



**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.

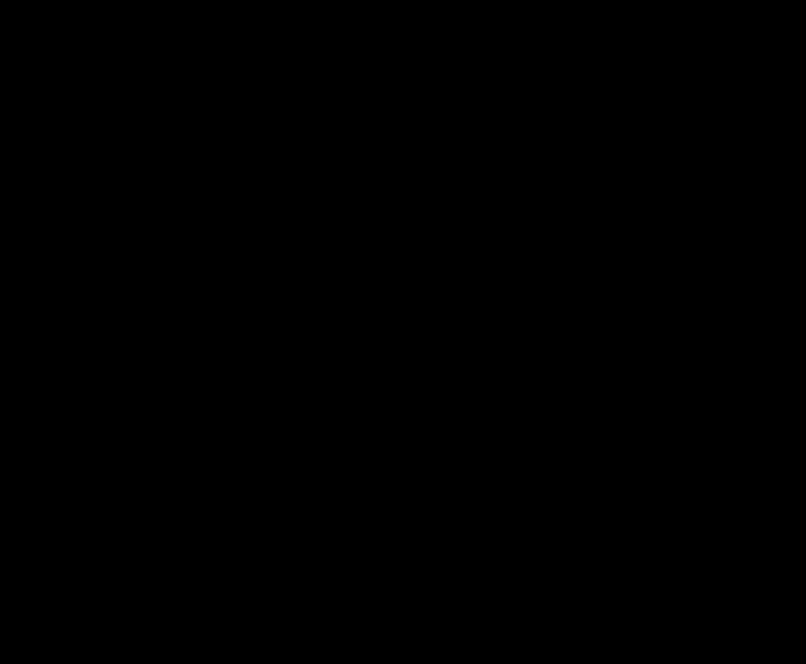
Please keep in mind the information provided above to assist with correctly completing your comment form. For additional information on what the difference is between a Regulation 18 and Regulation 19 Local Plan consultation, please view the FAQ's published on-line www.brentwood.gov.uk/localplan

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	Mr
First Name	Terence
Last Name	Dearlove
Job Title (if applicable)	NA
Organisation (if applicable)	Na
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	Terence David Dearlove
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Question 1: Please indicate which consultation document this representation relates to?

The Local Plan	<input checked="" type="checkbox"/>
Sustainability Appraisal	<input type="checkbox"/>
Habitat Regulations Assessment	<input type="checkbox"/>

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 04 (Managing growth & disproportionate allocation to Blackmore)
Section 08 (Natural environment including flood risk and the purpose of Green Belt)
Section 09 (Site allocations)

Question 3: Do you consider the Local Plan is:		
Sound?	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
Legally Compliant?	YES <input type="checkbox"/>	NO <input type="checkbox"/>
Compliant with the Duty to Cooperate?	YES <input type="checkbox"/>	NO <input type="checkbox"/>

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	<input checked="" type="checkbox"/>
The Local Plan is not justified	<input checked="" type="checkbox"/>
The Local Plan is not effective	<input checked="" type="checkbox"/>
The Local Plan is not consistent with national planning policy	<input checked="" type="checkbox"/>

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**

I consider the Plan to be unsound, not legally compliant and fails to comply with the duty to cooperate for the following reasons:

The Sustainability Appraisal (January 2019) refers to improvement of services and facilities in rural areas but that is completely undermined by the impact that proposed developments R25 & R26 will have on residents of Blackmore and those in surrounding areas reliant on Blackmore facilities. Blackmore village is categorised as Cat. 3 (large village) however this is outdated as the village now consists of just one small village shop (inclusive of a Post Office counter) and one small primary school.

Parking to access these facilities is extremely limited thereby causing significant issues for existing residents, whilst Public transport to and from Blackmore village is already inadequate for existing residents of the village and surrounding communities.

The challenges facing Blackmore village, as set out above, are already heightened by the current (EFDC) development of 30 houses in Fingrith Hall Lane and by a proposed development of affordable housing in Nine Ashes Road (EFDC).

The nearest doctors surgery is in Doddington and despite development / enlargement of the surgery within the last few years that continues to struggle to cope with existing demands from Blackmore, Doddington and other surrounding villages. Furthermore, the proposed developments of R23 & R24 will also add to the burden.

Given the potential impact on local infrastructure, services and facilities I am extremely concerned to have seen no reference to adequate consultation between BBC and EFDC. Blackmore village is comprised of circa 330 dwellings with a population of 829. The Local Plan has the potential to add close to one quarter to this and that takes no account of the EFDC developments referred to above.

The Sustainability Appraisal (SA)2019 includes an objective to reduce flood risk. Blackmore already has significant challenges and instances of flooding are a matter of photographic record. Further development will almost certainly make a bad situation worse and hereby also conflict with the SA.

No Housing needs survey has been conducted that demonstrates why Blackmore should be included in the LDP, furthermore, the decision to include Blackmore contradicts the LDP (2016) which stated that growth in rural north and rural south areas of BB would be limited in order to retain 'local character'.

BBC has failed to demonstrate that there are other brownfield sites that are available and these should take priority over the greenfield land off of Red Rose Lane.

The proposed developments in Blackmore do not promote 'sustainable development' and other more suitable/ sustainable locations should be considered such as urban extension to Brentwood and further additions to the 'Dunton Hills Garden Village' project.

On a final note there is no evident clear strategy for the villages in the north of the Borough, Blackmore being just one example. As a consequence it appears that decisions have been made within the Local Plan that take no account of the challenges that are already faced, the impact that the plan would have on these challenges and instead the decision to add 70 plus homes to what is a small village community seems to be based on 'targets need to be met for new houses – where we can put them'.

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.

Site R25 – Land north of Woolard Way and

Site 26 – Land north of Orchard Piece

The above sites should be removed from the LDP and planners should refer to the Blackmore Village Heritage Association 'Neighbourhood Plan', which clearly sets out the local housing needs for our already sustainable 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

YES, I wish to participate in the oral part of the EIP

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.