



**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

Susan Webb
17-3-2019

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	Susan
Last Name	Evelyn
Job Title (if applicable)	Retired Teacher
Organisation (if applicable)	N/A
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	Susan Evelyn Webb
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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).

LDP Section 04: (Managing growth)

- Policy SP01 – D(a) and D(f)
- Para 4.9
- Para 4.20
- Policy SP02

LDP Section 08: (Natural Environment)

- Policy NE06, 8.51–8.64
- Para 8.85 (iv)
- Para 8.90
- Para 8.101
- Policy NE13

LDP Section 09: (Site Allocation)

- Policy R25, 9.197 - 9.200
- Policy R26, 9.201 - 9.204

Question 3: Do you consider the Local Plan is:

Sound?

YES

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NO

☒

Legally Compliant?

YES

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NO

☒

Compliant with the Duty to Cooperate?

YES

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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

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

X

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 do not believe the plan is sound, positively prepared, is not effective and cannot, therefore, cannot be consistent with National Planning Policy for the following reasons:

1. There been grossly insufficient consultation with other neighbouring authorities. For example Epping Forest District Council (EF) which is building about 30 new houses just 1 mile north of Blackmore at the top of Fingrith Hall lane which will have a major impact on the local facilities, the utilities and the traffic in Blackmore. Also four pairs of semi's even closer to Blackmore built in the last few years. These need to be assessed with the 70 new properties being proposed for Blackmore.
2. The access to/from Red Rose Lane is completely unsuitable for the addition of over 70 properties. This is a single track road, and is already dangerous for walkers and horse riders. Adding the extra volume of traffic on this road is completely unsuitable.
3. The village has already been subject to serious flooding in recent years, most recently being 3 years ago, when several houses on the Green were flooded. Additionally several of the surrounding roads (including Red Rose Lane) were impassable. Adding over 70 properties with their associated run-off will cause further flooding problems. (See attached photo from June 2016 of the junction of The Green and Chelmsford/Ingatestone Road)
4. The sewerage, electricity and other utilities were not designed to cope with an additional 70 properties (an increase of around 30%) without counting the 30 extra properties in Fingrith Hall road. No appropriate mitigation is highlighted in the plan.
5. There has been no clear housing strategy for the North of the Borough. Whilst there are many options that could be considered for building houses in the North of the Borough, it is as if Blackmore has been chosen with virtually no other options being considered and others – such as Honey Pot Lane and Red Rose Farm – completely ignored or withdrawn.
6. There has been no 'Housing Needs' survey carried out which would demonstrate why Blackmore has been included in the LDP, and why other areas have not. The survey carried out by local reps has been entirely ignored.
7. The Borough Council has not shown that the required additional houses for the Borough could not be delivered by increasing the housing density on the other allocated sites in the plan or continuing to include Honey Pot Lane (now removed from the latest draft).
8. There are Brownfield sites available nearby (Red Rose Farm as one example) but there is no evidence these have been considered in preference to using greenfield, Green

Belt land.

9. Putting a substantial residential development in the north of the village on Green Belt land off of Red Rose Lane which increases the housing in a historic village by over 30% is fundamentally wrong. The infrastructure (bus services, roads, village facilities, doctors, school) simply cannot cope with such a large increase of people.
10. Adding 200–300 more cars (over 70 houses in Blackmore and 30 in Fingrith Hall lane) in the village of Blackmore (which already suffers from significant parking problems) will create a real danger to pedestrians in the village. The lives of small children and old people will be put in real danger with such a large increase in traffic volumes.
11. Other more suitable locations (eg areas around Doddinghurst, urban extensions to Brentwood, increasing the size of the Dunton Hills proposal) which all have better transport links would have been a far better proposal than the development in Blackmore which is not a sustainable development proposal.
12. The pieces of land proposed in Blackmore are important wildlife and natural habitats for rare species such as newts and other creatures.
13. The Local Development Plan proposal includes a plan to regularise an unauthorized traveler site on the Chelmsford Road (at Oak Tree Farm—plots 1,2,3). This will add to further overcrowding in the village and of its services.
14. I feel very strongly that Blackmore is already extended to the limit of its capability if it is to retain the rural feel, historic nature and

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.

My modification would be that sites R25 and R26 should be removed from the LDP and that Planners should refer to the BVHA 'neighbourhood plan'. This clearly sets out our local housing needs, and would avoid further development in the Blackmore area which is an already sustainable community.

Also remove the Site GT 16 – all 8 previously unapproved pitches.

Leave Blackmore **IN Green Belt** and restore the classification of "Rural Village in a sparse setting (which it is for roads, Buses, etc. etc. it really is)

I am very unhappy that you have chosen to issue such a difficult form to complete with wholly unnecessary/inappropriate personal elements in Section A. It has taken me an unacceptable amount of time to understand and complete. I am very tempted to believe this is a deliberate attempt to stifle meaningful comment. A lot of people who hold views exactly like mine HAVE been put off from objecting because of this.

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.