended images (p.25, p.28, p.42, p.52, p.94) are more specific.</li> <li>4. Palpable error on page 123 for seats which back on to traffic which people never like and use far less</li> <li>5. This will be helpful in improving the nature of public realm within Brentwood though it will have little impact on the quality or nature of buildings.</li> </ol>	<p>1,2,3: Noted.</p> <p>4: Noted. The image showing on page 123 was to accompany the guidance on urban furniture, rather than a precedent for encouraging seats backing onto traffic. A slight revision was made to the introduction section (step 3, page 8) to explain how to interpret images showing precedents.</p> <p>3,5: The BTCDG takes on a holistic approach which is about place-making and co-ordinating development within the Brentwood Town Centre. Therefore, guidance relating to the design quality of buildings largely focuses on how it works within its context and less on the architectural aspirations of buildings.</p>