

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.	<i>I support the Prefts have neighbourhood residents association request for an EIP for reasons outlined as annexes to Question 5.</i>
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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.
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 Brentwood Pre-Submission Local Plan (Regulation 19) January 2019 COMMENT FORM	BRENTWOOD B.C. 19 MAR 2019 Received
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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.

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. Doing this will make the local plan sound as it will negate all the issues that have described in Question 5.

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 not sound. All transport assessments were taken at times devoid of school traffic. Priests Lane is a 'residential lane' that has increasingly become a transport thoroughfare and is congested, the plan has not made itself aware of this congestion and does not take accurate account of increased traffic that will occur due to this development and also the development of 1,000 homes in Sharnford and the Elizabeth line, so increasing congestion and pollution on Priests Lane.

The reasonable representations by residents that new road access along Priests Lane are requirements have not been adhered to, not that they do not meet the requirements for safe highways. The plan does not address residents concerns that the road design is dangerous. The proposed plan for this site does not meet sustainability conditions.

This Priests Lane site has been rejected a number of times in the past for issues such as those described above and also because it is a valuable open urban space and should be preserved as such for the benefit of current local residents.

The development does not comply with the Essex design guide with regard to road and pavement width.

The local plan needs to address other issues such as traffic concerns, healthcare and education needs and it does not, in relation to increased housing of this development. No specific robust argument has been made that a viable access point is viable. There are other alternative sites available that are better; the local infrastructure cannot support this development

Please continue on a separate sheet if necessary

Section A: Personal Details

Title	Dr
First Name	RUSSELL
Last Name	PEARSON
Job Title (if applicable)	CONSULTANT OPHTHALMIC SURGEON
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	RUSSELL VAUGHAN 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, POLICY R19 : LAND AT PRESTJ 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	☒