



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.

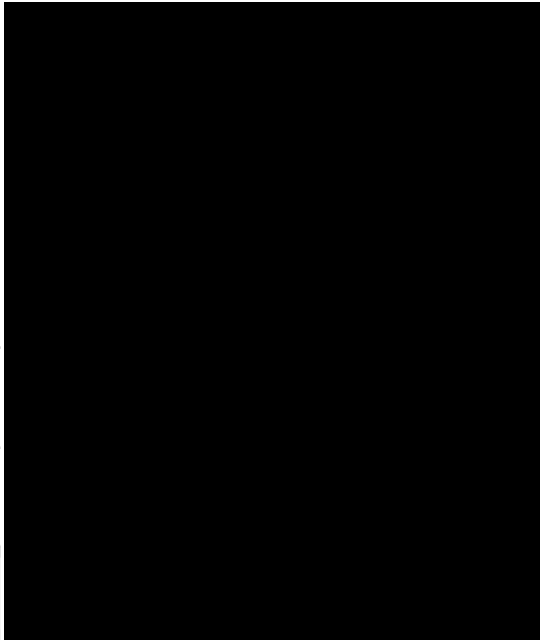
Please keep in mind the information provided above to assist with correctly completing your comment form. For additional information on what the difference is between a Regulation 18 and Regulation 19 Local Plan consultation, please view the FAQ's published on-line www.brentwood.gov.uk/localplan

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	Mrs
First Name	Valerie
Last Name	Godbee
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	Valerie Godbee
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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 09: Site Allocation

POLICY R25: LAND NORTH OF WOOLLARD WAY
POLICY R26: LAND NORTH OF ORCHARD PIECE

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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 checked="" 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

Brentwood Borough Council must provide 7800 houses a third of which have been allocated to Dunton Hills and the rest scattered over the borough.

Blackmore has been allocated 70 which represents 60% of land released in villages in what is described in the LDP as a 'borough of villages'. This is totally disproportionate.

Brownfield sites have not been properly considered before the green belt and green field sites.

The LDP has not shown that the 70 houses could not be built by increasing density on the more urban sites. Denton Village could easily absorb this amount for example.

In addition there are other sites within the Blackmore boundaries that have been submitted to Brentwood Planning for development as well as building by Epping Council on our borders. All of which will be using our services and infrastructure adding to further congestion in an already busy village.

There is a large, illegal, travellers site in Chelmsford road that additionally impacts all the roads, parking, infrastructure, school, doctor's surgery, services etc.

No Housing Needs Survey has been made, except by Blackmore Village Heritage Association, to ascertain local needs and to show why Blackmore has been included.

The infrastructure cannot support this additional build which could mean upwards of 200 people, 140 cars, 250 car journeys.

The doctors' surgery is overwhelmed. It is not possible to get an appointment for weeks. At time of writing this was until at least the end of April.

The local primary school, that is listed as an asset in the plan, is oversubscribed with a waiting list.

Traffic and parking is already a problem and will only get worse as planning departments in Brentwood and Epping continue to approve building plans

Why is Blackmore, population 829, in Settlement Category 3 along with Doddinghurst, population 2,550, rather than Settlement Category 4?

The definition of Category 4 is 'Remote and small rural villages and hamlets, with poor public transport, limited shops, jobs and community facilities; some of these settlements rely on nearby settlements for services' which is more pertinent to the village of Blackmore.

No consideration has been given to the wild life that is abundant in the two fields including barn owls, newts, reptiles and bats.

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.

- A clear plan needs to be implemented for Blackmore and the other villages in the north of the Borough
- There doesn't appear to have been much, if any, consultation with Epping & Chelmsford Borough Councils. 30 properties have been built in Fingrith Hall Lane which will impact the village and the inhabitants will further impact the local services, schools, doctors etc
- Blackmore is a remote village with scarce services, public transport, doctors' appointments are already at a premium and there is a long waiting list for the local primary school.
- More sustainable locations with better infrastructure, more schools, & surgeries, etc etc such as the urban areas of Brentwood are available.
- Brownfield sites have not been properly considered before the green belt and green field sites and promoting the land off Red Rose Lane.
- The LDP has not shown that the 70 houses could not be built by increasing density on the more urban sites. Denton Village could easily absorb this amount for example.
- No Housing Needs Survey has been made, except by Blackmore Village Heritage Association, to ascertain local needs and to show why Blackmore has been included in the LDP.
- Red Rose Lane is a narrow road with drainage ditches either side. Two cars cannot pass without one pulling over. This is the only access from the proposed site so is totally unsuitable for the amount of additional traffic which would be upwards of 150 cars. Phil Drane has quoted that 'Red Rose Lane is an inappropriate access road'
- Essex CC and Councillor Lesley Wagland agrees with the road and infrastructure issues.
- Building 70 plus houses there would not create any jobs for the area.
- Both sites are frequently subject to flooding. Building on these fields would also increase the flood risk elsewhere in the village in particular by the village pond which is currently a flood hazard. A cursory look at the Essex CC web site <https://flood.essex.gov.uk/know-your-flood-risk/check-if-you-re-at-risk-of-flooding/> would clearly show the high risk of flooding Blackmore is under.
- Stondon Massey would welcome additional housing to ensure viability of their village and there are sufficient brownfield sites to accommodate such growth.

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.

