

**Section A: Personal Details**

Title	Mr
First Name	James
Last Name	Hughes
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

James William Hughes

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).

LDP Fig 2.3 Settlement Hierarchy  
LDP Section 04: (Managing growth)

- Policy SP01 – D
- Paras 4.6, 4.9 and 4.20
- Policy SP02
- Policy SP04 – A

LDP Section 06: (Housing Provision)

- Policy HP08

LDP Section 08: (Natural Environment)

- Policy NE06 and Paras 8.51 – 8.64
- Para 8.85 (iv)
- Para 8.90
- Para 8.101
- Policy NE13

LDP Section 09: (Site Allocation)

- Policy R25 and Paras 9.197 - 9.200
- Policy R26 and Paras 9.201 - 9.204

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 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

I consider the plan to be unsound and fails to comply with the Duty to Cooperate for the following reasons:

1. **LDP Fig 2.3 Settlement Hierarchy.** The population of Blackmore is listed as 829, but this doesn't make provision for the residents of Nine Ashes road nor does it cover the Travellers living illegally within the village bounds which Brentwood Council still refuse to take action on – nor the residents living on the Chelmsford road, who all use local amenities. The total of the separate population figures do not add up to the total population figure either – by a margin of around 600 people. Assumptions have been made based on these figures, calling into question the validity of the proposals.
2. **Duty to Cooperate.**  
I would say that the development of the 30 huge houses by Epping District council very close to the boundary of Blackmore Parish means that the village amenities are already under pressure – and this has not been accounted for within any of the plans.
3. The single track road named “red Rose Lane” is not suitable for extra traffic without marked improvements to the road – including fixing pot holes and filling ditches on either side. It is also continually used by the public – on foot and on horseback – and is part of at least one major cycle route. There are no walkways so the extra traffic will increase the danger to road users.
4. **Flood Risk.** The village centre of Blackmore irrigation is almost non-existent – and actually in recent years the continual flooding has actually washed away pavements and seeped into low-lying houses on Church Street. Some of these pavements have yet to be repaired and propose considerable risk to the ageing population in the area. I also know of occasions where freshly dug graves in the churchyard have had to have water pumped out of them. Creating new houses on the proposed sites will dramatically reduce the amount of open land and large plant life able to soak up this water. Blackmore is at continual risk of flooding which makes the proposal unfit for purpose as it will create more of an issue. The council – if it wanted to build further homes in these parishes – would have to invest heavily in the irrigation of the entire village to make these plans plausible.

**5. Infrastructure**

The plan makes no provisions for the development of local amenities and infrastructure – and the local school and doctor's surgery are already at capacity – and wait times are far too long for an increasingly ageing population. The internet connection is appalling, the sewage system is at tipping point, there are frequent power-cuts in the area already (so the board is unlikely to be able to cope with the addition of new properties), Public Transport is almost non-existent in the village (and the 61 bus, which I used for 2 years to get to work in Brentwood, was and continues to be under threat) and parking anywhere is a nightmare – especially on Sundays (church services) and during the yearly firework displays which are organised by the Parish Council.

6. A survey should have been carried out to demonstrate the need for housing – and in particular the need for 'type of housing'. I have already expressed my distaste for Epping Council's development of what I would call 'mansions'. Being 21 years of age, mortgaging a house anywhere in this area seems like a dream to me – one I hope to realise but one I have come to understand will be nearly impossible in my lifetime.
7. There are more suitable locations with better access to larger towns in the area: extensions to Brentwood or possibly increasing the size of the proposal for Dunton Hills would all have better transport links for commuters, on better kept roads.
8. Some of the proposed sites in Blackmore are incredibly vital to the survival of certain types of wildlife in the English countryside – we have seen a huge decline in the hedgehog population countryside in the last few years and the green sites around Blackmore provide a safe haven for these creatures.
9. I have a particular problem with the regularisation of the Traveller site on Chelmsford Road as detailed in policy HP08. I served on the Parish Council for a year before I moved to Brentwood so I have experienced first-hand the failure of Brentwood Borough Council to exercise its duty to attempt to remove the Travellers from the site. I have sympathy obviously that the Travellers have had children who now attend the local school – but the very fact that they have been able to settle for that long just provides proof that they are no longer 'travelling'. Further proof has been sent to the Council in recent years of the fact that many 'Travellers' at that site actually own property elsewhere, which invalidates their 'Traveller' status. If this site is regularised, Brentwood is opening its doors to further illegal settlements. And on a personal note I feel this is an affront to honest people who are desperately trying to save to purchase a place to call their own legally – especially in an area of such high house/land prices.

10. Policy SP02 states that new development will be directed towards highly accessible locations along transit/growth corridors. Blackmore is neither of these things.

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.

Due to issues I have made clear I believe it is the Council's duty to remove sites R25 and R26 from the LDP such that they do not overwhelm local amenities and services; such that they do not cause further flooding by removing crucial green spaces and such that they are not driving forward with plans that would adversely affect live in the surrounding areas. Blackmore is not an affordable area for young people trying to get on the 'property-ladder': so any attempt to provide affordable housing within that area is counter-intuitive.

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.

N/A

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.