



**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](http://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](mailto: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](http://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.

<b>Section A: Personal Details</b>		
	<b>Respondent</b>	<b>Agent</b>
Title		Mr
First Name		Gary
Last Name		Stephens
Job Title (if applicable)		Planning Director
Organisation (if applicable)	Hallam Land Management	Marrons Planning
Address	c/o Agent	Bridgeway Bridgeway House Stratford-Upon-Avon
Post Code		CV37 6YX
Telephone Number		01789 339 963
Email Address		gary.stephens@marrons-planning.co.uk

## 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	Hallam Land Management Ltd
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Question 1: Please indicate which consultation document this representation relates to?

The Local Plan

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).

Spatial Strategy

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

### **Growth Strategy**

Hallam Land Management support the strategy of growth within the Central Brentwood Growth Corridor as it maximises the benefits of the existing sustainable transport corridors (the A12, the Great Eastern Main Line, and the Elizabeth Line). Development within and on the edge of the existing Brentwood urban area has the most propensity to benefit from these corridors, and it is where the majority of housing and employment needs are derived from.

However, in identifying the A127 corridor as the other key axis, the Spatial Strategy is reliant upon the delivery of a significant level of growth away from where the vast majority of housing and employment needs of the Borough are derived.

The Local Plan proposes that more than half of the total allocations are located in the A127 corridor. There is an imbalance here. Therefore, if further growth is necessary as representations made in relation to housing need and requirement suggest, the Central Brentwood Growth Corridor should be considered first, ahead of any further growth within the A127 corridor.

### **Key Diagram**

The Key Diagram sets out the main aspects of the Spatial Strategy and diagrammatically includes three green wedges around the Brentwood urban area. Reference is made to 'green wedges of Green Belt' separating the urban areas of Brentwood and Shenfield in the explanation to Policy NE9 - Green Belt (para. 8.93).

In respect of the arrow to the west of Brentwood, it doesn't separate any settlements given it is such a wide tract of land. Furthermore, this tract of land doesn't separate Brentwood from Pilgrim's Hatch because they are joined to the north and will be further joined by proposed site allocations R16 & R17.

Clearly, these Green Wedges have informed the Spatial Strategy but when considering the Key Diagram, they do not all serve the function as expressed in paragraph. 8.93. Further analysis of the Green Belt, landscape and settlement coalescence is submitted with these representations.

Please continue on a separate sheet if necessary

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.

Further growth should be directed towards the Central Brentwood Growth Corridor

Remove the north west green wedge symbol from the Key Diagram.

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.

To elaborate and examine the matters raised which are critical to the soundness of the Plan.

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.