



**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	Richard
Last Name	Hatter
Job Title (if applicable)	Strategic Planning Manager
Organisation (if applicable)	Thurrock Council
Address	Strategic Planning Policy Civic Offices, New Rd Grays, Essex
Post Code	RM17 6SL
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	Mr Richard Hatter
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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).

Chapter 3 - 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

The Brentwood Local Plan states in its vision that Brentwood is regarded as a collection of villages (including the proposed Dunton Hills Garden Village). The overall approach of the spatial strategy is to focus growth along two Transit Corridors in the borough at the Central Brentwood Growth Corridor/A12 and the South Brentwood Growth Corridor/A127.

Therefore the overall spatial strategy remains largely the same as the approach set out in the 2016 draft local plan and the 2018 Preferred Site Allocations consultation with development concentrated on land within the borough's transport corridors with Brentwood and Shenfield the main focus of development in the A12 corridor and strategic allocations in the A127 corridor at Dunton Hills Garden Village (35% housing Supply) and Brentwood Enterprise Park (58% of additional employment land). However the revised strategy restates maximising brownfield development and sustainable urban extensions in the transport corridors but also introduces limited growth at larger villages and reinforces the role of a new settlement at Dunton Hills Garden village including the potential for additional dwelling capacity at a later stage or beyond the plan period (up to 4,000 dwellings).

Thurrock Council has previously objected to the spatial strategy through its various iterations in previous stages of Brentwood Local Plan consultation and those objections remain. It is unclear why the spatial strategy should advocate a free-standing greenfield settlement in the Green Belt and why this should be the preferred location for development compared to existing settlement expansion or green field urban extensions which are likely to be more sustainable, less constrained and are closer to existing transport and other existing infrastructure and services.

The development of the Brentwood Local Plan spatial strategy appears to have:

- not considered a suitable range of reasonable alternative options that are easier to deliver and/or less constrained;
- put forward a large free standing settlement at Dunton Hills at an early stage which has pre-determined the spatial approach without being supported by the evidence;
- not assessed reasonable options for a free standing settlement or large scale settlement expansion elsewhere in the borough that should have been tested through local plan development evidence and SA process;

- developed a spatial strategy without key elements of the evidence base including land availability transport assessment;
- not taken account of the emerging spatial options being pursued by the adjoining authorities such as Thurrock and through the joint work of the South Essex authorities.

The Pre-submission local plan sets out the current position with regard to proposed housing supply with a total provision identified of 7,787 dwellings of which 6,088 dwellings are the proposed allocated sites and with Dunton Hills Garden Village allocation representing 35% of the Brentwood housing supply. This is a slight reduction in supply compared to the previous Preferred Options consultation stage.

Brentwood Council have produced a Housing and Economic Land Availability Assessment (HELAA) that identifies sites with just over 14,000 dwelling capacity that are deliverable and developable. It is unclear therefore why 35% of Brentwood's housing supply is focused on one large scale development in the very south of the borough.

A Site Assessment Study has been produced in 2018 that sets out how sites have been selected for inclusion as allocations. However it is also not fully clear how the sites for proposed allocations have been included and others discounted. Further evidence is required to understand why the proposed allocated sites are considered suitable and other potential allocations dismissed including using the existing evidence by undertaking updates to the land capacity and supply and further information provided from Green Belt review, landscape and infrastructure studies.

Thurrock Council remains concerned with regard to the spatial strategy and the levels and distribution of growth proposed between the A12 and A127 corridors and considers that Brentwood Council has not thoroughly tested reasonable alternative options or appropriately evidenced the spatial strategy in the pre-submission plan compared to alternatives. Thurrock Council also remains concerned about the identification and impact on the Green Belt of the proposed free standing Green Belt settlement of Dunton Hills Garden Village (DHGV). In addition limited new or updated evidence has been made available to demonstrate the deliverability or viability of such a scheme.

Thurrock Council considers that a more appropriate spatial strategy could be a variation of the previous spatial options with growth including Green Belt release concentrated in the A12 Brentwood/Shenfield corridor including at Ingatestone but with some potential along the A127 corridor including Green Belt release at West Horndon.

Further specific issues on the spatial strategy are set out below. This response should also be read in conjunction with comments submitted at the previous stage Growth Options consultation and the separate Dunton Garden Suburb Consultation.

A12 Corridor.

Thurrock Council considers there is further significant potential to provide housing and other development in the A12 Corridor Broad Area including the potential for urban edge expansion of settlements. Areas to the north of Brentwood and north, east and south east of Shenfield and Pilgrims Hatch south of Hutton and development of Ingatestone should be subject to further consideration for edge of settlement expansion as part of a Green Belt Review. It is considered due to the size and extent of the Green Belt in these locations that a limited number of urban expansions are less likely to have a significant harm to the openness of the Green Belt than locations in other broad areas.

The suggested A12 corridor locations have good existing transport services and community infrastructure and open space. The locations are also within reasonable distance of the railway stations.

Thurrock Council considers the role and potential economic and housing benefits of Crossrail in particular with regard to development at Shenfield have not been fully assessed and incorporated into the emerging Brentwood Local Plan, either as part of the current stage or previous consultations.

It is suggested that the role and development of Brentwood and in particular Shenfield as a terminus of Crossrail should be thoroughly investigated and its potential role to accommodate further growth over the period of the local plan and beyond. The implications of the potential to accommodate more growth and associated infrastructure requirements need to be considered with some weight as a way of meeting the undersupply of housing requirement currently identified in the Brentwood Local Plan options and supporting evidence.

The A12 widening and delivery of Crossrail will bring about significant increased capacity and accessibility improvements to transport infrastructure for Brentwood in the A12 Broad Corridor during the later-part of the plan period. This will make the A12 Corridor broad area more suitable for development opportunities.

There is also concern as regards the limited level of detail for the evidence base assessing the transport impacts of the various spatial strategy options and a detailed housing, economic and transport assessment of the impacts of Crossrail and with particular reference to Shenfield.

A127 Corridor

Thurrock Council remains concerned about the proposal for any large scale Strategic Green Belt releases either at Dunton Hill Garden Village or the previous option for the Dunton Garden Suburb. There does not appear to be a sufficiently robust evidence base to justify the development.

Dunton Hill Garden Village/Dunton Garden Suburb

Reference is also made below to the key Thurrock concerns regarding the free standing Dunton Hill Garden Village proposal (that are also covered in other representations) including:

- The Justification for such a free –standing settlement in this location;
- Significant impact and harm to the openness of the Green Belt;
- Coalescence of settlements;
- Detrimental impact on the Landscape;
- The lack of certainty regarding the deliverability of the development;
- Lack of detail on location and phasing of such a development;
- Lack of detail on the viability of such a proposal;
- Impact of the scale of development on adjoining housing markets and ability of Thurrock to deliver its housing;
- Infrastructure delivery and funding;
- Impact on strategic highway network - A127, A128, A13;
- Impact on the local highway network including within Thurrock;
- Lack of comprehensive transport modelling and mitigation measure;
- Assumptions and scoring in the SA/SEA.

Green Belt Issues on the A127 Corridor

The Brentwood Pre-submission Local Plan of 2019 identifies there are several sites for development of brownfield land and Green Belt release along the A127. It is considered that brownfield redevelopment and a Green Belt release at West Horndon would represent a suitable scale of housing development in this location.

It is considered any larger strategic Green Belt development at Dunton Hill Garden Village or the Dunton Garden Suburb or in combination with other development will have significant harm to the openness and function of the Metropolitan Green Belt. The Green Belt west and east of West Horndon meets the purposes of the Green Belt including preventing urban sprawl and coalescence between Basildon and West Horndon in the east and from West Horndon westwards to Cranham and Upminster in London.

The Dunton Hill Garden Village would result in a significant Green Belt release leaving a limited gap between Basildon and West Horndon. Any significant urban

extension west of Basildon together with the Dunton Hill Garden Village would also result in potential coalescence and urbanisation of the A127 corridor resulting in significant harm to the openness and strategic function of the Green Belt.

Further Green Belt releases for employment land (Brentwood Enterprise Park) at Junction 29 of the M25 with A127 taken together with a strategic release for housing at Dunton Hills Garden Village will also contribute to a cumulative impact on the openness of the Green Belt in this corridor.

Road Capacity and Impact

The A127 is at capacity at peak times and does not represent a better road transport alternative to the A12. Any larger development is going to require additional road infrastructure investment to improve access. It is noted that further work to assess the capacity and improvements is required to be undertaken by the Local authorities and Essex County. This information should have been available at the pre-submission stage of the plan. In terms of the impact on the A128 there are key maintenance safety mitigation measures that have not been properly identified or addressed.

Employment Provision - Brentwood Enterprise Park

The Brentwood Plan and supporting evidence identifies the requirement for additional employment land. However it is unclear why the employment sites at Brentwood Enterprise Park (Site ref E11), Land at East Horndon Hall (site ref E13) and at Dunton Hills Garden Village (site ref part R01) are proposed in the draft Local Plan. It is not always the case that employment land should be located at busy junctions or along the A127 corridor where it would add to traffic flows on a road at current capacity. The sites are not located close to existing centres and are without easy access for workers other than by car. Alternative locations and options should be investigated including the A12 corridor possibly as part of edge of settlement expansion and in mixed use schemes.

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.

It is considered the Brentwood Draft Local Plan and supporting evidence base will require further major revision and consultation with ongoing duty to cooperate with adjoining local authorities. In particular the preparation of the draft Brentwood Local Plan should be reviewed to take account of the outcome of testing of other spatial options being considered including the evidence by the South Essex authorities as part of the preparation of a Joint Strategic Plan.

Further work is required to develop the evidence base including the justification for the selection of the spatial options and dismissal of reasonable alternatives, housing capacity and supply further transport evidence and other infrastructure.

Due to the issues highlighted in this response and to the earlier documents it is considered that Brentwood Council needs to carefully consider how it proceeds with the preparation of the Local Plan and the timetable for its production. It is recommended that the Brentwood Plan with its current spatial strategy and site allocations should not be submitted for Examination.

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.

Due to the significance of the representations submitted by Thurrock Council it is requested that it attends the oral part of the examination

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.