



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	Ian
Last Name	Atkinson
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

Ian Atkinson

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).

Chapter 9 Site Allocations
RO1 Dunton Hills Garden Village Strategic Allocation
RO2 West Horndon Industrial Estate

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 proposed development within the Plan is highly concentrated within the A127 Corridor. This scale and concentration proposed will irrevocably harm the landscape, environment and Green Belt within this area (at a disproportionate level than the wider Borough).

Brentwood borough is not the only local authority area along the A127 Corridor. Basildon, Thurrock, Castle Point, Rochford and Southend-on-Sea are also planning for growth and will also be relying on the A127 Corridor. Thurrock Council in particular is considering a site for 10,000 + homes on land adjacent to West Horndon village, which would in effect turn the village into a large town. The Plan does not take account of this. The Plan states that the area would remain surrounded by countryside but this would not be the case.

In my opinion a sustainable level of development within the A127 Corridor is limited to the development proposed at site RO2 (the West Horndon Industrial Estates). Even at this level however it would require a significant amount of infrastructure expenditure to ensure it is sustainable.

My family and I enjoy village life and want our village to remain a village however, appropriate development here (at the appropriate density and style to complement the existing village) to this maximum would improve the lives of West Horndon residents. It would still however double the size of our village, which in my opinion is the maximum that West Horndon could sustain and should be asked to contribute.

Throughout the development of the Plan, potentially viable alternative sites have been ignored. I believe the initial rejection of further growth in the A12 Corridor, or any material development in the North of the Borough, is not founded on sound analysis or hard evidence.

Given the scale of development proposed, the original “problems” identified including the need for new infrastructure are relevant wherever the development is sited. Greater diversification of the identified housing need will assist in improving deliverability, feasibility and the impact on local transport networks. In particular no account seems to have been taken of the A12 upgrade or Crossrail.

The C2C rail line only has two tracks, whereas Shenfield has four and the trains are already well above capacity at peak times. The roads around the village (A127, A128) are characterised by standstills and queues in both the morning and evening

peaks.

An additional 500 cars (assuming just 1 per property) would have a very material impact on already severely strained and congested roads. It is therefore just not feasible for these roads to cope with the proposed development at Dunton Hills Garden Village and the proposed development by other councils, even with investment. It is also impossible to see how the train capacity could be upgraded sufficiently.

I also strongly challenge that the land around West Horndon village is suitable for development because of the flood risk, which is already a problem in the village and would create significant issues when considering larger scale development around the village.

For all of the above reasons I urge Brentwood Borough Council to rethink its current proposals and to come up with a revised plan that spreads the housing needs more fairly and equally across the Borough so that no one community is impacted so severely as in the current Plan.

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.

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.