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	COLIN FOREMAN.

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.	14C, 19, 78, 81 107, 108, 116
Sustainability Appraisal	para(s)	302, 503
Habitat Regulations Assessment	para(s)	
Policies Map or other supporting documents	Please specify	

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	☑

Flood risk and drainage issues

*MM14C The sewerage network in and around Blackmore is already in an over-*capacity situation and the addition of 70 homes will only make this situation worse.

MM19G As Blackmore is in a critical drainage area a green field will provide a more permeable surface than a housing development.

MM78 There is already a major flood risk in Blackmore to existing housing before the proposed addition of 70 homes.
Has an Enviroment Agency investigation been commissioned on the soundness of including R25 and R26 in the final/adopted LDP. This is a serious omission and effects the soundness of the LDP.
Red Rose Lane floods on a regular basis and is impassable. Access to site R26 from Chelmsford Road was impossible and consideration of building on R26, even with mitigation measures proposed would seem to be an error judgement..
Emergency vehicles will be impeded on by ongoing flooding (which is a certainty) and to consider using Red Rose Lane as an access point for R26 is problematic on many levels, ie flooding, narrowness, danger to walkers, cyclists, horse riders, etc. Also to suggest access via Orchard Piece as an alternative is unsatisfactory, and will lead to traffic chaos, damage to the infrastructure of the road, ie kerbs, verges etc, whether the existing road is "man enough" to support the constant use by HGV's and builders vehicles. The amount of damage caused to Meadow Rise access and verges, kerbs, was significant with only one property being worked on opposite the school.
Surface water run-off — Blackmore already suffers from significant levels of surface water flooding and to propose replacing 4 hectares of green fields (containing quality farmland) in the Green Belt with concrete, tarmac and "two large ponds" will only exacerbate the existing, well documented problems that the village has faced for many years.
The impact of climate change of all the above is obvious.
Both sites proposed are disastrous, with R25 being only slightly better.
Both sites are immedi ately uphill from the dwellings in the existing village and the potential inceased surface water run off will therefore flow directly into the centre of the village,the Conservation Area, all the Listing Buildings and the church. The most serious floods of 1987 and 2016 are upper most in the memory of the village community, and climate change is likely to increase the frequency of these events.
AECOM Sustainability Appraisal (sept 2021) indicates that the proposal to increase density in Blackmore potentially gives rise to a degree of risk.

Green Belt and Exceptional Circumstances

MM81 – What are the "exceptional circumstances" that suggest that R25 and R26 should be released from Green Belt as the arguments put forward at the Hearings

(from Brentwood Borough Council, the developer and legal teams) do not appear to contain any substance . The statement that Red Rose Lane is a defendable *boundary does not take into consideration housing on the north side, the new* Stonebond development (on brownfield lane) and the existing housing along the Chelmsford Road, Nine Ashes Road and Spriggs Lane There does not appear to be any "exceptional circumstances" and the fact that there is no objectively assessed housing needs investigation only underlines this.

R25 and R26 Blackmore and the Proposed Modifications thereto

MM107 and MM108 – Both sites are located in a critical drainage area, there is significant water run off and frequent flooding from the River Wid.
The increase in housing numbers from around 50 to around 70 means that with the greater the number the more the risk factors increase: flooding, drainage capacity, infrastructure issues (roads, schools, health services). Brentwood Borough Council understood this, hence the Focussed Consultation of November 2019. The NPPF guidelines should be forced to retrofit a flawed strategy in a historic, unique, remote, rural village,
Category 3 Settlement – there is no parade of shops, there is no travel agency. There is one small Co-Op store for day-to-day needs, together with a hairdressers, two pubs, and a teashop (what village in England does not have a tea shop or a pub).
MM116 Appendix 2
SO2 Sustainable Means of Travel and Walkable Streets – 70 extra homes means more cars, more journeys, more congestion in the village centre and more pollution. Many of the lanes in Blackmore are not safely "walkable" as they are too narrow with no pavements
SO3 – Deliver Sustain able Communities – building extra homes will not create any employment opportunities, support the rural economy or enhance community facilities. However, other "zombie" villages nearby do need this regeneration. Strategic thought needs to be given to the sustainability of villages in the north of the Borough. In Policy MG06 it is stated that a Housing Needs Assessment needs to be undertaken before the next LDP is constructed in the short term, begs the question "why is this not done first" before Blackmore is selected.
With regard to other reference points in the MM paper
Page 3 – promoting sustainable mobility – this cannot be ticked by building in Blackmore
Page 4 creating environmental net gain – building on Green Belt in Blackmore wil destroy the significant wildlife that current inhabits the R25 and R26 green fields.
Page 54/56 promoting improved choices in modes ot transport – this underlines the paradox of Brentwood Borough Council's strategy versus its developer led decision to promote building in Blackmore.
Sustainability Appraisal September 2021

Page 5 – community and wellbeing – the comments in this paragraph underline that Brentwood Borough Council has zero understanding of the community that has been *created by villagers of Blackmore over the decades, and it is appalling that and not* acceptable that BBC think that concerns are not significant. The work done with Stonebond on a brownfield site in Blackmore shows that we are not just "Nimbys".
Page 8 Reasonable Alternatives – in July 2018 Redrose Farm was presented as a reasonable alternative – a brownfield site, which was subsequently ignored and then *used as a "windfall" site, and pressed ahead with developer led destruction of the* Green Belt.
Page 9 – Omission Sites – Honeypot Lane (a long-standing "included" site) was voted out of the LDP due to site access issues and being on Green Belt and Blackmore was voted in , despite even more difficult access issues and being Green *Belt – where is the consistency and stragegy.*
In a village of c.350 dwellings to add c.70 (an c.20% increase) it is quite clear that the decision to build in Blackmore is developer led and opportunistic and does not "tick the boxes in Brentwood Borough Council's own limited strategic thinking.

In conclusion, it would appear that the decision to use Green Belt in Blackmore is developer led and the only consideration being given to the amount of profitability there is to be made. No consideration has been given to the concerns of the residents or the findings of professionals concerning drainage, flooding, etc.

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.

See attached schedule.

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.

The changes required would mean undertaking the whole procedure again from the very beginning with professional advice being taken account off, which does not appear to be case at present.

Please continue on a separate sheet if necessary