

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.

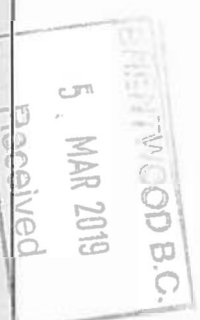
Please note that the Inspector (not the Council) will determine the most appropriate procedure to hear those who have indicated that they wish to participate in the oral part of the Examination.



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:

- 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.
- 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.

- d) **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:

- d) **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
- d) **Justified** – an appropriate strategy, taking into account the reasonable alternatives, and based on proportionate evidence;
- d) **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.

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.

The Lord at Priests Lane should be removed from the Local Development Plan.

Please continue on a separate sheet if necessary

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 Plan is unsound as the evidence is flawed.

1) The Transport Assessment is inaccurate as it did not include traffic along Priest's Lane. The Assessment was taken at times when a large proportion of school traffic was excluded. It did not assess potential access points which are hazardous.

2) The Transport Assessment did not include the future increase in traffic from the 1000 new homes planned in Sheffield, and the users of the Elizabeth Jane.

3) The Plan fails to address the safety of residents and all road users. At present the road is unsafe. There are two narrow pinch points in the road, where it is below the recommended width. There is a narrow pavement which is only along one side, pedestrians must cross at hazardous places to walk along the road. Residents have provided details of many accidents along Priest's Lane.

4) The site does not meet relevant sustainability conditions, those of access, transport network, mitigation of the impact of local services and the detrimental effect on health due to the increase in pollution. The junction of Priest's Lane and Middleton Hall Lane are at present a pollution hot spot.

5) Previously the site has been rejected for development as the open urban space was valued as an amenity, a green lung for the area.

6) The historic country lane was not designed to be a major thorough road carrying over 6000 vehicles daily. It does not comply with the Essex design guide with respect to both road and pavement width.

NPPF compliant: Local plans should address not only housing but traffic concerns, healthcare and education needs.

1) Potential access roads have not been assessed for safety and impact on the present residents.

2) The Sustainability Review refers to traffic as a concern, but there are no plans to deal with this issue.

3) There are no plans to meet the increase in educational and health service needs. Hogarth school is expanding to meet existing needs of Central Brentwood.

Please continue on a separate sheet if necessary

Section A: Personal Details

Title	MRS.
First Name	Helen
Last Name	Pearson
Job Title (if applicable)	n/a
Organisation (if applicable)	n/a
Address	
Post Code	
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	Helen Pearson
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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 9 Site Allocations, Housing Allocations, Policy R19: Land at Priests Lane

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	☒