



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	ALAN	
Last Name	SULLIVAN	
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	ALAN SULLIVAN	
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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).

General comments are being made about the Plan.

However, this response is mainly with regard to Policy R07 and the Allocated Site Sow N Grow Nursery, which also includes a part of 346, Ongar Road. Pilgrims Hatch. (Pages 277-278); and also the related explanatory paragraphs 9.117 to 9.121.

The Local Plan Housing Trajectory (Page 309). The Residential Site Allocations. (Page 315) and the Plan of the allocated site "Sow N Grow Nursery". (Page 324).

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

I consider that the Local Plan is both sound and legally compliant, having regard to the delivery of assessed housing need in accordance with the Housing Delivery Test as set out in the National Planning Policy Framework 2018, and in the Local Plan, over the Plan period.
(Continued).

It is important that the Local Plan delivers the housing needed over the Plan period in a sustainable manner by the selection of appropriate sites for development well served by public transport, whether by way of large such as at Dunton Hill, but also and just as importantly, by way of smaller sites, especially within and next to urban neighbourhoods, and comprising previously developed land.

Pilgrims Hatch has been appropriately defined as such a neighbourhood in the Settlement Hierarchy. This is supported.

Where there is previously developed land, this should be allocated for development as a priority, even if within the green belt; especially where located next to urban neighbourhoods where local services and public transport are available. The Sow N Grow site is just such a site and accordingly, the green belt boundaries can be amended accordingly, reflecting the exceptional circumstances prevailing. The approach is sound and effective, and this is also supported.

I therefore support the allocation in the Plan of the Sow N Grow Nursery site with the land at 346 Ongar Road, either side of the track to the allotments, as previously developed land forming the site in Policy R07. It is just the type of well-located land that should be released. It can be quickly developed as two separate smaller sites either side of the allotments trackway and readily deliver at least the 38 dwellings referred to.

It can therefore support the Housing Trajectory, meet local housing need and deliver housing early in the Plan period, especially when the expected delivery rate is accepted to be lower due to the larger site allocations taking more time to develop. This approach would be in accordance with the National Planning Policy Framework 2018; and related planning guidance. It would be sound and effective.

In summary, the selection of this site for Pilgrims Hatch is an example of a soundly prepared Plan that will be effective, legally compliant and in accordance with the National Planning Policy Framework. It will be good for Pilgrims Hatch by improving the appearance of the local area and delivering much needed housing early in the Plan period.

I therefore strongly support the Plan, the allocation of this site, and Policy R07.

Please continue on a separate sheet if necessary – not 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.

I am not seeking any modifications. I understand some small modifications are being suggested by the site owners, which I support, if the Inspector agrees they are needed.

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.

I may wish to appear at the Examination in due course and would like to reserve my decision on this to later in the year when the Hearing Dates are published.

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.