



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

GAVIN HENNESSY

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.



Section A: Personal Details

Title	MR
First Name	GAVIN
Last Name	HENNESSY
Job Title (if applicable)	N/A
Organisation (if applicable)	N/A
Address	
Post Code	
Telephone Number	
Email Address	

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

Unsound. The evidence base is flawed:

- The transport assessment is inaccurate as it has excluded traffic along Priests Lane and was not taken at a time which excluded a large proportion of school traffic, despite Council assurances that 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 1000 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 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 Complaint: 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.

Please continue on a separate sheet if necessary

Please see separate sheet

- 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 GP's per head. Schools further afield which may have space will require a car journey to attend exacerbating the already dire traffic situation.

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 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.

N/A.

LOCAL PLAN CONSULTATION
PLANNING POLICY TEAM
BRENTWOOD BOROUGH COUNCIL
TOWN HALL, INGRAVE ROAD
BRENTWOOD, ESSEX CM15 8AY.

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.

