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 WILLIAM JAMES ANDREW RATCHIFFE

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;
Sustainability Appraisal	para(s) &	PAGES - CENCLUSION PAKAS: 2.6; 2.8.1
Habitat Regulations Assessment	para(s)	
Policies Map or other supporting documents	Please specify	ANNEXE 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:

1)

- 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; ANNEXEZ: FOR THE VISION AND

STRATEGIC OBJECTIVES TO BE MEANINGFUL, SOUND AND EFFECTIVE, THEY HAVE TO BE RIGID ROUSLY APPLIED. THE ALLOCATIONS IN BLACKMORE (RDS & RDG) FAIL YOUR TESTS:

- · BLACKMORE IS THE REMOTEST VILLAGE IN THE BOROUGH
- · EXISTING (AND FUTURE) LESIDENTS ARE OVER-DEPENDENT CA MOTOR VEHICLES
- MALE HOUSES EQUALS MALE CARS, MOLEDELIVERIES MALEVEHILLE MOVEMENTS GENERALLY ... AND SIGNIFICANTLY INCREASED POLIUTION
- O THERE WILL BE A SIGNIFICANT NEGATIVE IMPACT ON BIO-DIVERSITY IF TWO GREEN FIELDS, IN THE GREEN BELT. ARE LOST
- OMMI & MM2 ARE RENDERED LINSONDO (NOT EFFECTIVE AND NOT PONTIVELY PREPARED) SHOULD RIS & RIG REMAIN IN THE PLAN

MM 5 (AND NEW POLICY MGO3-SETTLEMENT HIEFARCHY

- · BLACKMORE, COMPARED TO: DODDING HULST; KELVEDON HATCH; HEFONGATE & INGRAVE (NOW ONE CONVURBATION) AND MOUNTNESSING, IS QUITE DISTINCT & DIFFERNT
- O ITS SIZE, FAULITIES (CONTRO), RESOURCES (NOTABLY SHOPPING), ROADS AND CONNECTIVITY WITH THE REST OF THE BOLOUGHAND BEYOND UNDERLINE THIS POINT
- OTHERFICE FOL NATIONAL STATISTICS DEFINITIONS
 ARE SOUND, WHEREAS THE LAP CATEGORIES ARE
 Please continue on a separate sheet if necessary

CONT'D

3)

MM 78: STRATEGIC POLICY NEOD, FLOOD RISK

- * THERE NEEDS TO BE MALE SPECIFIC ENGAGEMENT WITH, AND A REPORT FROM, THE ENVIRONMENT AGENCY,
- · ESSEX CC HAS TO (SOME EXTENT) REPORTED ON SURFACE WATER RUN OFF (ALBEIT NOT UNDERSTOOD THE FULL IMPLICATIONS FOR BLACKMORE)
- OF FLUVIAL FLOODIACY, AND THE REGULARITY
 WITH WHICH THE REVEN WID FLOODS BLACKMORE
 THELE IS INSUMFICIENT DUE DILITENCE.
- POSITIVELY PREPARED).
- THE RIVER WID RIJES JUST NORTH OF BLAUKMORE, AND REGULARLY CAUSES FLOODING ALONG. THE CHELMSFORD ROAD (MAIN ROUTE INTO THE VILLAGE) AND ALONG REDROSE LAWE (RENDERING THE PROPOSED ACCESS ROAD TO RIGHTMASSABLE).
- THE STONDON HALL BROOK TRIBUTARY TO WHICH YOU DO REFER, INFATHER MORE DETAIL.
- THE SUSTAINABILITY APPRAISAL (2.8.1) SEEMS TO GLOSS OVER THE REALITY IN BLACKMORE. THIS FLOODING IS WELL DOCUMENTED, INCLUDING ALBUMS OF PHOTOS, SOME OF WHICH ARE ATTACHED.
- OWE ALSO CONTEST THE ROBUSTNESS OF, AND CONCLUSIONS FROM, THE DISCUSSIONS AT THE LOCAL PLAN HEARING, REFERRED TO IN THE SUSTAINABILITY APPRAISAL (HEARING ON 12.2.21)
- O SO, JUST TO UNDFRLINE, THE FLOODING ISSUES IN BLACKMORE (SURFACE WATER AND FLUVIAL) ARE REAL AND SECIOUS.
- GOOD REASON TO PROPERLY ENGAGE WITH THE ENVIRONMENT

4) MM81 - GREENBELT

5)

- OTHE "EXCEPTIONAL CIRCUMSTANCES" TEST. THIS HAS
 NOT BEEN ADEQUATELY DEMON STRATED, FOR EXAMPLE:
 IN PARAGRAPH 8.81 "GOOD CONNECTIVITY" IS QUITED.
 AGAIN, BLACKMORE IS REMOTE. NO MAIN ROADS, MAINLY
 NARROW LANES, IN ADEQUATE BUT JEWICE, AND A LONG
 DISTANCE FROM THE BOROUGH'S MAIN CONTRES AND
 RAILWAY STATIONS.
- TO THE CHEEN BELT (IE AS OPPOSED TO THE SO CALLED "CALL FORLAND", AND THEN ACQUIES CENCE TO PRESSURE FLOW DEVELOPERS VELY LATE IN THE PROCESS-REGIS) THEN YOUR DEVELOPERS BETTER DECISIONS, IN LINE WITH YOUR OWN STRATEGIC OBJECTIVES.
- OTHERE ARE CLEARLY OTHER, MUCH LARDER, SETTLEMENTS FULLOWNDED BY GREEN BELT, WITH BETTER CONNECTIVITY AND SERVICES. DODDINGHURST FOR EXAMPLE - NO HOUSING ALLO CATED.
- O AS PROPOSED BY BNHA ON MULTIPLE OCCASIONS.
 THERE ONOTHE TO BE A CONTERNET STRATEGY
 CONELING ALL THE VILLAGES IN THE NORTH OF
 THE BOROUGH, AS OPPOSED TO THE RANDOMAPPROACH
 ADOPTED IN THIS PLAN.

MM 107 & 108 (POLICES R25 & R26)

- · DELETION OF (b), THE "MINIMUM ISTO RESERVED FOR LOCALS ETC" CLAUSE, IS PRETTY OBVIOUS.
- OHOWEVER, WHAT DID NOT COME TO WIGHT IN THE HEARINGS IS WHY THIS CLAMPE WAS THERE IN THE FIRST PLACE, AS IT CERTAINLY DO NOT COME FROM VILLAGE DEMAND "-IN FACT IS WAS DEEMED RIDICULOUS BY BUHA WHEN PROMOTED, AND VOTED ON, AT THE ECM IN NOVEMBER 2018.
- AS BBC'S OWN BALLISTEN PUT IT ON 3.2.21, IT WAS
- · AGAIN MMI 4 MM2 THE SO'S HAVE BEEN IGNORED

THE ABOVE IS THE TRUE CONTEXT BEHIND THESE
SITES (PLEVIONALLY OMISHON SITES) SUMBANLY AND
UNEXPECTEDLY BEING "INCLUDED" AT REG 18, AND
IT IS SOMETHING THAT NEEDS TO CONFECURD. IT
HAS NOTHING TO BO WITH "STRATEGIC THINKING" IN
FACT IT IS THE POLAR OPPOSITE OF A PROPER STRATEGY!

O ACCESS TO RIS & RIGH.

Ly REDROSE LANE IS WHOLLY INADEQUATE FOR THIS
PULPOSE; NARROW, SINCTLE TRACK, NO PAVEMENTS
FLEQUENT FLOODING, AND A BANGER TO WILDLUFE
AND HUMANS (WALKERS, CYCLUSTS, HOLLE-FIDERS
ETC). IT MIGHT NOT HAVE RECEIVED "PROTECTED
LANE STATUS" (SUSTAINABILITY APPRAISANCE REFORS),
BUT REDROSE LANE IS INADEQUATE FOREXITING
VEHILLE USAGE (INCLUDING LOFLY RESTRICTIONS)
AND CECTAINTY SHOWLD NOT BE THREATENED WITH
AN ADDITIONAL TOO(PUS?) VEHILLE MENEMBERTS
PER DAY

L) IT IS NOT A DEFENDABLE BOUNDARY - LOOKAT THE NUMBER OF LOOKAT THE NUMBER OF LANES RILERDY TO THE NORTH OF REDFOJE LANES ADDED IN BECAUSE THE ABOVE COMMENTS HAVE BEEN TAKEN ON BOARD? BUT, ORCHARD PIECE IS A QUIET TO TALLY LINET FOR PURPOSE AT A NEW ACCESS ROUTE.

· PROPOSED CHANGES TO SITE ALLOCATIONS (50 TO Afong 570")

THE SUJTATINABILITIAPPRAISAT COMMENTS ON PACTES

"COMMUNITY AND WELL BEING" IS A MASSIVE UNDERSTATEMENT
OF OUR COMMUNITY. A 201 IN CREASE INDIVELLINGS

(ON TOPOFALTHE OTHER, WELL DO CUMENTED, DEVELOPMENT

IS NOT SUSTATINABLE: (354 +70 + EFD CHONSING, PLUS, PLUS

IN FACT, IT WILL DESTROY THE SUSTATINABLE

COMMUNITY THAT HAS BEEN BUILT OVER MANY DECADES

AND IT WILL HAVE A SECURIS, DETERMENTAL IMPACT, IN MANY DECADES

ON LIVES; RESOURCES; IN FRASTRUCTURE ETC ETC. MMISMM.

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.

IF MM1: MM2 AND ALL THE OTHER MM ISSUES DETAILED ABOVE ARE GUALT TO BE BRONGAT TO LIFE, IN A STRATEGIC WAY THEN THE ON W CONCUSION YOU CAN COME TO 15 TO TAKE SITES RUS & RUG BACK OMT OF THIS LOP AND TO AT LEAST DEFER A DECISION UNTIL THE "IMMEDIATE PARTIAL REVIEW" INEXT LOP IS CONSTRUCTED (PROPERLY & STRATEGICALLY), WITHON THE NEXT, SAY, TWO YEARS, IN SO DOING : (1) BBC WILL ACTUALLY BRING ITS VISION"
AND"STRATEGIC OBJECTIVES" TO LIFE; (2) A COHERENT PLAN (EVEN A "NEIGHBOULHOOD PLAN") CAN BE BUILT, STRATEGICALLY, FOL THE VILLAGES (PLURAL) IN THE NORTH OF THE BORONGHOINCHUDED THEREIN, EG: EXITING, SUSTAINABLE, VILLAGIES (LIKEBLACKMORE) CAN BE FULLY UNDONSTOOD BEFORE DECISIONS ARE MADE; OTHER SETTLEMENTS, INCLUDING "ZOMBIE" VILLACTES SUCH A.F STONDON MASSEY, CAN BE REJUNENATED; THE WHOLE BOROUGH,
Please continue on a separate sheet if necessary PLAN - THERE IS ONE

IN THE MAKING FOR THE SONTH " (DUNTON HILLS
GHARDON VILLAGE - A STRATEGY TO BE APPLAUDED);
FOR THE TOWN CENTRE/ "MID-BOROUGH", WHOR

AVAILABLE BROWN FIELD ETC; AND WE CAN ALL DO

MUCH, MUCH BETTER ONCE STRATEGY C THOUGHT

IS GIVEN TO PLANNING A SUSTAINABLE FUTURE FOR

ALL VILLAGES IN THE NORTH.

(NB - BVHA IS A PROACTIVE, PROFESSIONAL, AND POSITIVE ORGANISATION, AS YOU WILL NOTE FROM THE LETTER ATTAUTED, FROM STONEBOND (FEB 2021))
I/WE AKE TRYING TO HELP - TO GETTHE BEST ONTUME FOLEVEROME

- (3) THE CRITERIA FOIL SETTLEMENT HIEXARCHY, IN CONJUNCTION WITH POINT (2) ABOVE, CAN BE BUILT AROUND SOUND CRITERIA (IT'S PRETTY HARD TO ARGUE WITH THE O.N.S WHYTRY....?). MM5 CAN BE CORFECTED BY AGAIN DEFERRING DECISIONS AROUND "NORTHERN VILLAGES" / CHENBELT ETC, MTILL BLACKMORE IS NOT A CATEGORY 3 SETTLEMENT,
- (4) REAL FLOOD RIGHT CATEGORY 3 SETTLEMENT,
 PLANNING PELMISSION STAGE. THE RIVER WID IS
 A "CONSTANT", AS SITS PROPOSITION FLOOD. GET
 EVIDENCE IN FULL DETAIL, NO AMOUNT OF SUDS, OF
 FLOODING TO EXISTING DEVELLINGS
- 5) THERE CAN BE A MORE INDEPTH / LONGER LASTING REVIEW OF THE CHEEN BELT. CLEARLY FURTHER SITES ALE GOING TO HAVE TO BE ADDED AND I OR IMPENDING "IMMEDIATE PARTIAL REVIEW".

 "MENDING "IMMEDIATE PARTIAL REVIEW".

 "HOUSING CINEEDS ASSESSMENT" OF ALL OF THE

VILLACTES AS PART OF ANY "STRATEGIC PLAN"

FOR THE NORTH (PART X), WHY IS THE CURRENT PLAN TO ALLOCATE; 70 TO BLAUMORE (WITH NO" HOMSTAUCTED FOR THE TIPE OF PROPERTY LIKELY TO BE CONSTRUCTED; NIL FOR DOAD JGHURT (A "PROPER" CATEGORY 3 SETTLEMENT); NIL FOR STONDEN MASSEY (A ZOMBIE VILLAGE" CRYING ONT FOR INVESTMENT, IN LINE WITH BBC'S STRATE CTC OBJECTIVES) ETC.

IN SUMMARY, THE VAST MAJORITY OF THE LDP "WORKS" AND IS ALL GINED WITH THE VISION AND STRATEGIC OBJECTIVES. BUT THE "SMALL (INSIGNIFICANT TO SOME?) PARTIN THE NORTH, CANNOT BE CLASSED ASSTRATEGIC, OR EVEN JUSTIFIED OR SENSIBLE. FULTHERMORE, THERE NEEDS TO BE PROPER ACKNOWLEDGEMENT OF WHAT BLACKMORE HAS ALRIADY CONTRIBUTED TO BRENTWOOD'S OVERAL HONGON CO DEMAND (GOVERNMENT FIGHRES). REDROSE RARM (12 UNITS) IS TREATED BY BBC AS "WINDAM" WHEREAS THE REAUTY IS THAT BYHA STRATEGIC THINKING HELPED BRING THIS TO LIFE (12 WHITS) . THIS IS WHAT A "LOCAL PLAN" SHOULD ALL BE ABOUT, AND THE AUTHOROF THIS REPRESENTATION REMAINS READY TO HELP, FREE OF CHARGE, ONCE "COMMON STONSE" PREVAILS. THANK YOU



Bill Ratcliffe <u>Chairman of Blackm</u>ore Village Heritage Association



February 2021

Dear Mr Ratcliffe,

I hope you and your family are keeping well given the current circumstances. Following our previous correspondence and work together on our development in Blackmore I wanted to write to you to provide a special thanks to yourself and the whole Blackmore Village Heritage Association.

First of all, we would like to thank you all for your continued support during and after our development planning challenges. We greatly value our working relationship with you and appreciate how your work is key to our current and future success. We would also like to directly thank you for your participation in the support to our development which has greatly assisted us not only in improving our own internal processes but future interactions with local communities.

After an introduction from a former colleague back in the summer of 2018, we quickly understood the content and passion of the BVHA's village plan, in particular the residents' desire for smaller units, to suit either first-time buyers or elderly folk – combining this with a fitting vernacular to the surrounding village of Blackmore.

Following our discussions, we held a public consultation on the 23rd of July 2019 in Blackmore's Village Hall, outlining our key philosophy's. We produced A1 sized boards to display the proposal and made a 25-minute presentation to Blackmore residents and 3 members: Tom Bennett (Chairman), Helen Cannon and Terry Lockhart

The early correspondence with yourself and BVHA was crucial to Stonebond achieving planning consent and played a large part of our creating our vision for this site. During our discussions we proactively changed our plans to suit, providing both smaller units and supply of two bungalows.

This leads me on to acknowledging BVHA's competence in understanding Brentwood Borough Council's (BBC) emerging local plan and seeing the potential in brownfield sites which had not been previously identified.

BVHA's logical thought process to visualizing the advantage of brownfield redevelopment, within the greenbelt, and proactively approaching Stonebond shows an extremely good example of how local communities and house builders can work together.





We believe that the success of our development has not only been our sympathetic design to unite with the heritage and history of this special village but the local input to create the right homes for a community.

From start to finish, BVHA's professional attitude and logical views towards new development was second to none. From everyone at Stonebond Properties and the future residents of our development at Redrose Farm we would like to thank you again for your assistance, approach, and support throughout the planning process and beyond.

Kind regards,



Edd Cherry Business Development Manager



Rearose Lane / the River Wid 14.1.2021

Flooding in Blackmore Village:

Blackmore has always been prone to flooding. It's thought he derivation of its name comes from Black 'Mere' (or swamp) and the village lies in a pronounced depression in the topography where various streams, ditches and springs form the source of the River Wid.

The first mention of Blackmore was 'La Blakemore', in 1213, which Reaney (1935) translates as 'black swamp' referring to the low-lying site 'amidst many springs'. (Source: Blackmore Conservation Area Appraisal and Management Plan. Brentwood BC & Essex CC 2008)

All foul drainage from the village and its surroundings has to be pumped to the treatment works at Doddinghurst and this pumping was temporarily overcome in the flooding of June 2016.

Although some villagers remember flooding of some decades ago, which caused boats to be deployed in the village centre, the problem continues unabated and the following photographs are more recent examples.

Our experiences seem to bear out current thinking on 'Climate Change' which many experts in the field maintain is causing an increase in the frequency of flooding generally, and in those areas prone to it in particular.

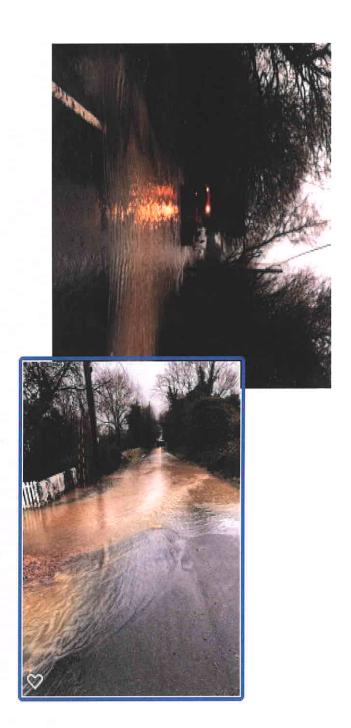
1. Red Rose Lane by site R26 - February 2020

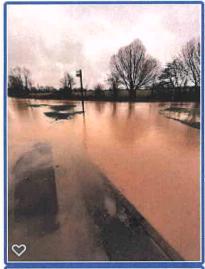




2.

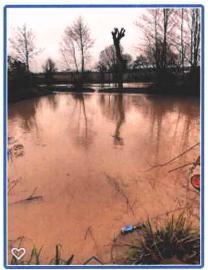


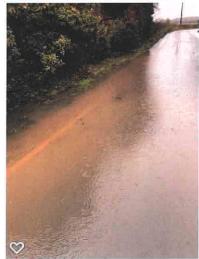






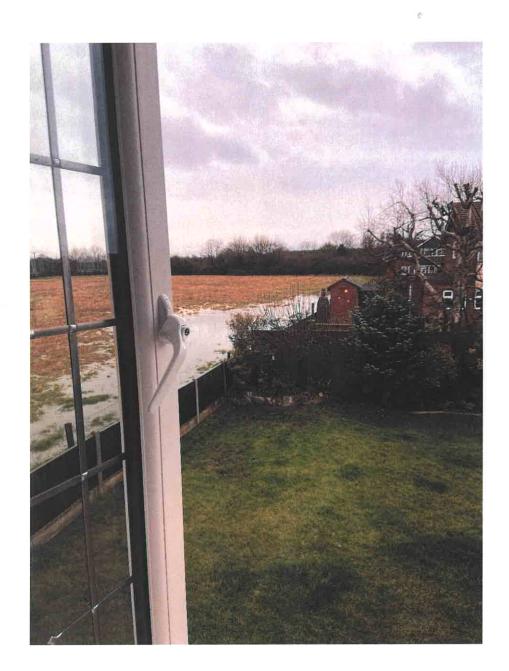


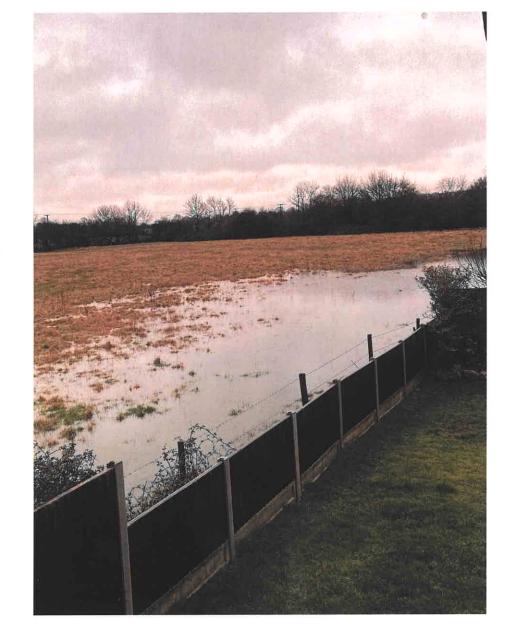


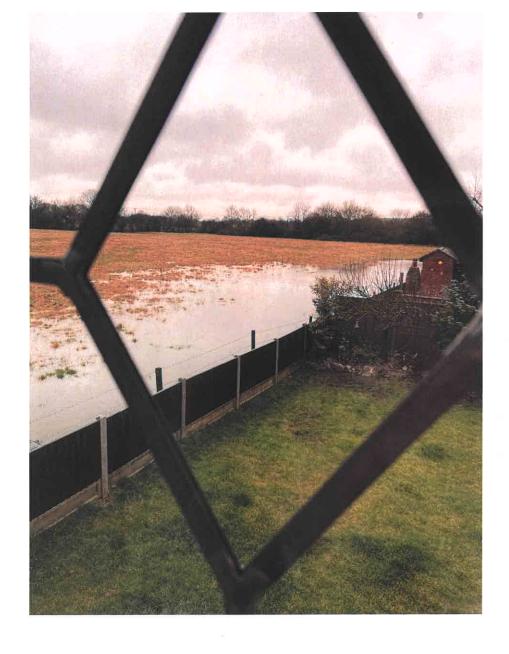


This photo is of Red Rose Lane opposite site R26

3. Flooding on site R25 – December 2019 (the water took a while to subside). We understand a further occurrence in 2020 led to the flooding of a resident's garden and garage on Woollard Way







4. Eastern end of Red Rose Lane (adjacent to site R25) December 2019







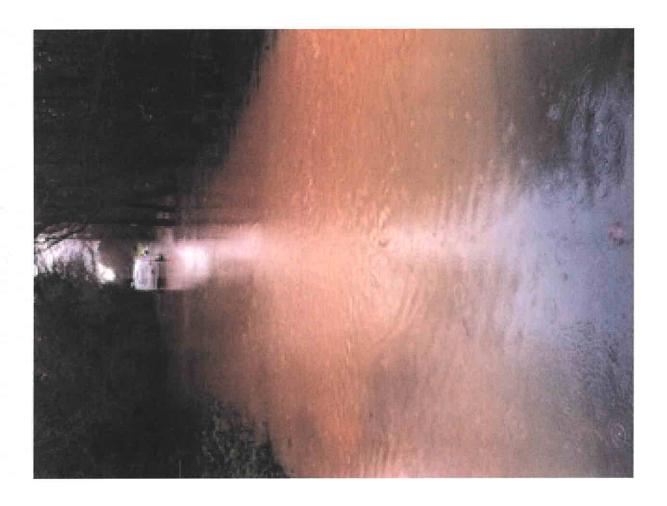


5. Blackmore Road, Blackmore Village June 23rd 2016



APPENDIX - FLOODING [20 December 2019 and 4 December 2020]

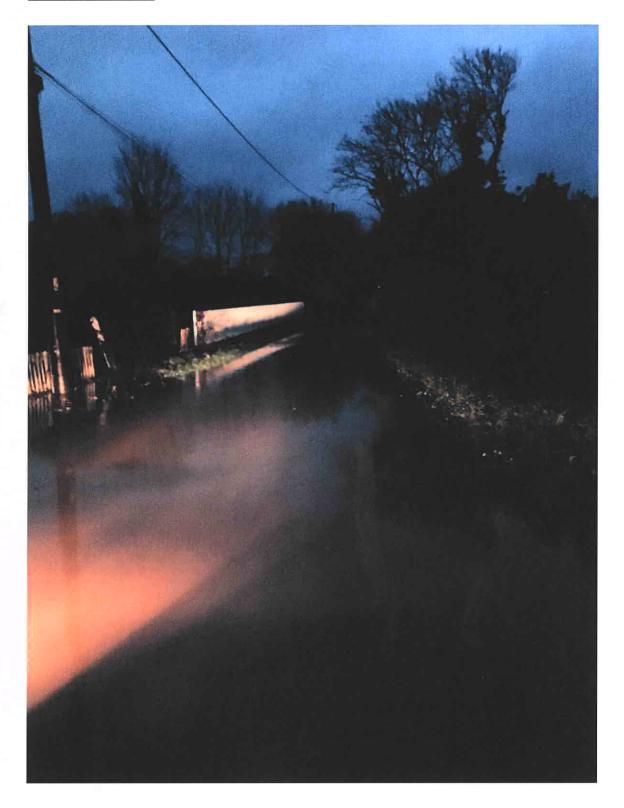
20 DECEMBER 2019

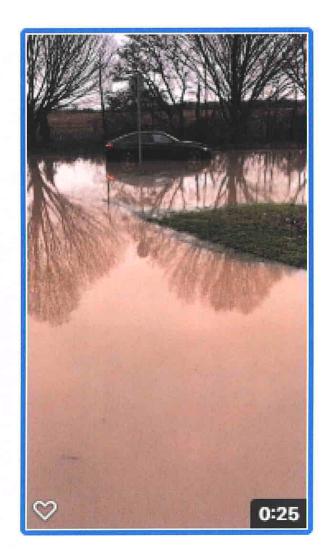


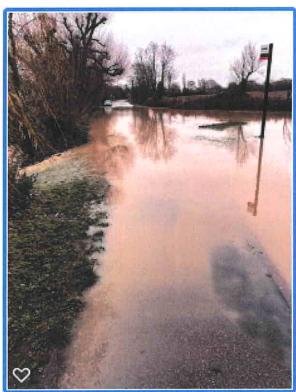


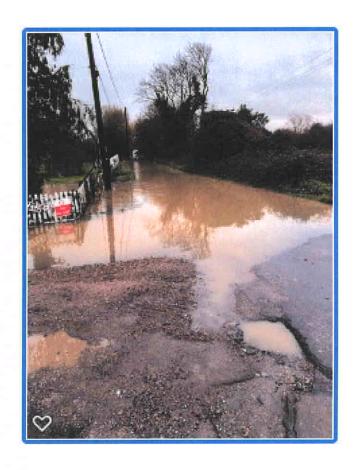


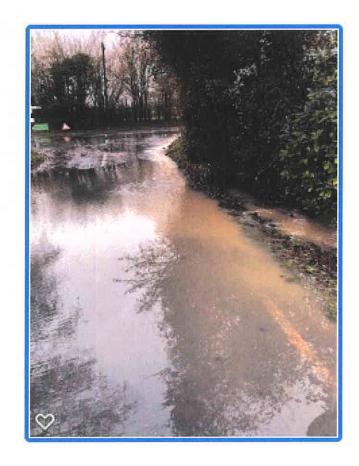
4 DECEMBER 2020

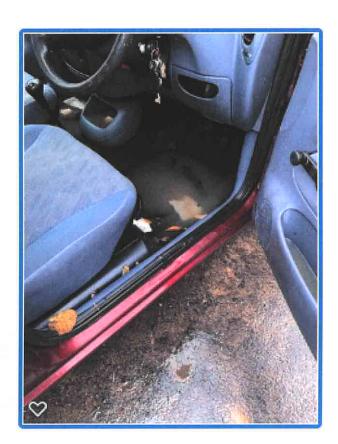












Appendix Three - Agricultural Land Assessment and Flooding/Flood Risk



The Sites' Agricultural Land Classification (ALC008 - Eastern Region): Very Good (blue).



Flood risk map 2018 (source - Essex County Council website - "check if you are at risk of flooding" - with annotations)



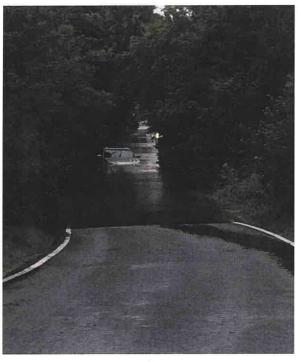




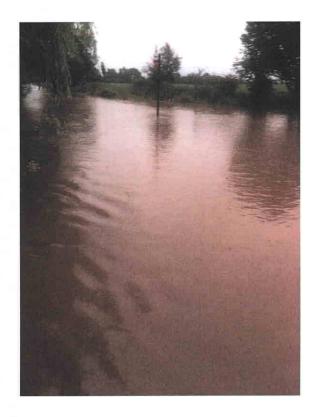
Above: Redrose Lane flooding - 1987



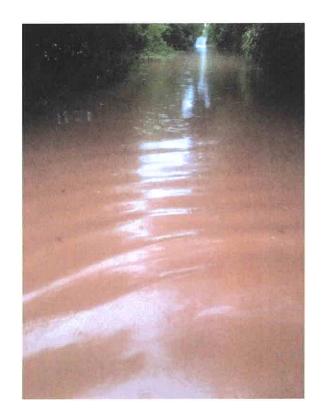
Above: Flooding on The Green - 2016



Above: Flooding on Redrose Lane - 2016 (note depth of water)



Above: Chelmsford Road flooding - 23 June 2016 (n.b. next to site R26)



Above: Redrose Lane flooding - 23 June 2016

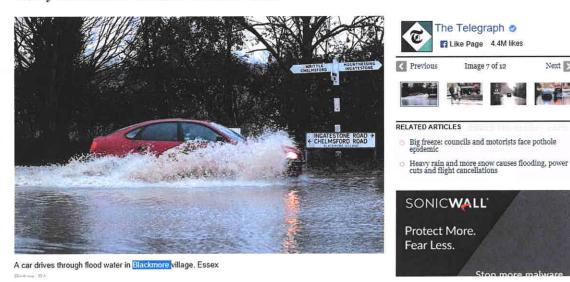


Above: Redrose Lane - March 2018

Extract from Daily Telegraph re 2011 Flooding:

The Telegraph

HOME » NEWS » PICTURE GALLERIES » UK NEWS
Heavy rain causes floods and road closures



Extract from Express re 2011 Flooding:

A woman is rescued from her car stuck in floodwater in Blackmore, Essex, yesterday

Express - 18 Jan 2011

Fire Service in Redrose Lane east bound to Chelmsford Road. (see picture below)



Extract from Romford Recorder re 2011 flooding:

Romford Recorder In Brief

THIS WEEK'S LOCAL NEWS HIC

UPDATE: More flooding problems in Brentwood borough area

O PUBLISHED: 11:35 18 January 2011 | UPDATED: 09:59 19 January 2011 | IAN WEINFASS



A woman being rescued from her car in Burnt House Lane, Ingatestone. Picture by Essex County Fire and Rescue Service.

FLOOD water has been causing more problems for motorists and residents across Ingatestone, Blackmore, Mountnessing and wider afield in Essex.

Essex County Fire and Rescue service had over ninety calls for help from across the county on Monday and Tuesday nights, and have rescued several people, including three men trapped in a minibus, and a 93-year-old woman.

The fire service has warned residents that they can only help in sitauations when a person's life is at risk.

A spokesman said: "When flooding is caused by rain, as was the case overnight, pumping the water from a person's home or garden does not solve the problem. It simply moves it to the next home or garden or it floods straight back in as it is being pumped.

"In most cases, callers were advised to isolate their electrical supply and to call back immediately if the flooding did begin to affect their electricity."

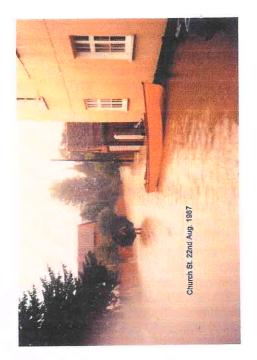
The 93-year-old woman was rescued from her car in flood water in Maldon Road, Mountnessing, on Tuesday (January 18) and was suffering effects from the cold water.

The minibus was stuck in Buttsbury Wash, Mountnessing Road, Ingatestone last Friday (January 14) with three men inside.

Two women had to be rescued in separate incidents after driving into water on Burnt House Lane, Ingatestone and Red Rose, Blackmore respectively on Monday (January 17). One said that water had started to flood into her car.

A van and it's driver were also rescued on Tuesday on Stock Lane, Ingatestone.

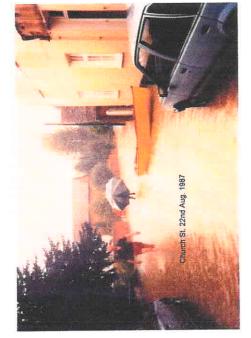
Assistant Chief Fire Officer Gary Fleming said: "We urge drivers to take caution when driving into flooded areas of road. The water can be deceptively deep and cars quickly

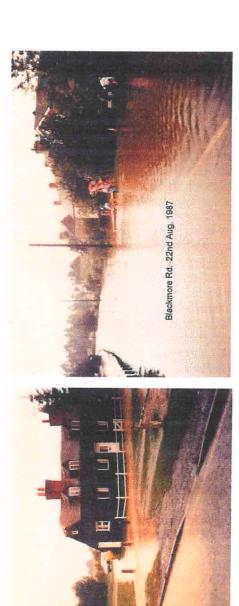










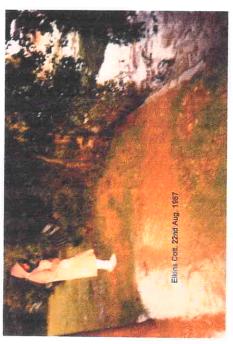




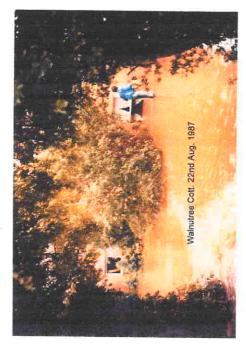




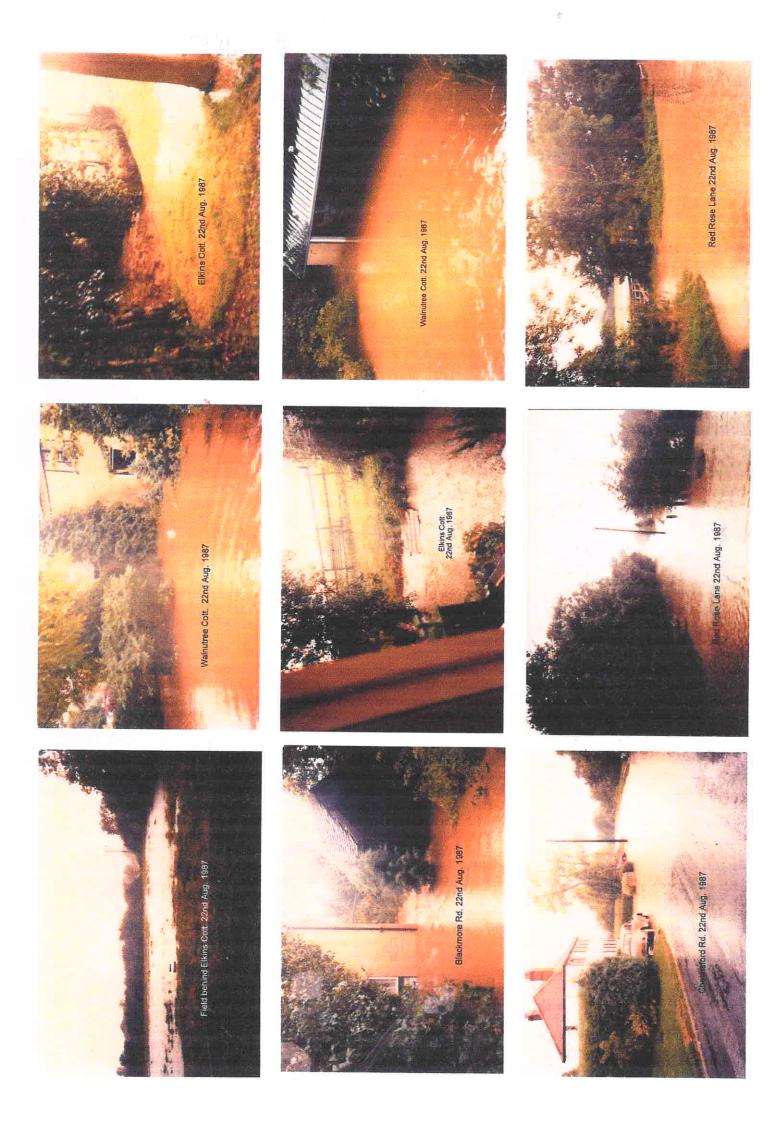












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