



**BRENTWOOD
BOROUGH COUNCIL**

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

Christine

Last Name

Blythe

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	Mrs. Christine J Blythe
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Question 1: Please indicate which consultation document this representation relates to?

The Local Plan

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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).

POLICY R26: LAND NORTH OF ORCHARD PIECE

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

As a co-landowner of site HELAA Ref: 076, the subject of Policy R26, Land North of Orchard Piece, Blackmore, I agree that this site is suitable for Green Belt release in order to provide new homes for the local community and to ensure development is not limited to the centre and south of the Borough.

The current pre-submission document is both a sound plan and legally compliant. It is the result of a positively framed, technically researched, participatory process that began some ten years ago. I support the sequential land-use approach, in particular Policy NE9 8.88 "development in the Green Belt will be deemed necessary to support rural economies, to ensure the sustainability of villages"(p228) and Policy NE13: Site Allocations in the Green Belt 8.115 "New housing development in these locations will provide for a range of needs as advised by evidence, such as the Council's Strategic Housing Market Assessment, and local housing strategy. This could be to provide starter homes,...and smaller units, for example to allow older people to have a realistic option to downsize and free up larger homes for families" (p238).

Policy R26 supports item 2.8 "To promote sustainable growth in rural areas, the NPPF (2018) paragraph 78 states that housing in rural areas should be located where it will enhance the vitality of rural communities, to ensure villages grow and thrive." (p21) The last development in the village of Blackmore took place in the 1960s, Policy R26 would serve to:

- update the housing stock to meet new design and energy efficient features (SP01: Sustainable development);
- increase housing in a larger village to meet local needs in the next 15 years (SP02: Managing growth);
- Provide mixed housing, with some smaller units in a desirable setting that will encourage social interaction (HP01).

I do not agree that the allocation of Policy R26 has been reduced from 40 to 30 units as there is an acute need at a local level for both private and affordable housing, and there is no technical justification for this change. According to Policy HP03 "Residential development proposals will generally be expected to achieve a net density of at least 35 dwellings per hectare net or higher.." Accordingly the net area of this site (1.52 hectares) this would equate to around 53 units. Therefore, given the need to provide sufficient housing supply for the coming 15 years an allocation of approximately 40 units should be reinstated.

We chose to work with Crest Nicholson, a locally based national award winning house builder, in the knowledge that Crest has the capability to effectively deliver housing of a high standard within the next two years. (SP:06 p60). Crest has the construction management design and expertise (SP:05 p58) to provide the housing needed, while preserving and enhancing the character and settlement of Blackmore. (SP:01)

In response to some comments from local residents, I would like to add that our site has not been used for arable farming owing to the quality of the soil. It faces Redrose Farm, once a dairy farm owned by our grandparents. Some of the agricultural land was sold to build Orchard Piece. The availability of new housing meant that we were able to live close by to our grandparents. Redrose Lane is at the outer edge of the village and our site lies within the village boundary. Policy R26 will give priority to those with "demonstrable local connection and those over 50". The latter is also important as there is insufficient housing stock for down-sizing in Blackmore.

In over 60 years of family ownership, we have not experienced flooding on our land. Furthermore it should be noted that a development on this site would lead to a betterment in the management of surface water discharge rates.

Land North of Orchard Piece, Policy R26, is a discrete site of only 1.52 hectares and represents a natural boundary to the settlement and release of this site for a small housing development would provide a boost to the village of Blackmore

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.

N/A

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

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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.

N/A

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.