



## 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](http://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](mailto: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](http://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

Janice

Last Name

Holbrook

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

Janice Holbrook

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).

Section 9 - Policy R25, and Policy R26,

Section 4 - Policy SP01– D(a) and D(f), Para 4.9, Para 4.2, Policy SP02

Section 8 - 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

☐

**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

The Local Plan for Blackmore is unsound because:

- a) The LDP has changed from its original plan, about 2 years ago, to that considered at Reg 18. When Reg 18 was discussed at Brentwood Borough Council chambers items were included without prior warning or an opportunity to discuss one of which is the Formal inclusion of the Travelers Site in Chelmsford Road.
- b) There is no explanation of why some sites have been included after initially being promised they will be excluded, for example Blackmore. And why have some far more suitable sites now disappeared, for example Honeypot Lane.
- c) Our concerns and proposals were deliberately, totally avoided to stop ANY Blackmore concerns being raised.
- d) Because of the late changes to the plans this has decreased the amount of time now available to Blackmore residents for them to appropriately consider and challenge the changes – a deliberate ploy by BBC???
- e) The recurring message in the original LDP was full of reference to quality of life and maintaining a sustainable community and improving residents' existence. This has now been cut from the latest version which is only concerned about meeting target numbers of dwellings. There is NO care or understanding by any member of the BBC to the impact this will have on the structure of this small, already under pressure, community.
- f) For ANYONE not of a professional/business background, your information has been constructed in such a confusing, complex manner that it will stop a large number of ordinary voters/residents with major concerns, from responding to your forms and voicing their opinions. I feel this is may be a deliberate ploy by BBC and I shall be contacting the [Plain English Campaign](#) regarding your inability to communicate simply and create intelligible, transparent, user-friendly documents for your community.
- g) Properties being built by Epping Forest Council on the Edge of Blackmore, Fingrith Hall Lane/Nine Ashes Road, have not been taken into account regarding the amount of properties/people that will be using Blackmore's under-pressure, under-funded facilities, like the School, Parking, Doctors Surgery, which is totally full, etc etc. Because there is no coordination with Epping Council and Brentwood this has an adverse affect on our community, which you have not considered.
- h) You also don't appear to consider any Private building developments, plus Other Council Developments within the Blackmore area in the LDP. All of these EXTRA developments add uncontrollable increased pressure to our facilities, including roads and road safety.
- i) There is no evidence that the developers would attempt to, or succeed in protecting this local community or creating any infrastructure improvements.
- j) Where is the evidence of a completed 'Housing Needs Survey' for Blackmore and the evidence that the proposed sites will fulfil the needs of the local community?
- k) Where is the evidence that an appropriate investigation has been completed into brownfield sites and why aren't those sites taking precedence over listed Green Belt Sites? Clearly these greenbelt sites would provide the most profit for the Developers, but BBC should be working on our behalf to protect this community rather than being developer led.
- l) There is no evidence of research by BBC into other areas that would positively benefit local communities if developed. For example; a Brownfield Site in Stondon Massey was put forward as that community wished to increase their village to make it more sustainable. BBC decided the bus route wasn't adequate and dismissed it without discussion. Honeypot Lane

which is a far more appropriate development was dropped on request of the local councilor. (who somehow managed to make the case before the guillotine).

- m) To place disproportionate growth on an existing Historic community which will cause great harm, whilst ignoring other areas who wish to improve their sustainability, is evidence of a flawed plan.
- n) To increase a small community by 30% more dwellings, when all the others do not reach even a double figure increase is totally deplorable, and that's without taking into account additional properties being built privately or by Epping Forest Council.
- o) "Protected Lanes" and "Quiet Lanes" policies have also not been considered by BBC. "Certain lanes have historic and landscape value and they are important to the character of the county. It is the policy of Essex County Council to preserve their traditional character by avoiding disturbance to the banks, ditches and verges wherever possible. Some verges contain unusual plant species, which should be safeguarded and encouraged through appropriate management. The protection of lanes and verges, including trees and hedges alongside the, will be pursued in co-operation with adjoining landowners and the Highways Authority, using traffic management measures where this is appropriate" and "Development proposals that would adversely affect the physical appearance of the protected lanes of Historic or landscape value or give rise to a material increase in the amount of traffic using these lanes and roads will not be permitted".
- p) Where and when were the surveys undertaken by the Planning Team to ascertain the problems that will exist with this development? Regs 18 & 19 could be passed with major issues to which you have no solutions. What if the Developers run out of money and pull out half way through this development leaving us with a massive carbuncle in Blackmore. Or, they might decide to cram a few more properties onto this area. Who would stop them?
- q) There are several major concerns regarding increasing the size of Historic Blackmore, to which BBC seem oblivious. All of the following facilities are used by the surrounding Villages, not only Blackmore, this means they are at breaking point already without a massive new development.
  - 1) Diminishing Greenbelt land – Greenbelt status is placed on land to preserve our countryside, flora and fauna and ever decreasing wildlife. Where will children and adults from Brentwood and other towns go to get away from concrete and noise if Councilors are allowed to wantonly eradicate historic preservation rights on a whim with the swipe of a pen.
  - 2) Medical facilities – The Surgery is full to bursting, waiting times for appointments are extreme causing danger to health and life already.
  - 3) School places – There are NO spare places in Blackmore, Doddinghurst or Kelvedon Hatch Junior Schools.
  - 4) Roads – The roads in and around this area are already very busy and narrow, parking is a major problem, especially at the school, the co-op and the Surgery with existing traffic. Certain village roads have no pavements or street lighting which, with an increase of an extra 200+ cars will be extremely dangerous for children, adults and wheelchair users.
  - 5) Transport – One bus an hour which doesn't even go to the main rail link.
  - 6) Employment – consists of the Co-op or working in a pub. All fully staffed already
  - 7) Infrastructure – Victorian sewerage systems within the Village which will not cope with additional toilets, bath water, washing machines etc. etc. etc.
  - 8) Flooding – this will become considerably worse if green belt is concreted over and built on.

- 9) Farm Machinery—You've not considered the annual to-ing and fro-ing of farm machinery, not only during harvest time but all year round.
- 10) St Lawrence Church – during Sunday worship, Weddings and Funerals people park in Fingrith Hall Lane, Orchard Piece and Blackmore Road as there is no parking at the Church. With a huge increase in vehicles/population how will these important services be able to take place?

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.

I do not feel this local plan is in any way sound and may not even be legally compliant. At the Brentwood Borough Council's Chamber meeting, where Reg. 18 was "debated", it was passed automatically due to "lack of time" following a guillotine motion to stop full discussion. Time was found however to introduce, but not debate, unannounced extras like formalization of Traveler Site Status in Chelmsford Road, and transferring new homes allocation to Dunton Hills to allow the removal of Honeypot Lane development from the LDP. This meant that Blackmore Councilors were prevented from speaking and raising **ANY** of the major concerns they had. In a less democratic society than UK, the free press would probably level accusations of a pre-agreed strategy being played out to avoid some parties being allowed their right to participate and be heard.

This whole process must now be independently reconsidered as the entire situation has been handled inappropriately and should be covered fairly and justly before proceeding to Reg 19.

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

☐

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.