



Consultation on Potential Main Modifications to the Local Plan 2016-33

September 2021

REPRESENTATION FORM

This form should be used to make representations on the Main Modifications to the Brentwood Local Plan 2016-2033 submission version as contained within the Schedule of Potential Main Modifications and accompanying updated Sustainability Appraisal and Habitats Regulations Assessment.

The Schedule of Potential Main Modifications and all required supporting documents can be accessed via the Local Plan website at <http://www.brentwood.gov.uk/local-plan-examination>

Please note this form has two sections:

Section A – Personal information

Section B – Your representation

Please ensure you complete **both** parts of the form.

Where possible, we would prefer responses are provided using our Local Plan online consultation portal. This is the quickest and easiest way to make representations. To respond in this way, please follow this link: <https://brentwood.oc2.uk/>

Comments will be considered by the independent Planning Inspectors undertaking the examination.

All responses must be received by 5pm Thursday 11 November 2021

Please return forms either by attaching completed forms by email to planning.policy@brentwood.gov.uk or alternatively by post to MM Consultation 2021, Planning Policy Team, Brentwood Borough Council, Town Hall, Brentwood, Essex CM15 8AY

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.

Guidance Note on Legal Compliance

The Inspectors have assessed whether the Plan meets the legal requirements under section 20(5) of the Planning and Compulsory Purchase Act 2004 (as amended (PCPA), which includes whether the Local Planning Authority has complied with the Duty to Cooperate (section 33 of the PCPA) when preparing the Plan, before moving on to test the Plan for soundness.

In relation to this consultation, comments regarding legal compliance should only be submitted where they relate to the potential Main Modifications.

Guidance Note on Soundness

Local Plans are required to be assessed against the tests of soundness. If you are objecting to a potential Main Modification, Question 3 of the representation form asks you to identify which of the below tests of soundness you consider the modification fails to address (soundness is explained in National Planning Policy Framework (NPPF 2021) paragraph 35).

Positively prepared - The Plan should be prepared based on a strategy which seeks to meet objectively assessed development and infrastructure requirements, including unmet requirements from neighbouring authorities where it is reasonable to do so and consistent with achieving sustainable development.

Justified - The Plan should be the most appropriate strategy, when considered against the reasonable alternatives, based on proportionate evidence.

Effective - The Plan should be deliverable over its period and based on effective joint working on cross-boundary strategic priorities.

Consistent with national policy - The Plan should enable the delivery of sustainable development in accordance with the policies in the NPPF.

The preparation of the Local Plan has had regard to all policies in the NPPF. However, insofar as your comments relate to the Main Modifications, you may take the view that the Local Plan:

- a) Fails to address a requirement of the NPPF; in this case you should explain what else it needs to include. Please note that the Local Plan does not need to repeat national policies; or
- b) Departs from national planning policies without good local reasons. In this case, please explain why.

Please keep in mind the information provided above to assist with correctly completing your comment form.

Section A: Personal Details	
Title	Mr
First Name	Gary
Last Name	Sanders
Job Title (if applicable)	
Organisation (if applicable)	
Address	
Post Code	
Telephone Number	
Email Address	

Do you wish to be notified when the Brentwood Local Plan 2016-2033 is adopted by the Council?	YES <input checked="" type="checkbox"/> NO <input type="checkbox"/>
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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	Gary James Owen Sanders
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Question 1: Which **Main Modification and/or supporting document** does your representation relate to?

Each Main Modification within the Schedule has a reference number. This can be found in the first column i.e. MM1, MM2

Any representations on a supporting document should clearly state which paragraphs of the document it relates to and, as far as possible, your comments should be linked to specific Main Modifications. You should avoid lengthy comments on the supporting documents themselves.

Representations on the Policies Map must be linked to specific modifications in that they reflect a change required as a result of a Main Modification.

Schedule of Potential Main Modifications	MM no.	1, 2, 5, 78, 81, 107, 108
Sustainability Appraisal	para(s)	Page 5 and para 2.6 & 2.8.1
Habitat Regulations Assessment	para(s)	
Policies Map or other supporting documents	Please specify	Annex 2

Question 2: Do you consider this **Main Modification and/or supporting document**:

Legally Compliant?

YES

☐

NO

☐

Sound?

YES

☐

NO

☒

Question 3: If you consider the **Main Modification and/or supporting document** unsound, please indicate which of the soundness test(s) does it fail (please mark all that apply):

Not positively prepared

☒

Not justified

☒

Not effective

☒

Not consistent with national planning policy

☐

Question 4: Please provide details of either:

- Why you consider the **Main Modification and/or supporting document** to be sound or legally compliant; or
- Why you consider the **Main Modification and/or supporting document** to be unsound or is not legally compliant.

MM1/MM2

Blackmore village is very remote. It is a long way from towns and railway stations, the bus service is almost non-existent and the lanes are too narrow and dangerous to walk. It is unsuitable for commuting and the car is the only way to travel if you live in Blackmore. More houses would therefore result in more vehicles, congestion and pollution (70 houses would result in approximately 140 more vehicles in the village). This goes against BBC's objectives and the Government's aim for reducing unnecessary car journeys.

The loss of 2 large green belt fields to houses would result in the loss of homes for foxes, hedgehogs, voles and badgers, amongst others.

MM5

Blackmore is not a class 3 village like Doddington, it should be recognised as a class 4 village. Blackmore has 1 tearoom, 1 small shop and a part time hair salon so cannot be classified the same as larger villages such as Kelvedon Hatch and Doddington who have a parade of shops, a lot more houses, are closer to towns and stations, and have far better and safer road links.

MM78

Blackmore has always had a problem with flooding, and concreting over 2 large fields will just compound the situation. The idea of digging 2 ponds on each field is pointless; when there is heavy rain the water table is at ground surface level. With extreme weather becoming more frequent, the flooding situation will only get worse.

MM81

I do not think the Exceptional Circumstances Test was carried out with any thoroughness. If it had been it would have identified, and included in the LDP, the brown field sites in Standon Massey and Red Road Lane, Blackmore.

MM107/108

Due to the exceptionally high level of concerns by most of Blackmore's residents, BBC reduced the number of houses to be built from 70 to 50. For the inspector to increase the number back to 70 begs the question why ask the public for a response to the LDP if you are then going to ignore that response?

Please continue on a separate sheet if necessary

Question 5: Please set out what change(s) you consider necessary to make the **Main Modification and/or supporting document** sound or legally compliant, having regard to the matters that you identified above.

You will need to say why this change will make the Submission Version of the Local Plan sound or legally compliant. It will be helpful if you are able to put forward your suggested revised wording of any policy or text. Please be as accurate as possible.

Please continue on a separate sheet if necessary