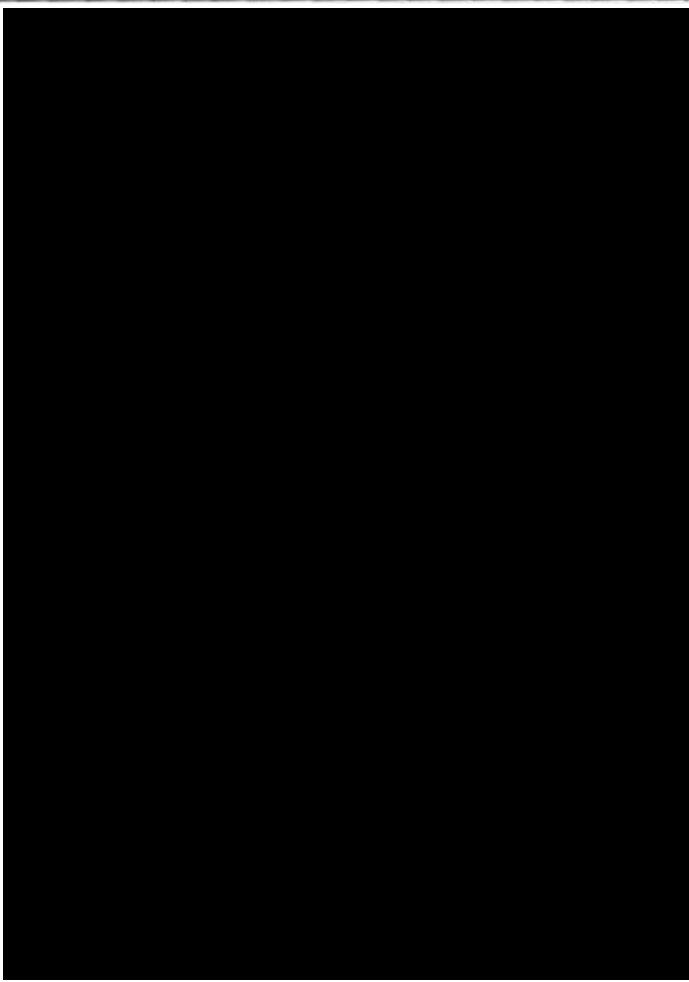


Section A: Personal Details

Title	Ms
First Name	Deborah
Last Name	Cullen
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	Deborah Cullen
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Question 1: Please indicate which consultation document this representation relates to?

The Local Plan

☒

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).

My comments are based on the sections set out below:

Section 04: (Managing Growth)

Policy SP01 - D (a) and D (f)

Para 4.9

Para 4.2
PolicySP02

Section 09: (Site Allocation)

Policy R25, 9.197- 9.200
Policy R26, 9.201 - 9.205

Section 08: (Natural Environment)

Policy NE06, 8.5 - 8.64
Para 8.85 (iv)
Para 8.90
Para 8.101
Policy NE13

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

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 falls to comply with the Duty to Cooperate

The Plan is unsound because it fails to comply with the requirements set out in the National Planning Policy Framework ("NPPF") para 35 as follows:

- a) It has not been properly prepared:
- Brentwood Borough Council ("BBC") has failed to objectively assess the area's housing needs in particular in reference to the proposed development of housing in the village of Blackmore (Site Policy Numbers R25 and R26).
 - The Blackmore Sites suddenly appeared in the draft plan in January 2018 but had not been in the earlier drafts of the plan which were consulted on during the course of 2016.
 - No clear strategy for the villages in the Borough has been consulted on publicly, nor has there been any consultation evidenced with the bordering Local Authorities (Epping Forest DC and Chelmsford City Council), whose boundaries both adjoin Blackmore Parish and whose residents' needs directly impact Blackmore Village in respect of housing provision, transport and other services. For example, there is already a development of 30 houses (approved by Epping Forest, without any evidence of consultation with BBC or Blackmore Parish Council) in progress at the top of Fingrith Hall Road which will impact the infrastructure, amenities and other facilities of Blackmore.
 - No evidence has been provided in the Local Development Plan of how these developments have been assessed to be sustainable in light of the impact the BBC proposals, plus the Epping Forest development and how they will impact the local infrastructure and character of the village of Blackmore.
- b) It is not justified on the following grounds:
- There has been no evidence put forward by BBC, such as a local housing need assessment for the village of Blackmore which would justify expanding the village housing stock by around a third. There has been no consultation in the village of its housing needs. In or around 2016 or 2017 there was a local meeting arranged to

review if affordable housing was required in the village. This proposal was abandoned due to the negative feedback from villagers.

- The BBC have failed to consider other more suitable locations for development which would not (a) encroach and irrevocably damage greenbelt land (contrary to Section 13 of the NPPF) (b) negatively impact the character, rural nature and restricted amenities on offer in the village of Blackmore and (c) would make use of existing suitable infrastructure and amenities, such as Brownfield sites, or sites with public transport and those other existing sites in the plan where the local infrastructure could easily bear an increased density in numbers of housing
- No proportionate evidence (or any at all) has been included in the plan to justify the proposed developments in Blackmore or how issues such as access to these proposed sites which are serviced currently by small narrow lanes or how other local infrastructure such as drainage, increased traffic flow on what are narrow country roads around Blackmore, schools, doctors surgeries will be dealt with.

c) It is not consistent with national policy:

- it does not enable the delivery of sustainable development as the proposed developments in Blackmore village as the Infrastructure will not support an increase in traffic on the single track roads and lack of parking at the school and village shop, school places in a school that is already at capacity with a large waiting list, additional pressure on the already crowded only doctor's surgery in Doddlinghurst.
- Under the NPPF section 13 conservation of the Green Belt is set out and the Plan states that the BBC "will continue to resist strongly pressure to allow development in these clusters". The proposal to grow what is a historic, rural village such as Blackmore by a third is not consistent with either the national policy of keeping greenbelt land open and BBC's own policy to avoid irrevocable damage to the character of the Green Belt.

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.

The Blackmore Sites should be removed from the Local Plan until there has been:

- (1) A full housing need survey for Blackmore
- (2) A proper consultation, including the BBC taking into account alternative sites
- (3) A properly formulated strategy from BBC in relation to protecting the heritage and character of the villages within the Borough

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.