



**BRENTWOOD
BOROUGH COUNCIL**

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.

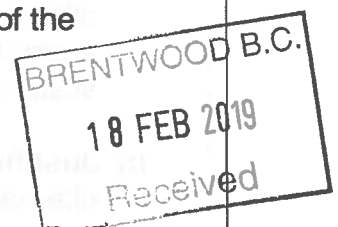
Please return forms either by attaching completed forms by email to **planning.policy@brentwood.gov.uk** or alternatively by post to Planning Policy Team, Brentwood Borough Council, Town Hall, Brentwood, Essex CM15 8AY.

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:

- 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.

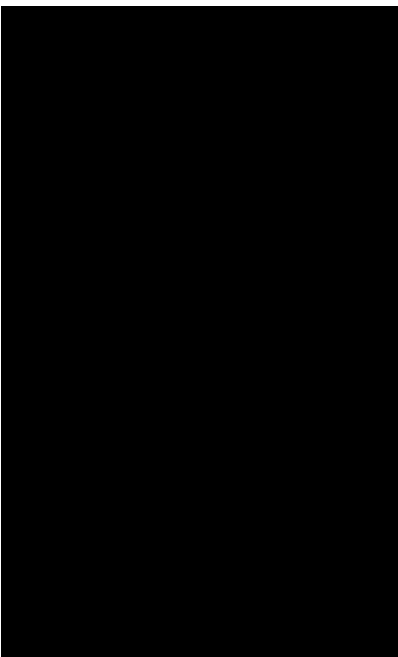
Please keep in mind the information provided above to assist with correctly completing your comment form. For additional information on what the difference is between a Regulation 18 and Regulation 19 Local Plan consultation, please view the FAQ's published on-line www.brentwood.gov.uk/localplan

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.

Section A: Personal Details

Title	Mr
First Name	Richard
Last Name	Allum
Job Title (if applicable)	
Organisation (if applicable)	
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	Richard Allum
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Question 1: Please indicate which consultation document this representation relates to?

The Local Plan

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Sustainability Appraisal

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Habitat Regulations Assessment

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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 ☒

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:

- Data for the junction at Middleton Hall Lane was taken during a period of exam study leave meaning a reduction of approximately 1/3 of students and therefore a significant reduction in car journeys.
- The Transport Assessment does not account for the transfer of pupils to and from Brentwood School which accounts for a large proportion of the congestion along Priests Lane.
- The Transport Assessment does not account for the increased traffic usage of Priests Lane as a result of cars travelling from the proposed development of 1,000 houses in Shenfield to the A127, nor the increase in other journeys as a result of this development.
- The Transport Assessment does not account for any impact of the Elizabeth Line.
- No specific assessment has been carried out to determine whether the Lane can support any additional vehicles at peak times.
- No assessment has been carried out of the potential access routes. These are either unsighted or not intended to withstand such volumes of traffic so pose a safety hazard to motorists and pedestrians alike.
- 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.

Question 5 response continued

..... Question 5 response continued

Duty to Cooperate; The technical submissions of residents have not been addressed.

- Submissions have been made regarding the safety issues surrounding the potential access routes and that they do not conform to Essex Highways requirements. These have not been addressed.
- No traffic assessment has been carried out along Priests Lane to support any additional houses despite requests from residents.
- The land is currently designated greenfield and was previously protected open urban space. There has been no proof that there is enough open space within the area, indeed it has been removed from previous plans for this reason.
- No account has been made of the increased pollution resulting from the increase in car journeys from this and the proposed Shenfield development at a junction which is already 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 plan does not include any planning for traffic concerns.
- The sustainability review refers to traffic as a concern but is silent on plans to manage increased traffic flow through the town centre and Brentwood has historically had significant traffic problems with limited mitigation options.
- The failure to address these issues will result in poor future planning and is clearly the reason why the NPPF requires them to be included in local plans.
- There is no additional provision for increased educational needs, the expansion of Hogarth School is to meet current demands. Schools further afield which may have space will require a car journey to attend, exacerbating the already dire traffic situation.
- No thought has been given to health provision in a town where the population is of increasing old age. There is already a low level of GPs per head.

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.

- The needs of the current population need to be assessed regarding traffic flow, GP and school availability.
- Accurate traffic assessments should be carried out BEFORE any site is decided on for development and a sensible debate had regarding its viability and housing delivery.
- The safety and health of current residents should be considered before increasing traffic and therefore pollution in an already congested area.
- The plan must address the requirement for open space in the area and special consideration must be given to the requirements of the two schools bordering the sites as they will inevitably be requiring additional space, be it playing fields (due to the loss of their current areas) or future expansion of the schools (in the light of the extra demand from the rapid increase in population as a result of the proposed plan).
- The site is not justified given the amount of technical evidence against development.

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

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YES, I wish to participate in the oral part of the EiP

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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.

