

Question 5 Continued:

7. There is no clear housing strategy for the villages and general area in the north of the Borough. There are many other options that have been suggested through this process but have not been considered.
8. A 'Housing Needs' survey should have been carried out which would have demonstrated why Blackmore has been specifically included in the LDP and why other more suitable areas have not been included.
9. The Borough Council have not shown that the required additional houses for the Borough could not be delivered by increasing the housing density on the other allocated sites in the plan.
10. There are Brownfield sites available nearby but there is no evidence these have been considered in preference to using Green Belt land.
11. Other more suitable locations eg. areas around Dodinghurst, which have better transport links would have been a far better proposal than the development in Blackmore which is not a sustainable development proposal for the reasons given.
12. The proposed sites are important wildlife and natural habitats.
13. Policy HPO8 seeks to regularise an illegal traveller site on the Chelmsford Road. The Borough Council has failed to undertake its duty to attempt to remove the travellers since they moved in some years ago. The Council has watched the site grow without taking any action!

13. Continued.... They must re-visit this. In regularising the site, the Council is providing open invitation for other travellers to do the same as the council will be seen as weak, capitulating and an easy target area.

14. Policy SPS2 states that new development will be directed towards highly accessible locations along transit/growth corridors. Blackmore is not highly accessible and not along a growth corridor.



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 *MRS*

First Name *VICKY*

Last Name [REDACTED]

Job Title [REDACTED]

(if applicable) [REDACTED]

Organisation [REDACTED]

(if applicable) [REDACTED]

Address [REDACTED]

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.

To outline my views and concerns over the plan and point out why the development in Blackmore would be incredibly detrimental to the area.

* My family moved to Blackmore 2 years ago from Epping for a quiet village life. The village does not have the capacity for 70 new homes!

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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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

Vicky Mumby

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).

LOP Fig 2.3 Settlement Hierarchy
LOP Section 04: (management growth)
- policy SP01 - D
- Paras 4.6, 4.9 and 4.20
- Policy SP02
- Policy SP04 - A

LOP Section 06: (Housing Provision)
- Policy HPO8

LOP Section 08: (Natural Environment)
- Policy NE06 and Paras 8.51 - 8.64
- Para 8.85 (iv)
- Para 8.90
- Para 8.101
- Policy NE13

LOP Section 09: (Site Allocation)
- policy R25 & Paras 9.197 - 9.200
- policy R26 & Paras 9.201 - 9.204

Question 3: Do you consider the Local Plan is:

Sound?	YES	<input checked="" type="radio"/> NO
Legally Compliant?	YES	NO
Compliant with the Duty to Cooperate?	YES	<input checked="" type="radio"/> 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 the plan to be unsound and fails to comply with the Duty to Cooperate for the following reasons:

1. LPP Fig 2.3 Settlement Hierarchy: There are errors in the plan eg. the population of Blackmore is listed as 829 but this does not cover the residents in Nine Ashes Road past Red Rose Lane and Chelmsford Road which includes a mobile home park and illegal traveller site.

2. Duty to Cooperate: There has not been sufficient consultation with other neighbouring authorities. There is a development of 30 new, large houses by Epping Forest District Council 100m outside the parish boundary in Fingrith Hall Lane. These properties are 1.3 miles from Blackmore village and 5 miles from any other town/village. This will exacerbate the impact of the proposed 70 new properties being considered for Blackmore on the infrastructure and amenities.
3. Red Rose Lane is a single track road and not suitable for the extra volume of traffic generated by the proposed housing. It is used by walkers, joggers, cyclists, dog walkers and horse riders and has no pavement. The additional traffic will bring increased danger to these users along with the lack of street lights.
4. Flood Risk: Blackmore sits in a dip and is prone to flooding which has occurred a number of times over the years. The planned 70 houses will reduce the available open land to soak up water, therefore flooding will increase.
5. Policy NE06 flood risk states in 8.52: Developing inappropriately in high risk areas can put property and lives at risk; this policy seeks to ensure this does not happen.
6. Infrastructure Requirements: There are no infrastructure requirements listed in policy R25 or R26, however, all amenities and services are already stretched inc. the local primary school, electricity, sewerage system, doctors surgery etc.

Please continue on a separate sheet if necessary *Continued on separate sheet.....*

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.

Due to the many issues/concerns listed above, the best course of action would be to remove sites R25 and R26 from the Plan. The Blackmore Village Heritage Association (BVHA) has produced a 'Neighbourhood Plan' which should be referred to by the Planners. This clearly sets out our local housing needs for our already sustainable, thriving community.