



**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).

Transport & Connectivity

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

Sustainable Transport and Transport Policies

Whilst Thurrock Council supports in principle the overall aims of the sustainable transport Policies in the Brentwood Pre-Submission Local Plan (Regulation 19) it is concerned about the realism and practical deliverability of this approach.

Both the Brentwood Pre-Submission Local Plan and the IDP refer to ongoing work with other stakeholders or further evidence being required. There is insufficient information in the plan policies and supporting text about the actual schemes and measures that are required to deliver such an overall transport strategy. Although additional information is provided on schemes in the Infrastructure Delivery Plan (IDP) it is still considered there is not enough evidence in terms of the transport measures; their costs and phasing to support the proposals in the Local Plan including at Dunton Hills Garden Village.

Generally, there seems to be insufficient information to support the change in travel behaviour that is needed to support the ambition and policies of the local plan. More information is needed in relation to sustainable travel initiatives, cost of implementation/operation (where relevant) and, importantly, how residents and commuters will be encouraged and empowered to use and embrace the suggested sustainable travel initiatives. It is unlikely that simply delivering more cycle routes, cycle parking provision, EV charging etc will result in the required increase in sustainable modes of travel, without some form of behavioural change provision. It is unclear how the suggested improvements to walking, cycling, public transport and EVs will deliver meaningful benefit if they are not supported by a package of behaviour change components which set out and support the need to use sustainable travel options.

It is encouraging to note in the IDP that the travel survey data which identifies the levels of travel to work by train and those travelling to work driving by car or van. However, it is also noted that cycling, walking and bus travel to work are lower in Brentwood than the East of England. Promotion of walking and cycling is recognized in the plan through extending the Public Rights of Way network and the introduction of strategic walking and cycling routes for new sites.

Thurrock Council would suggest that more can be done to ensure that, where possible, these should be connected with the wider network, including Thurrock's

network, especially on the south corridor.

While it is encouraging that the plan identifies the need to maximise the value of railway connectivity through improvements to the train stations in the borough, there is need for more clarity in terms of measures, costs and phasing of works.

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. It is considered there is insufficient information on the benefits of Crossrail or the transport measures that should be provided if such an option is pursued.

The plan recognises that there has been no major relief, gyratory or one-way system within the town centre, and that traffic continues to be funnelled into a road system that has not significantly changed for many years. Additional AQ monitoring data should be included. It would also be beneficial to understand how the sustainable travel initiatives, identified within the plan, will deliver AQ and health benefits.

Transport Technical evidence

The Modelling description provided within the Transport and Movement section is somewhat vague. It mentions three scenarios: Base Case (observed data), Reference Case (background growth) and Local Plan Growth (adding on trips associated with the Local Plan proposals); and the use of spreadsheet model. However, there is no mention of data collection (source, year, etc.), only the use of digital road network for Essex with flows and speed at the links. It is considered that additional data collection is needed to inform the plan.

For trip distribution and assignment models, there is no mention of the software of procedure used. This information is also omitted from the junction models, although it is noted that this may be contained in supporting documentation elsewhere.

The evidence lists junctions that are “under stress”, but it is not clear if this means that the junctions are saturated. There is no additional detail as to what level of stress or saturation is experienced. Therefore it is difficult to understand the extent of the existing or future issues that might be experienced.

For the junctions that are listed, there is no mention of problems in the Base Case (level of services, delays, speeds, etc.) or the expected impact for the Local Plan Growth scenario. It is suggested that additional work is needed here.

Thurrock Council suggests that additional work is needed in relation to the breakdown of costs and phasing of delivery. Again, without this information, it is difficult to understand the impact on the wider network and Thurrock area.

Despite the need for further clarification on the transport network impacts, there is an opportunity to work collaboratively on the plan to deliver sustainable transport

measures that will benefit Thurrock. The Southern Growth Corridor includes measures as the West Horndon New Transport Interchange, a new multi-modal interchange at West Horndon Station that could also serve Northern Thurrock developments. Cycle routes on this part of the plan can also be connected with Thurrock's network.

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 recommended that specific additional evidence base required includes:

- A more fully developed transport evidence base that includes cumulative and site specific impacts of development on the local and strategic highway network and to identify further infrastructure and /or mitigation measures required together with costing and phasing;
- An up to date Infrastructure Delivery Plan (IDP) that includes infrastructure costs, phasing, delivery and viability.

Despite the need for further clarification on the transport network impacts, there is an opportunity to work collaboratively on the plan to deliver sustainable transport measures that will benefit Thurrock. The Southern Growth Corridor includes measures as the West Horndon New Transport Interchange, a new multi-modal interchange at West Horndon Station that could also serve Northern Thurrock developments. Cycle routes on this part of the plan can also be connected with Thurrock's network.

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.