

Section A: Personal Details

Title	Mr
First Name	Eric
Last Name	Webb
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

Eric [REDACTED] b

Question 1: Please indicate which consultation document this representation relates to?

The Local Plan

X

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).

Section 09: (Site Allocation)

- Policy R25

- Policy R26

Section 04: (Managing Growth)

- Policy SP01

- Policy SP02

- Policy SP03

Section 08: (Natural Environment)

- Policy NE06

- Policy NE13

Section 07: (Prosperous Communities)

- PC 14

Question 3: Do you consider the Local Plan is:

Sound?

YES

☐

NO

X

Legally Compliant?

YES

☐

NO

X

Compliant with the Duty to Cooperate?

YES

☐

NO

X

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

X

The Local Plan is not justified

X

The Local Plan is not effective

X

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

I have lived in Blackmore since mid 1984 and strongly supported the community in making and keeping this a happy and pleasant place to live in: Fighting to maintain the Library, The continued designation of the Bull as a Public House (now a Community Asset) and the denial of planning agreement for the Travellers on the Oak Tree Farm Plot 3 and Wenlocks Meadow.

I – like many others – could recognise the validity of the 2016 LDP proposals but the latest (Reg 19) proposals run contrary to that in both the proposals for Plots R25 and R26 and the suggestion to recognise Plots at Oak Tree Farm. NONE OF THIS IS JUSTIFIED OR APPROPRIATE.

It is therefore UNSOUND in addition to being not justified and – in view of other very local developments in Epping Forest (in None Ashes Road and Fingrith Hall Lane – all of which use and overstress facilities in Blackmore – not compliant with the duty to cooperate.

Additionally

- 1) **The removal of Blackmore from the designated Green Belt areas is unsound and the very suggestion that it be counted with Mountnessing and Ingrave in being suitable for additional development is unsound and frankly perverse in that there are poor public transport and only**

minor roads (several of which have notices to say they are unsuitable for heavy traffic) and poor other infrastructure in Blackmore as a rural village compared to these other towns on A roads with all day frequent bus services.

- 2) The LDP proposal has substantially changed the way it treats Blackmore from earlier plans to considered right up to Reg 18, with no proper debate or explanation of why some sites have SUDDENLY been included after initially being 'promised' to be excluded e.g. Blackmore R25/26 and Oak Tree Farm traveler pitches.
- 3) Some eminently suitable sites have been removed disappeared from the LDP eg Honeypot Lane.
- 4) The late changes to the plan and administration/conduct of the November Council meeting prevented discussion of these key elements at the meeting and inappropriately curtailed the amount of time available to properly consider and challenge it.
[In fact - when Reg 18 was debated in the BBC chamber a) Items were included without any prior warning or debate eg Formal inclusion of Traveler Site Status in Cheimsford Road, and b) major concerns and alternative proposals were totally and deliberately avoided by using of a guillotine motion—seemingly aimed to stop any Blackmore concerns being raised].
- 5) Little of what is in the Reg 19 Draft Plan (aside from with Dunton Hills and the South of the Borough) appears properly integrated— or to have been addressed to fulfill the "Duty to Cooperate". The developments assigned to Villages to the North of Brentwood with poor infrastructure, amenity (full schools, GP surgery under pressure already etc.) and transport links *(and concentrated principally on Blackmore in the Green Belt)* falls most tests of rationality or lack coherent justification. "Least worst" is not an acceptable rationale when thoroughly acceptable alternatives are being denied.
- 6) The earlier (circa 2016) LDP drafts contained significant reference to 'quality of life', 'maintaining sustainable communities', 'improving residents' existence' for the future and 'working for the people' was a recurring theme. I feel that these recent omissions are due to the fact that the plans no longer fit these criteria and are aimed solely to meet the dwellings and traveler site numbers criteria. Such rationale makes the plans unacceptable and unsound.
- 7) The formal comments process issued to Residents —THIS FORM — is not one which most residents will be able to approach sensibly or compete accurately:— it needs a degree of specialist knowledge or explanation by Councillors and others with intimate knowledge of planning matters. [It is so complex and confusing for almost anyone who is not a professional planner. It has prevented large numbers of ordinary residents from responding even though they have major concerns. It is difficult not to see this as a deliberate ploy to avoid hearing genuine concerns.
- 8) The 'Duty to Cooperate' (work with adjacent Councils/Planning Groups appears to have been poor to non-existent with Epping Forest (EF) — the near neighbour to Blackmore. Epping Forest is not — as far as I can see from reading the LDP — mentioned as having been consulted at all!!! EF are erecting some 30 houses within about a mile of Blackmore (Former Roding Stables at Norton Heath) and has recently allowed completion of 4 pairs of 4 bed semi- detached houses on the former Nine Ashes Farm — all of which will use Blackmore facilities, school, roads, local surgery etc.. This MUST be taken into account.
- 9) Other private developments in and around Blackmore are not being counted and properly agreed as mitigation on the numbers being suggested.
- 10) I would contend that small amounts which C.I.L. required from developers would raise will be grossly insufficient to do an adequate job of protecting the local community— even if it was actually directed at the village impacted by the development it was related to (which is rarely the case).
- 11) Our Parish Council and Borough Councilor(s) confirm that no relevant "Housing Needs Survey" has been completed for Blackmore. So there is no evidence that the proposed sites are required

for the benefit of Blackmore nor that they will fulfil the needs of the local community.

- 12) ~~There is no evidence of proper investigation or consideration being given to further brownfield sites (eg Red Rose Farm for one) that are available and should take precedence over the Green Belt Sites R25 and R26 which are proposed.~~
- 13) More logical sites on the outskirts of major towns eg Honeypot Lane have been removed from the latest proposals. Substitute these, please!!
- 14) It is unsound to arbitrarily place disproportionate growth on one existing community which will cause it harm, leaving others with nothing at all when they would actually like some development to improve their sustainability. e.g. Blackmore v Stondon (who have already approached Brentwood Planning and, I understand, been turned down!)
- 15) It is unsound, unjustified and wholly inappropriate, wrong and flawed to propose a 30% increase in dwellings for any community which is already challenged with transport links, schools, health care etc. when others do not reach double figure increases. [The% increase is more like 50% if related developments [from Epping Forest— already built or in construction) were to be considered. (see 8 above)
- 16) No appropriate consideration appears to have been given to Counties "Protected Lanes" & "Quiet Lanes" policies. See 9.41 page 134. "Certain lanes have historic and landscape value and they are important to the character of the county. It is the policy of Essex County Council to preserve their traditional character by avoiding disturbance to the banks, ditches and verges wherever possible. Some verges contain unusual plant species, which should be safeguarded and encouraged through appropriate management. The protection of lanes and verges, including trees and hedges alongside them, will be pursued in co-operation with adjoining landowners and the Highways Authority, using traffic management measures where this is appropriate" & C10 Protected Lanes DEVELOPMENT PROPOSALS THAT WOULD ADVERSELY AFFECT THE PHYSICAL APPEARANCE OF THE PROTECTED LANES OF HISTORIC OR LANDSCAPE VALUE OR GIVE RISE TO A MATERIAL INCREASE IN THE AMOUNT OF TRAFFIC USING THESE LANES AND ROADS WILL NOT BE PERMITTED.
- 17) When questioned at public meetings and at other times, the BBC Planning Team have avoided responsibility for any solutions to infrastructure and other issues by suggesting that these will be addressed by Developers. So far, no surveys have been undertaken to ascertain if a problem exists with the development proposed. This means that the proposal is made with outstanding unresolved issues and no meaningful solutions. This seems unsound, unjustified, ineffective and flawed.
- 18) A multiplicity of shortfalls are present in the proposals for R25 and R26 including
- a) Lack of employment viability;
 - b) Lack of transport links;
 - c) lack of infrastructure;
 - d) lack of medical facilities;
 - e) lack of education facilities;
 - f) Severe flooding problems;
 - g) lack of roads to build the development and subsequently deal with the substantial increase in traffic movement;
 - h) loss of Green Belt and
 - i) damage to natural habitats.

When problems are this significant, solutions must be proposed before including in the Listed Sites. Failure to do this is unsound, unjustified, ineffective and flawed.

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 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.

- **A clear need for the proposals to be reconsidered as part of a new 'strategy' for the Villages (including Blackmore) in the North of the borough/North of Brentwood town.**
- **Proper and appropriate consultation with Epping Forests District Council to ensure that these developments on the boundaries or the two boroughs are appropriately addressed with capable, sustainable integrated plans. [30+ houses in Fingrith Hall lane+ 4 pairs of semi's on former Nine Ashes Farm affect Blackmore! And more are being developed in King Street on the pub site]**
- **Proper consideration to alternative sites in the Village— Brown field Red Rose Farm, or the area — Stondon or re-inclusion of Honey Pot Lane. These are either more suitable or more sustainable or both.**
- **Housing needs in the area do not require this density of development—assign more to other areas**
- **Perform a proper and appropriate Housing Need Survey and rely on the outcome of that.**
- **Do not propose access to/egress from sites (such as R25 and R26 on roads entirely unsuitable for it.**
- **Do not propose developments in a place (Blackmore R25 and R26) where there is already a severe flooding risk/problem which the development will worsen and no mitigation proposal in the plans.**
- **Respect results of prior planning enquiries which found that Traveller pitches at Plot 3 Oak Tree Farm were not appropriate. Likewise no not recognise Plots 1 and 2 which were previously not approved for entirely appropriate reasons.**

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.

X

Question 8: If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary.

The residents of Blackmore have not had their case properly heard in a general review and it still needs to be heard and reflected by modifications of the plans and the removal of R25 and R26 from the plan –and removal of the previously unapproved Traveller pitches on Oak Tree Farm.

Blackmore representatives time was cut short (and discussion guillotined) at a major meeting in November and there were late additions to the plan about development in Blackmore (notably 7 Traveler Plots) which had not been pre-notified., So I see this as the first time when the full case can be heard by a relevant authority. I am happy to be (at least one of) the people who gets to have a say on behalf of the Village and surrounding area.

Since November 2018, several alternative sites to R25 R26 have been notified to the Brentwood Planners who appear unwilling to revise plans further despite having– in previous drafts and the 2016 plan 1) - excluded R25 and R26 and 2) excluded the unapproved {even at temporary level} Traveller plots for what local residents and our councilors consider are relevant reasons eg Green Belt location, Traveller site permission previously refused but enforcement action not taken up by Brentwood Council.

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.

Question 7: If your representation is seeking a modification, do you consider it

YES, I wish to participate in the oral part of the EIP.	<input type="checkbox"/>
NO, I do not wish to participate in the oral part of the EIP.	<input checked="" type="checkbox"/>

Question 8: If you wish to participate at the oral part of the Examination, please outline why you consider this to be necessary.

The residents of Blackmore have not had their case properly heard in a general review and it still needs to be heard and reflected by modifications of the plans and the removal of R22 and R25 from the plan – and removal of the previously unapproved Traveller pitches on Oak Tree Farm.

Blackmore representatives time was cut short (and discussion postponed) at a major meeting in November and there were late additions to the plan about development in Blackmore (notably 7 Traveller Plots) which had not been pre-notified. So I see this as the first time when the full case can be heard by a relevant authority. I am happy to be (at least one of) the people who gets to have a say on behalf of the Village and surrounding area.

Since November 2018, several alternative sites to R22 R25 have been notified to the Brentwood Planning Committee. The Committee has been asked to consider the removal of R22 and R25 from the plan (1) - excluded R22 and R25 and 2) excluded the unapproved (even at temporary level) Traveller plots for which local residents and our councilors consider are relevant reasons eg Green Belt location. Traveller site permission previously refused, but enforcement action not taken up by Brentwood Council.

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.