



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	Mr
First Name	Kevin
Last Name	Wood
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	Kevin Dennis Wood
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Question 1: Please indicate which consultation document this representation relates to?

The Local Plan

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Sustainability Appraisal

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Habitat Regulations Assessment

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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).

Section 9 (Site Allocations)
Allocation R25 – paragraphs 9.197-9.200
Allocation R26 – paragraphs 9.201-9.204

Section 4 (Managing Growth)
Paragraphs 4.9, 4.20
Policy SP02

Section 8 (Natural Environment)
Policy NE06 – 8.51-8.64
Paragraphs 8.85, 8.90, 8.101
Policy NE13

Question 3: Do you consider the Local Plan is:

Sound?

YES

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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

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The Local Plan is not justified

☒

The Local Plan is not effective

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The Local Plan is not consistent with national planning policy

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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

There is no clear strategy for Blackmore and other villages in the north of the borough.

Brentwood Borough Council does not appear to have taken into consideration the proposals of neighbouring authorities e.g. Epping Forest District Council is proposing to construct 30 dwellings at the top of Fingrith Hall Lane – the residents of these houses will almost certainly use Blackmore as a local shopping place adding both to the traffic along Fingrith Hall Lane and the parking congestion in the centre of Blackmore village.

Both policies R25 and R26 are based upon development off Red Rose Lane which according to the plan will be the main vehicular access. In total the plan as it currently stands is to add 70 homes across the two allocations – Red Rose Lane is a narrow lane most of which is not wide enough to allow two cars to pass one another, but given Blackmore's relatively poor public transport connections we can expect an average of at least two additional cars per household and assuming a minimum of two journeys each per day (one in and one out) that is a minimum of 280 extra cars per day along this narrow lane which has no pavements. In addition, Red Rose Lane has signs at each end stating that it is unsuitable for heavy goods vehicles (see photos embedded below) and yet this will be the access route for all the construction traffic for the two sites. Red Rose Lane has drainage ditches running down either side of it which are important for local drainage and widening the road is not a viable option without further increasing the flood risk for the rest of the village. Please also see further comments below concerning the flood risk within the village.



Fingrith Hall Lane – unsuitable for heavy goods vehicles

Both of these sites are green belt land. Section 2 in paragraph 2.8 of the plan classes Blackmore as Settlement Category 3 which to quote the table under paragraph 2.10 are “Villages in a sparse rural setting that provide day to day needs for local residents. Brownfield redevelopment opportunities and limited urban extensions will be encouraged to meet local needs where appropriate. Development should be appropriate to the rural setting of the area.” Adding 70 homes on green belt land in a village with a population of 829 is neither appropriate to the rural setting nor is it brownfield redevelopment. This does not in any way seem to comply with Policy SP01: Sustainable Development which states in paragraph 4.9 “For a scheme to be acceptable, development will be required to make satisfactory arrangements for vehicular, cycle and pedestrian access into the site and for parking and servicing within the site. Any traffic generated by the development should be capable of being satisfactorily accommodated by the transport network and not give rise to unacceptable highway conditions, safety and amenity concerns.” The LDP proposes that 1% of the net homes should be on green belt land around “large villages”, a total of 123 homes, and yet 70 of these are proposed for this one village – this appears to contradict paragraph 8.101. There is also no justification as to why Blackmore, amongst a number of other settlements should be “excluded from the Green Belt” (paragraph 8.90).

In addition the village primary school is already fully subscribed and the local doctor’s surgery (which is located in Doddinghurst) is very busy and it can take up to two weeks to obtain an appointment. There is nothing within the development plan to mitigate for this.

There is very limited parking in the centre of the village both outside the village shop and the two public houses and tea shops, with cars regularly parked along both sides of Fingrith Hall Lane and around Horse Fayre Green and it can be expected that this only will only spread further into the surrounding residential areas and along to the village green with the additional cars that the proposed developments will bring.

There does not appear to have been any housing needs survey to demonstrate why Blackmore requires such extensive development

The proposed sites are liable to flooding and building on these and concreting them over will increase the flood risk to the rest of the village. Blackmore lies in a shallow bowl of land at the top of a gentle valley with the River Wid emerging from the south side of The Moat. So, surface water drains from the west, north and east into the village and then around The Moat to become the River Wid. This is ok in normal conditions but when rainfall is extreme the streams and drainage pipes are overwhelmed with flooding of roads which is common and sometimes with danger to homes. There was flooding of roads in the village in June 2016 after heavy rain and I am aware that the home of one

of our near neighbours was flooded by waters rising from the stream that runs underneath their house in Church Street as it could not cope with the volume of rainfall. Having more hard impermeable surfaces such as roofs, drives and roads which increase the speed of run-off of surface water will further increase the risk of overwhelming the drainage systems. This seems to totally contradict policy NE06.

There is therefore no indication within the LDP as to how the proposed Policy R25 and R26 developments around Blackmore will be “repaid through significant benefits to the new and existing communities” (paragraph 8.114) – in fact due to the size of the proposals it would seem to be to the detriment of the existing community through the addition traffic, congestion and flood risk that would result from these policies.

Please continue on a separate sheet if necessary

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.

Sites R25 and R26 should be removed from the LDP. Blackmore Village Heritage Association in cooperation with the local Parish Councils will be producing a local needs plan that will look at the actual needs within the local area for what is already a sustainable community rather than producing a plan that just seeks to help the Borough Council meet its housing quota, and planners should instead refer to this and produce an updated plan in cooperation with the local community.

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

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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.

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.