

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:

- 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
- b) **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 LAND 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

Unsound: The evidence base is flawed:

- The Transport Assessment is inaccurate as it has excluded traffic along Priests Lane, and was taken at a times which excluded a large proportion of school traffic, despite Council assurances that a traffic assessment would be done for Priests Lane.
- The Transport Assessment does not account for the increased usage of Priests Lane from the proposed development of 1,000 houses in Shenfield travelling to the A127, nor does it account for the impact of the Elizabeth Line.
- The Plan fails to address safety of residents: the technical submissions of residents that new road accesses along Priests Lane are hazardous have not been addressed, nor concerns that the road design is dangerous for increased traffic movements.
- The site does not meet relevant sustainability conditions, notably access, transport network, mitigation of impact on local services, and unacceptable effect on health due to increased pollution.
- The Priests Lane sites have been rejected previously because the land was deemed a valuable open urban space.
- No account has been made of the increased pollution along Middleton Hall Lane and Priests Lane, the junction of which is a pollution hotspot.
- The Lane was never meant to be a main distributary road which it has now become. Residents have pointed out that as such it does not comply with the Essex design guide with respect to road and pavement width.

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

- The sustainability review refers to traffic as a concern, but no mitigation options have been identified.
- No specific or robust argument has been made that a viable access point is possible.
- When considered against reasonable alternatives these sites can not be deemed justified and there is nowhere in the plan which allows for the enhancement of infrastructure as a result of development.
- There is no additional provision for increased educational and health needs, the expansion of Hogarth School is to meet current demands and there is already a low level of GPs per head. Schools further afield which may have space will require a car journey to attend, exacerbating the already dire traffic situation.

Please continue on a separate sheet if necessary

Section A: Personal Details

Title	MISTER
First Name	ARTHUR
Last Name	WELHAM
Job Title (if applicable)	SENIOR PLANNING OFFICER BRENTFORD COUNCIL (RETIRED)
Organisation (if applicable)	EX, ESSEX COUNTY COUNCIL PLANNING DEPT.
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	ARTHUR JAMES WELHAM
-----------	---------------------

Question 1: Please indicate which consultation document this representation relates to?	
The Local Plan	<input checked="" type="checkbox"/>
Sustainability Appraisal	<input type="checkbox"/>
Habitat Regulations Assessment	<input type="checkbox"/>

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 <input type="checkbox"/> NO <input checked="" type="checkbox"/>
Legally Compliant?	YES <input type="checkbox"/> NO <input type="checkbox"/>
Compliant with the Duty to Cooperate?	YES <input type="checkbox"/> NO <input type="checkbox"/>

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	<input checked="" type="checkbox"/>
The Local Plan is not justified	<input checked="" type="checkbox"/>
The Local Plan is not effective	<input checked="" type="checkbox"/>
The Local Plan is not consistent with national planning policy	<input checked="" type="checkbox"/>