



# 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	Miss
First Name	Faye
Last Name	Wilders
Job Title (if applicable)	Principal Planner
Organisation (if applicable)	Fairview New Homes
Address	50 Lancaster Road, Enfield
Post Code	EN2 0BY
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

Faye Wilders – Fairview New Homes

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).

**Policy R18: Land at Crescent Drive**

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

Fairview New Homes are submitting these representations to the Brentwood Local Plan 2016 to 2033, Pre-Submission Regulation 19 Stage consultation. The submission relates to the former Brentwood Blood Centre, Crescent Drive, CM15 8DP. The representations relate to the soundness of the Local Plan.

**Policy R18: Land at Crescent Drive**

**Policy R18 A: Amount and Type of Development**

The site is identified as having capacity for “around 55” homes of mixed size and type, including affordable housing. Supporting text at paragraph 9.165 states that the site is anticipated to be delivered between 2021/22 and 2023/24.

Fairview supports the designation for housing, and having undertaken some design and massing work, considers that it can accommodate more than 55 units. However, for the basis of a policy designation, Fairview supports this policy and considers that this policy is sound.

This is for the following reasons:

Ownership - The site is solely owned by Fairview New Homes.

Fairview - Fairview was established in the 1960s and has now delivered over 400 projects across the Southeast. Fairview has a strong track record of success and rapid delivery. Following the planning process, Fairview implements consents as soon as possible. Fairview is a specialist in urban sites with challenging characteristics and has a strong track record of regenerating vacant and derelict sites into residential use. As such, it is considered that the delivery of the site can be achieved in the short term and the delivery timescale included within the policy is sound.

Site Characteristics - The site comprises an irregular shaped parcel of land with an area of 1.5 hectares, of which 1 hectare is developable. The remainder of the site is heavily wooded and protected by planning designations.

The site comprises a vacant blood donor, research and distribution centre, with associated laboratories, cold stores and office facilities. The main building in the centre of the site is 2 storeys at the front increasing to 3 and 4-storeys to the rear. Single storey workshops and garages are located to the south and south-west. There are two existing access points from Crescent Drive into the site.

**Policy R18: B Development Principles**

Within the draft policy the following development principles are listed:

- a. vehicular access via Crescent Drive;
- b. provision for public open space;
- c. protect and enhance landscape boundaries to the south west of the site;
- d. protect existing site trees within the development site; and
- e. provision for pedestrian and cycle connections.

Fairview supports development principles a, c, d and e of the draft policy. Fairview does not consider "B Development Principle b. provision for public open space" to be sound.

This is for the following reason:

Site Constraints - The key constraints to developing the site comprise the site levels and large number of existing trees. The site slopes from north to south by 3 metres and north-west to south-east by 4 metres. As such there is a storey height difference between the front and back of the site and from each side.

Paragraph 5.181 in reference to Policy BE22: Open Space in New Development, useable open space is defined as 2000m<sup>2</sup> in a single mass, giving people a space to be able to play. It is considered that given the substantial constraints relating to levels and tree coverage of the site, that creation of a public open space within the site is not a sound principle of development. Smaller pockets of amenity space that respond to the tree locations and ground levels would be a more appropriate development principle for this specific site.

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.

Removal of Policy R18: B Development Principles criterion b. provision for public open space;

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.