



**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>	
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).

Site Policy E11 – Brentwood Enterprise Park & supporting text

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 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 E13) and at Dunton Hills Garden Village (Site ref RO1) are proposed in the pre-submission 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.

The A127/M25 Junction Enterprise Park (policy E11) is considered unsustainable and an inappropriate location for Brentwood's job growth. Notwithstanding our principle objection on greenbelt and sustainability issues if the site is proposed for development an alternative use that capitalize on its M25 location (i.e. a service station) could be considered.

However it is considered that development at this site would harm the openness of this part of the Green Belt and result in urban sprawl along the A127 by spreading the extent of built development further into the Green Belt. The form and scale of the site would also cause significant harm to the other purposes of the Green Belt and would result in major encroachment into the countryside whilst also causing harm to the purpose of preventing the merging of neighbouring towns. It is noted that the location scores overall a Moderate in terms of meeting the purposes of the Green Belt in the Brentwood draft Green Belt Review.

Any Green belt release here together with any Green Belt release east of the existing West Horndon urban boundary would also result in potential coalescence and urbanisation of the A127 corridor resulting in significant loss to the openness and strategic function of the Green Belt

It is unclear how access to this site will be achieved from junction 29 of the M25 under the latest option for the proposed Lower Thames Crossing.

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 that site E11 should be deleted from the plan.

Notwithstanding our principle objection on greenbelt and sustainability issues if the site is proposed for development an alternative use that capitalize on its M25 location (i.e. a service station) could be considered.

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.