



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.

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	Martin Clark
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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.	<input type="checkbox"/> MM2 <input type="checkbox"/> MM14 <input type="checkbox"/> MM27 <input type="checkbox"/> MM51
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		MM74 MM75 MM78 MM81 MM107 MM108
Sustainability Appraisal	para(s)	<input type="text"/>
Habitat Regulations Assessment	para(s)	<input type="text"/>
Policies Map or other supporting documents	Please specify	<input type="text"/>

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	<input checked="" type="checkbox"/>
Not effective	<input checked="" type="checkbox"/>
Not consistent with national planning policy	<input checked="" type="checkbox"/>

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.

MM2 - Brownfield opportunities to be encouraged has been deleted

States limited growth in Blackmore. Not true. The growth is excessive

MM14 - No attention given to flood risk in Blackmore. Development will increase risk

MM 19 – States optimise use of Sustainable Drainage Systems. Fields being built on in an area known to flood can only increase flood risk

MM27 – States transport impacts should be mitigated. Difficult in a remote village with few public transport links

MM51 – Conservation areas to be protected. Development in Blackmore will greatly increase the risk of flooding in the central Conservation Area

MM74 –Protecting and enhancing the natural environment . By removing three green belt fields and installing 70 houses is hardly ‘Protecting and enhancing the natural environment’

MM75 – States ‘so far as possible retain existing trees and hedgerows. This is ignored

MM78/81 – Flood Risk ‘New development will be required to avoid areas of flood risk’. The phrase where possible has been deleted therefore why are houses even being considered in a known area of flood risk. Areas R25 and R26 often flood with even average rainfall and this water will need to flow somewhere if houses are built. Most likely it will move the excess water downhill towards the centre of the village which already suffers during wet spells

MM107 – Increase R25 from 30 to 40 houses. Why?

MM108 – Increase R26 from 20 to 30 houses. Why?

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.

MM2 – Remove the proposed development of 4 Hectares of existing Greenbelt land or at least reduce the numbers of proposed dwellings. Not increase them as the current MM's propose

MM14- Carry out a local risk assessment of the flood risk especially in light of the recent paper issued by the Met Office(Weather – October 2021 Vol 76' No10) warning of increased flood risk due to climate change and rising water levels

MM19 – Retain the green belt around Blackmore to minimize future flood risks

MM27 – without major infrastructure changes to roads and public transport there will be a large increase in car traffic in and around the village

MM51 – Not possible to achieve with current proposals

MM74 - Not possible to achieve with current proposals

MM75 - Not possible to achieve with current proposals

MM78/81 – Any increase in housing will go against the advice in MM78 which is basically 'avoid developing in flood risk areas'

MM107/108 – It was accepted by the BBC that the original 'in the order of 90' houses was too many. This was reduced to 'around 70' then reduced again to 'around 50'. Obviously someone at Brentwood considered that the village was being over developed. However under the latest MM's this has been restored to around 70. What is the justification for this?

Please continue on a separate sheet if necessary