



**BRENTWOOD
BOROUGH COUNCIL**

Brentwood Pre-Submission Local Plan (Regulation 19)

January 2019

COMMENT FORM

From Tuesday 05 February to Tuesday 19 March 2019 we are consulting on the next stage of the Brentwood Local Plan: Pre-Submission Local Plan (Regulation 19). You can view and comment on the consultation document online at:
www.brentwood.gov.uk/localplan

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

All responses should be received by 5PM Tuesday 19 March 2019.

Please return forms either by attaching completed forms by email to **planning.policy@brentwood.gov.uk** or alternatively by post to Planning Policy Team, Brentwood Borough Council, Town Hall, Brentwood, Essex CM15 8AY.

How to complete the representation form:

This form consists of two sections – Section A: Personal Information, and Section B: Your Representation. Please note that your representation cannot be accepted without completing information identified in Section A.

The Local Plan Pre-Submission (Regulation 19) consultation consists of more formal and technical questions focused on the four Tests of Soundness and whether the Local Plan is compliant with relevant legislation. Comments are to be focused on three core areas – is the Plan positively prepared (referred to as 'soundness'), does the Council adhere to the Duty to Cooperate, and is the Plan legally compliant (addressed by question 3 of this comment form). These terms are defined below:

- a) **Soundness:** Local Planning Authorities must prepare a Local Plan based on relevant and appropriate evidence base. They are required to publish these documents on their website. The evidence used to develop the Brentwood Local Plan can be found on the Council's website under Evidence Base.
- b) **Duty to Cooperate:** Throughout the plan-making process discussions have taken place with various statutory consultees and neighbouring authorities. A summary of these meetings can be found within the Duty to Cooperate Statement, published as part of the Regulation 19 consultation. This is a live



document and will be updated prior to being submitted to the Secretary of State.

- c) **Legally Compliant:** Local Planning Authorities must prepare a Local Plan which adheres to the requirements as set out in the National Planning Policy Framework (NPPF), planning practice guidance, and other relevant planning regulations & legislation.

Question 4 of this comment form asks for further information on your opinion of the Plans 'soundness'. According to the National Planning Policy Framework (NPPF) para 35, Local Plans are examined to assess whether they have been prepared in accordance with legal and procedural requirements and whether they are sound. Plans are 'sound' if they are:

- a) **Positively prepared** – providing a strategy which as a minimum seeks to meet the area's objectively assessed needs, and is informed by agreements with other authorities, so that unmet need from neighbouring areas is accommodated where it is practical to do so and consistent with achieving sustainable development
- b) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- c) **Effective** – deliverable over the plan period, and based on effective joint working on cross-boundary strategic matters that have been dealt with rather than deferred, as evidenced by the statement of common ground; and
- d) **Consistent with national policy** – enabling the delivery of sustainable development in accordance with the policies in the NPPF.

Please keep in mind the information provided above to assist with correctly completing your comment form. For additional information on what the difference is between a Regulation 18 and Regulation 19 Local Plan consultation, please view the FAQ's published on-line www.brentwood.gov.uk/localplan

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 the above conditions.



Section A: Personal Details

Title

MR

First Name

TIM

Last Name

WEBB

Job Title

(if applicable)

Organisation

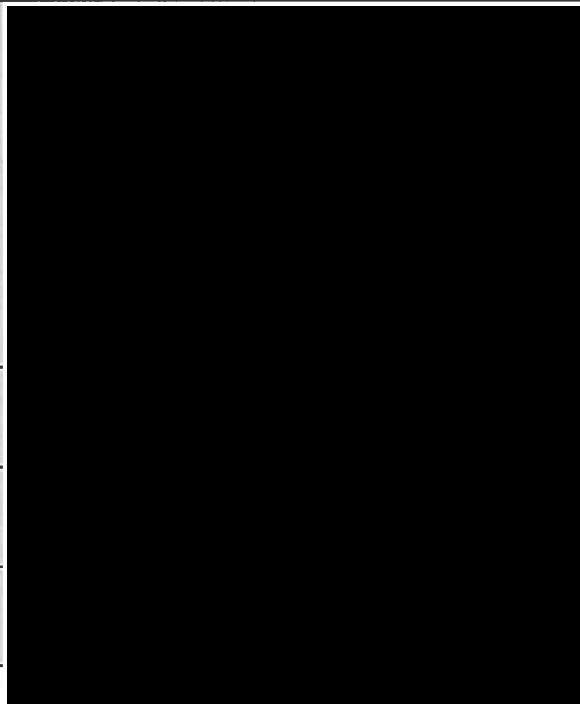
(if applicable)

Address

Post Code

Telephone Number

Email Address



Section B: Your Representation

Please complete a separate sheet for each representation that you wish to make. You must complete 'Part A – Personal Details' for your representation to be accepted.

Representations cannot be treated as confidential and will be published on our Consultation Portal. Any representations that are considered libelous, racist, abusive or offensive will not be accepted. All representations made will only be attributed to your name. We will not publish any contact details, signatures or other sensitive information.

Full Name

TIMOTHY WEBB

Question 1: Please indicate which consultation document this representation relates to?

The Local Plan

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Sustainability Appraisal

☒

Habitat Regulations Assessment

☒

Question 2: Please indicate which section of the indicated document identified above that you are commenting on (where applicable please clearly state the section / heading or paragraph number).

R01 – R26 (inclusive)

Question 3: Do you consider the Local Plan is:

Sound?

YES

☐

NO

☒

Legally Compliant?

YES

☐

NO

☒

Compliant with the Duty to Cooperate?

YES

☐

NO

☒

Question 4: If you consider the Local Plan unsound, please indicate your reasons below (please tick all that apply):

The Local Plan has not been positively prepared

☒

The Local Plan is not justified

☒

The Local Plan is not effective

☒

The Local Plan is not consistent with national planning policy

☒

Question 5: Please provide details of either:

- Why you consider the Plan to be sound, legally compliant, or adheres to the Duty to Cooperate; or
- Why you consider that the Local Plan is unsound, is not legally compliant, or fails to comply with the Duty to Cooperate

The Local Plan fails to fulfil the prescribed criteria because it involves deliberate, wanton, massive, wholesale destruction, despoliation, violation and vandalism of the countryside and the Green Belt in contravention of the Town & Country Planning Acts and the five main purposes of the Green Belt as stipulated by the National Planning Policy Framework.

The enormous proposed 'Dunton Hills Garden Village' (R01) would not only desecrate a vast area of countryside / Green Belt but would also place an intolerable burden on infrastructure including (inter alia) the A127 and A128.

In destroying green fields, the proposed Shenfield scheme (R03) would inflict 'urban sprawl' on an immense scale, facilitating the merging of Brentwood / Shenfield into Ingatestone and, ultimately, Chelmsford - precisely what the Green Belt (as specified by the five main purposes) is required to prevent.

The two schemes to the south of Redrose Lane (R25 and R26) would ruin a hitherto unspoilt rural setting and substantially increase the scale of a small village with no regard whatsoever to the ability of local facilities and amenities to cope with the unwanted population influx.

Please continue on a separate sheet if necessary (Continued)

Continued

The two schemes at Kelvedon Hatch (R23 and R24) would likewise have a detrimental impact, pushing back the frontiers of the village.

The proposals off Dodinghurst Road (R16 and R17) would not only eliminate green spaces - and horses - but would cause unacceptable problems - and hazards - with vehicles entering and leaving Dodinghurst Road.

In addition to the foregoing, the Local Plan fails to satisfy the objectives of the 'Sustainability Appraisal' with regard to, inter alia:

- Soils: The Local Plan as presented is contrary to the stated objective to "make best use of brownfield land and protect the resource of productive agricultural land."
- Heritage: The character of the historic village of Blackmore would be severely compromised by excessive and unwarranted development as proposed (R25 and R26).
- Landscape: The various Rural / Green Belt proposals would inevitably have a debilitating effect on the landscape - beyond the actual schemes themselves - in defiance of the stated objective. The hideous abomination of the existing "Trueloves" development, which has impaired the landscape as viewed over a wide area from multiple perspectives, should never be repeated.
- Biodiversity: Wholesale destruction of the countryside / Green Belt as envisaged would have dire consequences for flora and fauna (not only "protected" species). Moreover, no account has been taken of specific considerations at each individual site (such as, by way of example, R18).

Furthermore, the "Duty to Co-operate" has not been upheld in that, inter alia:

- the views of various statutory bodies pertaining to the impact of 'Dunton Hills Garden Village' (R01) on the A127 have been disregarded.

(CONTINUED)

Continued

- the justifiable concerns of Blackmore Parish Council (R25 and R26) have been treated with contempt.

Question 6: Please set out what modification(s) you consider necessary to make the Local Plan sound or legally compliant, having regard to the matters that you identified above.

You will need to say why this modification will make the Local Plan sound or legally compliant. Please be as accurate as possible.

- Planning and building according only to absolute, irrefutable necessity and not based on hypothetical projections of dubious accuracy extrapolated way into the future.
- Rejecting all development in the Countryside / Green Belt, thereby respecting and upholding relevant Statutes.
- Concentrating unavoidable development on "brown field" sites, eg: West Hornsden Industrial Estate (R02), Watley (R04 and R05) and Water Way Industrial Estate (R15), followed (in order of priority) by Ingatesstone (former garden centre, R21 and other, R22) and town centre car parks (R10, R11, R14) — in each case seeking greater yield by increasing density and constructing additional storeys.
- Complying with the prescribed objectives of the "Sustainability Appraisal".
- Respecting Council Tax payers, and the democratic process, by rejecting any, all, development where there is significant local opposition.

ALL policy — local / regional / national / international — should be predicated primarily on the need to restrict and ultimately reverse unsustainable population growth — Not parallel to it

Please continue on a separate sheet if necessary

Question 7: If your representation is seeking a modification, do you consider it necessary to participate at the oral part of the Examination in Public (EiP)?

NO, I do not wish to participate in the oral part of the EiP

☐

YES, I wish to participate in the oral part of the EiP

☐

Question 8: If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary.

Please continue on a separate sheet if necessary.

Please note that the Inspector (not the Council) will determine the most appropriate procedure to hear those who have indicated that they wish to participate in the oral part of the Examination.