

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	RAYMOND CONSTERDINE
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Question 1: Which **Main Modification and/or supporting document** does your representation relate to?

Each Main Modification within the Schedule has a reference number. This can be found in the first column i.e. MM1, MM2

Any representations on a supporting document should clearly state which paragraphs of the document it relates to and, as far as possible, your comments should be linked to specific Main Modifications. You should avoid lengthy comments on the supporting documents themselves.

Representations on the Policies Map must be linked to specific modifications in that they reflect a change required as a result of a Main Modification.

Schedule of Potential Main Modifications	MM no.	<input type="text" value="14C,19G,78,"/>
Sustainability Appraisal	para(s)	<input type="text" value="116"/>
Habitat Regulations Assessment	para(s)	<input type="text"/>
Policies Map or other supporting documents	Please specify	<input type="text"/>

Question 2: Do you consider this **Main Modification and/or supporting document**:

Legally Compliant?

YES

☐

NO

☐

Sound?

YES

☐

NO

☒

Question 3: If you consider the **Main Modification and/or supporting document** unsound, please indicate which of the soundness test(s) does it fail (please mark all that apply):

Not positively prepared

☒

Not justified

☒

Not effective

☒

Not consistent with national planning policy

☐

Question 4: Please provide details of either:

- Why you consider the **Main Modification and/or supporting document** to be sound or legally compliant; or
- Why you consider the **Main Modification and/or supporting document** to be unsound or is not legally compliant.

I consider the Main Modification to be **unsound** for several reasons.

Blackmore, or as it was known historically “Black Marsh” or “Black Swamp” has a long history of flooding stretching back hundreds of years. The current situation, if anything, is worsening. In the short time I have been resident in the village (9 months) the village has flooded 3 times to the extent that roads have been impassable and properties affected.

Indeed the areas immediately adjacent and roads serving areas R26 and R25 have been closed to vehicles by the floods. Already, we are in a situation where the sewerage system serving Blackmore is “over-capacity”. To contemplate replacing green fields with roads and housing and adding to the already unsatisfactory situation is **unsound**.

The situation has been brought to the attention of Brentwood Council at the hearing in February 2021. It was requested that consultation with the Environment Agency should be a basic but important step to investigate the soundness of the modifications. To proceed now without consultation with the Environment Agency is **unsound**.

There has been much discussion about Climate Change and we can all see the prevailing weather conditions for our area is demonstrating new extremes of temperatures and of rainfall. We have observed greater regularity and severity of flooding in and around Blackmore. To take away two fields, which offer 4 hectares of drainage and to replace them with roads, houses and the requirement for more capacity for sewerage and rain water run off will impact more areas previously not directly affected by flooding. This plan is entirely **unsound**.

The selected areas or R26 and R27 are uphill from the village centre. Any rainwater run-off will flow directly to the village and will likely impact directly on the historical listed buildings in that vicinity. To risk such damage and destruction to one of the most picturesque and well visited villages in the area for the sake of the creation of 70 houses is **unsound** and would be, in my view, immoral.

The introduction of between 50 and 70 new homes in Blackmore will, inevitably impact and place strain on existing infrastructure. The village is already seeing increased traffic flow on its lanes, many of which have no footpaths. Brentwood’s policy for “Sustainable means of Travel and Walkable Streets” appears to be at odds with the proposal to increase housing by around 20%. Streets/lanes already unsafe to walk are destined to be unwalkable. Add to that, the increased pressure on existing infrastructure such as the Primary School and the Medical Centre and the plan to expand the village by so much is again **unsound**.

I understand the need to provide new housing and the pressure that BBC are feeling from central government, but to identify areas on a map without due consideration for the impact on the existing community is **unsound**. I am sure there are many developers who will be enthusiastic at the opportunity to build in Blackmore. They will, understandably, be profit driven. At the very least, some of that profit should fund improved infrastructure.

Please continue on a separate sheet if necessary

Question 5: Please set out what change(s) you consider necessary to make the **Main Modification and/or supporting document** sound or legally compliant, having regard to the matters that you identified above.

You will need to say why this change will make the Submission Version of the Local Plan sound or legally compliant. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as accurate as possible.

I think my objections to the Main Modification are clear and evidenced from my own experience and observation. The identification of sites R26 and R25 is flawed, most particularly do to the existing flooding issues and the potential for worsening the situation further.

In my opinion R26 and R25 should be removed from the plan and capacity should be sought elsewhere. Failure to do so will be detrimental to the village of Blackmore and therefore to the Brentwood area.

Please continue on a separate sheet if necessary