



**BRENTWOOD
BOROUGH COUNCIL**

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.

<p>Do you wish to be notified when the Brentwood Local Plan 2016-2033 is adopted by the Council?</p>	<p>YES <input checked="" type="checkbox"/></p> <p>NO <input type="checkbox"/></p>
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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	Danielle Cohen
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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	<p>MM no.</p> <div style="border: 1px solid black; padding: 5px; display: inline-block;"> <p>MM1/MM2, MM5, MM78, MM81, MM107/108</p> </div>
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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 <input type="checkbox"/>	NO <input type="checkbox"/>
Sound?	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>

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	<input checked="" type="checkbox"/>

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.

MM1/MM2

Blackmore is a small remote village. It is not within walking distance to any towns. Road connections and the bus service are poor. More houses mean more cars and congestion for people having to commute. I thought the BBC strategic objective was to reduce unnecessary journeys. Wildlife will be lost if you turn two fields into houses.

MM5

Blackmore should be classified as a class 4 village not class 3. It has 1 shop and 1 small oversubscribed school so cannot be compared to the likes of larger villages such as Doddinghurt which has 3 times the population. Blackmore only has 800 residents. The allocation of 70 houses will potentially increase the population by around 30% with clearly extremely limited infrastructure.

MM78

Flooding is a major problem for Blackmore and always has been. I have lived in my house for 8 years. For the past 3 I have struggled to get any insurers to cover my home for flood damage as it is recognized as flood risk per the UK government. Replacing 2 large fields with concrete and tarmac will only make the situation worse.

MM81

In my opinion, the exceptional circumstances test was not carried out with any meaningful thought or conviction. There are two brownfield sites in Stondon Massey and Red Rose Lane (Blackmore) that would have been included in the LDP.

MM107/108

BBC listened and understood the local issues relating to Blackmore and reduced the number of new dwellings from 70 to 50. The inspectors seem to have ignored this and increased the number back to 70. This is a display of either ignorance or laziness that they refuse to investigate specific sites.

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.

MM1/MM2

A full suitability and sustainability review must be undertaken to justify if any development is the correct course of action. The sites in Blackmore were chosen by developers not BBC.

MM5

The settlement hierarchy should be redone to allocate Blackmore to a level 4 village. The developers requests should be assessed for suitability and sustainability specifically looking at the infrastructure required to support any new housing developments.

MM78

The Environment Agency must be involved and their input listened to and taken into consideration.

MM81

BBC should give clear supporting evidence that the exceptional circumstance test was carried out to release green belt land for development both thoroughly and legally or review the situation to meet government guidelines.

MM107/108

This must be reviewed. BBC reduced the number of dwellings by 20 after the many objections from residents of Blackmore. To simply ignore this makes this process of asking for peoples thoughts and opinions undemocratic, a waste of time and quite frankly farcical.

Please continue on a separate sheet if necessary