



**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.

Do you wish to be notified when the Brentwood Local Plan 2016-2033 is adopted by the Council?	YES <input checked="checked" type="checkbox"/>	NO <input type="checkbox"/>
---	--	-----------------------------

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	Patricia Taylor
-----------	-----------------

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.

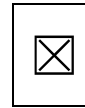
Schedule of Potential Main Modifications	MM no.	14-19, 78, 81,107, 108,116,
Sustainability Appraisal	para(s)	

Habitat Regulations Assessment	para(s)	<input type="text"/>
Policies Map or other supporting documents	Please specify	Photos relating to R25 & R26

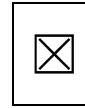
Question 2: Do you consider this Main Modification and/or supporting document :		
Legally Compliant?	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>
Sound?	YES <input type="checkbox"/>	NO <input checked="" type="checkbox"/>

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



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.

Flood risk and drainage issues – MM14-19

MM14C: The sewerage system for Blackmore is at over-capacity already and this was not resolved nor considered before the two sites R25 and R26 were included at the last minute within the LDP following Regulation 18. Any considerable development within the village, as proposed for the two sites, would only add to the existing problems with flood risk and drainage issues.

MM19G: Blackmore is in a critical drainage area and sits within a 'bowl' and regularly floods (as photographs will evidence). The suggestion that SuDS will resolve this situation is not viable and if built upon, the present greenbelt fields R25 and R26 will not allow water to soak away, inevitably causing flooding to nearby properties. Climate change needs to be taken into account – we are experiencing flooding on an increasingly regular basis.

MM78: As already stated, Blackmore suffers with severe flooding on a regular basis and this is a significant fact when taking existing housing into effect. An Environmental Agency survey should be undertaken as a matter of urgency before sites R25 and R26 can be considered for the LDP. This should already have been undertaken and shows a lack of soundness in completion of the document.

The source of the River Wid is just North of Blackmore and regularly floods Red Rose Lane, which has become impassable on 10 occasions over the period Dec-Feb 2021. No mitigation measures could cope with the influx of water and to use this lane as an access point is completely unsustainable as it is regularly used by walkers, riders and cycling clubs, plus it is narrow, unlit and without pathways and would not provide a suitable route for emergency vehicles during a flood situation in particular. Orchard Piece would not provide a suitable alternative as suggested as this too is very narrow and dangerous.

Re: the Sustainability Appraisal undertaken in September 2021, sites R25 and R26 are situated uphill from the rest of the village and its dwellings and any potential run-off of flood water will head straight for the conservation area in the centre, which includes our church and listed buildings, let alone the existing dwellings which already have to face the pond constantly overflowing. This flooding was particularly bad and well-documented/photographed during the years 1987 and 2016, with properties abutting the moat being caused serious damage. This appraisal recognizes as degree of risk to increased housing density in the village – which is a massive understatement!

MM81: Green Belt and Exceptional Circumstances

What are the 'exceptional circumstances' that justifies R25 and R26 being released from the Green Belt? This has not been proven and seems to simply be developer led. The only 'exceptional circumstance' I can see is that Brentwood Borough Council have failed to identify suitable brownfield sites to develop before taking R25 and R26 into the plan. There have been other brownfield sites put forward but these have not been explored fully. How can Redrose Lane be considered as a 'defendable boundary' when there was a development of 8 properties on a brownfield site along the lane and there are existing properties along Nine Ashes Road and the Chelmsford Road? There needs to be a housing need proven to justify building 70 extra houses within the green belt.

MM107 and MM108

As previously stated, the two sites R25 and R26 are situated in a critical drainage area with significant and regular flooding. An increase in the number of houses proposed to around 70 (and no doubt the developers will press for more) the more the pressure on the village and the flooding and drainage situation increases. NPPF guidelines should not be manipulated to put a village, which is rich in history and is very rural and unique, at risk from all the fall-out from such development. Blackmore has one small Co-op and two public houses, so how it can be classed as a Category 3 Settlement is very questionable. We have no parade of shops (as in Doddinghurst for instance) and we certainly do not have a travel agency!!!

Annexe 2 – MM116 – Appendix 2:

SO2 – Strategic Policy BE09 – Sustainable Means of Travel and Walkable Streets

In Blackmore we have very few 'walkable streets'. Most are narrow dark lanes with no pavements. As for travel – there is a bus service which has a very limited range, and has been put at risk of withdrawal on occasions in the past. This would mean the extra 70 homes (on average 2 cars per household) would add an extra 140 cars being used on the badly maintained roads. Building these homes would not bring extra economy into the village as many people travel outside to work – even taking into account the current home-working situation via Covid 19.

SO3 – Deliver Sustainable Communities

This does not automatically come from building houses on green belt. In fact the income of the village could be affected in a negative manner as many people visit due to its beauty, for example the many cycling and walking clubs using the lanes surrounding us. These lanes are already dangerous and narrow and the addition of an extra influx of vehicles would certainly put them off visiting and using the tea rooms and public houses etc. A housing needs assessment has not been undertaken and should have been done **before** considering Blackmore for development. Who are the people who will be living in these houses? Not local people to be sure, so how this will add to the rural economy is also questionable.

'Promoting sustainable mobility' – how can building in Blackmore do this? As already said – under my comments on SO2 – the inevitable use of more cars is NOT sustainable.

'Creating environmental net gain' – there will be no 'net gain' for the considerable amount of wildlife currently living in R25 and R26, so this is of no substance. We are supposed to be protecting our countryside, not destroying it!

'Promoting improved choices in modes of transport' – The only choice would be use your own car or the infrequent bus service! There is no choice.

Sustainability Appraisal – September 2021

'Community and Wellbeing' – There certainly are significant concerns from the villagers of Blackmore. We already have a sustainable and successful village. We are not against all development and, indeed, were pleased to see the brownfield site along Redrose Lane put to use with the 8 houses built there and worked closely with the developers to aid its fruition. This was put forward as a 'reasonable alternative' to the Council, but was not included and has now been considered a 'windfall site'. This is not strategic planning. The Honeypot Lane 'included site' was withdrawn from the LDP due to access issues and it being on the Green Belt – well R25 and R26 within Blackmore have even worse access issues and are also within the Green Belt! The proposal to build on these sites are developer-led and not for the improvement or benefit of the residents of Blackmore. Developers have been trying to build on these sites in the 25 years I have lived in the village. Until now the Green Belt has been respected but, in order to fit in with government figures (even though the PM is now recognizing that building on the Green Belt should not be undertaken unless there are solid 'exceptional circumstances' which have not been proved in the case of our village) the fields are under what the residents consider to be a 'threat' of destruction. This is opportunistic development and not in the best interests of the residents of Blackmore.

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.

Environmental Agency evaluation should be undertaken as a matter of urgency before consideration of sites R25 and R26 in Blackmore for development and inclusion within the LDP.

Housing Needs evaluation to be undertaken. Why has this not already been done?

Revision of the Sustainability Appraisal undertaken September 2021.

Revisit the 'Exceptional Circumstances' and provide an explanation.

Revisit 'Brownfield Site' availability and take into consideration other villages nearby which would welcome development.

Investigate closer the withdrawal of the Honeypot Lane site in comparison with R25 and R26 sites in Blackmore.

Please continue on a separate sheet if necessary





