



**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		
	Respondent	Agent
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).

SP02 – Managing Growth

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

Establishing Local Housing Need and Requirement

The Pre-Submission Document (February 2019) (BBDP) defines an annual housing need of 350 dwellings per annum (dpa) using the standardised method based on the 2016 based household population projections.

Since the BBDP was drafted, the Framework has been amended to make clear that the 2014 household population projections are the baseline for calculating the standard housing need. On this basis, the annual housing need in the BBDP should be adjusted to 452 dpa.

In addition, an allowance may be necessary for unmet housing needs arising from neighbouring areas (see representations made by Hallam Land Management in relation to the Duty to Co-operate). Any figure would need to be added to the annual housing requirement.

The BBDP also proposes a housing supply buffer of 20% to allow for flexibility in meeting the requirement. This is supported in order to ensure the requirement is achieved. Without planning for a buffer to the housing requirement, there is the potential that housing needs will not be met. This is particularly necessary within Brentwood on the basis that the majority of Borough is Green Belt, and therefore there is very limited capacity for speculative windfall development to address any shortfall arising during the plan period.

Notwithstanding this has yet to be demonstrated, on the assumption that there are no unmet needs arising from neighbouring authorities, the housing requirement with a 20% buffer would be 542 dpa. If there are unmet housing needs, this figure would clearly be greater.

Provision should therefore be made in Policy SP02 for at least a minimum of 9,214 dwellings (based on 542 dpa) in the plan period 2016 to 2033.

On this basis, and setting aside the issue of unmet needs, the total housing supply in Figure 4.2 does not show a sufficient supply and mix of sites to meet the minimum number of homes required. It also does not demonstrate a five year supply on adoption of the Plan.

Stepped Trajectory

Policy SP02 proposes a stepped trajectory in housing supply due to existing Green Belt boundaries currently constraining growth. However, the increase in housing supply starts at 2023/24, which is a year after the housing trajectory assumes delivery starts on a number of the strategic Green Belt allocations (2022/23). The two dates should be consistent with each other.

Plan Period

It is assumed that adoption of the BBDP will be at the earliest in 2019/20. The Plan will therefore fall short by 1 year in ensuring the Plan looks ahead over a minimum 15 year period from adoption (NPPF paragraph 22).

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.

The Local Plan must be amended to reflect the most up-to-date approach to assessing the local housing need, and take into account unmet housing needs from neighbouring areas when establishing its housing requirement.

The total housing supply must demonstrate that it provides a sufficient supply and mix to meet the requirement, including for the first five years of the Plan period.

The stepped trajectory must be consistent with the evidence as to when strategic Green Belt allocations will start delivering.

The Local Plan should plan for a minimum of 15 years from adoption.

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.