

## 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 | Kevin Dennis Wood |
|-----------|-------------------|

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.         | MM107/MM108 |
| Sustainability Appraisal                   | para(s)        |             |
| Habitat Regulations Assessment             | para(s)        |             |
| Policies Map or other supporting documents | Please specify | R25/R26     |

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.

The proposal for R25 to increase the proposed number of dwellings to be built on a greenfield site from 30 to 40, and for R26 to increase the proposed number of dwellings from 20 to 30, where in both instances the numbers had previously been reduced as the original number was not considered appropriate seems nonsensical. These proposals to build on greenfield sites on what is potentially good quality agricultural land also make no sense. And the proposed developments are on the edge of, and on higher ground than, a known flood risk area (flood zone 3 as defined in the Brentwood Local Plan Proposed Changes to Policies Maps document published in February 2020). Building on the existing greenfield areas is only going to increase the flood risk to the houses within the flood zone.

It should also be pointed out that Red Rose Lane, which is one of the proposed access points to both the R25 and R26 developments, was flooded and impassable on a number of occasions during the period of the original consultation in December 2020-February 2021 and this road is not even considered part of the designated flood zone! The alternative suggestions now added for R26 of access via Fingrith Hall Lane or Orchard Piece are also not viable as the access from Fingrith Hall Lane would require a new road either on or very close to the existing junction between Red Rose Lane and Fingrith Hall Lane, and Orchard Piece is a cul-de-sac and therefore access from there would create an unreasonable amount of disruption for existing residents of that road.

MM14 has been amended to state:

"All development proposals should have regard to the Water Cycle Study and:

- b. not cause deterioration in the quality of a water course or groundwater;
- c. not lead to adverse impacts on the natural functioning of the watercourse, including quantity, flow, river continuity, groundwater connectivity, or biodiversity impacts."

The proposals for R25 and R26 do not appear to be consistent with this change.

Should these developments go ahead will the Borough Council take responsibility for the reparation of damages for residents if and when their homes are flooded due to this development taking place?

In addition to the above, the existing wording on MM81 in relation to Green Belt and Rural Development states "The Metropolitan Green Belt within Brentwood Borough (as defined in the Brentwood Policies Map) will be preserved from inappropriate development so that it continues to maintain its openness and serve its key functions" and an additional amendment has been added stating "Planning permission will not be granted for inappropriate development in the Green Belt other than in very special circumstances.". What are the "very special circumstances" that make it appropriate to allow this development to take place in R25 and R26?

Finally, MM5, in defining Blackmore as "relatively larger village" in Settlement Hierarchy 3 now makes reference to presence of the primary school. However the school is already over-subscribed and residents moving into the village have no guarantee of being able to obtain a place in the school for their children. There have been no proposals so far as to how the educational needs for families

moving into an additional potential 70 dwellings will be met, nor how, as the same section now states, "Development opportunities will be supported to meet local needs where appropriate (for example health facilities, bus services etc.).

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.

For the protection of the existing village of Blackmore the only viable solution is to either scale back considerably the number of homes proposed or to remove this from the LDP completely.

Please continue on a separate sheet if necessary