



**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	Martyn
Last Name	Thomas
Job Title (if applicable)	Development and Transport Planning Manager
Organisation (if applicable)	London Borough of Havering
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Post Code	RM1 3SL
Telephone Number	01245 432845
Email Address	Martyn.thomas@haverling.gov.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	Martyn Thomas
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Question 1: Please indicate which consultation document this representation relates to?

The Local Plan

Yes

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).

Policy R01 – Dunton Hills Garden Village Strategic Allocation (Proposal and explanatory 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

Comments made in regard to Strategic Allocation Policy R01 – Dunton Hills Garden Village (with particular reference to Policy R01 (II) Spatial Design)

London Borough of Havering commented in 2018 at the Regulation 18 consultation stage of the Brentwood Local Plan and commented on the emerging proposals for Dunton Hills Garden Village. At that stage there was relatively little detail on the emerging proposal other than a location and an overview of the likely issues to be addressed.

In the current consultation document, more detail on the proposal has been provided and this is welcome. It is helpful that there is more clarity on implementation.

Some of the matters raised by the Council in its 2018 response (such as the importance of timely infrastructure provision and the detail of infrastructure to be provided) have been addressed.

A key element of the Council's 2018 response focused on the relationship between the DHGV proposal and its likely impact on the adjoining highway network given the scale of the development proposed (almost 260 hectares of residential lead development and some 2,700 new homes over the plan period).

The comments noted that the DHGV proposal adjoined the A127 trunk road. This is a key route into Havering and intersects with the A12 trunk road at the Gallows Corner intersection.

Havering's comments noted that the A127 is already well trafficked and that Gallows Corner is already highly congested, an accident 'hot-spot' and gives rise to environmental problems such as poor air quality.

Havering's comments noted that other stakeholders had previously objected in principle to the extent of development along the A127 corridor and said that the DHGV proposal should be considered in that regard.

Havering's comments also highlighted the importance of Transport for London being afforded the opportunity to comment on the implications of the DHGV proposal because the A127 is a Transport for London route once it is within the London boundary.

Havering's comments said that the Local Plan proposal should highlight the joint working taking place between authorities along the A127 corridor because this is an important means to the various

authorities ensuring the scale and timing of development along the corridor is taken into account.

Havering continues to liaise with other stakeholders (such as Highways England and Transport for London) on the importance of investment in transport infrastructure and to that end strongly supports the work of the A127 Task Force group of authorities and interested parties in lobbying for improvements to the A127 Corridor in the recognition of the growth planned along it.

The Policy R01 Dunton Hills Garden Village Strategic Allocation in the current consultation Local Plan includes a section on Transport Impact Mitigations (Section H).

This refers to mitigations necessary to support the DHGV proposal but these do not adequately address the strategic implications of this proposal on the wider highway network. The focus of the measures is about 'fitting' the proposal into the network with local measures (such as junction improvements, bus routes and public transport improvements) rather than ensuring that the considerable traffic it may generate itself is capable of being accommodated on the wider highway network as well as all the other growth planned for east London and south Essex.

It is welcome that these issues are noted in in the explanatory text to Policy BE11 Strategic Transport Infrastructure (paragraphs 5.97 – 5.102) but they should be referenced in the DHGV proposal because of its scale.

There is no recognition in the proposal about the likely adverse environmental impacts of significant additional traffic along the A127 (including within Havering) resulting from the proposal such as noise, vibration and reductions in air quality.

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.

Policy R01 : Dunton Hills Garden Village Strategic Allocation should be amended :

- to provide explicit commentary on the likely significant implications of the proposal for the wider strategic highway network
- to recognize the importance of working with other stakeholders (such as Transport for London and London Borough of Havering) so that there can be certainty that the impacts of the DHGV proposal are satisfactory and can be accommodated without any adverse impact on the network beyond Brentwood
- to recognize the role of the established joint working between authorities along the A127 corridor to ensure that the significant growth along the corridor is understood, assessed and mitigated as necessary.
- to recognize the merit of the preparation of a Statement of Common Ground or Memorandum

of Understanding between relevant stakeholders to recognize the issues involved and set out a joint commitment to recognizing these and addressing them

- to recognize that the scale of the proposal and the traffic it will generate is likely to have significant adverse **environmental** impacts for the wider area (including Havering) and that these need to be considered and mitigated
- to include cross reference to Policy BE11 Strategic Transport Infrastructure (where the Local Plan addresses some issues relating to the wider highways network albeit without referring to DHGV)

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.

In order to set out the views of Havering Council on the Brentwood Local Plan and to ensure that the Council has an opportunity to contribute to the discussions with the Inspector.

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.