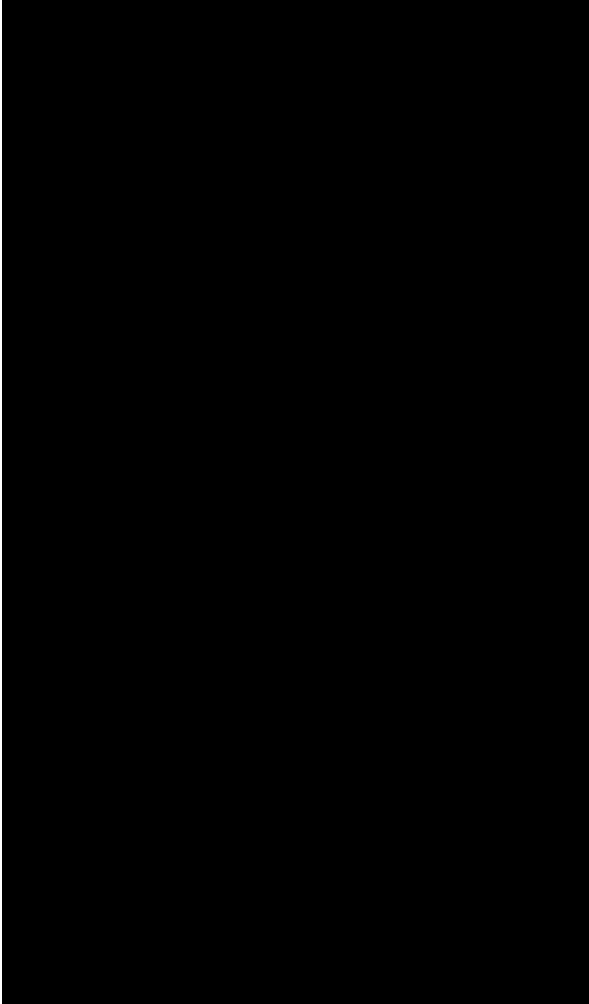


Section A: Personal Details

Title	Mr
First Name	David
Last Name	Rolfs
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	David [REDACTED] Rolfs
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Question 1: Please indicate which consultation document this representation relates to?

The Local Plan

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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).

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

☐

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

☒

The Local Plan is not justified

☒

The Local Plan is not effective

☒

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 consider the Local Plan to be unsound, not legally compliant and fails to comply with the Duty to Cooperate on the following grounds:

1. **Soundness:** *Local Planning Authorities must prepare a Local Plan based on relevant and appropriate evidence base.*
 - a. In my opinion the evidence base has not considered a number of germane facts– or if it has it has not provided sufficient weight to the following:
 - i. **Health - General Practice.** Deal Tree Health Centre is already operating at figures beyond the optimum number of patients per GP, as outlined in the Brentwood Infrastructure Delivery Plan (IDP). New housing has already impacted this further, with developments in Rookery Road and The Elms in Lower Road Mountnessing, along with travellers who have occupied land on the Chelmsford Road all squeezing Deal Tree Health Centre further. The addition of 70 new properties in Blackmore under R25 and R26 will further exacerbate the problem.
 - ii. **Primary Education:** DODDINGHURST / KELVEDON HATCH (Group 3) primary provision which includes Blackmore Primary School, has insufficient spaces on several grounds:
 1. In accordance with the National Audit Office report “Capital Funding for New School Places’ (2013) there should be a minimum 5% surplus that the Department for Education assumes in its planning as necessary to support operational flexibility (mid-year admissions) and facilitate parental choice. A deficiency may thus be deemed to exist without the certainty of every local place being filled”. DODDINGHURST / KELVEDON HATCH (Group 3) primary provision which includes Blackmore Primary School, has only a 3% surplus.
 2. Blackmore Primary School is currently full so has no surplus, let alone the 5% that the NAO recommends, or the 3% that is mentioned for Group 3 in the BBC paper.
 3. In addition, 70 new properties in the Group 3 catchment is directly in Blackmore, further compounding the poor situation. This includes additional housing proposed by EFDC for the top end of Fingrith Hall Lane. Although such housing is not in Brentwood Borough’s plans, the schooling for these houses will be assumed to be in Blackmore Primary School.
 - iii. **Services and the environment in Blackmore.** There is a limited bus service with the final bus from Brentwood Station leaving at 18:35. This will mean that new residents will need to own one possibly two cars. With so little parking capacity in Blackmore, this will have a detrimental impact on the village centre.
 - iv. **Roads in Blackmore.** There is no through road in the village, and plan to use Red Rose Lane for the sites R25 and R26 is a major flaw in the planning. It is a single-

track road and marked as unsuitable for large vehicles. Therefore, the construction of 70 properties and their subsequent use by the new residents will present significant difficulties along Red Rose Lane.

- v. **Sewage and drainage.** What are the plans for extending these if we are to avoid the flooding and associated health risks which we have experienced in the past few years? The presence of 70 properties will add to this problem, especially with their run-off.
- vi. **Electricity, gas, telephone and internet.** There will need to be additional facilities installed to support the proposed 30% growth. Has this been considered?

2. **Duty to Cooperate:** *Throughout the plan-making process discussions have taken place with various statutory consultees and neighbouring authorities.*

- a. In my opinion there has been insufficient engagement with neighbouring authorities, in particular with Epping Forest. This is reflected in the fact that the development planned for Fingrith Hall Lane of some 30 houses by EFDC will inevitably put a strain on Blackmore as described above for the following aspects:

- i. Health
- ii. Schooling
- iii. Roads
- iv. Services and the environment in Blackmore

3. **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*

- a. In my opinion the Local Plan has not adhered to the NPPF because of its disregard of the following:
 - i. **Green Belt.** Central Government has said that Green Belt must be protected. It appears that the BBC is disregarding the green belt status of the village.
 - ii. **Maintaining the local ecology.** The development of R25 and R26 will damage important areas for our wildlife.
 - iii. **Blackmore's heritage.** Blackmore is a village with great history, some dating back to Tudor times. It is incumbent on us all to retain our heritage. The growth of 30% to Blackmore with its knock-on impact on the lanes and roads around the village will jeopardise this.
 - iv. **Other inclusions.** The BBC seems to have amended the status of the Travellers Site in Chelmsford Road, and wrapped it into the Local Plan. Was it legal to do so?

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.

The BBC planners should perform the outstanding and incomplete tasks as outlined above. In addition, the planners should take notice of the neighbourhood plan (BVHA) which sets out the Blackmore local housing needs and how Blackmore can continue to support a sustainable community.

Sites R25 and R26 should be removed from the Local Plan.

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.

