



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

AUDREW

Last Name

FINLAY

Job Title

(if applicable)

Organisation

(if applicable)

Post Code
Telephone
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

AUDREY ROSS FINLAY

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).

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.

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	<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"/>

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.

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

Question 5 – Why is the Local Plan unsound.

1. There is no clear housing strategy for the Villages, which includes Blackmore. Rather than seeking to deliver sustainable development in accordance with national and regional policy, the Local Plan seeks to destroy small villages with unsustainable housing growth. Additional housing should be focussed on the most suitable and sustainable areas – i.e. urban extension to Brentwood.
2. Brentwood council has not adequately consulted with neighbouring authorities (Epping) when deciding on the impact additional housing will have on the village.
3. Blackmore village is unable to sustain residential development off Red Rose Lane. Blackmore is an isolated village with limited services and infrastructure. Parking in the village is already dangerous, with motorists parking in extremely dangerous positions when visiting the local amenities in the village (for example, blocking views at junctions/parking on double yellow lines – extremely serious for vulnerable road users, pedestrians, children, cyclists – of which there are many). The local doctor's surgery is already full. What will be the impact of additional housing on existing local residents who already have to wait weeks for an appointment?
4. As a regular runner down Red Rose Lane I can attest to the fact that this narrow lane is entirely unsuitable for the volume of traffic that is being proposed. As it is, a car in either direction will force you onto the verge. This road will be positively dangerous if the development proceeds as planned. The children of Blackmore school were forced to put up posters on the trees and bushes outside the school pleading with parents not to park on the double yellow lines because of the dangers involved. Most parents simply ignore the signs (written & coloured in by the children) because there simply is nowhere else to park. How will additional housing & an increased volume of vehicles improve this already dangerous situation?
5. Brentwood council has not demonstrated that there are other brownfield sites that are available and which should take priority over the Green Belt land off Red Rose Lane.
6. Brentwood council has failed to demonstrate that the required housing could not be met by increasing housing density on other allocated sites.
7. The proposed sites in Blackmore are liable to flooding. Indeed, our own back garden regularly sees standing water in it after a moderate amount of rainfall. Where will all the rain go if the Red Rose Lane site has been concreted over? Can the council guarantee that development will not make flooding worse in the village thereby driving up insurance costs and driving down the value of local properties for all?

Question 6 – Modifications

1. Produce a clear housing strategy for the villages. Determine why vulnerable villages with already overstretched amenities and dangerous roads (caused by the already existing high volume of traffic) are preferable to an extension of already developed urban conurbations.

2. Brentwood council needs further consultation with surrounding councils in order to determine the full impact of additional housing on the village. More suitable sites could have & should have been identified.
3. Stretched local amenities, dangerous parking, an already full to capacity doctors surgery and a packed school (with a wholly inadequate & dangerous parking arrangement) means the Blackmore sites outline in the Local Plan are not suitable.
4. Red Rose Lane is a small country lane suitable for light traffic flow. There are no pavements (very few exist in the whole area) making this dangerous for pedestrians (incl the numerous local dog walkers that already use it), cyclists (who visit from far and wide) as well as motorists. Vehicles are significantly larger now than they were when this lane was originally constructed. The lane is too narrow for the size, speed and volume of cars already. Additional traffic flow will make this small country lane even more dangerous.
5. Red Rose Lane is Green Belt land. It is protected in order to prevent 'urban sprawl', preserve the character (and safety) of existing settlements and to encourage development within already existing built-up areas. The council needs to demonstrate that brownfield sites/previously developed land options have been looked at before destroying Green Belt land in local villages.
6. The council needs to demonstrate that the required level of housing cannot be met by increasing housing density on other, more suitable sites.
7. Blackmore (and the surrounding area) suffers from very hard, heavy, clay soil. Heavy clay soils tend to hold water very well, however, they drain very slowly after rainfall and this is often observed from an upstairs window overlooking the Red Rose Lane site (and indeed the back garden). Where will all this additional rain water go if this field is concreted over? Indeed, at the time of writing (March 2019) much of the Red Rose Ln site is still under standing water. Can Brentwood council confirm that this field is not crucial in managing rainwater levels? I have, on occasion, had rainwater completely submerge my rear garden. Will concreting over the Red Rose Lane site make this situation better or worse?

March 2019.

