

# BRENTWOOD BOROUGH LOCAL DEVELOPMENT FRAMEWORK

## Urban Place Supplement Supplementary Planning Document Consultation Statement (Regulation 17 Statement)

### PRE-PUBLIC PARTICIPATION CONSULTATION

#### Introduction

In the preparation of draft Supplementary Planning Documents the Department for Communities and Local Government (DCLG) advises authorities to informally involve local communities and other stakeholders in the development of policy guidance.

Work on the Urban Place Supplement has been advanced by a Technical Working Group led by officers of the Essex County Council Built Environment Branch working with colleagues from both within Essex County Council and Essex local authorities. Study visits to view good practice, both within this country and abroad, informed the process.

The involvement of stakeholders in the production of the draft Urban Place Supplement has taken place over a 15-month period and comprised the following main activities:

Essex Design Initiative Workshops	February - April 2005
Household Survey, high-density developments	July – August 2005
UPS Technical Consultation	November 2005 – March 2006
UPS Questionnaire	November – December 2005
Developers' meetings	May 2006

The scope and outcome of these consultations are summarised below:

#### 1. EDI Workshops

The Essex Design Initiative (EDI) was launched in January 2005 as a joint initiative by Essex County Council, the Commission for Architecture & the Built Environment and the East of England Development Agency. It aims to improve the design quality of the built environment and to create genuinely sustainable communities. One of its principal strands in meeting these aims is the production of new urban planning guidance - an Urban Place Supplement (UPS) to the Essex Design Guide.

Three workshops, each with approximately 60 attendees drawn from the development industry, local authorities and other local and national organisations (see list in Appendix 1), were held under the auspices of the EDI in February,

March and April 2005. These workshops began examining the issues that mirrored the then proposed content of the UPS and were entitled 'Quality is no accident', 'Development in context' and 'Sustainable development'.

Each workshop resulted in the identification of a number of key 'learning points' which have influenced the content and emphases of the first draft of the UPS. In particular these related to the physical and organisational factors that influence quality, the need for a wider engagement in the design process, what constitutes 'local context' (and the importance of properly identifying it) and the central place that sustainability - in all its forms - must have in the development process.

## **2. High Density Developments Household Survey**

In addition, in recognition of the increasing role that higher density development will play in the future, a limited survey targeted on compact urban schemes was undertaken to assess residents' experiences of higher-density living.

This survey, which covered high density developments in Chelmsford, Purfleet, Colchester, Brentwood and Chafford Hundred, the 293 replies to which constituted a 16% response rate, looked at transport, lifestyle, environment, recycling and space issues. The results highlighted a poor level of satisfaction with the quality of open space, accessibility and recycling facilities although residents were generally satisfied with the appearance and layout of developments.

The UPS seeks to address these issues, particularly in its central emphasis on the importance of high quality in the public realm. In addition, a purpose of the UPS is to help deliver developments that are sustainable and which have properly integrated and convenient recycling facilities.

## **3. UPS Technical Consultation**

The publication of the first draft of the UPS in November 2005 marked the commencement of an extensive 'technical' consultation period during which time the document was widely circulated to individuals and organisations who might be involved in implementing the proposed policies and who might be in a position to highlight technical flaws in what was being proposed.

This wide-ranging technical consultation included consultation with the Office of the Deputy Prime Minister (now DCLG), East of England Development Agency, English Heritage, Sustrans, Housing Corporation, Environment Agency, English Nature, Home Builders Federation, GoEast, Arts Council, Carbon Trust, Learning Skills Council, Business Link, Sport England, English Heritage, National Federation of Builders, housebuilders and developers, architects, planning consultants, social housing providers, agents, and representatives of District and Borough Councils.

As well as being widely circulated as part of the technical consultation, the UPS has been available in an electronic format on the Essex Design Initiative website. The technical consultation has elicited responses from over 50 organisations and individuals (listed in Appendix 2) These have either been as a result of the on-line UPS questionnaire (below) or have been by written representations. The draft Urban Place Supplement has found general support and there has been a desire to try to refine the UPS into a genuinely practical document. 200, often very detailed, points have emerged for consideration and/or incorporation in the second draft.

The main points that have emerged as a result of this consultation have been in relation to: the proposed Context Appraisal methodology, private open space/quality of public realm issues, biodiversity and the green points system, new street types (play street and mixed-use street), requirements for car parking at higher densities, the proposed 50% non-residential use requirement on some frontages, the EcoHomes BREEAM requirements, on-site renewable energy requirements, waste/recycling issues and the cost implications of the UPS.

These detailed responses have been used in the consideration of possible refinements to the UPS and have either resulted in alterations and clarification of the text (see 4 below), prompted further research (for example, in relation to costings) or are the subject of continuing discussions and will be assessed in relation to comments received from the public consultation phase.

#### **4. UPS Questionnaire**

A structured questionnaire relating to specific aspects of the first draft of the UPS was made available on the Essex Design Initiative website during November and December 2005. This formed part of the technical consultation above. 20 copies of this questionnaire were completed and returned, the majority of which were from developers or consultants, the remainder being from local and national organisation and individuals.

The questionnaire sought views on the methodology proposals contained in the UPS (particularly the Context Appraisal approach) and was designed to gauge opinion on those proposals in the UPS that were likely to constitute a recognisable shift in the application of particular policies i.e. the relationship of private/public space, the accommodation of the car, the proposed 'green points' system, and the proposals for reduced energy use and renewable energy sources within developments.

Views on these issues have resulted in a clarification and expansion of guidance on the production of Context Appraisals now contained in the consultation second draft UPS and, together with views expressed through the more general consultation process (3 above), have led to refinements in the proposals relating to energy conservation and production.

## **5. Developers' Meetings**

Following developers' submissions in respect of the draft UPS, individual meetings were held with representatives of six development companies in order to explore further the detailed issues that they had raised and to allow the opportunity to expand upon the policies being proposed in the document. Where appropriate, the results of this dialogue with the development industry will be used to refine the final version of the UPS.

All respondents to the technical consultation will have the opportunity to make further representation as part of the public consultation.

## **PUBLIC PARTICIPATION STAGE**

### **Consultation**

The Draft SPD will go to all local authorities for public consultation. Brentwood Borough Council will engage the public on the Draft SPD as set out in the Brentwood Submission Statement of Community Involvement and detailed below.

The consultation is, however, being undertaken jointly between the local District and Borough Councils and Essex County Council.

### **Brentwood Borough Council Statement of Community Involvement (SCI)**

The Submission SCI sets out how Brentwood Borough Council will involve the community in the preparation, alteration and review of local planning policy (Development Plan Documents), supplementary planning guidance (Supplementary Planning Documents) and in the consideration of planning applications.

### **Who Will Be Consulted**

The Town and Country Planning (Local Development) (England) Regulations 2004 require local authorities to meet a minimum level of community involvement and specify a number of organisations which must be consulted if the Council considers that they will be affected.

In addition to meeting its statutory obligations, the Council would like local groups, organisations and individuals to become involved in the preparation of the new Local Development Framework. A list of groups and organisations the Council proposes to involve in the LDF process is at Appendix 3, and these will be consulted on the Draft UPS as considered appropriate.

### **Methods to Involve the Community**

Brentwood Borough Council will, as appropriate, use a variety of methods to enable community involvement in process of preparing Supplementary Planning Documents. The methods are:

- Information/documents available on the Council's website
- Documents available for inspection at the Town Hall, Information Centre and local libraries
- Letters and hard copy documents
- Newspaper articles, press releases and/or advertisements
- Leaflets

- Questionnaires (as appropriate)
- Targeted consultation
- Exhibitions and Displays
- Public Meetings

All written comments received by the Council will be acknowledged in writing. At the end of each consultation period the Council will analyse all responses and prepare a summary report to Committee that outlines the main issues raised and officer recommendations for future action. Where the Council considers appropriate, the substance of the comments will be reflected in changes being made to the draft document. These reports, minutes of meetings and decisions will be made publicly available.

Representers will be individually notified in writing of how their representations have been considered and the Council's decision.

### **Consultation Database**

A database of all individuals and organisations that have submitted comments and/or requested to be kept informed will be established and this database will be used to keep registered individuals and organisations advised of the subsequent stages of the process and, as appropriate, the development of the Local Development Framework generally.

In its initial stages, this database will contain all consultees listed in Appendix 3, as well as those individuals and organisations who have previously expressed an interest in being informed about the development of the Local Development Framework and included on the LDF mailing list. New individuals and organisations will be added to the consultation database as identified or as requested.

### **Following the public consultation**

It is proposed that consultation responses, both for the Urban Place Supplement and the Sustainability Appraisal, will be assessed by an Assessment Board. This Board will comprise representatives of both County and District Councils who, together with the Sustainability Appraisal adviser, will examine responses received from all sources and resulting from all District and Borough Council consultations and decide on what, if any, changes should be made to the UPS document as a result of these responses.

## **APPENDIX 1**

### **Organisations that attended one or more of the EDI workshops:**

Abbey Developments Ltd  
Alan Baxter Associates  
Alan Shaw Architects  
Andrew Martin Associates  
Applied Environmental Research Centre Ltd  
BAA  
Barratt Eastern Counties  
Barton Wilmore (Architecture)  
Basildon District Council  
Bellway Homes Essex  
Beyond Green  
Bovis Homes Group Plc  
BPTW Architects  
Broadway Mallion  
CABE  
Carter Jonas  
Castle Point Borough Council  
Chelmsford Borough Council  
Colchester Borough Council  
Colne Harbour Project Group  
Croudace Homes Ltd  
David Lock Associates  
David Wilson Homes Eastern  
Dennis Sharp Architects  
EDAW  
EEDA  
Epping Forest District Council  
Essex and Suffolk Water  
Essex Police  
ExDRA  
Feilden and Mawson Architects  
FPD Savills  
Go East  
Greater London Authority  
Harlow District Council  
Haverstock  
Housing Corporation (Eastern Region)  
JCN Associates LTD  
John Finch Partnership  
Ken Yeang International  
Laing Homes  
Land Securities  
Lansbury Developments Ltd  
Lend Lease  
Livework

Llewelyn-Davies  
Lexden Restorations Ltd  
Lovell Partnerships  
Neil Tully Associates  
PCKO Architects  
Persimmon Homes (Essex)  
Philpot Design  
Plater Claiborne Architecture & Design  
Proctor & Matthews  
Prospect Row  
RWCL  
Robert Hutson Architects  
Rochford District Council  
Smart Planning Ltd  
Southend-on-Sea Borough Council  
Sustainable Development Commission  
Sustrans  
Swan Housing Association Ltd  
Thames Gateway South Essex Partnership  
The Guinness Trust  
Thurrock UDC  
Terence O'Rourke  
University of Westminster  
Urban Design Group  
Uttlesford District Council  
Weston Homes  
WPP Architects  
WSP Environmental  
WS Atkins

## **APPENDIX 2**

### **Organisations which responded to consultation**

#### **Developers/Housebuilders**

Barratt Eastern Counties  
Bellway Homes  
Countryside Properties PLC  
Emerson Group  
Flagship Housing Group  
Galliard Homes Limited  
Jones Homes Northern Limited  
Jones Homes Southern Limited  
Lend Lease  
Mersea Homes  
Persimmon Homes (Essex) Limited  
Ropemaker Properties  
Taylor Woodrow Developments Limited

## **Organisations**

Colchester Civic Society  
Energy Savings Trust  
English Heritage (East of England Region)  
English Nature  
English Partnerships  
Environment Agency  
Essex Wildlife Trust  
GO-East (Growth Areas Team)  
Home Builders Federation  
Mid Essex Health Trust  
National Federation of Builders  
Retirement Housing Group of HBF  
Sport England  
Tendring Primary Care Trust  
TGSEP/Greengrid Partnership  
TGSEP/health & social care sector

## **Consultants**

Alan Stones  
Barton Willmore Partnership  
Chetwoods Associates (London) Limited  
David Lock Associates  
EntecUK  
Hibbs Walsh Associates  
LSI Architects  
Melville Dunbar Associates  
Planning Law Practice  
Proctor and Matthews Architects  
Robin Webb Consulting Limited  
Stanley Bragg Architects  
URBED  
White Young Green

In addition, ten responses were received from individuals. The list does not include the liaison that has occurred within and between the local authorities involved in production of the UPS.

## **APPENDIX 3**

### **List of Consultees as set out in the Brentwood Borough Council Submission Statement of Community Involvement**

#### **Specific Consultation Bodies**

The Regulations require that following bodies must be consulted to the extent that the Council thinks that the proposed subject matter of the LDD affects the body:

- East of England Regional Assembly
- Essex County Council
- Adjoining Local Authorities
- The Countryside Agency
- The Environment Agency
- Highways Agency
- The Historic Buildings and Monuments Commission for England
- English Nature
- The Strategic Rail Authority (to be superseded by Department of Transport or Network Rail)
- The East of England Development Agency
- The London Development Agency
- Parish Councils, within and adjoining Brentwood Borough
- Any person to whom the electronic communications code applies by virtue of a direction under Section 106 (3)(a) of the Communications Act 2003
- Any person who owns or controls electronic communications apparatus situated in any part of the area of the local planning authority
- Strategic Health Authority
- Person to whom a licence has been granted under Section 7(2) of the Gas Act 1986
- Sewage Undertakers
- Water Undertakers

### **Government Departments**

The Government Office for the Eastern Region should be consulted, and will often be the first port of call for central government departments.

In addition, local planning authorities are strongly advised to consult any Government Departments or agencies which have large land holdings in the area covered by the LDD. This will allow the LDF to take account of the possible need for expansion of facilities or the likelihood of large-scale land disposals. The departments that may be affected in Brentwood include the Home Office; the Department of Transport; the Department of Health; and the Department for Environment, Food and Rural Affairs.

### **General Consultation Bodies**

The Regulations require that the following bodies must be consulted where the Council considers appropriate (these are generally local groups, and are in addition to the national and regional organisations and bodies set out in 'Other Consultees' below):

- **Voluntary bodies** whose activities benefit any part of Brentwood Borough, e.g. Council for Protection of Rural Essex; Brentwood Community Transport; Brentwood Council for Voluntary Services; Citizens Advice Bureau; Brentwood Locality Youth Service; Inter Church Action Group for the Homeless; MIND (Brentwood); Brentwood Arts Council; Brentwood Sports Council; Rural Community Council for Essex

- **Bodies which represent the interests of different racial, ethnic minority or national groups** in the Brentwood Borough, e.g. Essex Racial Equality Council, Gypsy and Traveller Law Reform Society
- **Bodies which represent the interests of different religious groups** in Brentwood Borough, e.g. Diocese of Brentwood; Hindu Dharma Society; Schools Pastor (Sawyers Church)
- **Bodies which represent the interests of disabled persons** in Brentwood Borough, e.g. Access Group (Brentwood); Brentwood Club for Visually Impaired Persons; Essex Disabled Peoples Association; Essex Voluntary Association for the Blind; Employment Opportunities for People with Disabilities; RAD Essex; Talking Newspaper (Brentwood); SNAP
- **Bodies which represent the interests of persons carrying on business** in Brentwood Borough, e.g. The Federation of Small Businesses; Brentwood Chamber of Commerce; Brentwood Town Centre Partnership Board

### **Other Consultees**

The following agencies and organisations are also considered appropriate:

- Age Concern
- Brentwood Youth Council
- Church Commissioners
- Confederation of British Industry
- Commission for Architecture and the Built Environment
- Country Landowners Association
- English Partnerships
- English Tourist Board
- Commission for Racial Equality
- Crown Estate Office
- Diocesan Board of Finance
- Disability Rights Commission
- Electricity, Gas and Telecommunications Undertakers
- The National Grid Company
- Environmental groups, including Council for the Protection of England, Friends of the Earth, Royal Society for the Protection of Birds, Essex Wildlife Trust
- Equal Opportunities Commission
- Fire and Rescue Services
- Forestry Commission
- General Aviation Awareness Council
- Gypsy Council
- Health and Safety Executive
- Help the Aged
- Her Majesty's Inspectorate of Pollution
- Housing Corporation
- Inspire East
- Institute of Directors

- Learning and Skills Council
- Local Amenity and Conservation Societies
- Local Police Authority
- Local Resident Groups
- Local Transport Authorities
- Local Transport Operators
- National Farmers Union
- National Playing Fields Association
- Network Rail
- Passenger Transport Authorities
- Passenger Transport Executives
- Police Architectural Liaison Officers
- Post Office Property Holdings
- Primary Care Trust
- Rail Companies
- Rail Freight Group
- Rail Passenger Committee
- Rural Development Commission
- Sport England
- Thames Chase
- The House Builders Federation
- Water Companies
- Youth Parliament